MARKETING PRIVACY NOTICE

Last updated: 22 July 2026

Version: 1.0

1. Introduction

1.1. This privacy notice explains how Conferma Limited ("**we**", "**us**", "**our**" or "**Conferma**") collects, uses, shares, and protects your personal data, and sets out your rights under the data protection laws that apply to you depending on where you are based.

1.2. We are committed to protecting your privacy and handling your personal data openly, securely, and in accordance with the data protection laws that apply to you based on where you are located. These include, the UK General Data Protection Regulation (the "UK GDPR") and the Data Protection Act 2018, as updated by the Data (Use and Access) Act 2025, in the United Kingdom; the EU General Data Protection Regulation (Regulation (EU) 2016/679) in the European Economic Area; the Australian Privacy Act 1988 (Cth); the California Consumer Privacy Act 2018; and the Singapore Personal Data Protection Act 2012; and any other privacy or data protection laws that apply to you. We refer to these together as the "**Data Protection Laws**", and we follow guidance issued by the Information Commissioner's Office (the "ICO") and other relevant regulators.

1.3. This notice applies specifically to individuals who receive marketing communications from us, including prospective business contacts and other individuals whose business contact details we have obtained for the purpose of marketing our products and services. It explains how we handle your personal data in that context. We have a separate, broader privacy notice on our website at https://www.conferma.com/privacy-notice/ that covers our other processing activities in relation to our customers, suppliers and visitors to our website. This Marketing Privacy Notice supplements that website privacy notice, and where both are relevant they should be read together.

1.4. This notice does not form part of any contract. We will provide it to you within a reasonable period after we obtain your details and no later than our first marketing communication to you, and it may be linked from the marketing messages we send.

2. Who We Are

2.1. The data controller responsible for your personal data is:

Conferma Limited (company registration number 05704113)
Address: Ocean House, Towers Business Park, Wilmslow Road, Didsbury, Manchester, M20 2LY, UK
Email: privacy@conferma.com

2.2. We have a data protection representative registered with the ICO, who oversees questions about this notice and how we handle personal data. You can contact them about anything in this notice, or to exercise your rights, at privacy@conferma.com or by writing to us at the address above.

3. The Data We Collect About You

3.1. "**Personal data**" means any information relating to an identified or identifiable living individual. It does not include data where the identity has been permanently removed (anonymised data).

3.2. Depending on your relationship with us, we may collect, use, and store the following categories of personal data:

Identity Data: name, title, job title, employer, and username or similar identifier.

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Contact Data: business or personal email address, telephone number, postal address, and other contact details.
Business Relationship Data: information about your role, your dealings with us, records of correspondence, and details of the services or products of interest to you.
Transaction Data: details of payments, orders, services provided, and other records relating to any contract between us.
Technical Data: internet protocol (IP) address, login data, browser type and version, device information, time zone setting and location, operating system and platform, and other technology on the devices you use to access our website or services.
Usage Data: information about how you use our website, products, and services.
Marketing and Communications Data: your preferences in receiving marketing from us and your communication preferences.

3.3. We do not routinely collect any **special categories of personal data** (such as data revealing health, race, ethnicity, political opinions, religious beliefs, trade union membership, genetic or biometric data, or data concerning sex life or sexual orientation), nor data relating to criminal convictions and offences. Where we do need to process such data, we will do so only where a lawful basis and an additional condition under the Data Protection Laws apply, and we will tell you separately.

4. How We Collect Your Personal Data

4.1. We collect personal data about you in the following ways:

Direct interactions: when you give us your business contact details, correspond with us, request information or marketing from us, attend our events, or provide your business card or contact details.
Third parties or publicly available sources: we obtain business contact details from third-party business data and enrichment providers (for example, ZoomInfo), from publicly available sources such as company websites and professional networking sites, and from our group companies and business partners.
Marketing engagement: where you engage with our marketing emails, we may collect limited technical and usage data, such as whether an email was opened or a link was clicked, to help us measure and improve our communications.

4.2. Where we obtain your personal data indirectly (that is, not from you directly), we will provide you with this privacy information within a reasonable period after obtaining it, and no later than one month, or at the latest when we first communicate with you, in accordance with the Data Protection Laws.

5. How and Why We Use Your Personal Data

5.1. We will only use your personal data when the law allows us to. Most commonly, we rely on one or more of the following lawful bases:

Consent: where you have given clear consent for us to process your personal data for a specific purpose.
Contract: where processing is necessary to perform a contract we have with you, or to take steps at your request before entering into a contract.
Legal obligation: where processing is necessary to comply with a legal or regulatory obligation.
Legitimate interests: where processing is necessary for our legitimate interests (or those of a third party), provided your interests and fundamental rights do not override those interests.

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5.2. The table below sets out the purposes for which we process the personal data of our marketing contacts and the lawful basis we rely on for each. Where we rely on legitimate interests, we identify the interest concerned.

Purpose of processing	Categories of personal data	Lawful basis
To manage our relationship with you, including notifying you of changes to our terms or this notice	Identity, Contact, Marketing and Communications	Contract; Legal obligation; Legitimate interests
To measure and improve the effectiveness of our marketing communications	Technical, Usage, Marketing and Communications	Legitimate interests (understanding and improving our marketing)
To send you direct marketing about our products and services we think are relevant to you	Identity, Contact, Marketing and Communications, Usage	Legitimate interests and/or Consent where required; direct marketing recognised as capable of being a legitimate interest under the DUAA 2025
To establish, exercise, or defend legal claims and manage risk	Any relevant category	Legitimate interests (protecting our legal position)

5.3. Where we rely on legitimate interests, you have the right to object to that processing (see clause 10). Where we send you direct marketing by electronic means, we also comply with the Privacy and Electronic Communications Regulations (PECR), and you can opt out at any time. The right to object to direct marketing is absolute, and we will always stop on request.

5.4. Where we rely on your consent, you can withdraw it at any time (see clause 10).

5.5. Whether the provision of personal data is required:

a) where we need to process your personal data to comply with the law, or to enter into or perform a contract with you (or the organisation you represent), the provision of that data is a statutory or contractual requirement;

b) if you do not provide personal data that we need for these purposes, we may be unable to provide the relevant products or services, or to perform the contract; and

c) in all other cases, providing your personal data is voluntary, and there is no obligation to provide it.

6. Disclosures of Your Personal Data

6.1. We may share your personal data with the following categories of recipient, in each case only so far as necessary for the purposes described in this notice:
Group companies: members of our corporate group, including our subsidiaries, our ultimate holding company Fermr Holdings Ltd, and its parent Sabre GLBL Inc., for the administration and provision of our services and internal management purposes;

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Service providers and processors: third parties who provide services to us, including IT, hosting, cloud infrastructure, payment processing, analytics, marketing, and professional advisers, who process personal data on our behalf under written contracts;
Business partners: partners with whom we work to deliver products and services to you; and
Regulators and authorities: the ICO, tax authorities, law enforcement, courts, and other regulators or authorities where required or permitted by law.

6.2. We require all third parties who process personal data on our behalf to respect the security of your personal data, to process it only on our documented instructions and for the purposes we specify, and to comply with the Data Protection Laws. We do not allow them to use your personal data for their own purposes.

7. International Transfers

7.1. We are based in the United Kingdom, and your personal data is primarily stored and processed here. Some of our service providers and group companies are located outside the United Kingdom, so your personal data may be transferred to and stored at destinations outside the UK and the European Economic Area (EEA).

7.2. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection by relying on at least one of the following safeguards:

a) transfers to countries that the UK Government has determined provide an adequate level of protection for personal data (UK adequacy regulations);

b) the ICO's International Data Transfer Agreement (IDTA), or the UK Addendum to the European Commission's Standard Contractual Clauses, together with a completed transfer risk assessment; and/or

c) where the recipient is a certified organisation in the United States, the UK Extension to the EU-US Data Privacy Framework.

7.3. You may contact us using the details in clause 14 for more information about the safeguards we apply to a particular transfer, and to request a copy of the relevant mechanism.

8. Data Security

8.1. We maintain appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing, accidental loss, destruction, or damage. These measures reflect industry standards and our regulatory obligations, and include, but not limited to, encryption in transit and at rest, access controls, network security, staff training, and supplier due diligence.

8.2. We hold, or align with, recognised information security standards, including PCI DSS version 4.0.1 and ISO 27001:2022, where applicable. Further detail on our security posture is available at our Trust Centre (https://trust.conferma.com/).

8.3. We have procedures in place to detect, investigate, report, and respond to suspected personal data breaches. Where we are legally required to do so, we will notify the ICO and any affected individuals of a breach.

9. Data Retention

9.1. We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including to satisfy any legal, regulatory, tax, accounting, or reporting requirements, and to establish, exercise, or defend legal claims.

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9.2. To determine the appropriate retention period, we consider:

a) the amount, nature, and sensitivity of the personal data;

b) the potential risk of harm from unauthorised use or disclosure;

c) the purposes for which we process the data, and whether we can achieve those purposes by other means; and

d) the applicable legal, regulatory, and contractual requirements.

e) Details of the retention periods, or the criteria we use to set them, for different categories of your personal data are set out in our retention policy [and/or are available on request]. When personal data is no longer needed, we will securely delete or anonymise it.

10. Your Legal Rights

10.1. Under the Data Protection Laws, you have the following rights in relation to your personal data:

a) the right to be **informed** about how we collect and use your personal data (which this notice is intended to satisfy);

b) the right to **access** your personal data and to receive a copy of it;

c) the right to **rectification** of inaccurate or incomplete personal data;

d) the right to **erasure** of your personal data in certain circumstances (also known as the "right to be forgotten");

e) the right to **restrict processing** of your personal data in certain circumstances;

f) the right to **object** to processing of your personal data where we rely on legitimate interests, and an absolute right to object to processing for direct marketing purposes;

g) the right to **data portability**, that is, to receive the personal data you have provided to us in a structured, commonly used, and machine-readable format, and to have it transferred to another controller, where the processing is based on consent or contract and carried out by automated means; and

h) where our processing is based on your **consent**, the right to **withdraw that consent** at any time, without affecting the lawfulness of processing carried out before withdrawal.

10.2. You will not usually have to pay a fee to exercise your rights. However, we may charge a reasonable fee, or refuse to comply, if your request is manifestly unfounded, excessive, or repetitive, as permitted by law.

10.3. We may need to request specific information from you to help us confirm your identity before responding to a request. We will respond to all legitimate requests within one month. Occasionally it may take longer if your request is particularly complex or you have made several requests, in which case we will notify you and keep you updated.

10.4. To exercise any of these rights, please contact us using the details in clause 14.

10.5. You have the right to lodge a complaint at any time with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection matters, at www.ico.org.uk. We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us at privacy@conferma.com in the first instance.

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11. Additional Information Depending on Where You Are Based

11.1. Depending on where you are located, additional local laws may apply and your rights may vary. For example:

a) If you are in the European Economic Area: where the EU GDPR applies, you have equivalent rights to those set out above, and you may lodge a complaint with your local data protection supervisory authority.

b) If you are in Australia: where the Australian Privacy Act 1988 applies, we will only send you electronic marketing where you would reasonably expect it or you have opted in, and we always give you a simple way to opt out.

c) If you are in California: where the California Consumer Privacy Act applies, you have the right to know what personal information we hold about you, to request its deletion, to opt out of any “sale” or “sharing” of personal information, and not to be treated differently for exercising your rights. We do not sell your personal information for money.

d) If you are in Singapore: where the Singapore Personal Data Protection Act applies, we rely on your consent, or an applicable exception, to send you marketing, and you may withdraw that consent at any time.

12. Automated Decision-Making and Profiling

12.1. We do not carry out automated decision-making that produces legal effects concerning you, or that similarly significantly affects you, and we do not use your personal data for such profiling.

13. Changes to This Privacy Notice

13.1. We keep this privacy notice under regular review. We may update it from time to time to reflect changes in the way we process personal data, or changes in the law.

13.2. Any changes will be posted in our Trust Centre, with the "Last updated" date at the top revised accordingly. Where changes are significant, we will take reasonable steps to bring them to your attention. We encourage you to review this notice periodically.

14. Contact Us

14.1. If you have any questions about this privacy notice, our data protection practices, or wish to exercise any of your rights, please contact us:

Conferma Limited, Ocean House, Towers Business Park, Wilmslow Road, Didsbury, Manchester, M20 2LY, United Kingdom
Email: privacy@conferma.com

14.2. You can also contact the ICO at any time:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Helpline: 0303 123 1113
Website: www.ico.org.uk

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