

Slalom, LLC ("we" or "us") provide this policy to inform you of our personal information handling practices for personal information we collect from those who contact us by phone or email and visitors to [www.slalom.com](http://www.slalom.com) and web and mobile sites operated by us that link to this policy ("site" or "sites").

This policy (together with our [Terms of Use](#), [Cookie Policy](#) and any other documents referred to in it) sets out the basis on which any personal data, personally identifiable information, or personal information ("personal data") we collect from you, or that you provide to us, through our sites will be processed by us. This policy does not cover any personal data we collect offline or that we process as a service provider for clients.

*Residents of the European Economic Area, the United Kingdom, or Switzerland, see our EEA+ Supplemental Data Protection Law Disclosures to this policy [here](#).*

*Residents of Japan, see our Japan Supplemental Data Protection Law Disclosures to this policy [here](#).*

*California residents, see our California Consumer Privacy Act Privacy Policy [here](#).*

When you contact us, or make an inquiry, via our site, your data will be collected and controlled by Slalom, LLC (a US limited liability company organized under the laws of the State of Colorado and based at 821 2nd Avenue, Suite 1900, Seattle, WA 98104) who will share that data with our relevant affiliate company to which your inquiry, or request, relates ("**Relevant Slalom Company**"). For example, if you inquire about engaging Slalom Consulting Limited (a UK incorporated company) then your personal data may be shared with Slalom Consulting Limited for these purposes. In such event both Slalom, LLC and the Relevant Slalom Company may be considered controllers of your data under applicable law (for example, the General Data Protection Regulation 2016/679 and its implementing national legislation and the UK GDPR (the "**Privacy Legislation**"). We and the Relevant Slalom Company may also share your personal data with our other parties from time to time for the purposes set out in this privacy policy.

**For your information:**

- inquiries relating to our European business are generally handled by Slalom Consulting Limited, a company incorporated and registered in England and Wales with company number 08874662 whose registered office is at 2 London Bridge, 2nd Floor East, London, SE1 9RA;
- inquiries relating to our Canadian business are generally handled by Slalom Consulting ULC, a Canadian unlimited liability company formed under the laws of British Columbia whose registered office is at 745 Thurlow Street, Suite 2400, Vancouver, BC V6E 0C5;
- inquiries relating to our U.S. business are generally handled by Slalom, LLC, a limited liability company organized under the laws of the State of Colorado and based at 821 2nd Avenue, Suite 1900, Seattle, WA 98104;
- inquiries relating to our Japanese business are generally handled by Slalom K.K., a Japanese corporation whose registered office is Toranomom Hills Mori Tower 28F 1-23-1 Toranomom, Minato-ku Tokyo 105-6328 Japan

- inquiries relating to our Australian business are generally handled by Slalom Australia Pty Ltd a company incorporated and registered in Australia with company number 635 861 004 whose registered office is at Level 10, 68 Pitt Street, Sydney NSW 2000, Australia,

unless we notify you otherwise.

### **Information we collect about you**

We will collect and process the following data about you:

- **Information you give to us.** This is information about you that you give us by filling in forms on our site or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you request information about our services, and when you report a problem with our site.

The information you give us may include your name, address, e-mail address and phone number, and other information that you choose to provide. Providing such personal data is voluntary. However, without providing such personal data, we will not be able to provide you with information or services you request from us. You will know what personal data you provide because you will actively submit it to us.

- **Information we collect about you.** In addition to the personal data that you actively provide, for us to monitor and maintain the performance of the sites and to analyze trends, usage and activities in connection with the sites, to measure the effectiveness of advertising we serve to you, and to deliver relevant advertising to you, the sites may automatically collect, process and store certain information from you, to the extent permitted under applicable law:
  - technical information, including the domain and host name from which you access the Internet, the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone and country setting, browser plug-in types and versions, operating system and platform; and
  - information about your site visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.
- **Information we receive from other sources.** We are working closely with third parties (including, for example, marketing services and recruitment agencies) that may provide us with additional information about you.

If we are unable to collect this information, this may affect the provision of the services you have requested from us.

### **Cookies**

To the extent permitted under applicable law, our site uses cookies and similar technologies to distinguish you from other users of our site and enable us and third parties to automatically collect information about how you access and use our sites, and about the device you use to access our sites. This helps us to provide you with a good experience when you browse our site and also allows us to customize and improve our site. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Policy](#). Some web browsers include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. You can make certain choices about cookies and similar technologies to communicate your choice not to be tracked online in our privacy preference center. But we do not respond to DNT signals.

### **Uses made of the information**

We use information held about you in the following ways:

- **Information you give to us.** To the extent permitted under applicable law, we will use this information:
  - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
  - to provide you with information about other goods and services we offer that are similar to those that you have already purchased or inquired about;
  - to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. We will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you, or where you have consented to this, or where we can otherwise lawfully do so.
  - to notify you about changes to our service; and
  - to ensure that content from our site is presented in the most effective manner for you and for your computer.
- **Information we collect about you.** To the extent permitted under applicable law, we will use this information:
  - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
  - as part of our efforts to keep our site safe and secure;
  - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and

- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- **Information we receive from other sources.** To the extent permitted under applicable law, we will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

### **Disclosure of your information**

To the extent permitted under applicable data protection law, we may share your personal data with:

- Any member of our group, which means our subsidiaries.
- Selected third parties including:
  - service providers who act as our data processor who are subject to contractual obligations to implement technical and organizational security measures to safeguard the personal data and to process the personal data only as instructed. These third-party service providers assist us in assessing our information security controls, maintaining our site, analyzing our site traffic, and in providing services and information to us and to users of our site;
  - advertisers and advertising networks that require the data to select and serve relevant advertisements to you and others. We may provide advertisers and advertising networks with aggregate information about our users. We may also use such aggregate information to help advertisers reach the kind of audience they want to target;
  - analytics and search engine providers that assist us in the improvement and optimization of our site;

To the extent permitted by applicable data protection law, we will also disclose your personal data to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If we or our subsidiaries, or substantially all of the assets of any of the foregoing, is acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation or request of law enforcement, or in order to enforce or apply our [Terms of Use](#) and other agreements; or to protect the rights, property, or safety of us or our subsidiaries, our employees, customers, or others.
- **Overseas Disclosures**

Your personal data may be disclosed to employees, representatives, or other third parties operating outside of the country you are based who work for, or are engaged by us or our subsidiaries in other countries, including the USA and in other countries that we operate, and to our service providers who may be located outside of the country you are based, including the USA and in other countries that we operate. We note that these persons and third parties may also store, transfer or access personal data outside of the country you are based.

In disclosing your personal data overseas, we will take such steps as are reasonable in the circumstances to require that overseas recipients protect your personal data in accordance with applicable laws.

### **Contact and Complaints**

Questions, comments or requests regarding this privacy policy are welcomed and should be addressed to [privacy@slalom.com](mailto:privacy@slalom.com) or by mail at Slalom, LLC, 821 2nd Avenue, Suite 1900, Seattle, WA 98104. Similarly, if you have any complaints about our privacy management practices, you can contact us at the same details. You may also have a right to raise your complaint with the relevant privacy regulator in your jurisdiction.

### **Changes to our privacy policy**

We may make changes to this notice, including material changes, from time to time. We will inform you of any changes to the processing activities described in this notice before we start that new processing.

Effective Date: 1 January 2022.

## EEA+ Supplemental Data Protection Law Disclosures

Slalom, LLC provides to residents of the European Economic Area, Switzerland and the United Kingdom (EEA+) the following disclosures to supplement the Website Privacy Policy.

Data Controller: The data controller is Slalom, LLC, a US limited liability company organized under the laws of the State of Colorado and based at 821 2nd Avenue, Suite 1900, Seattle, WA 98104.

Legal Bases for Processing under European Union and United Kingdom law: Legal bases for the processing of your personal data by Slalom, LLC are:

- (i) performance of a contract, where we have entered into a contract with you and need to process your personal data to fulfil our contractual obligations to you (Art. 6 (1) lit. b GDPR/UK GDPR),
- (ii) our legitimate interests (Art. 6 (1) lit. f GDPR/UK GDPR) for the transfer of your personal data within the group of companies which are the following: for internal administrative and support purposes,
- (iii) compliance with a legal obligation to which Slalom is subject (Art. 6 (1) lit. c GDPR/UK GDPR), for example if we are required by law to disclose personal data to law enforcement agencies, or governmental authorities,
- (iv) our legitimate interests for the purposes of exercising our legal rights or defending legal claims,
- (v) our legitimate interests (Art. 6 (1) lit. b GDPR/UK GDPR) for the transfer of your personal data in connection with a transfer of all or part of our organization or assets which are the following: the orderly transition of all or part of our business,
- (vi) our legitimate interests to protect and defend the rights or property of us or third parties, including enforcing agreements, policies and terms of use, and in an emergency including to protect the safety of our employees or any person which are the following: to protect the property, rights, and safety of any person and to prevent fraud. Information on the balancing test is available upon request.

Recipients in Third Countries: The personal data that we collect or receive about you may be transferred to and processed by recipients that are located inside or outside the EEA+ and which are not recognized from an EEA+ law perspective as providing for an adequate level of data protection. These third parties are generally cloud hosting and internet service providers, operating systems and platform providers, and certain [technology partners](#). When interacting with our site or contacting Slalom, LLC, you transfer personal data to the United States. And Slalom, LLC may transfer your personal data to the UK, Australia, Japan, Canada, Germany, Switzerland, and Ireland. Transfers from Switzerland to the UK, Germany, Canada and Ireland do not require additional safeguards. Transfers from Switzerland to Australia, Japan, and the US are based on your consent. To the extent your personal data are transferred to countries that do not provide for an adequate level of data protection from an EU or UK law perspective, we will base the respective transfer on appropriate safeguards (Art. 46 GDPR/UK GDPR), such as standard data protection clauses adopted by the European Commission. You can ask for a copy of such appropriate safeguards by contacting us as set out in the contact section.

Period of Data Storage: Your personal data will be retained for as long as necessary to provide you with the services requested, which in most cases does not exceed 5 years. When Slalom no longer needs to use your personal data to comply with contractual obligations, we will remove it from our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it, unless

we need to keep your information, including personal data, to comply with statutory retention periods e.g. for tax purposes for a legally prescribed time period thereafter, or if we need it to preserve evidence within statutes of limitation.

Data Subject Rights: Under applicable law, you may have the following rights in relation to your personal data. These may be limited under applicable data protection law.

(i) Right to request from us access to personal data: You have the right to confirm with us whether your personal information is processed, and if it is, to request access to that personal information including the categories of personal information processed, the purpose of the processing and the recipients or categories of recipients. You have the right to obtain a copy of the personal data undergoing processing. However, this is not an absolute right and the interests of other individuals may restrict your right of access.

(ii) Right to rectification: You have the right to obtain from us rectification of inaccurate or incomplete personal information concerning you. Depending on the purposes of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

(iii) Right to erasure of your personal data (right to be forgotten): You have the right to ask us to erase personal data concerning you.

(iv) Right to restriction of processing: In limited circumstances, you have the right to request that we restrict processing of your personal data.

(v) Right to data portability: You may have the right to receive personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit that personal data to another entity without hindrance from us.

**(vi) Right to object: Under certain circumstances you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, including profiling, by us and we can be required to no longer process your personal data.**

**Moreover, if your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. In this case your personal data will no longer be processed for such purposes by us.**

You also have the right to lodge a complaint with a supervisory authority. If you have declared your consent for any personal data processing activities, you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal. You can exercise your rights by contacting us as set out in the contact section.

Failure to Provide Personal Data: Where we are required by law to collect your personal data, or we need to collect your personal data under the terms of a contract we have with you, and you fail to provide that personal data when we request it, we may not be able to perform the contract we have or are trying to enter into with you. This may apply where you do not provide the personal data we need in order to provide the services you have requested from us. In this case, we may have to cancel the provision of the relevant services to you, in which case we will notify you.

## Japan Supplemental Data Protection Law Disclosures

### 1. Details of relevant Slalom entities

Address and the name of the company representatives of Slalom entities that regularly process personal information of individuals in Japan are as follows:

Slalom, LLC

821 2nd Avenue, Suite 1900, Seattle, WA 98104

Company representative: Christopher Burger, Vice President, Information Security & Governance, [privacy@slalom.com](mailto:privacy@slalom.com)

Slalom K.K.

Toranomon Hills Mori Tower 28F 1-23-1 Toranomom, Minato-ku Tokyo 105-6328 Japan

Company representative: Ko Asami, General Manager Japan, [privacy@slalom.com](mailto:privacy@slalom.com)

For details of other entities, please contact us by email addressed at [privacy@slalom.com](mailto:privacy@slalom.com) or by mail Slalom Consulting, Privacy Office, 821 2nd Avenue, Suite 1900, Seattle, WA 98104.

### 2. Joint use of personal data within Slalom group

We will share your personal data described in this policy with the Slalom entities (please see a list of the Slalom entities below). Those Slalom entities will use the personal data for the purposes set out in the "Uses made of the information" section. The entity which is responsible for management of personal data is Slalom K.K. specified above.

#### Slalom entity list

Slalom, LLC

Slalom Consulting ULC

Slalom Consulting Ltd.

Slalom Australia Pty Ltd.

Slalom Netherlands B.V.

Slalom GmbH

## California Consumer Privacy Act Policy

In this California Consumer Privacy Act Policy, we, Slalom, LLC, disclose information about our data processing practices as required by the California Consumer Privacy Act of 2018, as amended ("CCPA"). This California Consumer Privacy Act Policy applies solely to residents of the State of California ("consumers" or "you"). Any terms defined in the CCPA have the same meaning when used in this policy. This policy does not reflect our collection, use, or disclosure of California residents' personal information, our obligations, or data subject rights, where an exception or exemption under the CCPA applies. You can download a PDF version [here](#).

### 1. Right to Know About Personal Information Collected, Disclosed, or Sold

This policy describes personal information we generally collect, use, disclose and sell about California residents. You have the right to request that we disclose what personal information we collect, use, disclose and sell about you specifically ("right to know"). To submit a request to exercise the right to

know, please call our toll-free phone number (855) 256-3238 or submit an email request to [privacy@slalom.com](mailto:privacy@slalom.com) and include “California Request to Know” in the subject line.

We will ask that you provide certain information to verify your identity, such as a code sent to an email address we may have on file for you. If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. We will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

## 2. Our Personal Information Handling Practices in 2021

We have set out below the categories of personal information we have collected about California residents in the preceding 12 months and, for each category of personal information collected, the categories of sources from which that information was collected, the business or commercial purposes for which the information was collected, and the categories of third parties with whom we shared the personal information.

<b>Category of personal information</b>	<b>We collected such personal information to use for the following business or commercial purposes:</b>	<b>We have collected such personal information from the following categories of sources:</b>	<b>We shared such personal information with the following categories of third parties:</b>
Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.	to monitor and maintain the performance of the sites and to analyze trends, usage and activities in connection with the sites, to measure the effectiveness of advertising we serve to you, and to deliver relevant advertising to you.	Directly from the California resident, cookies or lead generation service providers.	Cloud hosting and internet service providers, government entities, operating systems and platform providers, and certain <a href="#">technology partners</a> .
Any categories of personal information described in subdivision (e) of Section 1798.80: “Personal information” means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social	to monitor and maintain the performance of the sites and to analyze trends, usage and activities in connection with the sites, to measure the effectiveness of advertising we serve to you, and to deliver relevant advertising to you; to carry out our obligations arising from any contracts entered	Directly from the California resident, cookies or lead generation service providers.	Cloud hosting and internet service providers, government entities, operating systems and platform providers, and certain <a href="#">technology partners</a> .

<p>security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. "Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records."</p>	<p>into between you and us and to provide you with the information, products and services that you request from us;  to provide you with information about other goods and services we offer that are similar to those that you have already purchased or inquired about;  to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. We will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you, or where you have consented to this, or where we can otherwise lawfully do so;  to notify you about changes to our service;  and  to ensure that content from our site is presented in the most effective manner for you and for your computer</p>		
<p>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>to monitor and maintain the performance of the sites and to analyze trends, usage and activities in connection with the sites, to measure the effectiveness of advertising we serve to you, and to deliver</p>	<p>Directly from the California resident.</p>	<p>Certain <a href="#">technology partners</a>.</p>

	<p>relevant advertising to you;</p> <p>to provide you with information about other goods and services we offer that are similar to those that you have already purchased or inquired about; and</p> <p>to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you.</p> <p>We will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you, or where you have consented to this, or where we can otherwise lawfully do so.</p>		
Biometric information.	to provide you with certain experiences during a client or other marketing event.	Directly from the California resident.	
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	<p>to monitor and maintain the performance of the sites and to analyze trends, usage and activities in connection with the sites, to measure the effectiveness of advertising we serve to you, and to deliver relevant advertising to you;</p> <p>to provide you with information about other goods and services we offer that are similar to</p>	Through our use of cookies.	

	<p>those that you have already purchased or inquired about; to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. We will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you, or where you have consented to this, or where we can otherwise lawfully do so; and to ensure that content from our site is presented in the most effective manner for you and for your computer.</p>		
<p>Audio, electronic, visual, thermal, olfactory, or similar information.</p>	<p>to provide you with certain experiences during a client or other marketing event.</p>	<p>Directly from the California resident.</p>	
<p>Professional or employment-related information.</p>	<p>to provide you with information about other goods and services we offer that are similar to those that you have already purchased or inquired about; to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. We will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which</p>	<p>Directly from the California resident or lead generation service providers.</p>	<p>Certain <u>technology partners</u>.</p>

	<p>were the subject of a previous sale or negotiations of a sale to you, or where you have consented to this, or where we can otherwise lawfully do so; and to ensure that content from our site is presented in the most effective manner for you.</p>		
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**3. Disclosures of Personal Information, No Sale**

Over the preceding 12 months, we disclosed certain categories of California residents’ personal information, in some cases as directed by you, to the categories of third parties as shown in the table above.

We do not and in the preceding 12 months did not sell California residents’ personal information. We do not have actual knowledge that it sells the personal information of minors under 16 years of age.

**4. Right to Request Deletion of Personal Information**

You have a right to request the deletion of personal information that we collect or maintain about you. To submit a request to delete personal information, call our toll-free phone number (855) 256-3238 submit an email request to [privacy@slalom.com](mailto:privacy@slalom.com) and include “California Request to Delete” in the subject line.

We will ask that you provide certain information to verify your identity, such as a code sent to an email address we may have on file for you. If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. Once we have verified your identity, we will ask you to confirm that you wish to have your personal information deleted. Once confirmed, we will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

**5. Right to Opt-Out of the Sale of Personal Information**

You have the right to opt-out of the sale of your personal information by a business. We do not sell your personal information.

**6. Right to Non-Discrimination for the Exercise of a Consumer’s Privacy Rights**

You may not be discriminated against because you exercise any of your rights under the CCPA in violation of Cal. Civ. Code §1798.125.

**7. Authorized Agent**

You can designate an authorized agent to make a request under the CCPA on your behalf if:

- The authorized agent is a natural person or a business entity registered with the Secretary of State of California and the agent provides proof that you gave the agent signed permission to submit the request; and

- You provide the authorized agent signed permission, verify your own identity directly with us, and directly confirm with us that you provided the authorized agent with permission to submit the request.

If you use an authorized agent to submit a request to exercise your right to know or your right to request deletion, please have the authorized agent take the following steps in addition to the steps above:

Mail a certified copy of your written declaration authorizing the authorized agent to act on your behalf to 821 2nd Avenue, Suite 1900, Seattle, WA 98104 United States; and

- Provide any information we request in our response to your email to verify your identity. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue.

If you provide an authorized agent with power of attorney pursuant to Probate Code sections 4121 to 4130, it may not be necessary to perform these steps and we will respond to any request from such authorized agent in accordance with the CCPA.

#### **8. Contact for More Information**

If you have questions or concerns regarding our privacy policy or practices, you may contact us using the following details:

Email address: [privacy@slalom.com](mailto:privacy@slalom.com)

Postal address:  
Slalom, LLC  
821 2nd Avenue, Suite 1900  
Seattle, WA 98104  
United States

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