

# Privacy Policy

We are committed to protecting and respecting your privacy.

## Important Information and Who We Are

### Purpose of this Privacy Policy

This privacy policy (“Privacy Policy”) (together with our [Terms of Use](#) and [Cookie Policy](#)) sets out the basis on which any personal data collected from You, or that You provide, will be processed by The Freeman Company, LLC (“**Freeman**”) and its parents, subsidiaries, and affiliates (collectively, “**TFC,**” “**we,**” “**our,**” or “**us**”). This policy also outlines Your privacy rights and how the law protects You.

We do not knowingly collect data relating to children.

It is important that You read this Privacy Policy, so that You are fully aware of how and why we are using Your data.

### CONTROLLER

As between You and us, TFC is the controller and responsible for Your personal data. We, as a controller, determine why and how we collect and use Your personal data.

We may share Your personal information within **TFC**, specifically Freeman and its parents, subsidiaries, and/or affiliates.

We have a privacy team who is responsible for overseeing questions in relation to this Privacy Policy. If You have any questions about this Privacy Policy, including any requests to exercise Your legal rights, please contact the privacy team using the details set out below.

### CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

Any changes we may make to our Privacy Policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our Privacy Policy.

It is important that the personal data we hold about You is accurate and current. Please keep us informed if Your personal data changes during Your relationship with us.

This Privacy Policy was last updated April 2026.

## THIRD-PARTY LINKS

TFC's websites or applications may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about You. We do not control these third-party websites and are not responsible for their privacy statements. When You leave our websites or applications, we encourage You to read the privacy notice of every website You visit.

## The Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about You which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from You and other details of products and services You have purchased from us.
- **Technical Data** includes internet protocol (IP) address, Your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices You use to access this website.
- **Profile Data** includes Your username and password, purchases or orders made by You on behalf of your organization, Your organization's interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how You use our website, products and services.
- **Marketing and Communications Data** includes Your preferences in receiving marketing from us and our third parties and Your communication preferences.

We also collect, use and share **aggregated data** such as statistical or demographic data for any legitimate business purpose. Aggregated data may be derived from Your personal data

but is not considered personal data in law as this data does not directly or indirectly reveal Your identity (“Aggregated Data”). For example, we may aggregate Your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with Your personal data so that it can directly or indirectly identify You, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

## **IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, or under the terms of a contract we have with You and You fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with You (for example, to provide You with goods or services). In this case, we may have to cancel a product or service You have with us but we will notify You if this is the case at the time.

## **How is Your Personal Data Collected?**

We use different methods to collect data from and about You including through:

Information You give us: You may give us information about You by filling in forms on our sites, applications, software, programs, platforms, or tools (collectively, our “**Sites**”), or by corresponding with us by phone, e-mail or otherwise. This includes information You provide when You register to use our Sites, subscribe to our service, search for a product or service, complete any forms, surveys or statements, place an order on our Sites and when You report a problem with our Sites. The information You give us may include (without limitation): Your name or company name, company number, VAT number, address, e-mail address and phone number, ACH routing information for payments transfer and payment card information and personal descriptions, photographs and copies of identity documents (such as passports).

2. Information we collect about You: With regard to each of Your visits to our Sites we may automatically collect the following information:

- technical information, including (without limitation) the Internet protocol (IP) address used to connect Your computer to the Internet, Your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about Your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Sites (including date and time); products or 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 and any phone number used to call our customer service number.

We collect this personal data by using cookies, beacons, and other similar technologies. Please see our Cookie Policy for further details.

- Information we receive from other sources: We may receive information about You if You use any of the other websites we operate or the other services we provide. In this case we will have informed You when we collected that data that it may be shared internally and combined with data collected on this site. We are also working closely with third parties (including, without limitation, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about You from them.

## **How We Use Your Personal Data**

We will only use Your personal data when the law allows us to. Most commonly, we will use Your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with You.
- Where it is necessary for our legitimate interests (or those of a third party) and Your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we rely on consent as a legal basis for processing Your personal data other than in relation to sharing with third parties Your personal data for direct marketing communications, which may be sent via email or text message. You have the right to withdraw consent to marketing at any time by opting out of the email or text message or by contacting us using the contact information provided below.

## **PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

We use information held about You in the following ways:

1. Information You give to us: We will use this information:

1. 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;

2. to provide You with information about other goods and services we offer that are similar to, or complementary to, those that You have already purchased or inquired about or may have interest in;
3. to provide You, or permit selected third parties to provide You, with information about goods or services we feel may interest You. If You are an existing customer, we will only contact You by electronic means (e-mail or SMS) and by phone with information about goods and services similar to, or complementary to, those which were the subject of a previous sale or negotiations of a sale to You. If You are a new customer, and where we permit selected third parties to use Your data, we (or they) will contact You by electronic means or by phone only if You have consented where required by law, or if You have not unsubscribed from electronic communications. If You do not want us to contact You for marketing purposes, please update Your preferences by visiting our [email communications preference center](#) or select the applicable unsubscribe feature;
4. to notify You about changes to our service;
5. to ensure that content from our Sites is presented in the most effective manner for You and for Your computer.

**2. Information we collect about You: We will use this information:**

1. to improve our services, administer our Sites, and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
2. to improve our Sites to ensure that content is presented in the most effective and efficient manner for You and for Your computer;
3. to allow You to participate in interactive features of our service, when You choose to do so;
4. as part of our efforts to keep our Sites safe and secure;
5. to measure or understand the effectiveness of advertising we serve to You and others, and to deliver relevant advertising to You;
6. to make suggestions and recommendations to You and other users of our Sites about goods or services that may interest You or them.

**3. Information we receive from other sources:** We may combine this information with information You give to us and information we collect about You. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Note that we may process Your personal data for more than one lawful ground depending on the specific purpose for which we are using Your data. Please contact us if You need details about the specific legal ground we are relying on to process Your personal data.

## **MARKETING/OPTING OUT**

We strive to provide You with choices regarding certain personal data uses, particularly around marketing and advertising.

You can ask us or third parties to stop sending You marketing messages at any time by following the opt-out links on any marketing message sent to You.

Where You opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions, which information we will retain for as long as necessary to provide services to You.

## **PROMOTIONAL OFFERS FROM US**

We may use Your identity, contact, technical, usage and profile data to form a view on what we think You may want or need, or what may be of interest to You. This is how we decide which products, services and offers may be relevant for You (we call this marketing).

You will receive marketing communications from us if You have requested information from us or purchased goods or services from us or one of our business partners, or filled out contact information forms and, in each case, You have not opted out of receiving that marketing.

## **THIRD-PARTY MARKETING**

We will get Your express opt-in consent where required by law before we share Your personal data with any company outside **TFC** for marketing purposes.

## **COOKIES**

Our website uses cookies to distinguish You from other users of our website. This helps us to provide You with a good experience when You browse our website and also allows us to improve our Site. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Policy](#).

## **CHANGE OF PURPOSE**

We will only use Your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If You wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

Please note that we may process Your personal data without Your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **Disclosures of Your Personal Data**

We may share Your personal information with any member of the **TFC**.

We may share Your information with selected third parties including, but not limited to:

1. Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them for Your benefit or directly with You;
2. Advertisers and advertising networks that require the data to select and serve relevant advertisements to You and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate anonymized information about our users. We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from You to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience; and
3. Analytics and search engine providers that assist us in the improvement and optimization of our Sites.

We may disclose Your personal information to third parties:

1. In the event that we sell or buy any business or assets, in which case we may disclose Your personal data to the prospective seller or buyer of such business or assets;
2. If TFC or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; and
3. If we are under a duty to disclose or share Your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use, Cookie Policy and other agreements; or to protect the rights, property, or safety of TFC, the TFC and our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

We require all third parties to respect the confidentiality and security of Your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use Your personal data for their own purposes and only permit them to process Your personal data for specified purposes and in accordance with our instructions. To the extent a third party is engaged by TFC to process Your personal data in accordance with our instructions, TFC remains responsible and liable to You if a third party processes Your personal data in a way not intended by You, any contract TFC has with you, or pursuant to this policy, unless TFC proves that it is not responsible for the event giving rise to the damage.

## **Data Security**

All information You provide to us is stored on our secure servers. Personal data is transmitted to other websites through the use of Transport Layer Security (TLS) encrypted protection. Where we have given You (or where You have chosen) a password which enables You to access certain parts of our Site, You are responsible for keeping this password confidential. You are prohibited from sharing Your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect Your personal data, we cannot guarantee the security of Your data transmitted to our Site; any transmission is at Your own risk. Once we have received Your information, we will use strict procedures and security features to try to prevent unauthorized access.

We have put in place procedures to deal with any suspected personal data breach and will notify You and any applicable regulator of a breach where we are legally required to do so.

## **Data Retention**

### **HOW LONG WILL YOU USE MY PERSONAL DATA?**

We will only retain Your personal data as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, reporting requirements or record retention requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of Your personal data, the purposes for which we process Your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

### **WHERE WE STORE YOUR PERSONAL DATA**

The data that we collect from You may be transferred to, and stored at, a destination in the US, where many of our central databases operate. TFC is a group of companies which operate globally so personal data may also be processed by staff operating outside the US who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of Your order, the processing of Your payment details, and the provision of support services. If You are located outside of the US, You use the Sites at Your own risk. By using the Sites and the services related thereto, You acknowledge that the data protection and other laws of other countries may provide a less comprehensive standard of protection than those in Your country.

We will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy.

## Your Legal Rights

You have the following rights under data protection laws in relation to Your personal data.

The right to:

- **Request access** to Your personal data (commonly known as a “data subject access request”). This enables You to receive a copy of the personal data we hold about You and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about You. This enables You to have any incomplete or inaccurate data we hold about You corrected, though we may need to verify the accuracy of the new data You provide to us.
- **Request deletion** of Your personal data. This enables You to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove Your personal data where You have successfully exercised Your right to object to processing (see below), where we may have processed Your information unlawfully or where we are required to delete Your personal data to comply with local law. Note, however, that we may not always be able to comply with Your request for deletion of your personal data for specific legal reasons which will be notified to You, if applicable, at the time of Your request.
- **Object to processing** of Your personal data where we are relying on a legitimate business interest (or those of a third party) and there is something about Your particular situation which makes You want to object to processing on this ground as You feel it impacts on Your fundamental rights and freedoms. You also have the right to object where we are processing Your personal data for direct marketing purposes.

In some cases, we may demonstrate that we have compelling legitimate grounds to process Your information which override Your rights and freedoms.

- **Request restriction of processing** of Your personal data. This enables You to ask us to suspend the processing of Your personal data in the following scenarios: (a) if You want us to establish the data's accuracy; (b) where our use of the data is unlawful but You do not want us to delete it; (c) where You need us to hold the data even if we no longer require it as You need it to establish, exercise or defend legal claims; or (d) You have objected to our use of Your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Withdraw consent at any time** where we are relying on consent to process Your personal data. However, this will not affect the lawfulness of any processing carried out before You withdraw Your consent. If You withdraw Your consent, we may not be able to provide certain products or services to You. We will advise You if this is the case at the time You withdraw Your consent.

If You wish to exercise any of the rights set out above, please contact us at [privacy@freeman.com](mailto:privacy@freeman.com) or complete a [Data Subject Access Request \(DSAR\)](#) form to request deletion of your personal data.

You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. A list of Supervisory Authorities is available here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

### **NO FEE USUALLY REQUIRED**

Typically, You will not have to pay to access Your personal data or to exercise any of the other rights. The first request is free of charge, but additional, repetitive or excessive requests *may* incur a nominal administrative fee.

### **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from You to help us confirm Your identity and ensure Your right to access Your personal data (or to exercise any of Your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact You to ask You for further information in relation to Your request to speed up our response.

### **TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if Your request is particularly complex or You have made a number of requests. In this case, we will notify You and keep You updated.

## **APPLICABLE LAWS**

TFC complies with all applicable data privacy laws.

This Privacy Policy, its subject matter and its formation (and any non-contractual disputes or claims) are governed by the laws of the State of Texas. We both agree to the exclusive jurisdiction of the state and federal courts of Dallas County, Texas, USA.

## **CONTACT**

Questions, comments, and requests regarding this Privacy Policy should be addressed to the privacy team at one of the following methods set out below.

Our full details are:

TFC

Attn: Data Privacy

Address: 14221 North Dallas Pkwy Suite 200

Dallas, TX 75254

Email: [privacy@freeman.com](mailto:privacy@freeman.com)

Phone: 214-445-1000

Toll-Free: 1-800-423-8416

Web Form: <https://www.freeman.com/contact#contact-us>

## **CALIFORNIA'S "SHINE THE LIGHT" LAW**

If You are a California resident and wish to review or change the personal data of Yours which TFC possesses, please contact us by one of the ways listed above in the Contact section.

## **International Transfers**

We share Your personal data within the TFC. This may involve transferring Your data outside the US or to external third parties based outside the US.

## **TRANSFERS OF PERSONAL DATA OUTSIDE THE EUROPEAN UNION**

As described above, sometimes we must transfer Your data, including personal data, to staff operating outside the US, including the European Union (“EU”) and the greater European Economic Area (“EEA”), who work for us or for one of our suppliers. The relevant data is transferred in order to, among other purposes, fulfill Your order, process Your payment details, or to provide services, including marketing services. Pursuant to the General Data Protection Regulation (EU) 2016/679 (“GDPR”), the governing body of the European Union, the European Commission, has ruled that certain countries outside of the EEA adequately protect personal data and some do not. In order to transfer data from the EEA to other countries, such as the United States, that in the European Commission’s view do not adequately protect personal data, we comply with legal frameworks that establish an equivalent level of protection with EU law. The European Commission’s Standard Contractual Clauses (“SCC”) are such a framework permitting the transfer of personal data outside the EEA and we incorporate these into our Data Processing agreements that we append to our contracts. By accessing and using our sites and providing us with Your information You acknowledge and agree that any such data that may be sent to the EEA will be processed and returned from the EEA to us through the SCC.

The Freeman Company LLC and its U.S.-based subsidiaries Freeman Audio Visual, LLC, Freeman Expositions, LLC and Phase Ten Strategic Corporation d/b/a Marketing Design Group complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Freeman has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. Freeman has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) Program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

With respect to personal data received or transferred pursuant to the Data Privacy Framework Program, Freeman is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

Pursuant to the DPF Program, EU, UK, and Swiss individuals have the right to obtain our confirmation of whether we maintain personal information relating to you in the United States. Upon request, we will provide you with access to the personal information that we hold about you. You may also correct, amend, or delete the personal information we hold about you. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data transferred to the United States under the DPF, should direct their query to [privacy@freeman.com](mailto:privacy@freeman.com). If requested to remove data, we will respond within a reasonable timeframe.

We will provide an individual opt-out choice, or opt-in for sensitive data, before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your personal information, please submit a written request to [privacy@freeman.com](mailto:privacy@freeman.com).

### **Dispute Resolution and Recourse**

In compliance with the DPF, Freeman commits to resolve DPF Principles-related complaints about your privacy and our collection or use of your personal information. European Union, United Kingdom, and Swiss individuals with inquiries or complaints regarding our handling of personal data in reliance on the DPF should first contact Freeman at: [privacy@freeman.com](mailto:privacy@freeman.com).

Freeman has further committed to refer unresolved DPF Principles-related complaints to a U.S.-based independent dispute resolution mechanism, BBB NATIONAL PROGRAMS. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by us, please visit [www.bbbprograms.org/dpf-complaints](http://www.bbbprograms.org/dpf-complaints) for more information and to file a complaint. This service is provided free of charge to you. If your DPF complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See <https://www.dataprivacyframework.gov/framework-article/ANNEX-I-introduction> for more information on this process.