

BrightTALK Privacy Policy

(date of last revision: June 10, 2021)

1. Introduction

BrightTALK recognizes that privacy is important when using the Web for communications. This policy explains how BrightTALK collects, stores, uses and shares Personal Data.

2. This Policy

This Policy is issued by BrightTALK Inc. (“**BrightTALK**”) and is addressed to individuals outside our organisation with whom we interact, including visitors to our website (our “**Site**”) and other users of our services (together, “**you**”). BrightTALK is a wholly-owned subsidiary of TechTarget, Inc. Defined terms used in this Policy are explained in Section (15) below. For the purposes of this Policy, BrightTALK is the Controller. Contact details are provided in Section (14) below. This Policy may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law. We encourage you to read this Policy carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Policy.

3. Processing Your Personal Data

Collection of Personal Data: We may collect Personal Data about you, such as your name, address and contact details. Examples of sources from which we may collect Personal Data include the following:

- We may obtain your Personal Data when you provide it to us (e.g., where you contact us via email or telephone, or by any other means).
- We may collect your Personal Data in the ordinary course of our relationship with you (e.g., in the course of administering your BrightTALK account).
- We may collect Personal Data that you manifestly choose to make public, including via our Site.
- We may receive your Personal Data from third parties who provide it to us (e.g., social media platforms via plugins).

- We may collect or obtain Personal Data when you visit our Site, or use any features or resources available on or through our Site. When you visit our Site, your device and browser will automatically disclose certain information, some of which may constitute Personal Data (see below).

Creation of Personal Data: We may also create Personal Data about you, such as records of your interactions using our Site, and details of your account history.

Categories of Personal Data: The categories of Personal Data about you that we may Process include:

- Personal details: given name(s); preferred name; gender; date of birth / age; nationality; photograph; preferences; and account settings.
- Contact details: telephone number; email address; and social media profile details.
- Professional details: professional profile details; association memberships; qualifications and company insight data.
- Device details: device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to our Site and other technical communications information.
- Payment details: billing address; bank account number or credit card number; cardholder or account holder name; card or account security details; card 'valid from' date; card expiry date.
- Usage details: records of your use of our Site and other services, including: registrations; details of content with which you interact; votes; questions; downloads; ratings; feedback; profile views; search queries; anonymous viewings; page views; player clickstream; chapters; and favourite moments.
- Analysis data: keywords, communities, trends, content quality and content importance.
- Views, opinions and interests: any comments, ratings, views or opinions that you choose to send to us, post via our Site, via a survey, or publicly post via social media platforms; your community interests and solution interests.

Lawful basis for Processing Personal Data: In Processing your Personal Data in connection with the purposes set out in this Policy, we may rely on one or more of the following legal bases, depending on the circumstances:

- we have obtained your prior express consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way);

- the Processing is necessary in connection with any contract that you may enter into with us;
- the Processing is required by applicable law;
- the Processing is necessary to protect the vital interests of any individual; or
- we have a legitimate interest in carrying out the Processing for the purpose of managing, operating or promoting our business, and that legitimate interest is not overridden by your interests, fundamental rights, or freedoms.

Processing your Sensitive Personal Data: We do not seek to collect or otherwise

Process your Sensitive Personal Data, except where:

- the Processing is required or permitted by applicable law (e.g., to comply with our diversity reporting obligations);
- the Processing is necessary for the detection or prevention of crime (including the prevention of fraud);
- the Processing is necessary for the establishment, exercise or defence of legal rights; or
- we have, in accordance with applicable law, obtained your prior explicit consent prior to Processing your Sensitive Personal Data (as above, this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Purposes for which we may Process your Personal Data: The purposes for

which we may Process Personal Data, subject to applicable law, include:

- Our Site: operating and managing our Site; providing content to you; displaying advertising and other information to you; and communicating and interacting with you via our Site.
- Provision of services to you: providing our Site and other services to you (including suggesting content that may be of interest to you, based on your past activity); communicating with you in relation to those services; recommending content that may be of interest to you; and recommending your content to others.
- Marketing communications: communicating with you via any means (including via email, telephone, text message, social media, post or in person) news items and other information in which you may be interested, subject to ensuring that such communications are provided to you in compliance with applicable law.
- Disclosing Personal Data to our customers: in accordance with the provisions of this Policy and applicable law, we may disclose certain Personal Data to

our customers. Our customers may contact you with information that may be of interest to you, provided that such communication is not otherwise in breach of applicable laws.

- Communications and IT operations: management of our communications systems; operation of IT security; and IT security audits.
- Health and safety: health and safety assessments and record keeping; and compliance with related legal obligations.
- Financial management: sales; finance; corporate audit; and vendor management.
- Surveys: engaging with you for the purposes of obtaining your views on our Site or our services.
- Improving our Site and our services: identifying issues with existing Site and our services; planning improvements to existing Site and our services; creating new Site and our services.

4. Disclosure of Personal Data to Third Parties

We may disclose your Personal Data to other entities within the BrightTALK group, for legitimate business purposes (including providing services to you and operating our Site), in accordance with applicable law. In addition, we may disclose your Personal Data to:

- our customers, subject always to compliance with the terms of this Policy and the requirements of applicable law;
- other users, pursuant to our User Agreement, who may see your profile details in your public profile setting, such as name, job title, organization, country, photos, brighttalk.com activity and history, and comments, unless you choose to hide yourself from other users upon viewing a particular webcast;
- legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- accountants, auditors, lawyers and other outside professional advisors to BrightTALK, subject to binding contractual obligations of confidentiality;
- third party Processors (such as IT service providers or other third party service providers we use for operational purposes), located anywhere in the world, subject to the requirements noted below in this Section (4);

- any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights;
- any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security; and
- any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation)

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

5. Internal Transfer of Personal Data

We may disclose your Personal Data to other entities within the BrightTALK group, for legitimate business purposes (including providing services to you and operating our Site), in accordance with applicable law. In addition, we may disclose your Personal Data to:

- our customers, subject always to compliance with the terms of this Policy and the requirements of applicable law;
- other users, pursuant to our User Agreement, who may see your profile details in your public profile setting, such as name, job title, organization, country, photos, [brighttalk.com](https://www.brighttalk.com) activity and history, and comments, unless you choose to hide yourself from other users upon viewing a particular webcast;
- legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- accountants, auditors, lawyers and other outside professional advisors to BrightTALK, subject to binding contractual obligations of confidentiality;
- third party Processors (such as IT service providers or other third party service providers we use for operational purposes), located anywhere in the world, subject to the requirements noted below in this Section (4);

- any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights;
- any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security; and
- any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation)

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

6.Data Security

We have implemented appropriate technical and organizational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

You are responsible for the ensuring that any Personal Data that you send to us are sent securely.

7.Data Accuracy

We take every reasonable step to ensure that:

- your Personal Data that we Process are accurate and, where necessary, kept up to date; and
- any of your Personal Data that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay.

From time to time we may ask you to confirm the accuracy of your Personal Data.

8.Data Minimization

We take every reasonable step to ensure that your Personal Data that we Process are limited to the Personal Data reasonably required in connection with the purposes set out in this Policy.

9.Data Retention

The criteria for determining the duration for which we will keep your Personal data are as follows: we will retain copies of your Personal Data in a form that permits identification only for as long as is necessary in connection with the purposes set out in this Policy, unless applicable law requires a longer retention period. In particular, we may retain your Personal Data for the duration of any period necessary to establish, exercise or defend any legal rights.

10.Your Legal Rights

Subject to applicable law, you may have a number of rights regarding the Processing of your Personal Data, including:

- *the right to request access to, or copies of, your Personal Data that we Process or control;*
- *the right to request rectification of any inaccuracies in your Personal Data that we Process or control;*
- *the right to request, on legitimate grounds:*
- *erasure of your Personal Data that we Process or control; or*
- *restriction of Processing of your Personal Data that we Process or control;*
- *the right to object, on legitimate grounds, to the Processing of your Personal Data by us or on our behalf;*
- *the right to have your Personal Data that we Process or control transferred to another Controller, to the extent applicable;*
- *where we Process your Personal Data on the basis of your consent, the right to withdraw that consent; and*
- *the right to lodge complaints with a Data Protection Authority regarding the Processing of your Personal Data by us or on our behalf*

This does not affect your statutory rights.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Policy, or about our Processing of your Personal Data, please use the contact details provided in Section (14) below.

California consumers may have additional rights as described in the [California Consumer Privacy Notice found here](#), which is hereby incorporated into this Policy by reference.

11.Cookies

A cookie is a small file that is placed on your device when you visit a website (including our Site). It records information about your device, your browser and, in some cases, your preferences and browsing habits. We may Process your Personal Data through cookie technology, in accordance with our [Cookie Policy](#).

12.Minors

Minors under the age of eighteen years old are not eligible to use our Site and we therefore ask that minors do not submit any Personal Data to us, or use any of the services provided on, through or via our Site.

13.User Agreement

All use of our Site is subject to our [User Agreement](#)

14.Contact Details

If you have any comments, questions or concerns about any of the information in this Policy, or any other issues relating to the Processing of Personal Data by BrightTALK, please contact:

Support Department

BrightTALK Inc.
703 Market St., 15th Floor, San Francisco, CA, 94103
support@brighttalk.com
415 625 1500

In accordance with Article 27 of the GDPR, we have appointed a representative within the European Union.

The contact details of our EU representative are below.

Postal Address: E-Magine Medias SAS, 29 rue du Colisée, 7th Floor, 750008 Paris

Email address: eurep_ttgt@techtarget.com

Telephone: +33 (0)1 77 32 13 00.

E-Magine Medias role in this respect is limited solely to being a contact point for questions from European residents and data protection supervisory authorities regarding data protection. E-Magine Medias cannot respond to other communications or legal processes on BrightTALK's behalf. This designation does not alter BrightTALK's role with respect to the personal data in its control nor does it affect BrightTALK's responsibility or obligations under GDPR.

15. Definitions

- **'Controller'** means the entity that decides how and why Personal Data is Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
- **'Data Protection Authority'** means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
- **'Personal Data'** means information that is about any individual, or from which any individual is identifiable. Examples of Personal Data that we may Process are provided in Section (3)
- **'Process', 'Processing' or 'Processed'** means anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **'Processor'** means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).

- **'Sensitive Personal Data'** means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law.