



LAST UPDATED: January 28<sup>th</sup>, 2026

## COMMERCIAL PRIVACY POLICY

This Commercial Privacy Policy (“Policy”) governs how Merito Solutions, Inc. and its affiliates (“Merito,” “we,” “us,” or “our”) collect, use, store, and protect personal information when individuals voluntarily engage with Merito for commercial communications, including newsletters, events, marketing communications, and direct outreach. This Policy is intended to provide transparency regarding Merito’s commercial data practices and applies only in the contexts described herein.

This Policy does not apply to personal data that Merito processes on behalf of customers or partners in connection with professional services, subcontracted services, or other contractual service arrangements. Such data is governed by the applicable agreements, data protection addenda, and service-specific privacy terms, under which Merito acts as a service provider or processor and processes personal data solely on the instructions of the relevant customer or partner.

### Information We Collect

Merito may collect personal information that you voluntarily provide to us through our website, event registrations, newsletter subscription forms, contact forms, or other direct interactions initiated by you. This information may include your name, business email address, company name, job title, and any other information you choose to submit. Merito does not require you to provide personal information unless you choose to opt in to receive commercial communications.

### Use of Personal Information

Where you have provided your personal information and expressly opted in, Merito may use that information to send newsletters, technical content, event invitations, product or service updates, surveys, and other commercial communications related to Merito’s offerings. Merito may also use your information to respond to inquiries or requests that you initiate. Merito will not send marketing or promotional communications to you unless you have explicitly consented to receive them.

### Legal Basis for Processing

Where required by applicable data protection laws, including the General Data Protection Regulation (GDPR), Merito processes personal information for commercial and marketing purposes based on your explicit consent. Your consent is voluntary and may be withdrawn at any time without affecting other lawful processing activities.

### Data Separation and Purpose Limitation

Merito maintains strict separation between personal information collected directly for commercial and marketing purposes and personal data processed by Merito on behalf of customers or partners under contractual service arrangements. Personal information collected for newsletters, events, or marketing communications is stored and managed separately and is not combined with, cross-

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referenced against, or derived from personal data processed in Merito's role as a service provider or processor. Personal data processed on behalf of customers or partners is never used for Merito's own marketing, sales, or business development purposes.

### **Opt-In, Opt-Out, and Individual Rights**

You may opt in to receive commercial communications from Merito by providing your consent through a subscription form or similar mechanism. You may withdraw your consent at any time by using the unsubscribe link included in any communication or by contacting Merito at [privacy@merito.com](mailto:privacy@merito.com). Subject to applicable law, you may also request access to, correction of, or deletion of your personal information collected under this Policy.

### **Sharing of Personal Information**

Merito may share personal information collected under this Policy with third-party service providers that support Merito's commercial activities, such as email delivery platforms, marketing analytics providers, or event management services. Such service providers are engaged under contractual obligations to process personal information solely on Merito's behalf and to implement appropriate safeguards. Merito does not sell personal information.

### **Data Security**

Merito implements reasonable administrative, technical, and organizational measures designed to protect personal information against unauthorized access, disclosure, alteration, or loss. While no system can guarantee absolute security, Merito maintains safeguards appropriate to the nature of the data and the purposes for which it is processed.

### **International Data Transfers**

If you are located outside the United States, your personal information may be transferred to and processed in the United States or other jurisdictions where Merito or its service providers operate. By opting in and providing your information, you consent to such transfers to the extent permitted by applicable law.

### **Changes to This Policy**

Merito may update this Policy from time to time to reflect changes in applicable law, business practices, or operational requirements. The most current version of this Policy will be made available via Merito's website.

### **Contact Information**

If you have questions, concerns, or requests regarding this Commercial Privacy Policy or Merito's commercial data practices, please contact us at [privacy@merito.com](mailto:privacy@merito.com).

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