

the EXPONEA PRIVACY POLICY

Version, 8.0

Effective date: 1st July 2020

1. INITIAL PROVISIONS

1.1. **Exponea s.r.o.**, with its registered office at City Business Center I, Karadžičova 8/7244, 821 08 Bratislava – mestská časť Ružinov, Slovakia, registered in the Commercial Register maintained by the County Court in Bratislava I, Section Sro, Insert 107011/B (“Exponea” or “we” or “us”) is **committed to protecting the personal data** of our Customers, individuals who visit our website at the domain exponea.com (“our website”), individuals who contact us via contact forms on our website, individuals receive marketing communication or newsletters from us, applicants for a job in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter referred to as “**GDPR**”) and Act No. 18/2018 Coll. on personal data protection (hereinafter referred to as “**Data Protection Act**”).

1.2. This Privacy Policy is binding to (i) all our Customers who are provided with the Services based on the Agreement as defined in the General Terms and Conditions – Exponea Platform, (ii) visitors of our websites, (iii) individuals who contact us through our website, (iv) job applicants (all the previously mentioned individuals hereinafter referred to as “**you**”).

1.3. Capitalized words not defined in this Privacy Policy shall have the meaning ascribed to such words in the General Terms and Conditions – Exponea Platform and GDPR.

2. DATA PROCESSING

2.1. **Pre-contractual relationships.** If you are an individual interested in cooperation with Exponea (candidate for a job, prospective partner/supplier/customer), you may contact us via contact forms available on our website. In such contact form you are required to provide information that includes your full name, company email, phone number and company industry. We process this data for the purpose of handling your request regarding our future cooperation. The legal ground for processing this data is Article 6 (1) b) GDPR **contract performance**. Exponea processes this data as the Controller within the meaning of Article 4 (7) GDPR.

2.2. **Hiring.** Exponea processes personal data (CV, resumes) of unsuccessful candidates for a job in our internal database for the period of up to one (1) year, provided that candidates provided us with the consent to such processing. The legal ground for processing this data is **consent** according to Article 6 (1) a) GDPR. Exponea processes this data as the Controller within the meaning of Article 4 (7) GDPR. You can withdraw your consent at any time by sending an email to hr@exponea.com or via our website in section <https://exponea.com/legal/control-your-data/>.

2.3. **Contractual relationship.** Exponea processes personal data of its existing Customers in order to provide them with Services. The data processed for such purpose may include: full name, company email, phone number, data in the Account, company name, industry and others. The legal ground for processing this data is Article 6 (1) b) GDPR **contract performance**. Exponea processes this data as the Controller within the meaning of Article 4 (7) GDPR.

2.4. **Direct marketing (non-customers).** Exponea processes personal data of individuals who subscribed for receiving personalized (targeted) newsletters. The legal ground for processing this data is **consent** according to Article 6 (1) a) GDPR. You have the right to withdraw your consent at any time (for more information please see Section 9 hereof). Exponea processes this data as the Controller within the meaning of Article 4 (7) GDPR. The data processed for such purpose may include: email address, gender, login information, time zone setting, operating system and platform, information about visits including the URL, the search terms, information about what you viewed or searched on our website, page response times, download errors, length of visits to certain pages, page interaction information, (such as scrolling, clicks, and mouse-overs) and the methods used to browse away from the page, activities of users, browsing web pages. In every email we will provide you with the opportunity to exercise an opt-out choice if you do not want to receive any further marketing communications from us. The opt-out choice may be exercised by clicking on the “unsubscribe” link located at the bottom of our marketing emails. There is also a possibility of opting-out from receiving emails by clicking on “opt-out from emailing” available on our website in the section <https://exponea.com/legal/control-your-data/>.

2.5. **Direct marketing (Exponea’s Customers).** Exponea processes personal data for the purpose of targeted email marketing to existing Customers. The data processed for such purpose may include: email address, gender, login information, time zone setting, operating system and platform, information about visits including the URL, the search terms, information about what you viewed or

searched on our website, page response times, download errors, length of visits to certain pages, page interaction information, (such as scrolling, clicks, and mouse-overs) and the methods used to browse away from the page, activities of users, browsing web pages. The legal ground for processing this data is our **legitimate interest** according to Article 6 (1) f) GDPR. Exponea processes this data as the Controller within the meaning of Article 4 (7) GDPR. You have the right to object to such processing (for more information please see Section 9 hereof). In every email we will provide you with the opportunity to exercise an opt-out choice if you do not want to receive any further marketing communications from us. The opt-out choice may be exercised by clicking on the “unsubscribe” link located at the bottom of our marketing emails. There is also a possibility of opting-out from receiving emails by clicking on “opt-out from emailing” available on our website in the section <https://exponea.com/legal/control-your-data/>.

2.6. Contact forms. If you get in touch with us through any contact form, we have on our website we will process your name, email address, phone number, company and other data you provide us with. We will process the data for the purpose of dealing with your request. The legal ground for processing this data is **consent** under Article 6 (1) a) GDPR. Exponea processes this data as the Controller within the meaning of Article 4 (7) GDPR. You can withdraw your consent at any time via our website in the section <https://exponea.com/legal/control-your-data/>.

2.7. Exponea Alumni. If you enrol to Exponea Alumni community basic information about you such as your name, email address and information about your former Exponea position, and who was your team leader are processed by Exponea. If you provide us with your phone number, LinkedIn profile, new position and the company you are moving on to, your skills, personal mission and a desire to offer mentorship these are processed as well. Furthermore, Exponea processes any communication via the Slack App. The legal ground for processing of the above-mentioned data is **consent** under Article 6 (1) a) GDPR and **legitimate interest** under Article 6 (1) f) GDPR. You may withdraw your consent to the processing of your personal data at any time. Exponea processes this data as the Controller within the meaning of Article 4 (7) GDPR.

3. COOKIES ON OUR WEBSITES

3.1. Our website uses cookies to collect information about individuals who visit our website. Cookies are small text files that are stored on your computer or other device. Cookies ensure our website functions correctly and provide important features and ensure the security of our page. They also help us to understand

how our website is being used. We use cookies for analytical purposes for example to track and monitor what country, what pages and what method was used to visit our website as well as how you navigate on our website. Cookies are used as well for purposes of website's personalization and browsing experience optimisation. Additionally, cookies help us deliver online advertising that we believe is most relevant to you. Cookies are also used for profiling. Cookies can tell us if you have seen a specific advert, and how long it has been since you have seen it. This information allows us to measure the effectiveness of our online advertising campaigns and control the number of times you are shown an advert.

3.2. When you visit our website, you are informed through a cookie banner that we collect cookies and you may manage the types of cookies that you allow to be dropped on your device. After choosing whether you consent to our cookies or not, you can change the settings and withdraw your consent at any time via our website in the section <https://exponea.com/legal/control-your-data/>.

3.3. We use the following types of cookies: (i) essential cookies, which are essential for transmission of communication and proper functioning of our website's targeting and for the provision of services explicitly requested by you; and (ii) analytical and advertising cookies, which help make advertisements more relevant to visitors of our website. Essential cookies cannot be disabled as they are essential for the functioning of our website. If you do not consent to the use of analytical and advertising cookies, the functionality of our website may be limited. When analytical cookies are collected we process personal data such as (IP) address, gender, time zone setting, operating system and platform, information about visits including the URL, the search terms, information about what you viewed or searched on our website, page response times, download errors, length of visits to certain pages, page interaction information, (such as scrolling, clicks, and mouse-overs) and the methods used to browse away from the page, activities of users, browsing web pages.

3.4. When we collect essential cookies the legal ground for processing of this data is Article 6 (1) f) GDPR, **legitimate interest**. When we collect analytical and advertising cookies we only do so once you have given us your **consent** in accordance with Article 6 (1) a) GDPR that is the legal ground for such processing. You can withdraw your consent to analytical and advertising cookies at any time via our website in the section <https://exponea.com/legal/control-your-data/>.

3.5. Our Services and/or websites and the communications generated from using and/or registering for our Services and/or platform, such as promotional emails,

may contain electronic images known as “web beacons”. Web beacons generally work in conjunction with cookies, and we may use them in the same way we use cookies.

4. THIRD PARTY WEBSITES

4.1. **Our website may contain links** (which may take the form of hyperlinks, widgets, clickable logos, images or banners) **to and from third party websites**. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. We strongly recommend that you read their privacy policies and terms and conditions of use to understand how they collect, use, and share information. We are not responsible for the privacy practices or the content on the websites of third-party sites.

4.2. Exponea is currently using so-called social plugins from the following social networks: (i) facebook.com, (ii) twitter.com, (iii) linkedin.com (iv) plus.google.com (v) instagram.com (“plugins”), which are indicated by their logos on our website. When you visit our website, your browser establishes a direct connection with the servers on which these plugins run. The content of the plugins is transferred directly by Facebook/Twitter/LinkedIn/Google/Instagram to your browser, which then integrates it into our website. Integration of the plugins causes Facebook/Twitter/LinkedIn/Google/Instagram to receive the information that you have accessed on the corresponding page of Exponea website. If you are logged with Facebook/Twitter/LinkedIn/Google/Instagram, it will be able to assign your visit to your account on these social networks. Please note that an exchange of this information already takes place when you visit our website regardless of whether you interact with the plugin or not. If you do not want Facebook/Twitter/LinkedIn/Google/Instagram to gather data about you via our website, you must log out of them before visiting Exponea website. For more information regarding how these social networks process your data in their privacy policies:

a) Facebook: https://www.facebook.com/legal/FB_Work_Privacy

b) Twitter: <https://twitter.com/en/privacy>

c) LinkedIn: <https://www.linkedin.com/legal/privacy-policy>

d) Instagram: <https://help.instagram.com/155833707900388>

e) Google: <https://www.google.com/intl/en-GB/policies/privacy/>

4.3. We use Google Analytics and similar services (e.g. LinkedIn Analytics) that collect **third-party cookies**. The information about your use of the websites (including your IP address) generated by the cookies will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not have full functionality of this website. By using our websites, you acknowledge that Google may process data in the manner and for the purposes set out above. Please see further Google policies at: <http://www.google.com/intl/en/policies/technologies/ads/>.

4.4. We also use **advertisement systems** (i.e. Google Marketing Platform, Google Ads, LinkedIn Ads, Twitter Advertising, Facebook Custom Audience, Google Dynamic Remarketing, Facebook Pixel, GA Audiences and Hubspot that collect third-party cookies on our website. Cookies collected by these advertisement systems will be used by third parties for advertisement purposes. Exponea also uses other cookies trackers for the following purposes:

- 4.1.1.1. Hotjar (to record sessions of visitors on our site);
- 4.1.1.2. Google Tag Manager (to manage HTML/JS tags);
- 4.1.1.3. Leadfeeder, Influx2, Saleloft and G2Crowd (to find leads who would benefit from our services);
- 4.1.1.4. Exponea SDK (to track user's interaction with the website);
- 4.1.1.5. Marketo and Hubspot (to track who downloads our content);
- 4.1.1.6. Drift (to run our chatbot and collect insights into how our users navigate the website);
- 4.1.1.7. Intercom (our online chat function to ask questions about the Exponea application).

4.5. You may refuse the use of cookies by selecting the appropriate settings in the site's cookie banner. Please see section 3 for more details.

5. SHARING OF INFORMATION COLLECTED

5.1. Exponea will share your personal data with third parties only in the ways that are described in this Privacy policy. We use trusted third parties to provide services on our behalf, such as marketing, analytics, credit card processing, shipping, live chat service, webhosting and others. Any such third parties are available herein (mainly in Section 4) and at this link:

https://exponea.com/terms-of-service/list_of_sub-processors_and_sub-contractors.pdf

5.2. Subject to the previous paragraphs, your personal data shall not be shared or provided to any other third party without your consent except for the following cases: (i) where Exponea is obliged to provide personal data by law or an order of public authority; or (ii) if personal data sharing is specifically allowed by applicable law.

5.3. If third-party providers are established outside of the EU/EEA, Exponea shall ensure that it cooperates only with third-party providers that are located in countries that ensure adequate levels of protection based on the European Commission's adequacy decision, or that Exponea has entered into agreements with corresponding Standard Contractual Clauses that ensure adequate safeguards with respect to the protection of the privacy and fundamental rights and freedoms of individuals or that the third-party provider complies with EU-US Privacy shield or Swiss-US Privacy Shield Principles. Please find the link of our sub-processors here:

https://exponea.com/terms-of-service/list_of_sub-processors_and_sub-contractors.pdf

6. SECURITY

6.1. **Exponea is committed to store your data securely.** Therefore, we have implemented technical and organizational security measures in an effort to safeguard the personal information in our custody and control (which do not, however, deprive you of your duty to take proper steps to secure your data, particularly for the transmission of data to our Account). The aim is to eliminate unauthorised or unlawful processing of your personal data or the accidental, unauthorised or unlawful accessing, use, transferring, processing, copying, transmitting, alteration, loss or damage of your data. Despite all efforts to meet the rules set out in applicable legal regulations, it is not possible to ensure the security of your data if it is transferred or transmitted in an unsecured way. We will protect your data, including but not limited to, in the following ways: using

cryptography, where necessary; using passwords or secured token protection, where necessary; and restricting access to you data (i.e. access to your personal data is granted only to those of our employees or contractors for whom the access is necessary).

6.2. While we endeavor to always protect our systems, website and information against unauthorized access, use, modification and disclosure, due to the inherent nature of the Internet as an open global communications vehicle and other risk factors, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others, such as hackers.

7. DATA RETENTION

7.1. Generally personal data shall be kept for as long as necessary for the purpose for which it was processed. For how long Exponea will hold your personal data will as well depend on the legal basis on which your data is processed. Shall the processing be based on legitimate interest your data will be processed for as long as the given legitimate interest of Exponea is in place and shall be erased after. For data kept based on legal obligations the data retention period is prescribed by applicable legal regulations and shall be deleted once the legally prescribed time period lapses. For data processed based on performance of a contract the data is processed for the duration of the contractual relationship and for an applicable limitation period. This data is then erased after. Shall the processing be based on your consent your personal data shall be erased after you withdraw your consent. Please bear in mind that the same data may as well be processed based on other legal basis in which case your withdrawal of consent might not mean a full erasure of your data.

8. EXPONEA AS A DATA PROCESSOR

8.1. While using our Services, our Customers may be providing us with their clients' personal data. This data may include following: (IP) address, name, surname, gender, email address, login information, time zone setting, operating system and platform, information about visits including the URL, the search terms, information about what you viewed or searched on our website, page response times, download errors, length of visits to certain pages, page interaction information, (such as scrolling, clicks, and mouse-overs) and the methods used to browse away from the page, activities of users, browsing web pages.

8.2. Exponea analyzes our Customers' clients' personal data to build individual profiles. These profiles are used to predict future interests and display targeted (online) advertisement. The aim is to provide Customers' clients with offers that are relevant and interesting for them. The profiling is based on (surfing) behaviour of our Customers' clients on the Internet. Exponea does not make any decisions based solely on automated processing which produce legal effects concerning our Customers' clients or which significantly affect our Customers' clients. We conduct profiling solely for the purpose of providing them with more attractive offers for the purchase of goods and/or Services and customizing the content of websites according to our Customers' clients' preferences. Exponea processes this data as the Processor within the meaning of Article 4 (8) GDPR. The Customers have the obligation to ensure that they have collected their clients' respective consents and approval in order to process such data in accordance with GDPR , other applicable data protection law and the General Terms and Conditions – Exponea Platform or Data Protection Addendum.

8.3. **Exponea Application.** Access to your Exponea Application is protected with username and password. You are responsible for maintaining the confidentiality of your credentials, and we strongly recommend that you do not disclose your username or password to anyone. We will never ask you for your password in any unsolicited communication. Please notify our Data Protection Officer immediately of any unauthorized use of your account credentials or any other suspected breach of security. You can find out more about how we process information of our Exponea application user's here: <https://docs.exponea.com/docs/app-data-processing-notice>.

9. YOUR RIGHTS

9.1. You have the right to obtain from us **confirmation as to whether we process your personal data**. If you would like to obtain such confirmation, contact our Data Protection Officer via contact form available at <https://exponea.com/legal/control-your-data/> . If your personal data is processed by us, we will provide you with an access to such personal data and the following information: (i) the purposes of the processing, (ii) the categories of personal data concerned, (iii) the recipients or categories of recipients to whom the personal data have been or will be disclosed, (iv) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period, (v) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal

data concerning the data subject or to object to such processing (vi) the right to lodge a complaint with a supervisory authority, (vii) where your personal data are not collected from you, any available information as to their source, (viii) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. There is a possibility of obtaining a copy of your data directly from our website within the section <https://exponea.com/legal/control-your-data/> where you can download data Exponea processes about you as a controller.

9.2. You have the right to obtain from us without undue delay the **rectification of inaccurate personal data** concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement. If you would like to realise this right, please contact our Data Protection Officer via the contact form available at <https://exponea.com/privacy-policy/#contact-dpo>.

9.3. You have the **right to obtain from us the erasure** of your personal data without undue delay where you no longer wish we process your personal data on the basis of your consent. If you would like to realise this right, please visit section <https://exponea.com/legal/control-your-data/> on our website where you have an opportunity to delete the data Exponea processes for the purposes of website personalisation, pre-contractual relationships, hiring and direct marketing (non-customers). Please bear in mind that we cannot erase your personal data which we obtained from you when you bought our Services as we process this data not on the basis of your consent but on the basis of the Agreement we entered into.

9.4. You have the **right to obtain from us restriction** of processing where (i) the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of your personal data; (ii) the processing is unlawful and you oppose the erasure of your personal data and request the restriction of their use instead; (iii) we no longer need your data for the purposes of processing, but your personal data are required for the establishment, exercise or defence of legal claims; (iv) you have objected to processing in connection with the profiling (see more in section 3 hereof) pending the verification whether our legitimate grounds override yours. If you would like to realise this right, contact our Data Protection Officer via the contact form available at <https://exponea.com/legal/control-your-data/>.

- 9.5. You have the right to **receive your data** in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller. If you would like to realise this right, please visit the section <https://exponea.com/legal/control-your-data/> on our website. Please be aware that only data you have provided us with, and we process as a controller on the basis of your consent or performance of contract is covered by the right to data portability.
- 9.6. You have the **right to object** to processing of your personal data where (i) Exponea processes your personal data on its legitimate interest or for the purposes of direct marketing. If you would like to realise this right, please visit <https://exponea.com/legal/control-your-data/>.
- 9.7. If you feel that your data has been processed unlawfully, contact our Data Protection Officer via contact form available at <https://exponea.com/privacy-policy/#contact-dpo> who will undertake to resolve the problem. You have **the right to lodge a complaint** with Office for Personal Data Protection of the Slovak Republic. (Find the link here: <https://dataprotection.gov.sk/uouu/>), or with your relevant supervisory authority (for contact details please see: https://edpb.europa.eu/about-edpb/board/members_en).
- 9.8. If you feel that Exponea as the processor processes your data unlawfully, contact our Data Protection Officer via this contact form: <https://exponea.com/privacy-policy/#contact-dpo>. In this case Exponea will pass your request to the data controller.

10. California Consumer Privacy Act of 2018 (“CCPA”) Notice

- 10.1. Consumers residing in California have some additional rights in respect to their personal information under the California Consumer Privacy Act or (“CCPA”). If you are a California resident, this section applies to you and supplements the above policy.
- 10.2. You have a **right to be informed** about what personal information is collected about you. You can find what personal information is collected about you under Section 1 of this Privacy Policy.
- 10.3. You have a right to **request access** to data processed by Exponea, upon your request you will receive:
- The categories of personal information the Exponea collects about you

- The categories of sources of your personal information
- The business or commercial purpose for collecting your personal information
- The categories of any third parties Exponea shares your personal information with
- The specific pieces of personal information collected about you

You may exercise your rights here <https://exponea.com/legal/control-your-data/>

10.4. You have a right to **request the deletion** of personal information that Exponea holds about you. This right does not apply where Exponea needs to retain the personal information to:

- Provide goods or services to you
- Carry out any actions for internal purposes that you might reasonably expect
- Detect or resolve issues security or functionality-related issues
- Comply with the law
- Conduct research in the public interest
- Safeguard your right to free speech

You may exercise your rights here <https://exponea.com/legal/control-your-data/>

10.5. You have a **right not to be discriminated** against for exercising your rights under the CCPA. If you feel this right has been breached please contact our DPO at dpo@exponea.com

10.6. You have the **right to object to the sale** of your personal data to third-parties. Under CCPA, “selling” information occurs when personal information is shared in exchange for valuable consideration. This includes sharing data which identifies your device such as cookies. We use third party cookies and other technologies to better understand our users’ needs and to optimize our services and user experience.

You may exercise your rights here <https://exponea.com/legal/opt-out/>

11. Data Protection Officer

10.1. Exponea has designated a Data Protection Officer whom you have the right to contact with regard to all issues related to processing of your personal data and to the exercise of your rights. For more information about your rights please see Section 9.

10.2. If you feel that Exponea does not abide this Privacy Policy, you can contact our Data Protection Officer via

a) post: DPO, Exponea s.r.o., City Business Center I, Karadžičova 8/7244, 821 08

Bratislava – mestská časť Ružinov, Slovakia

b) contact form: <https://exponea.com/privacy-policy/#contact-dpo>

10.3. Data subjects may contact Exponea's Data Protection Officer with regard to all issues related to processing of their personal data and to the exercise of their rights under this Privacy Policy.

12. Final provisions

11.1. Our website is not directed to individuals under the age of eighteen (18). If you are under eighteen, do not provide your personal information on or to the website. We do not knowingly collect any personal information from children under eighteen on the Site. Users who are below the age of eighteen (18) (or the age of majority in the applicable jurisdiction) should not use the website without authorization from a parent or legal guardian.

11.2. If for any reason, any provision herein is found void or unenforceable, it will be severed to the extent void or unenforceable and the remaining provisions will continue in full force and effect.

11.3. The provisions of this Privacy Policy shall apply from the Effective Date stated above.

11.4. We may choose to make changes to this Privacy Policy at any time. If we decide to change this Privacy Policy, we will post the changes on our website and/or other places we deem appropriate. We may, but are not obligated, to send you an email or other notification of such change; but you should review this Privacy Policy from time to time for significant changes.