

EXPONEA PRIVACY POLICY – SMALLBIZ PLATFORM

Version, Effective Date: 1.0, 24.05.2018 – 31.08.2018

1. Initial provisions

- 1.1. **Exponea s.r.o.**, with its registered office at Twin City B, Mlynské Nivy 12, 821 09 Bratislava – Staré Mesto, 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 Customers using SmallBiz platform and individuals who visit smallbiz.exponea.com (“our website”), 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 all Customers using SmallBiz platform and visitors of our website (all the beforementioned 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 GDPR and General Terms and Conditions – SmallBiz platform.

2. PERSONAL DATA

- 2.1. If you are interested in using SmallBiz platform, you have to firstly register on our website smallbiz.exponea.com. Within the registration process, you will provide us with only with your **email address**. Once you have registered, you will receive an email from us which will contain a “sign-up button”. After clicking on the sign-up button, you will be redirected to a sign-up page and asked to insert your email address and **password**. Afterwards, you will gain an access to the SmallBiz platform, in which you can create projects. You will have to create a **name for each project** and allocate your URL, i.e. **domain name** to each project. Thereafter, you will need to integrate our SmallBiz platform into your website. Processing these data (email, password, project name, domain name) is necessary for your usage of our SmallBiz platform. The legal ground for processing this data is **contract**, i.e. Article 6 (1) b) GDPR. Exponea processes this data as the Controller within the meaning of Article 4 (7) GDPR.
- 2.2. Once you integrate our SmallBiz platform into your website, we will start collecting following non-personal data on your website: page view at cookie level, product ID, product price, product quantity . None of these data are considered as personal data pursuant to GDPR. For example, we are able to find out how many times your website has been seen visited per day, however, we are not able identify individuals who visited your website. All these non-personal data will be used within SmallBiz platform for creating banners/experiments which will be placed on your website.
- 2.3. If you enable **cookies** in your browser, we may collect following data about you: (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. The data such collected will enable us to improve your experience on our websites, manage and improve our website, to ensure that content from our websites is presented to you in the most effective manner. The legal ground for processing cookies is our **legitimate interest** given according to the Article 6 (1) f) GDPR. The data obtained through cookies is processed until you disable using cookies through your web browser settings. For more information about how to disable using cookies please see Section 3 hereof.

3. COOKIES ON OUR WEBSITES

- 3.1. Our website uses cookies to collect information about individuals who visit our website. Cookies are small encrypted text files that are stored on your computer or other device. Cookies help us to operate our website, provide important features and functionality on our website. They help us to understand how our website is being used. We use cookies for statistical purposes, for example to track and monitor, what country, what pages and what method, was used to visit our website. We can also do profiling. Additionally, cookies help us deliver online advertising that we believe is most relevant to you. 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. Cookies can help us to understand how our website is being used, for example, by telling us if you get an error messages as you browse. For more information about cookies please visit <http://www.allaboutcookies.org/>

- 3.2. When you visit our website, you are informed through a **cookie banner** placed at the bottom of our website that we collect cookies.
- 3.3. We use the following types of cookies: (i) essential cookies, which are essential for the provision of access to our websites; (ii) functionality cookies, which are crucial for the proper functioning of our websites (if these cookies are disabled, our website may not work properly); (iii) performance cookies, which do not identify you individually (until you enter your identification details in any of our forms) but help us to personalise your content in accordance with your actions on our websites; and (iv) targeting/advertising cookies, which help make advertisements more relevant to visitors of our website.
- 3.4. If you wish cookies not to be collected, you may restrict, block or delete the cookies at any time by modifying your browser configuration. Although each browser is parameterized differently, cookie configuration is normally located on the "Preferences" or "Tools" menu. If you turn off cookies, the functionality of our website may be limited (in the case of essential cookies you may not be able to access our website).
- 3.5. If you wish to prevent new cookies from being installed or if you wish to **delete existing cookies** you can find the instructions on the links below. The exact procedure depends on which browser you are using.
 - a) Internet Explorer
<http://windows.microsoft.com/en-GB/internet-explorer/delete-manage-cookies>
 - b) Firefox
<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
<https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>
 - c) Google chrome
<https://support.google.com/chrome/answer/95647?hl=en>
 - d) Safari
<http://help.apple.com/safari/mac/8.0/#/sfr111471>
- 3.6. Our SmallBiz platform 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 (see above).

4. DIRECT MARKETING

- 4.1. If you are using our SmallBiz platform, there are three different situations in which we may email you:

No.	Purpose	Legal base for processing	Your rights
1.	Sending email communication in connection with the usage of SmallBiz platform (upgrades, feedback)	Legitimate interest	Right to object
2.	Direct marketing of our similar products/services	Legitimate interest	Right to object
3.	Direct marketing of third parties (e.g. sending you discount vouchers for conferences organized by third parties)	Consent	Right to withdraw

4.2. 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 emails from us. The opt-out choice may be exercised by clicking on the “unsubscribe” link located at the bottom of our marketing emails.

5. THIRD PARTY WEBSITES

5.1. **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.

5.2. Exponea is currently using so-called **social plugins** from the following social networks: (i) facebook.com, (ii) twitter.com, (iii) linkedin.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 to your browser, which then integrates it into our website. Integration of the plugins causes Facebook/Twitter/LinkedIn to receive the information that you have accessed on the corresponding page of Exponea website. If you are logged with Facebook/Twitter/LinkedIn, 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. 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>

5.3. 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 consent to the processing of your data by Google 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/>.

5.4. We also use the **advertisement systems** that (i.e. DoubleClick, Google AdWords, LinkedIn Ads, Twitter Advertising, Facebook Custom Audience, Google Dynamic Remarketing, Facebook Pixel, GA Audiences, BeesWax) collect third-party cookies on our website. Cookies collected by these advertisement systems will be used by third parties for the advertisement purposes. Exponea also uses other cookies trackers for following purposes: IP Mappers (to decode IP address to country), Hotjar (to record sessions of visitors on our site), Google Tag Manager (to manage HTML/JS tags), LeadForensics (to identify anonymous customers and assign them to known companies), Intercom (online chat to ask questions about Exponea application), LiveRamp (data enrichment system). You may refuse the use of cookies by selecting the appropriate settings on your browser. For more information please see Section 3 hereof.

6. SHARING OF INFORMATION COLLECTED

6.1. 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 5) and at this link:

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

- 6.2. 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.
- 6.3. If third-party providers are established outside of the EU/EEA, you agree that we may transfer your data or data of your Clients to these third parties. In such cases, 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 or otherwise permitted by the applicable data protection legislation. Please find the link of our sub-processors here:
https://exponea.com/terms-of-service/list_of_sub-processors_and_sub-contractors.pdf

7. SECURITY

- 7.1. **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).
- 7.2. 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.
- 7.3. To provide you with increased security, access to certain personal information stored in your account is protected with your username and password. you are responsible for maintaining the confidentiality of your our credentials, and we strongly recommend that you do not disclose your Account username or password to anyone. We will never ask you for your password in any unsolicited communication. Please notify our Data Protection Officer: <https://exponea.com/privacy-policy/#contact-dpo> immediately of any unauthorized use of your account credentials or any other suspected breach of security.

8. YOUR RIGHTS

- 8.1. You have the right to obtain from us **confirmation as to whether or not we process your personal data**. If you would like to obtain such confirmation, please contact our Data Protection Officer via this contact form: <https://exponea.com/privacy-policy/#contact-dpo>. 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. you will be provided with a copy of your personal data undergoing processing.
- 8.2. 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.

- 8.3. 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. This means that if you no longer wish we send you newsletters via email or if you wish to delete your account on our website, you can contact us and we will delete all your personal data we processed for such purposes.
- 8.4. 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 12 hereof) pending the verification whether our legitimate grounds override yours.
- 8.5. You have the right to receive your personal data, which you have provided to us, 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 receive such data or if you would like us to transmit such data to another provider please contact us at <https://exponea.com/privacy-policy/#contact-dpo>
- 8.6. 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 the supervisory authority, Office for Personal Data Protection of the Slovak Republic. Find the link here: <https://dataprotection.gov.sk/uouu/>
- 8.7. 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 data controller.

9. Data Protection Officer

- 9.1. Exponea 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 8.
- 9.2. If you feel that Exponea does not abide this Privacy Policy, you shall contact our Data Protection Officer by
- a) post: DPO, Exponea s.r.o., Twin City B, Mlynské Nivy 12, Bratislava - mestská časť Staré Mesto 821 09, Slovakia
 - b) contact form: <https://exponea.com/privacy-policy/#contact-dpo>
- 9.3. Data subjects may contact the data protection officer with regard to all issues related to processing of their personal data and to the exercise of their rights under this Regulation.

10. Final provisions

- 10.1. 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 our website. 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.
- 10.2. 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.
- 10.3. The provisions of this Privacy Policy shall apply from the Effective Date stated above.
- 10.4. 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.