

IMPORTANT – PLEASE READ CAREFULLY

Introduction

Cleeng B.V., (“**Cleeng**”, “**we**”, “**us**”, “**our**”) offers subscriber retention management and directly or through its affiliate Cleeng llc offer certain merchant services. This Privacy Policy explains what personal information Cleeng collects, uses, shares and otherwise processes about individuals that visit its website Cleeng.com (“**Site**”) or that use its Merchant Module services (“**you**”). This Privacy Policy is meant to help you understand why and how we use your personal data. This is important, and we would appreciate you taking the time to carefully read our Privacy Policy so that you understand how we treat your personal data. If you have any questions or comments about our Privacy Policy or your dealings with Cleeng, feel free to contact us. You can find our contact details below under ‘Contact’.

What personal data do we process

We process your personal data. In this privacy statement we inform you about the personal data we process as a ‘data controller’ within the meaning of the General Data Protection Regulation (“**GDPR**”). Personal data processed by Cleeng includes personal data relating to (i) persons visiting our Site (“**visitors**”), (ii) persons that use our products and services including end-users of the Cleeng Merchant Module (“**users**”) and (iii) persons applying for a job, internship or to do other work at Cleeng (“**applicants**”). Cleeng processes the following personal data:

(i) Visitors:

- Technical information: your device information (such as a MAC address), the internet browser used by you, your IP address, information collected via cookies, such as your cookie ID, preferences, information about your visits to our Site (e.g. as the number of visits, average time spent on the website and what pages have been loaded). See for more information our Cookie Policy;
- Information provided by you in the context of sweepstakes, contests or promotions sponsored by us or a third party that you enter;
- Information we may acquire from a social media provider after you click on a social media button (such as your public profile information);
- Communications between you and us.

(ii) Users:

- Your name and contact information (email address, telephone number, company);
- Your payment information (e.g. currency, bank account or credit card details, details regarding transactions);
- Account information, such as your password, log-in details, whether you have used a trial period, products and services you are using and purchases made by you;
- Communications between you and us.

(iii) Applicants:

- Your name and contact information (your address, email address, address, telephone number);
- Your resume information and application information (e.g. previous employers, education, cover letter, references);
- Communications between you and us.

For what purposes do we process personal data and on what legal bases

We may only process personal data if a valid legal basis exists. We therefore only process the above mentioned data if:

- the processing is necessary for the performance of an agreement with you or in order to take steps at your request prior to entering into an agreement, for example when we handle job applications and process transactions ("**fulfilment of agreement**");
- the processing is necessary for the purposes of the legitimate interests pursued by Cleeng or by another person, and those interests outweigh the interests or fundamental rights of the person whose data are concerned, as is the case, for example, when we use contact details for maintaining our business relationships (hereinafter "**legitimate interest**"); or
- you have given your consent to the processing ("**consent**")

The tables below state for which purposes we process personal data on persons and on what legal basis.

Visitors:

Purpose

Legal basis

Website functionality and analytics

Legitimate interest (specifically: our business interest to have a well-functioning and relevant website in place), where appropriate: consent

Communications with you (as initiated by you: e.g. by email or phone)

Legitimate interest (specifically: our business interest, our and your interest to respond to your questions and requests) or performance of the agreement

Marketing (product updates, mailings, newsletters, contests etc.)

Consent, legitimate interest (specifically: our business interest)

Applicants:

Purpose

Legal basis

Considering your application

Contract, legitimate interest (specifically: our business interest to recruit workforce),
where appropriate: consent

Communication with you

Contract, legitimate interest (specifically: our business interest to recruit workforce)

Users:

Purpose

Legal basis

Communication with you

Contract, legitimate interest (specifically: our business interest to respond to questions
and requests)

Execution of orders, transactions and provision of products and services to you

Contract

Marketing (product updates, mailings, newsletters)

Consent, legitimate interest (specifically: our business interest to maintain customer
relationships)

With whom we may share personal data

We will not share your personal data with third parties without informing you through this Privacy Policy. At this time, we share your personal data in particular situations with the following categories of recipients:

- our affiliates for the purposes described in this Privacy Policy;
- social media users and social media providers in connection with your sharing activity in connection to the social media button on the Site. If you choose to use a social media button you authorize us to share personal data, and you understand that the use of the personal data will be governed by the social media site's privacy notice. Cleeng and the social media provider then qualify as joint data controllers. Please review the privacy policies of the social media platforms prior to using the social media button on the Site:

Facebook

Twitter

Linkedin

Youtube

- IT systems and service providers and other third parties engaged to assist Cleeng in carrying out or administrating its business;
- We may share your personal data that is collected through the cookies and by parties mentioned in our Cookie Policy, for analytic purposes. We may share your name and email address with Mailchimp for direct marketing;
- professional advisors and auditors to Cleeng; and

- legal and regulatory authorities, courts, tribunals, government agencies and law enforcement agencies.

Finally, we may disclose your personal data in specific situations with your consent or in case of a legal obligation

How long do we retain your personal data

We do not retain personal data any longer than necessary for the purposes for which the personal data are processed.

- Technical information: 1 year;
- Analytics information: see our Cookie Policy;
- Communications between you and us: legal retention period, in order to comply with laws or regulations in The Netherlands we must store certain data required for our bookkeeping for this period;
- Your name and contact information: legal retention period in order to comply with laws or regulations in The Netherlands we must store certain data required for our bookkeeping for this period;
- Payment, ordering and invoice information: seven years, in order to comply with laws or regulations in The Netherlands we must store such data required for our bookkeeping for this period;
- Your account information: legal retention period in order to comply with laws or regulations in The Netherlands we must store data required for our bookkeeping for this period;

- Job application data: data on Applicants are removed four weeks after the end of the selection procedure, unless the person is employed by us or consents to an extended retention hereof (and ultimately for a year).

How we protect your personal data

We take the protection of your data seriously and take appropriate measures to prevent misuse, loss, unauthorized access, unwanted disclosure and unauthorized changes. If you have the impression that your data is not properly secured or there are indications of abuse, please contact us at [support@publisher-cleeng.zendesk.com]. We are SOC Type 2 certified and follow the measures set out in the SOC Type 2 framework in the respect of the protection of personal data.

Your rights with regards to your personal data

The GDPR gives you the following rights with regard to personal data relating to you:

- The right to request whether or not personal data concerning them are processed, and, if this is the case, to get access to these;
- The right to request rectification and erasure of these personal data;
- The right to object the processing or to ask for a restriction of the processing;
- The right to withdraw the consent to the processing, if the processing is based on your consent;

- The right to receive your personal data or have this transmitted to an organisation designated by you, in a structured, commonly used and machine-readable format;
- Depending on the country where you live, the right to file a complaint with a supervisory authority that monitors the compliance with the rules for the protection of personal data. In the Netherlands, this is the *Autoriteit Persoonsgegevens* (www.autoriteitpersoonsgegevens.nl).

We will deal with a request in connection with the exercise of these rights in the manner as prescribed by law. However, these rights are not absolute; they do not apply under all circumstances and the applicable rules provide for exceptions. If we do not grant your request, we will explain to you why. In order to exercise these rights, you can send an email to [support@publisher-cleeng.zendesk.com]. You can also use this email address if you wish to file a complaint about the manner in which we have processed your personal data.

Do we transfer your personal data internationally?

We are a global business and we, or our service providers, may process, transfer, and store information about you on servers located in countries outside the European Union (EU) and European Economic Area (EEA), including in the United States. If such a situation presents itself, and personal data are transferred to a country outside the EEA that provides less legal protection to personal data, we will provide for appropriate safeguards in order for the transfer to take place in accordance with the

privacy laws here. We may do this by concluding a contract with the recipient in accordance with a format that the European Commission or a national supervisory authority has approved for this purpose, see in particular the EU Standard Contract Clauses (Article 46(2) GDPR). You can access this documentation on the European Commission website (see here, as updated from time to time). We may also rely on the derogations in Article 49 GDPR, such as your consent or necessity to perform the contract between you and Cleeng.

Cookies and similar technologies

Cookies are files or pieces of information that may be stored in your computer's hard drive when you visit a website. We use cookies to recognize a device when a person visits our Site. We use cookies to better tailor our Site and our products to your interests and needs. Cookies may also be used to help speed up your future activities or improve your user experiences by remembering the information that you have already provided to us. Cleeng uses cookies on the Site. For more information about the cookies that Cleeng uses, please see the Cookie Policy.

Contact

Should you have any questions regarding this Privacy Policy or would like to use your personal data protection rights described above, please contact us at support@publisher-cleeng.zendesk.com.

For any questions regarding the data processing via social media buttons, please

contact one of our joint data controllers:

Facebook, Inc. can be reached online or by mail at: Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland. You can contact Facebook's data protection officer [here](#).

Twitter International Company can be reached online or by mail at: Twitter International Company, Attn: Data Protection Officer, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 IRELAND. You can contact Twitter's data protection officer [here](#).

LinkedIn Ireland Unlimited Company can be reached online or by mail at: Attn: Legal Dept. (Privacy policy and user agreement), Wilton Plaza, Wilton Place, Dublin 2, Ireland. You can contact LinkedIn's data protection officer [here](#).

Youtube can be reached online.

Amendments

This policy will be reviewed at least once a year and will be approved by our data protection officer. This current policy was last reviewed on Mar 29, 2022.

If we amend this policy in the future, we will publish the amended statement on our site, stating the date on which the amendments will take effect. If there are

amendments that affect one or more data subjects to a considerable degree, we will do our best to also directly inform these data subjects about this.

March 29th, 2022.