

Privacy Policy

1 Introduction

- 1.1 At Altura B.V. (**us, we, our**), we value your privacy and the importance of safeguarding your data and we are committed to comply with all the laws, rules and regulations related to data protection including, but not limited to, the General Data Protection Regulation (**GDPR**).
- 1.2 This privacy policy (the **Policy**) applies to the situation where we determine the purpose and means of the processing of Personal Data and act as the **Data Controller** and describes our privacy practices for the activities set out below. As per your rights, we inform you how we collect, store, access, and otherwise process information relating to individuals. In this Policy, personal data (**Personal Data**) refers to any information that on its own, or in combination with other available information, can identify an individual. Where we process Personal Data on behalf of our customers, acting as **Data Processor**, we will always comply with the Data Protection Agreement in place between our customer and us.
- 1.3 Altura, located at Sarphatikade 8, 1017 WV Amsterdam, The Netherlands, is responsible for processing your Personal Data.
- 1.4 This Policy applies to our websites, domains, applications, products and services, and applies when you interact with us by (i) making use of our products and services, (ii) visiting our website or (iii) otherwise interacting with us.

2 Processing of your personal data

- 2.1 The Personal Data we collect. The Personal Data we collect about you depends on the nature of your dealings with us or what you choose to share with us. Information collected in relation to our products and services may contain the type of actions performed, log data of activity, as well as other information. This information may be linked to you, and we may use this information to better provide technical support to you and to improve our products and services. The Personal Data we further collect about you may include:
 - (i) First and last name;
 - (ii) email address;
 - (iii) phone number;
 - (iv) IP address;
 - (v) Location;
 - (vi) Time-zone;
 - (vii) Profile picture(optional);
 - (viii) other Personal Data that you actively provide, for example through information requests, by creating a profile on our website, in correspondence and by telephone.

2.2 How we collect Personal Data. We receive your Personal Data in a few different ways, including when you share this information with us directly or through third parties. You may give us your information by filling in forms, using our products or services, entering information online or by corresponding with us by post, phone, email, telephone or otherwise. This includes Personal Data you provide, for example, when you:

- (i) **Create an account:** If you want to use our products and services, you are required to create an account with us. To create an account, we need some information from you. This may, in certain cases, include Personal Data (such as your name, email address or phone number). Without this data, we are not able to provide our services.
- (ii) **Contact us:** You can contact us through the contact option on our website. You can also contact us directly via email. In both cases, we will have at least your email address and name. Further information you provide to us may also contain Personal Data. We use this Personal Data to contact you so that we can answer your question and handle it. If you are not a registered user with an account, we will delete your personal data as soon as your issue or question is resolved and you do not wish to continue using our services. From users with an account we often already have this information in another context and from them the information is therefore often kept longer (see also 2.2(i)).
- (iii) **Use tools:** Through our products and services, you can use various tools. You can also upload documents. Such documents may contain Personal Data. When you use any of our tools, we have a dual role with respect to the data you provide to us through them. On the one hand, with respect to the data you provide to us, you yourself are the Data Controller and we are the Data Processor. By uploading the documents and using our tools, you instruct us to process that Personal Data for the purpose you choose (the use of a particular tool). That processing is subject to our Data Processing Agreement. On the other hand, we also use the Personal Data you provide ourselves in a manner and for a purpose determined by us, namely the further development of our services and products as well as the development of our algorithms, which ultimately benefits our customers. With respect to that processing, we are the Data Controller and it is that processing that this Policy governs.
- (iv) **Visit our website:** Every time you visit our website, data is collected in the background by means of technologies such as cookies (see also our Cookie statement on our website). Cookies are simple small files that are sent with pages of the website and stored by your browser on the hard drive of your device. More information about enabling, disabling and deleting cookies can be found in the instructions and/or by using the help function of your browser. For example, cookies and similar technologies may collect your IP address, information about your browser and device, and information about which pages you visit and about how you navigate our website. This Personal Data is used by us to compile user statistics, among other things.

2.3 Interactions on our website. As you interact with our website, we may automatically collect the following types of data (all as described above):

- (i) device data about your equipment,

- (ii) usage data about your browsing actions and patterns, and
 - (iii) contact data where tasks carried out via our website remain uncompleted.
- 2.4 We collect this data by using cookies, server logs and other similar technologies. Please see our cookie section (on our website) for further details.

3 Purpose and legal basis

3.1 Business purposes. We use the information we collect from you to provide, maintain, protect, and improve products and services, and to develop new ones. In addition, we may use the information for one or more of the following purposes:

- (i) To provide information that you request from us relating to our products or services;
- (ii) To provide you with information, such as information about any changes, offers, updates, or other announcements, related to the products and services provided by us;
- (iii) To provide you with customer and/or technical support;
- (iv) To gather analysis or valuable information so that we can improve our products and services;
- (v) To monitor the usage of our products and services, as well as our website;
- (vi) To detect, prevent, and address technical issues;
- (vii) To market and sell our products and services; and/or
- (viii) To comply with applicable laws and regulations.

3.2 Website. When you use our website, we process technical data to offer you the functionalities of our website and to allow our website's administrators to manage and improve our website's performance (**Log Data**). This Log Data may include information such as your computer's IP address, browser type, browser version, the pages of our website that you visit, the time and date of your visit, the time spent on those pages and other statistics. In addition, if you enter data on our website, we process this data to provide you with information or functionalities. In addition, we process Personal Data to allow you to save your data, such as your preferences. We also use cookies to ensure that you can retrieve information from our website quickly. You can read more about our use of cookies on our website. We process Personal Data for this purpose based on our legitimate interest in providing the functionalities of our website and, if you agree to the use of non-strictly necessary cookies, based on your consent.

3.3 Compliance with the law. We may be required to process your Personal Data to comply with applicable laws and regulations, for example in the event of tax-related obligations. In connection with this purpose, we may need to disclose your Personal Data to governmental or supervisory authorities.

3.4 Legal basis. All in all, we rely on the following legal bases to collect, use, share and otherwise process your Personal Data:

- (i) as necessary to provide the products services and fulfil our obligations pursuant to any agreement you enter into with us;

- (ii) where you have consented to the processing;
- (iii) where necessary to comply with a legal obligation of whatever nature (including any compliance obligations), a court order, to prevent or limit any damages that we might sustain, or to exercise and defend legal claims; and
- (iv) where necessary for the purposes of our or a third party's legitimate interest.

4 Transfers to third parties

- 4.1 Third parties engaged by us. We may share your Personal Data with trusted third-party service providers, consultants, and other agents that help us in providing, maintaining, protecting, and improving our products and services as well as our website. These service providers only have access to the Personal Data necessary to perform these limited functions on our behalf and are required to protect and secure your information. We take required contractual, technical and organizational measures to ensure that third parties only process your Personal Data to the extent necessary and in accordance with applicable laws.
- 4.2 Third-party links on our website. Our website may contain links to websites operated by third parties. If you access a third-party website through our website, your Personal Data may be collected by that third party through its website. We make no representations or warranties in relation to the privacy practices of any third-party provider or website and we are not responsible for the privacy policies or the content of any third-party provider or website. Third-party providers / websites are responsible for informing you about their own privacy practices and we encourage you to read their privacy policies.
- 4.3 Business transfer. In the event we undergo a merger, acquisition, bankruptcy or any other transaction where a third party assumes control of our business, we may transfer all your Personal Data we have collected from you to such third party and will make reasonable efforts to notify you prior to such transfer.

5 Data transfers

Your personal data will only be stored or processed by us or by third parties engaged outside the European Union (and the European Economic Area) if this is in accordance with the applicable regulations (in particular, the GDPR) for the transfer of Personal Data to countries outside the European Union (and the European Economic Area). This means that we will only pass on your Personal Data to countries outside the European Union (and the European Economic Area) if the European Union has decided that the third country concerned guarantees an adequate level of protection or if other appropriate safeguards are offered, such as an adequacy decision or the use of standard contractual clauses approved by the European Commission.

6 Data retention

- 6.1 Personal Data collected. We only collect Personal Data in relation to the purposes set out in this Policy and do not collect more Personal Data than necessary for those purposes. We also ensure that the Personal Data we collect is accurate and sufficient to properly fulfill those purposes.
- 6.2 Retention period. We will only retain your Personal Data for as long as necessary for the purpose for which your Personal Data was collected and to the extent

required by applicable law. For example, we are required by tax regulations to retain certain Personal Data for a period of seven (7) years. When we no longer need your Personal Data, we will remove it from our systems and/or take steps to anonymize it so you can no longer be identified based on this information.

7 Protection of personal data

We protect and secure your Personal Data to the best of our ability, for example against loss and unlawful processing. Taking into account the state of the art, we provide appropriate technical and organizational measures to ensure a security level appropriate to the risk. We work according to the ISO27001 security standards. Within Altura, only employees have access to Personal Data as necessary for the performance of their duties. Moreover, such employees are subject to confidentiality obligations. Furthermore, our IT infrastructure is professionally secured. We have procedures in place in the event of a data breach or if we suspect one. We will notify the affected Data Subjects and the local data protection authority in the event of a data breach if we are required to do so by law.

8 Your rights

- 8.1 Right to withdraw consent. If we process Personal Data based on your consent, you are allowed to withdraw your consent at any time.
- 8.2 Right to information and access. You have the right to learn whether we are processing your Personal Data and to request a copy of the Personal Data we are processing about you.
- 8.3 Right to rectification, restriction, limitation, deletion. You have a right to have your information rectified, restricted, limited or deleted.
- 8.4 Right to object. Under certain circumstances, you have the right to object to the processing of your Personal Data when we process your Personal Data on the basis of our legitimate interest. In such cases, we will cease processing your Personal Data unless there are compelling legitimate grounds to continue processing or where it is needed for legal reasons.
- 8.5 Right to portability. You have the right to obtain the Personal Data we hold about you, in a structured, electronic format, and to transfer such Personal Data to another data controller, where this is (a) Personal Data which you have provided to us, and (b) we are processing that data based on your consent or to perform a contract with you.
- 8.6 Complaints. If you have a complaint about this Policy or any element of the Personal Data that we hold, then please contact us. If you are not satisfied, then you have the right to lodge a complaint with the local data protection authority.

9 Changes

We may modify this Policy at any time. If we make changes to this Policy, then we will post an updated version of this Policy at this website. When using our services, you will be asked to review and accept our Policy. In this manner, we may record your acceptance and notify you of any future changes to this Policy.

10 Contact us

To contact us, please email us at legal@altura.io