



132 N. York Street, Elmhurst, IL 60126

Aproove Privacy Policy

Effective starting: May 2020

WHAT THIS POLICY COVERS

Your privacy is important to us, and so is being transparent about how we collect, use, and share information about you. This policy is intended to help you understand:

1. What information we collect about you
2. How we use information we collect
3. How we share information we collect
4. How we store and secure information we collect
5. How to access and control your information
6. How we transfer information we collect internationally
7. Why and how are cookies used
8. Other important privacy information

This Privacy Policy covers the information we collect about you when you use our products or services, or otherwise interact with us (for example, by attending our premises or events or by communicating with us), unless a different policy is displayed.

Aproove, we and us refers to Aproove SA, Aproove Technologies Inc. and any of our corporate affiliates. We refer to all our products, services and websites as "Services" in this policy.

This policy also explains your choices surrounding how we use information about you, which include how you can object to certain uses of information about you and how you can access and update certain information about you. If you do not agree with this policy, do not access or use our Services or interact with any other aspect of our business.

Where we provide the Services under contract with an organization (for example, your employer) that organization controls the information processed by the Services. For more information, please see Notice to End Users below. This policy does not apply to the extent we process personal information in the role of a processor on behalf of such organizations.

1. WHAT INFORMATION WE COLLECT ABOUT YOU

We collect information about you when you provide it to us, when you use our Services, and when other sources provide it to us, as further described below.

Information you provide to us

We collect, process and store information about you when you input it into the Services or otherwise provide it directly to us, such as :

- Contact information: your name and your email address or the email address of the recipient(s).
- Information about yourself: location, phone number, city etc.
- Preferences: for example language settings or interests.
- Content and metadata: you may choose to upload or create Content which contains all sorts of personal information about you and others. Such Content also contains a filename, size and filetype.
- Personal messages: the ones you send to people along with sharing your files.

Account and Profile Information: We collect information about you when you register for an account, create or modify your profile, set preferences, sign-up for or make purchases through the Services. For example, you provide your contact information and, in some cases, billing information, when you register for the Services. You also have the option of adding a display name, profile photo, job title, and other details to your profile information to be displayed in our Services. We keep track of your preferences when you select settings within the Services.

Content you provide through our Services: When you use our Services we collect and store content that you post, send, receive and share. This content includes any information about you that you may choose to include. Content also includes the files and links you upload to the Services. If you use a server or data center version of the Services, we do not host, store, transmit, receive or collect information about you (including your Content), except in limited cases, where permitted by your administrator: we collect feedback you provide directly to us through the Services and; we collect content using analytics techniques that hash, filter or otherwise scrub the information to exclude information that might identify you or your organization; and we collect clickstream data about how you interact with and use features in the Services. Server and data center administrators can disable our collection of this information from the Services via the administrator settings or prevent this information from being shared with us by blocking transmission at the local network level.

Content you provide through our websites: The Services also include our websites owned or operated by us. We collect other content that you submit to these websites, which include social media or social networking websites operated by us. For example, you provide content to us when you provide feedback or when you participate in any interactive features, surveys, contests, promotions, sweepstakes, activities or events.

Information you provide through our support channels: The Services also include our customer support, where you may choose to submit information regarding a problem you are experiencing with a Service. Whether you designate yourself as a technical contact, open a support ticket, speak to one of our representatives directly or otherwise engage with our support team, you will be asked to provide contact information, a summary of the problem you are experiencing, and any other documentation, screenshots or information that would be helpful in resolving the issue.

Payment Information: We collect payment and billing information when you register for certain paid Services. For example, we ask you to designate a billing representative, including name and contact information, upon registration. You might also provide payment information, such as payment card details, which we collect via secure payment processing services (Stripe).

Information we collect automatically when you use the Services: We collect information about you when you use our Services, including browsing our websites and taking certain actions within the Services, such as

Your use of the Services: We keep track of certain information about you when you visit and interact with any of our Services. This information includes the features you use; the links you click on; the type, size and filenames of attachments you upload to the Services; frequently used search terms; how you interact with others on the Services. We also collect information about the teams and people you work with and how you work with them, like who you collaborate with and communicate with most frequently. If you use a server or data center version of the Services, the information we collect about your use of the Services is limited to clickstream data about how you interact with and use features in the Services, in addition to content-related information described in "Content you provide through our products," above. Server and data center administrators can disable our collection of this information from the Services via the administrator settings or prevent this information from being shared with us by blocking transmission at the local network level.

Device and Connection Information: We collect information about your computer, phone, tablet, or other devices you use to access the Services. This device information includes your connection type and settings when you install, access, update, or use our Services. We also collect information through your device about your operating system, browser type, IP address, URLs of referring/exit pages, device identifiers, and crash data. We use your IP address and/or country preference in order to approximate your location to provide you with a better Service experience. How much of this information we collect depends on the type and settings of the device you use to access the Services. Server and data center Service administrators can disable collection of this information via the administrator settings or prevent this information from being shared with us by blocking transmission at the local network level.

Cookies and Other Tracking Technologies: Aproove and our third-party partners, such as our advertising and analytics partners, use cookies and other tracking technologies (e.g., web beacons, device identifiers and pixels) to provide functionality and to recognize you across different Services and devices.

Information we receive from other sources: We receive information about you from other Service users, from third-party services, from our related companies, social media platforms, public databases, and from our business and channel partners. We may combine this information with information we collect through other means described above. This helps us to update and improve our records, identify new customers, create more personalized advertising and suggest services that may be of interest to you.

Other users of the Services: Other users of our Services may provide information about you when they submit content through the Services. We also receive your email address from other Service users when they provide it in order to invite you to the Services. Similarly, an administrator may provide your contact information when they designate you as the billing or technical contact on your company's account or when they designate you as an administrator.

Other services you link to your account: We receive information about you when you or your administrator integrate third-party apps or link a third-party service with our Services. For example, if you create an account or log into the Services using your Google credentials, we receive your name and email address as permitted by your Google profile settings in order to authenticate you. You or your administrator may also integrate our Services with other services you use, such as to allow you to access, store, share and edit certain content from a third-party through our Services. For example, you may authorize our Services to access, display and store files from a third-party document-sharing service within the Services interface. Or you may authorize our Services to connect with a third-party calendaring service or to sync a contact list or address book so that your meetings and connections are available to you through

the Services, so you can invite others to collaborate with you on our Services or so your organization can limit access to certain users. Your administrator may also authorize our Services to connect with a third party reporting service so your organization can review how the Services are being used. The information we receive when you link or integrate our Services with a third-party service depends on the settings, permissions and privacy policy controlled by that third-party service. You should always check the privacy settings and notices in these third-party services to understand what data may be disclosed to us or shared with our Services.

Aproove companies: We receive information about you from Approve affiliated companies.

Aproove Partners: We work with a global network of partners who provide consulting, implementation, training and other services around our products. Some of these partners also help us to market and promote our Services, generate leads for us, and resell our Services. We receive information from these partners, such as billing information, billing and technical contact information, company name, what Services you have purchased or may be interested in, evaluation information you have provided, what events you have attended, and what country you are in.

Other Partners: We receive information about you and your activities on and off the Services from third-party partners, such as advertising and market research partners who provide us with information about your interest in and engagement with, our Services and online advertisements.

Third Party Providers: We may receive information about you from third party providers of business information and publicly available sources (like social media platforms), including physical mail addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), IP addresses and social media profiles, for the purposes of targeted advertising of products that may interest you, delivering personalized communications, event promotion, and profiling.

2. HOW WE USE INFORMATION WE COLLECT

How we use the information we collect depends in part on which Services you use, how you use them, and any preferences you have communicated to us. Below are the specific purposes for which we use the information we collect about you.

- 1) **To provide the Services and personalize your experience:** We use information about you to provide the Services to you, including to process transactions with you, authenticate you when you log in, provide customer support, and operate, maintain, and improve the Services. Our Services also include tailored features that personalize your experience, enhance your productivity, and improve your ability to collaborate effectively with others by automatically analyzing the activities of your team to provide search results, activity feeds, notifications, connections and recommendations that are most relevant for you and your team. To opt out of this personalization, please contact privacy@aproove.com.
- 2) **Customer support:** We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash information, and to repair and improve the Services. Where you give us express permission to do so, we share information with a third party expert for the purpose of responding to support-related requests.
- 3) **Account & billing:** creating and upholding your personal account for example to facilitate your address book and to enable you to access your Content across different devices, facilitating payment of your subscription fee and perform accounting, auditing & billing activities.

- 4) **For safety and security:** We use information about you and your Service use to verify accounts and activity, to detect, prevent, and respond to potential or actual security incidents and to monitor and protect against other malicious, deceptive, fraudulent or illegal activity, including violations of Terms of Service.
- 5) **For research and development:** We are always looking for ways to make our Services smarter, faster, secure, integrated, and useful. We use information and collective learnings (including feedback) about how people use our Services to troubleshoot, to identify trends, usage, activity patterns, and areas for integration and to improve our Services and to develop new products, features and technologies that benefit our users and the public.
- 6) **To market, promote and drive engagement with the Services:** We use your contact information and information about how you use the Services to send promotional communications that may be of specific interest to you, including by email and by displaying Aprovee ads on other companies' websites and applications. These communications may be informed by audits of interactions (like counting ad impressions), and are aimed at driving engagement and maximizing what you get out of the Services, including information about new features, survey requests, newsletters, and events we think may be of interest to you. We also communicate with you about new Services, product offers, promotions, and contests. You can control whether you receive these communications as described below under "Opt-out of communications."
- 7) **To protect our legitimate business interests and legal rights:** Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.
- 8) **To communicate with you about the Services:** We use your contact information to send transactional communications via email and within the Services, including confirming your purchases, reminding you of subscription expirations, responding to your comments, questions and requests, providing customer support, and sending you technical notices, updates, security alerts, and administrative messages. We send you email notifications when you or others interact with you on the Services. We also provide tailored communications based on your activity and interactions with us. We also send you communications as you onboard to a particular Service to help you become more proficient in using that Service. These communications are part of the Services and in most cases you cannot opt out of them. If an opt out is available, you will find that option within the communication itself or in your account settings.
- 9) **With your consent:** We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Services, with your permission.

Legal bases for processing (for EEA users):

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal ground for doing so under applicable EU laws. Each processing activity has a valid legal ground, which is described below.

- **Contractual obligations with you:** regarding the activities and purposes mentioned under 1, 2, 3, 8 and 9. We need to process personal information to offer our Services through our websites and mobile apps, to provide (technical) support and to bill your subscription fee.

- **Legal obligations:** regarding the activities and purposes under 3, 4 and 7. We are legally obliged to process your personal information for accounting purposes, to respond to legal requests and NTD or DMCA requests.
- **Consent:** (partially) regarding activities and purposes mentioned under 2 (e.g. accessing your Content for support), 6 (except when we communicate direct marketing in relation to our own and similar Services to you as a paid user) and 8.
- **Legitimate interests:** (partially) regarding activities and purposes under 1, 3 and 7 (e.g. to provide cross device access). For the purposes mentioned under 4 in order to provide safe Services, to prevent fraud and react against illegal use of our Services. For our innovative interests as mentioned under 5. And finally for our (direct) marketing, brand interests under 6 and legal & compliance interests as stated under 7. When we use your personal information based on our or a third party's legitimate interest, we will make sure to balance your rights and freedoms against said legitimate interest. If, to the extent applicable, you wish to object to the activities based on our legitimate interest and there's no opt-out available in your account settings or received communication, please contact privacy@aproove.com.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

3. HOW WE SHARE INFORMATION WE COLLECT

We make collaboration tools, and we want them to work well for you. This means sharing information through the Services and with certain third parties. We share information we collect about you in the ways discussed below, including in connection with possible business transfers. We are not in the business of selling information about you to advertisers or other third parties.

- 1) **Service Providers:** We work with third-party service providers to provide website and application development, hosting, maintenance, backup, storage, virtual infrastructure, payment processing, analysis and other services for us, which may require them to access or use information about you. If a service provider needs to access information about you to perform services on our behalf, they do so under close instruction from us, including appropriate security and confidentiality procedures designed to protect your information.
- 2) **Sharing with third parties:** We share information with third parties that help us operate, provide, improve, integrate, customize, support and market our Services.
- 3) **Sharing with other Service users:** When you use the Services, we share certain information about you with other Service users.
- 4) **For collaboration:** You can create content, which may contain information about you, and grant permission to others to see, share, edit, copy and download that content based on settings you or your administrator (if applicable) select. Some of the collaboration features of the Services display some or all of your profile information to other Service users when you share or interact with specific content.
- 5) **Managed accounts and administrators:** If you register or access the Services using an email address with a domain that is owned by your employer or organization or associate that email address with your existing account, and such organization wishes to establish an account or site, certain information about you including your name, profile picture, contact info, content and past use of your account may become

accessible to that organization's administrator and other Service users sharing the same domain. If you are an administrator for a particular site or group of users within the Services, we may share your contact information with current or past Service users, for the purpose of facilitating Service-related requests.

- 6) **Aproove Partners:** We work with third parties who provide consulting, sales, support, and technical services to deliver and implement customer solutions around the Services. We may share your information with these third parties in connection with their services, such as to assist with billing and collections, to provide localized support, and to provide customizations. We may also share information with these third parties where you have agreed to that sharing.
- 7) **Third Party Apps:** You, your administrator or other Service users may choose to add new functionality or change the behavior of the Services by installing third party apps within the Services. Doing so may give third-party apps access to your account and information about you like your name and email address, and any content you choose to use in connection with those apps. If you are an administrator, or a technical or billing contact listed on an account, we share your details with the third-party app provider upon installation. Third-party app policies and procedures are not controlled by us, and this privacy policy does not cover how third-party apps use your information. We encourage you to review the privacy policies of third parties before connecting to or using their applications or services to learn more about their privacy and information handling practices. If you object to information about you being shared with these third parties, please uninstall the app.
- 8) **Links to Third Party Sites:** The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. If you submit information to any of those third party sites, your information is governed by their privacy policies, not this one. We encourage you to carefully read the privacy policy of any website you visit.
- 9) **Social Media Widgets:** The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. Your use of and any information you submit to any of those third-party sites is governed by their privacy policies, not this one.
- 10) **Third-Party Widgets:** Some of our Services contain widgets and social media features. These widgets and features collect your IP address, which page you are visiting on the Services, and may set a cookie to enable the feature to function properly. Widgets and social media features are either hosted by a third party or hosted directly on our Services. Your interactions with these features are governed by the privacy policy of the company providing it.
- 11) **With your consent:** We share information about you with third parties when you give us consent to do so. For example, we often display personal testimonials of satisfied customers on our public websites. With your consent, we may post your name alongside the testimonial.
- 12) **Compliance with Enforcement Requests and Applicable Laws; Enforcement of Our Rights:** In exceptional circumstances, we may share information about you with a third party if we believe that sharing is reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, (b) enforce our agreements, policies and terms of service, (c) protect the security or integrity of our products and services, (d) protect Aproove, our customers or the public from harm or illegal activities, or (e) respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

13) Sharing with affiliated companies: We share information we collect with affiliated companies and, in some cases, with prospective affiliates. Affiliated companies are companies owned or operated by us. The protections of this privacy policy apply to the information we share in these circumstances.

14) Business Transfers: We may share or transfer information we collect under this privacy policy in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. You will be notified via email and/or a prominent notice on the Services if a transaction takes place, as well as any choices you may have regarding your information.

4. HOW WE STORE AND SECURE INFORMATION WE COLLECT

Information storage and security

We use industry standard technical and organizational measures to secure the information we store.

We make sure that personal information is only accessible by those who need access to do their job and that they are properly authorised. That means we keep logs of who has access to personal information, we limit the amount of people that have access and we make sure that personal information can only be read, copied, modified or removed by properly authorised staff. We monitor internal activity to ensure the safety and accuracy of personal information.

Aproove staff is required to conduct themselves in a manner consistent with the company's guidelines regarding confidentiality, ethics, and appropriate usage of personal information. Staff is required to sign a confidentiality agreement.

During an upload, while it is stored on our servers and during a download, Content is encrypted and only sent over a secure connection (https). The servers we use to store your Content for you are GDPR compliant and secure.

While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that information, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others.

If you use our server or data center Services, responsibility for securing storage and access to the information you put into the Services rests with you and not Aproove. We strongly recommend that server or data center users configure SSL to prevent interception of information transmitted over networks and to restrict access to the databases and other storage points used.

How long we keep information

How long we keep information we collect about you depends on the type of information, as described in further detail below. Aproove retains your personal information as long as its necessary to provide our Services to you (e.g. upholding your user account), to conduct our business activities and fulfill our legitimate interests, such as providing safe and secure services, to fix bugs and to reach out to you, to comply with applicable laws (e.g. retaining financial information for 7 years for tax purposes) and legal requests and to resolve (legal) disputes. After such time, we will either delete or anonymize your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

- **Account information:** We retain your account information for as long as your account is active and a reasonable period thereafter in case you decide to re-activate the Services. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, and to continue to develop and improve our Services. Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Services, not to specifically analyze personal characteristics about you.
- **Your Content:** The Content you create, use, store or share on our Services is, in principle, retained until you stop interacting with our Service(s), when you delete your Content from the Service(s), when you delete the Service(s) from your device(s) or when you delete your account. Always check out the website(s) or app(s) of the Service(s) you use for specific information. When using WeApprove your Content will be deleted 7 days after initial download, unless you have a WeApprove+ account in which case your Content is stored for the duration of your account and 30 days after the expiration of the account . After this period, a file is automatically deleted from our servers. The personal information that accompanies your Content upload is kept for a maximum of 12 months. Such personal information is only accessible to very few people within Approve, those that need it to perform their job, for example to provide you with support. When data is older than 12 months, we scrub it from the database, pseudonymise or anonymise it for analysis. Pseudonomising your personal information means that we do not use your email address or IP address for analytical purposes, but create a random pseudonym for both and use that pseudonym instead. That way we don't have to handle directly identifiable personal information, which is privacy-friendly.
- **Managed accounts:** If the Services are made available to you through an organization (e.g., your employer), we retain your information as long as required by the administrator of your account. For more information, see "Managed accounts and administrators" above.
- **Marketing information:** If you have elected to receive marketing emails from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our Services, such as when you last opened an email from us or ceased using your Approve account. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

5. HOW TO ACCESS AND CONTROL YOUR INFORMATION

You have certain choices available to you when it comes to your information. Below is a summary of those choices, how to exercise them and any limitations.

Your Choices:

You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), to request the deletion or restriction of your information, or to request your information in a structured, electronic format. Below, we describe the tools and processes for making these requests. You can exercise some of the choices by logging into the Services and using settings available within the Services or your account. Where the Services are administered for you by an administrator (see "Notice to End Users" below), you may need to contact your administrator to assist with your requests first. For all other requests, you may contact us as provided in the Contact Us section below to request assistance.

Your request and choices may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we or your administrator are permitted

by law or have compelling legitimate interests to keep. Where you have asked us to share data with third parties, for example, by installing third-party apps, you will need to contact those third-party service providers directly to have your information deleted or otherwise restricted. If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed.

Access and update your information: Our Services and related documentation give you the ability to access and update certain information about you from within the Service. For example, you can access your profile information from your account and search for content containing information about you using key word searches in the Service. You can update your profile information within your profile settings and modify content that contains information about you using the editing tools associated with that content.

Deactivate your account: If you no longer wish to use our Services, you or your administrator may be able to deactivate your Services account. If you can deactivate your own account, that setting is available to you in your account settings. Otherwise, please contact your administrator. If you are an administrator and are unable to deactivate an account through your administrator settings, please contact the appropriate support team.

Delete your information: Our Services and related documentation give you the ability to delete certain information about you from within the Service. For example, you can remove content that contains information about you using the key word search and editing tools associated with that content, and you can remove certain profile information within your profile settings. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.

Request that we stop using your information: In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. For example, if you believe a Services account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this policy. Where you gave us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. You can also opt-out of our use of your information for marketing purposes by contacting us, as provided below. When you make such requests, we may need time to investigate and facilitate your request. If there is delay or dispute as to whether we have the right to continue using your information, we will restrict any further use of your information until the request is honored or the dispute is resolved, provided your administrator does not object (where applicable). If you object to information about you being shared with a third-party app, please disable the app or contact your administrator to do so.

Opt out of communications: You may opt out of receiving promotional communications from us by using the unsubscribe link within each email, updating your email preferences within your Service account settings menu, or by contacting us as provided below to have your contact information removed from our promotional email list or registration database. Even after you opt out from receiving promotional messages from us, you will continue to receive transactional messages from us regarding our Services. You can opt out of some notification messages in your account settings. Please note, you will continue to receive generic ads.

Turn off Cookie Controls: Relevant browser-based cookie controls are described in our section below.

Send "Do Not Track" Signals: Some browsers have incorporated "Do Not Track" (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. Because there is not yet a common understanding of how to interpret the DNT signal, our Services do not currently respond to browser DNT signals. You can use the range of other tools we provide to control data collection and use, including the ability to opt out of receiving marketing from us as described above.

Data portability: Data portability is the ability to obtain some of your information in a format you can move from one service provider to another (for instance, when you transfer your mobile phone number to another carrier). Depending on the context, this applies to some of your information, but not to all of your information. Should you request it, we will provide you with an electronic file of your basic account information and the information you create on the spaces under your sole control.

If you think we have infringed your privacy rights, you can lodge a complaint with the relevant supervisory authority. You can lodge your complaint in particular in the country where you live, your place of work or place where you believe we infringed your right(s). For EU click here (https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

6. HOW WE TRANSFER INFORMATION WE COLLECT INTERNATIONALLY

We are a global business, which means we might share or store personal information in countries outside of the European Economic Area (“EEA”). Those countries have different data protection laws in place. However, when we transfer and host data globally, we will make sure that appropriate safeguards are in place in order to ensure your personal information enjoys a similar level of protection as it would within the EEA. For example, we will verify that the receiving partner is certified under EU-US Privacy Shield or we will sign EU Standard Contractual Clauses.

EU-US Privacy Shield

Our subsidiary in the United States, Aproove Inc., complies with the EU-US Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the use and retention of personal information transferred from the European Economic Area and the United Kingdom to the United States.

Aproove Inc. adheres to the EU-US Privacy Shield principles and is subject to oversight by the U.S. Federal Trade Commission. If you have any complaints regarding the transfer of your personal information to the US, please first file them directly at us via privacy@Aproove.com. The panel of EU Data Protection Authorities (DPA Panel) acts as the independent recourse mechanism for complaints regarding EU-US Privacy Shield complaints. The examination of such complaints is free of charge to you. You can find the contact information of your local DPA here. In case your concern still isn't addressed by the DPA Panel, you may be entitled to invoke binding arbitration under the EU-US Privacy Shield Principles.

As explained under section ‘What parties do we share personal information with’, we sometimes provide personal information with third parties to perform services on our behalf. If we transfer personal information received under the Privacy Shield to a third party, the third party's use of the personal data must also comply with our Privacy Shield obligations. In such a case we will remain liable under Privacy Shield for any failure to comply by the third party, unless we prove we're not responsible for the event giving rise to the damage.

You can find our certification here. To learn more about EU-US Privacy Shield visit: <https://www.privacyshield.gov> .

7. WHY AND HOW ARE COOKIES USED?

We place cookies with the intention of making Aproove even better. Feel free to block cookies, but this may affect how well our Services work.

We place several cookies (or similar technologies, like pixels or web beacons) on your device for the purpose of facilitating your use of the Service, controlling your use of the Services and to find out how the Service may be improved. We or our advertising partners also place cookies on our website(s). Being a global service, these partners can vary per country. When our advertising partners place cookies, these cookies can process personal information to measure the effectiveness of the campaign.

Cookies are small text files that are stored on your computer by your browser when you visit a website. Examples of cookie purposes are: your language preferences, logging into an account, remembering login details, controlling when you last accessed our Services and acceptance of the Terms of Service and Privacy Policy. Our website can place these cookies for the following purposes:

1. Functional cookies are used to provide functionalities when using our Service, such as the possibility to set preferences or to remember your previous settings.
2. Analytical cookies are used to optimise our Service. We also use analytical cookies to stop bots and malicious behaviour like spam. When we use analytical cookies, this could include third party cookies, as found in the cookie list. These third party analytical cookies process personal information, which is detailed in the cookie list too.
3. Advertisement cookies are used for commercial, editorial and promotional purposes. With these cookies your internet- and surf behaviour can be followed over various domains and websites. Aproove only checks the (one) website you visited prior to your visit to one of our websites. We do not track the website you visit after you leave our website. Advertisement cookies are often also placed by third parties to measure the effectiveness of their advertising campaigns and to follow your internet- and surf behaviour over other domains and websites where they have placed a cookie. Aproove does not have access to or control over personal information collected via these cookies or other features that advertisers and third parties may use. Our Privacy Policy is therefore not applicable to these third party cookies and we refer you to third parties' Privacy Statements to read how they handle personal information.
4. Pixel tags or web beacons are a piece of code embedded on the website that collects personal information about users' engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. The pixel also allows us to see from which previous website or channel a user arrived at our website.

We have an extensive cookie list available <https://www.aproove.com/legals>. Due to the changing nature of our Service, this may result in the cookie list not being fully up to date at times. If you would want to remove certain cookies, or block them from being stored in your browser, it is possible to arrange this through your browser settings for cookies. You can find these settings under the Privacy tab in the Preferences section of most browsers.

Here you can specify your cookie preferences or remove cookies. Please note that if you remove or refuse Aprovee cookies, the Service might not function in optimal form.

8. OTHER IMPORTANT PRIVACY INFORMATION

Notice to End Users

Many of our Services are intended for use by organizations. Where the Services are made available to you through an organization (e.g. your employer), that organization is the administrator of the Services and is responsible for the accounts and/or Service sites over which it has control. If this is the case, please direct your data privacy questions to your administrator, as your use of the Services is subject to that organization's policies. We are not responsible for the privacy or security practices of an administrator's organization, which may be different than this policy.

Administrators are able to:

- require you to reset your account password;
- restrict, suspend or terminate your access to the Services;
- access information in and about your account;
- access or retain information stored as part of your account;
- install or uninstall third-party apps or other integrations

In some cases, administrators can also:

- restrict, suspend or terminate your account access;
- change the email address associated with your account;
- change your information, including profile information;
- restrict your ability to edit, restrict, modify or delete information

California Requirements

Exercising your rights: If you are a California resident, there are some additional rights that may be available to you under the California Consumer Protection Act ("CCPA"). This policy explains the tools that we have made available to you to exercise your data rights under the CCPA, such as the right to deletion and the right to request access to the categories of information we have collected about you. For more information on how to exercise your rights please visit the "How to access and control your information" section of this policy. We encourage you to manage your information, and to make use of the privacy controls we have included in our Services. You will not be discriminated against for exercising any of your privacy rights under the CCPA. In order to protect your information from unauthorized access or deletion, we may require you to provide additional information for verification. If we cannot verify your identity, we will not provide or delete your information.

Sharing your personal information: We do not sell your personal information. We do share your information with others as described in the "How we share information we collect" section of this policy. We also show ads that we think are relevant. We've provided more information about how you can manage your advertising, and do-not-track preferences, within this policy.

Processing your information: This policy describes the categories of personal information we may collect, the sources of that information, and our deletion and retention policies. We've also included information about how we may process your information, which includes for "business purposes" under the CCPA - such as to protect against illegal

activities, and for the development of new products, features, and technologies. If you have questions about the categories of information we may collect about you, please be sure to visit the section of this policy called, “What information we collect about you.” For more details about our processing activities, please be sure to visit the section called, “How we use information we collect.”

If you have any questions or would like to exercise your rights under the CCPA, you can reach out to us at privacy@aproove.com.

Our policy towards children

The Services are not directed to individuals under 16. We do not knowingly collect personal information from children under 16. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information. If you become aware that a child has provided us with personal information, please contact the appropriate support team.

Changes to our Privacy Policy

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice by adding a notice on the Services homepages, login screens, or by sending you an email notification. We will also keep prior versions of this Privacy Policy in an archive for your review. We encourage you to review our privacy policy whenever you use the Services to stay informed about our information practices and the ways you can help protect your privacy.

If you disagree with any changes to this privacy policy, you will need to stop using the Services and deactivate your account(s), as outlined above.

CONTACT US

Your information is controlled by Aproove SA, a company incorporated under the laws of Belgium with registered office at 1, Boulevard Initalis, 7000 Mons, Belgium and registered with Crossroads bank for Enterprise under number 0867.065.974.

If you have questions or concerns about how your information is handled, please direct your inquiry to Aproove SA.

Gary Fisher – Privacy Officer

E-Mail: privacy@aproove.com

Sylvain Doré – Security Officer

E-Mail: security@aproove.com