

ZENTITY PRIVACY POLICY

ZENTITY is a technology company specializing in the development and implementation of complex mobile and web solutions, including their support.

Zentity a.s., and its affiliated companies worldwide (collectively “Zentity”, “we”, “us” or “our”) respects your right to privacy. To provide you relevant information and services, respond to your requests, and increase the benefits you receive when visiting our website(s), we may collect personal information about you. We want you to feel secure when providing such personal information to us and this Privacy Policy is intended to inform you about the type(s) of personal information we gather and how we use it.

This Privacy Policy informs you of our privacy practices and the choices you can make about the way we collect and use information about you, including information that may be collected from your online activity, use of our products and services, and provided to us for purposes of recruitment or employment consideration.

Use and Purpose of Collected Personal Data

The term "Personal Data" means information relating to an identified or identifiable natural person. That is, someone who can be directly or indirectly identified. This may include your full name, physical address, email address, telephone number, IP address, or any other personal information that, alone or in combination with other information, enables contact with you physically or online.

When We Collect Personal Data

We collect Personal Data that you knowingly and voluntarily provide when you:

- ❖ Register for any of our services;
- ❖ Submit requests, suggestions, or other communications to us;
- ❖ Choose to share usage information regarding Zentity products and services with Zentity;
- ❖ Interact with our websites

What Data We Collect

We collect information that is directly provided by you, collected automatically, and gathered from third parties.

Information Directly Provided by You

- ❖ Contact Data – We may collect contact data including your first name, last name, postal address, telephone number, fax number, email address and other similar contact information.
- ❖ Payment Data – We collect data necessary for processing payments and fraud prevention, including bank account numbers and other related billing information.

- ❖ Account Data – We collect anything related to the user account you create, this may include information such as your username, how you purchased or signed up for Zentity products and services, or events, your transaction, billing, and support history.
- ❖ Location Data – We may collect geolocation data when you enable location-based services or when you choose to provide location-related information during product, service, or event registration.
- ❖ Security Credentials Data – We collect user IDs, passwords, password hints, and similar security information required for authentication and access to Zentity products and services.
- ❖ Recruitment Data – We may collect certain demographic data including country, gender, age, preferred language, general educational and employment background, and general job interest data.
- ❖ Preferences – We collect information about your preferences and interests as they relate to our products, services and how you prefer to receive communications from us.
- ❖ Social Media Data – We may provide social media features that enable you to share information with your social networks and to interact with us on various social media sites. Your use of these features may result in the collection or sharing of information about you, depending on the feature. We encourage you to review the privacy policies and settings on the social media sites you use to make sure you understand the information that may be collected, used, and shared by those sites.

Other Unique Identifying Information – Examples of other unique information that we may collect from you include information you provide when you interact in-person, online or by phone or postal mail with our customer support channels Information Collected Automatically

We use technology integrated into our websites, products, and services that you can choose to enable to provide us with automated data collection. Such information may include:

- ❖ Product Usage Data - We collect product usage information from Zentity applications provided as a service. We collect detailed information about your interaction with the product service including IP addresses of user systems from which the system is accessed.
- ❖ Demonstration Usage Data - If you interact with our demonstration systems, we collect detailed information about your interaction with the demo system including IP addresses of user systems from which demo system is accessed.
- ❖ Device Data - Data collected from Google Analytics may provide us with information regarding your device type (mobile, tablet, desktop/laptop, etc.), operating system, and type of browser.
- ❖ Application Data - We may collect data regarding key performance metrics in order to understand if there are issues.
- ❖ Website Browsing Data – We collect information about your visits and activity on our Zentity websites, including the content that you view and interact with, the address of the website from which you were referred and other clickstream behaviour (such as the pages you view, the links you click or which items you've added to your shopping cart). Some of this information is collected using our tools for automatic data collection which include cookies, web beacons and embedded web links.

Information Collected from Third-Party Sources

We may also acquire data from third-party sources that we deem to be credible and that are either publicly-available, or available on a commercial basis. Such information may include:

- ❖ Personal data - We may collect Personal Data such as your name, address, email address, preferences, interests, and certain demographic data. For example, Personal Data may be collected when you login to our applications using social media credentials (e.g. using your Facebook or Google account). The details we receive may depend on your social media account privacy settings. In our products?
- ❖ Business contact data - In order to provide some of our products and services at an enterprise level, your business contact data may be provided to us by a designated entity within your business or enterprise (such as a member of your IT department). Where necessary, we may also use information provided by you or your employer, together with information from publicly-available and other online and offline sources, to conduct due diligence checks on business contacts as part of our anti-corruption and export control compliance programs.
- ❖ Combined data - In order to ensure data accuracy and offer personalized services we may link or combine the information that we collect from the different sources outlined above.

Other Information We Collect

We may also collect information and data you choose to provide that is not Personal Data, such as your occupation, affiliated companies, and general location. Additionally, we may collect technical information relating to your mobile phone, mobile device or computer and the way you interact with the Site, such as your IP address, browser type, and aggregate user data. This information is used to identify your internet browser, store your user preferences, authenticate user sessions, provide services.

How We Use Personal Data

We use your Personal Data for the following purposes:

Transaction Processing and Account Administration

To process transactions and orders of our products or services, to provide troubleshooting or consulting for our products or services, and for account administration.

Business Operations

To conduct ordinary business operations, incl., recruiting, conducting business research and analytics, corporate reporting and management, staff training and quality assurance purposes and outreach.

Managing Your Customer Experience

To maintain accurate contact and registration data, deliver customer support, and to offer products, services, and features that may interest you. We also use your data to deliver personalized communications and create recommendations based on your use of products and services, and your visits on our websites.

Administrative Communications

To answer questions or to provide information, support, or advice about existing and new products or services.

Research & Innovation

To develop new products, features, and services using research and development tools, and incorporating data analysis activities.

Security

To maintain the integrity and security of our websites, products and services and preventing and detecting security threats, fraud, or other criminal or malicious activity that might compromise your information or the information of other customers and/or website visitors.

Compliance with Law

We collect and store data as required to be compliant with applicable laws, regulations, especially with GDPR (EU Regulation 2016/679 General Data Protection Regulation).

Third Parties With Whom We Share Your Data

Sharing with Zentity Affiliates

We may transfer your Personal Data to other Zentity entities within the EU or worldwide for the purposes outlined in this Privacy Policy. To ensure that your Personal Data is private, Zentity entities are contractually bound to comply with our privacy requirements. For the transfer of Personal Data to Zentity entities outside of the European Union, we have agreed on respective EU Model Clauses between the Zentity entities. Furthermore, our privacy guidelines are communicated to our employees on an annual basis as part of our mandatory security and privacy awareness training. By accessing our websites, registering a product or for services, creating an account, or otherwise providing us with your Personal Data, you consent to the transfer of your Personal Data throughout the global Zentity network of entities based on the restrictions stated above.

Sharing Data with Third Party Service Providers

We will not provide your Personal Data to any third party without your permission, except as provided in this Privacy Policy. We will not share Personal Data with third parties that would directly contact you without your explicit consent to be contacted by a partner. However, we may provide information and data that is not Personal Data, to our third-party providers for any purpose. We work with external service providers to plan, manage and/or support certain aspects of our business operations on our behalf.

These service providers may be located in the EU or in other global locations and may provide services such as advertising and marketing activities, email service, or data hosting. Our service providers are required by contract to safeguard any Personal Data they receive from us and are prohibited from using the Personal Data for any purpose other than to perform the services as instructed by Zentity.

Examples of our third-party service providers and the use of your data:

- ❖ Google Analytics - We use Google Analytics to understand visitor trends, page popularity, geographic distribution of interest, time on pages, or issues with our site. For more information about Google Analytics, see <https://policies.google.com/privacy?hl=en> and for more information about how Google uses data when you use a Google partner's sites or apps, see www.google.com/policies/privacy/partners/
- ❖ Facebook - We use Facebook platform to publish information on Zentity product and services as well as other Zentity-related content. We use a Facebook cookie to match audiences and enable us to ensure we can deliver paid (and unpaid) advertising to our Facebook followers and additional audiences that we think would be interested in the content.
- ❖ LinkedIn - We use LinkedIn platform to share content with our community of global followers on LinkedIn. We also use matching techniques to provide advertising on LinkedIn. The matching techniques include the use of a cookie we execute on our websites and may include email matching (which is only used for Zentity advertising).

Sharing Data for Other Reasons

Corporate transactions

Circumstances may arise where, whether for strategic or other business reasons, Zentity decides to sell, buy, merge or otherwise reorganize its businesses. In such transactions, we may disclose or transfer your Personal

Data to prospective or actual purchasers or receive your Personal Data from sellers. Our practice is to seek appropriate protection for your Personal Data in these types of transactions.

Compliance with law

We may also share your Personal Data when we believe, in good faith, that we have an obligation to:

- ❖ respond to duly authorized information requests of law enforcement agencies, regulators, courts, and other public authorities, including to meet national security or other law enforcement requirements;
- ❖ comply with any law, regulation, subpoena, or court order;
- ❖ investigate and help prevent security threats, fraud or other criminal or malicious activity;
- ❖ enforce/protect the rights and properties of Zentity and/or our affiliates; or
- ❖ protect the rights or personal safety of Zentity's and our affiliates' employees, and third parties on or using Zentity property when allowed and in line with the requirements of applicable law.

How We Keep Your Data Secure

To prevent unauthorized access or disclosure, and to ensure the appropriate use of your information, we utilize reasonable and appropriate physical, technical, and administrative procedures to safeguard the information we collect and process. We retain the data only as required or permitted by law, and while the data continues to have a legitimate business purpose.

Cookies and Website Automatic Data Collection

We use and allow certain other companies to use cookies, web beacons and other similar technologies (collectively "Tools for automatic data collection") on our website and in the marketing, sale and delivery of our products and services. We do this to understand your use of our website and our products and services and to improve your user experience and to enable personalized features and content, optimize our advertisements and marketing, and to enable third-party advertising companies to assist us in serving ads specific to your interests across the internet.

Our Use of Cookies

Cookies are text files containing small amounts of information which are stored on your device when you visit a site. The entity that places cookies on your browser can then read the information on that cookie that it set. We categorize cookies as follows:

- ❖ Necessary cookies - These cookies are essential for our websites and their features to work properly, and for us to properly provide services that depend on our websites and these features. (e.g., to remember cookie permission settings, session logins, etc.)
- ❖ Convenience cookies - These enable us to improve the usability and performance of our websites and services that depend on our websites.
- ❖ Statistics cookies - Used to collect information about how you navigate to and from our websites and how you use our website. The collection of this information is carried out as anonymous access measurements. Statistics cookies may be classified as either session cookies or persistent cookies. Session cookies expire when you close your browser session. Persistent cookies may remain on your system for an extended period of time.
- ❖ Targeting/Retargeting cookies - Used by our advertising services to provide you with Zentity-relevant advertising content.

Third Party Advertising Cookies and Social Media Cookies

Third party cookies may be used when you share information using a social media feature on our website or with services made available via our website. The social media network may record your activities which may be linked to targeted advertising. The types of cookies used by these third parties and how they use the information generated by them will be governed by those companies privacy policies.

You can find out more about some of our social media, interest-based advertising partners and opt-out mechanism by visiting these websites:

- ❖ Google Opt-out page - <https://adssettings.google.com>
- ❖ Facebook Opt-out page - <https://www.facebook.com/help/568137493302217>
- ❖ LinkedIn Opt-out page - <https://www.linkedin.com/help/linkedin/answer/62931/manage-advertising-preferences>

If you do not want to allow cookies at all, or only want to allow use of certain cookies, please refer to your browser settings. You can also use your browser settings to withdraw your consent to our use of cookies at any time, and delete cookies that have already been set. Your browser help menu contains information about the process of opting out on different browsers.

Note that by disabling certain categories of cookies, you may be prevented from accessing some features of our sites, and certain content or functionality may not be available.

If you are in the EU and would like to opt out of third party cookies relating to interest-based advertising, please go to www.youronlinechoices.eu.

Other Automatic Data Collection Tools

Web Beacons

We may use and permit select third parties to use web beacons (usually in combination with cookies) to compile information about your website usage and your interaction with email or other communications, to measure performance and to provide content and ads that are more relevant to you.

A web beacon is object embedded in online content, pictures, videos, and emails that can allow a server to read certain types of information from your device, know when you have viewed particular content or a particular email message, determine the date and time when you viewed the beacon, and the IP address of your device. For instance, we may include web beacons on our websites, and in our promotional email messages or newsletters to determine whether our messages have been opened or acted upon and whether our mailing tools are working correctly.

Because web beacons are the same as any other content request initiated in a web page, you cannot opt out or refuse them. However, you may be able to disable web beacons in email messages by not downloading images contained in messages you receive (this feature varies depending on the email software used on your personal computer). However, doing this may not always disable a web beacon or other Tools for automatic data collection in the email message due to specific email software capabilities. For more information, refer to the details provided by your email software or service provider. Web beacons may also be rendered ineffective in some circumstances by opting out of cookies or amending your cookie settings in your browser.

Embedded Web Links

Emails from us often use links designed to lead you to a relevant area on the web, after redirection through our servers. The redirection system allows us to change the destination URL of these links, if necessary, and to determine the effectiveness of our communications and marketing initiatives. In emails, such web links may also allow us to determine whether you have clicked a link in an email, and information about this interaction may be connected to your personal identity.

If you do not want us to collect information about the links that you click, you can:

- ❖ Change your choice about how you receive communications from us (i.e., choose a text-based version of the message where available) or choose not to click links in emails that we send.
- ❖ Choose privacy settings in your browser and email client that will restrict this information.

Your Rights

At your request, we will:

- ❖ inform you of what personal information we have on file for you;
- ❖ amend or correct the personal information that we have on file for you or any previous privacy preferences that you have selected; and/or
- ❖ erase personal information that you have provided to us, or that we have collected. You may do so by contacting us via email at dpo@zentity.com;

provided, however, that we ask individuals to identify themselves and the information requested to be accessed, corrected or erased before processing such requests, and, to the extent permitted by applicable law, we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup media).

If you ask us to erase your Personal Data from our records, we will use commercially reasonable efforts to do so while retaining any record necessary to comply with a governmental authority or applicable federal, state, or local law.

Contact Us

If you have any questions or concerns about our PrivacyPolicy, our collection and use of your data or a possible breach of local privacy laws, you can contact us via email to dpo@zentity.com or write to us at the appropriate address below:

Zentity a.s.
Attn: Data protection office
Rosmarin Business Center
Dělnická 12
170 00 Prague 7
Czech Republic

All communications will be treated confidentially, and we will also take reasonable steps to verify your identity in order to validate any requests, questions or concerns. Upon receipt of your communication, our representative will respond to you within a reasonable time to address your requests, questions or concerns and ensure that they are resolved in a timely and appropriate manner.

