

This Privacy Policy (the “**Policy**”) explains how information about, and/or that directly identifies, you or makes you identifiable (“**personal information**”) is collected, used and disclosed by Cequence s.r.o. (“**Company**,” “**we**” or “**us**”) in connection with our website at www.cequence.io (the “**Site**”) and our online websites, products, services or applications (including our Cequence platform) offered in connection with the Site (collectively with the Site, the “**System**”). By visiting the Site, registering for an account at the Site, or otherwise using the System, you signify that you have read, understood and agree to the collection, storage, use and disclosure of personal information as described in this Policy.

This Policy explains how we use your personal information when we act as a data controller. As far as you use our Systems as a natural person, we are the controller of your personal information. We are responsible for, and control, the processing of your personal information.

Wherever our customers use our System to submit, manage, or otherwise use content relating to third parties (containing personal information in relation to these third parties), we have contractually committed ourselves to only process such information on behalf and under the instruction of the respective customer, who is the data controller. This Privacy Policy does not apply to such processing and we recommend you to read the Privacy Policy of the respective customer, if their processing concerns your personal information.

1. Information We Collect, and How We Collect It

We don’t ask you for personal information unless we truly need it. We collect personal information necessary for providing you with a secure, fast and efficient online contract management platform. In order to do so, Cequence must collect information to identify users, and to allow our users to identify each other.

We collect personal information in connection with your visits to and use of the System. This collection includes information that you provide in connection with the System, information from third parties, and information that is collected automatically such as through the use of cookies and other technologies.

Information That You Provide

We collect personal information from you. The categories of information we collect can include:

- **Registration information.** We collect personal and/or business information that you provide when you register for an account at the Site. This information may include your name, email address, and password. Your user name, email address and any optional profile information that you elect to associate with your account is referred to herein as your “Profile Information.”
- **Information from use of the System.** After registration, when you upload or transmit files, documents, data or information as part of your use of the System (collectively, “**Your Content**”), we collect any personal information you include in Your Content.

- **Inquiries and feedback.** If you contact us, we will collect the information that you provide us, such as your contact information and the contents of your communication with us. We collect this information even if you are not a registered user of the System.
- **Contract negotiation.** If you choose to use our System to invite a third party to the System in order to negotiate a contract, Cequence stores the information you provide to send the invitation and to track the success of the invitation System.

You are free to choose which personal information you want to provide to us or whether you want to provide us with personal information at all. However, some information, such as your name, address, payment information and information on your requested Systems may be necessary for the performance of our contractual obligations.

Your Content

Your use of the System will involve you uploading or inputting various content into the System, including but not limited to: contracts, attachments, and conversations (together, the “Content”).

We will encrypt and store these documents. You control who you invite to view or sign the Content and how your Content is shared with others via your settings on the System.

The Company may view and use your Content only as necessary, in Company’s reasonable judgment: (i) to maintain, provide and improve the System; (ii) to provide data analytics and related features of the System to you; (iii) to resolve a support request from you; (iv) if we have a good faith belief, or have received a complaint alleging, that such Content is in violation of our Terms of System; (v) as reasonably necessary to allow Cequence to comply with or avoid the violation of applicable law or regulation; or (vi) to comply with a valid legal subpoena or request. We may also analyze the Content in aggregate and on an anonymized basis, in order to better understand the manner in which our System is being used.

Information from Third Parties

We also collect and receive information about you from third parties. For example, when you interact with the System through third party sites and services, such as when you login using an account or credentials from a third party service, share or export Your Content from the System with third party services, or integrate the System with third party services (such as your email service so that emails can be shared with the System), we may receive information from those websites and services. For example, when you login using an account or credentials from a third party service, we may receive information such as your name, email address, access tokens, and other information related to your account with the third party service. When you create, share or export Your Content from the System with third party services, we may receive information such as user names, IP addresses, device identifiers, profile information, contacts, or e-mail addresses. When you integrate the System with third party services, we may receive information such as user names, IP addresses, device identifiers, profile information, contacts, or e-mail addresses. We also may receive any other information that a third party site or service shares with us (or that you choose to allow it to share with us). The data we receive may depend upon your privacy settings with the site or service, though we do not control those settings or promise they will be effective. You should always review and customize your privacy settings with sites and services before using them in connection with the System.

Information from Other Sources

We may obtain information from other sources, such as third-party information providers, or through

mergers and acquisitions, and combine this with information previously collected. In these cases, our Privacy Policy governs the handling of the combined personal information.

We use this information to operate, maintain, and provide to you the features and functionality of the System, as well as to communicate directly with you, such as to send you email messages about products and services that may be of interest to you.

Information That Is Automatically Collected (Cookies and Other Technologies)

We, and our third party partners, also automatically collect information about you and any computer or device you use to access the System, read our emails, or otherwise engage with us. Some of the information we collect, and ways we collect it, include:

- **Cookies.** When you use or visit the System, we may send one or more cookies — small text files containing a string of alphanumeric characters — to your computer or device that allows us to uniquely identify your browser, computer, or device. A cookie may also convey other information to us, such as: your Internet Protocol (“IP”) address; unique device identifiers; your browser settings and specification; and information about how you use the System (e.g., the pages you view, the links you click, features and functionalities you utilize, how frequently you access the System, and other actions you take on the System). Cookies also allow us to track your usage of the System over time.
- **Log Files.** We may record log file information each time you access the System. This information may include information such as: your requests or actions; IP address; browser type; unique device identifiers; information about your computer or device; number of clicks; how you interact with links, features, or functionalities on the System; and other such information.
- **Clear Gifs.** We may employ clear gifs (also known as web beacons or pixel tags) which may collect information about you, your computer or device such as: your requests or actions; IP address; unique device identifiers; browser type; information about your computer or device; how you interact with links, features, or functionalities of the System; information about cookies; all of which can show your System usage patterns.
- **Mobile Device Information.** When you access the System with a mobile device, we may collect and store a unique identifier associated with your device (including, for example, a UDID, Unique ID for Advertisers (“IDFA”), Google Ad ID, or Windows Advertising ID), or information about your mobile carrier, device type, model and manufacturer, and mobile device operating system brand and model.

We also collect information about the way you use our System, for example, the site from which you came and the site to which you are going when you leave our System, the pages you visit, the links you click, how frequently you access the System, whether you open emails or click the links contained in emails, whether you access the System from multiple devices, and other actions you take on the System. We may collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the System and to understand more about the demographics of our users. We may also work with third party partners to employ technologies, including the application of statistical modeling tools, which attempt to recognize you across multiple devices.

We use or may use the data collected through tracking technologies to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the System; (b) provide custom, personalized content and information, including targeted content and advertising; (c) identify you across multiple devices; (d) provide and monitor the effectiveness of our System; (e) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our System; (f) diagnose or fix technology problems; and (g) otherwise to plan for and enhance our service.

If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. Please note that doing so may negatively impact your experience using the System, as some features and services on our System may not work properly. Depending on your mobile device and operating system, you may not be able to delete or block all cookies. You may also set your e-mail options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our e-mail and performed certain functions with it.

We and our third party partners may also use cookies and tracking technologies for advertising purposes. For more information about tracking technologies, please see “Third Party Tracking and Online Advertising” below.

2. How We Use Information

We collect, use, process, combine, retain and store personal information and information that we collect or receive for a variety of purposes, including the following:

- For our business activities, including to operate, monitor, analyze, promote, and improve the System, and to provide you with the features and functionality of the System;
- To process your payment;
- To communicate with you and respond to your requests, such as to respond to your questions, contact you about changes to the System, and communicate about account related matters;
- For marketing and advertising purposes, such as to market to you or offer you with information and updates on our products or services we think that you may be interested in. While we may use your personal information in this manner, we do not use or share Your Content for marketing or advertising purposes; unless you have explicitly submitted it to us for that purpose;
- For analytics and research purposes;
- To enforce this Policy, to resolve disputes, to carry out our obligations and enforce our rights, and to protect our business interests and the interests and rights of third parties;
- To comply with contractual and legal obligations and requirements;
- To fulfill any other purpose for which you provide personal information; and
- For any other lawful purpose, or other purpose that you consent to.

3. Sharing of Information

We also share, transmit, disclose, grant access to, make available, and provide personal information with and to third parties, including:

- **AS DIRECTED BY YOU:** To others at your direction, such as by displaying your Profile information on your profile page and elsewhere on the System in accordance with the preferences you set in your account – you can review and revise your Profile information at any time
- **TO TRUSTED SERVICE PROVIDERS AND BUSINESS PARTNERS:** To trusted service providers, subcontractors, partners, vendors, consultants, and others that help us with any of the purposes noted above or otherwise in this Policy, including by performing services on our behalf such as hosting our Systems, sending out email updates or postal mail, identifying and serving targeted advertisements, processing payments, providing back-office services, or measuring site traffic. Such providers include Amazon Web Services, Zuora, Mandrill. They are required to have a privacy policy and security standards in place that are at least as protective of your information as is this Privacy Policy. We may also store personal information in locations outside the direct control of the Company (for instance, on servers or databases co-located with hosting providers).
- **TO RELATED COMPANIES:** To our affiliates, parent companies, subsidiaries, and other related companies, all for the purposes noted above or otherwise in this Policy;
- **TO LAW ENFORCEMENT OR IN ORDER TO PROTECT OUR RIGHTS:** To third parties to respond or comply with, in our sole discretion, a court order, subpoena, law enforcement or other government request (with or without notice to you, in our discretion) under applicable law;
- **IN CONNECTION WITH A SALE OR CHANGE OF CONTROL:** To buyers, successors, or others in connection with a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by us may be among the assets transferred;
- **WITH YOUR CONSENT:** To other third parties with your consent; and
- Third parties, in our discretion, to: (i) satisfy any applicable law or regulation, (ii) enforce this Policy, including the investigation of potential violations thereof, (iii) investigate and defend ourselves against any third party claims or allegations, or (iv) protect against harm to the rights, property or safety of us, the System, other System users, or third parties (including financial loss, or in connection with preventing fraud or illegal activity, and/or to enforce our Terms of System).

IN AN AGGREGATE AND NON-PERSONALLY IDENTIFIABLE MANNER: We may also aggregate, or strip information of personally identifying characteristics, and then share that aggregated or anonymized information with third parties.

4. Legal Basis for Processing in the EU

In the EU, the purposes for which we process your personal data are:

- 1) the provision of personal data by you may be necessary for the performance of any contractual relationship we have with you;
- 2) where it is necessary for compliance with our legal obligations laid down by EU law;
- 3) where in our legitimate interests (provided these are not overridden by your interests and fundamental rights and freedoms – this includes our own legitimate interests and those of other entities and branches in our group of companies) such as:
 - a) to contact you and respond to your requests and enquiries;
 - b) for business administration, including statistical analysis;
 - c) to provide the System to you; and
 - d) for fraud prevention and detection; and
 - e) to comply with applicable laws, regulations or codes of practices.

We may also process your personal data on the basis of your freely given, specific, informed and unambiguous consent. You should be aware that you are entitled under EU General Data Protection Regulation (“GDPR”) to withdraw your consent where that has been given, at any time. If you do this and we have no alternative lawful reason to process your personal data, this may affect our ability to provide you with rights to use the System.

5. Third Party Tracking and Online Advertising.

We permit third parties to collect information about you, your computer or device when you visit or use the System, open emails and otherwise interact with us. The information collected, and manner in which it is collected, may include the information and methods described in the “Information We Collect, and How We Collect It” Section above. These third-party online advertising networks, social media companies, and other third-party services collect information about your use of our website over time so that they may play or display ads on our System, on other devices you may use, and on other websites, apps, or services. Typically, though not always, the information we share is provided through cookies, social media plug-ins or similar tracking technologies, which recognize the device you are using and collect information, including click stream information, browser type, time and date you visited the site, and other information. We and our third-party partners use this information to make the advertisements you see online more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research.

Google Analytics. We use Google Analytics to recognize you and link the devices you use when you visit our site or System on your browser or mobile device, login to your account on our System, or otherwise engage with us. We share a unique identifier, like a user ID or hashed email address, with Google to facilitate the service. Google Analytics allows us to better understand how our users interact with our System and to tailor our advertisements and content to you. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, review Google’s site “How Google uses data when you use our partners’ sites or apps” located at www.google.com/policies/privacy/partners/. You can learn about Google Analytics’ currently available opt-outs, including the Google Analytics Browser Ad-On here <https://tools.google.com/dlpage/gaoptout/>.

We may also utilize certain forms of display advertising and other advanced features through Google Universal Analytics, such as Remarketing with Google Analytics, Google Display Network Impression

Reporting, the DoubleClick Campaign Manager Integration, and Google Analytics Demographics and Interest Reporting. These features enable us to use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the Doubleclick advertising cookie) or other third party cookies together to inform, optimize, and display ads based on your past visits to the System. You may control your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at <https://google.com/ads/preferences> or by visiting NAI's online resources at <http://www.networkadvertising.org/choices>.

For information about choices that you may have about the information collection and use described in this Section, see the "Your Choices" Section below.

6. Information Access and Correction

If you have registered for an account with the System, you can change registration information using your Google profile settings. If there is personal information in Your Content, you can use the features and functionality of the System to edit or delete the personal information or Your Content.

Not all personal information is maintained in a format that you can access or change. If you would like to request access to, or correction or deletion of personal information, you may send your request to us at Cequence s.r.o., Jesenskeho 37, 080 01 Presov, Slovakia or by emailing hello@cequence.io. We will review your request, and may require you to provide additional information to identify yourself, but we do not promise that we will be able to satisfy your request.

7. EU residents

If you are a resident in the European Union, you have the following rights in respect to your personal information that we hold:

- **Right to object.** You have a right to object to any processing based on our legitimate interests where there are grounds relating to your particular situation. You can object to marketing activities for any reason whatsoever.
- **Right of access.** The right to obtain access to your personal information.
- **Right to rectification.** The right to obtain rectification of your personal information without undue delay where that personal information is inaccurate or incomplete.
- **Right to erasure.** The right to obtain the erasure of your personal information without undue delay in certain circumstances, such as where the personal information is no longer necessary in relation to the purposes for which it was collected or processed.
- **Right to restriction.** The right to obtain restriction of the processing undertaken by us on your personal information in certain circumstances, such as, where the accuracy of the personal information is contested by you, for a period of time enabling us to verify the accuracy of that personal information.
- **Right to portability.** The right to portability allows you to move, copy or transfer personal information easily from one organization to another.

If you wish to exercise one of these rights, please contact us using the contact details at the end of this Policy. In addition to the above listed rights, as an EU resident, you also have the right to lodge a complaint with your local data protection authority. Further information about how to contact your local data protection authority is available at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

8. Your Choices

We strive to give you choices about how your personal information is used. These choices include the following:

- **Marketing E-Mails.** We may send you marketing e-mails from time to time. If you do not wish to receive them, you can opt-out following the unsubscribe instructions in the e-mails, or by contacting us at hello@cequence.io. We will work to honor your request within 10 business days. If you opt-out, we will still send you e-mails for service purposes, such as for communications about your account or subscription, and responses to your requests.
- **Online Advertising.** As described above in this Policy, we collect, share, and may permit third parties to collect information about your use of our System over time using cookies and other technologies, including so that they may play or display ads that may be relevant to your interests on our System as well as on other websites or apps, or on other devices you may use. Typically, though not always, the information we share is provided through cookies or similar tracking technologies, which recognize the device you are using and collect information, including hashed data, click stream information, browser type, time and date you visited the System, and other information. This information is used to display targeted ads on or through our System or on other websites or apps, including on Facebook. We or the third party online advertising networks use this information to make the advertisements you see online more relevant to your interests. You may be able to “opt out” of some of this information collection by actively managing the settings on your browser or mobile device, but we do not promise that such settings will be effective. Please refer to your browser’s or mobile device’s technical information for information on the settings offered for cookies or other tracking technologies. To learn more about cookies, you may wish to visit <https://www.consumer.ftc.gov/articles/0042-cookies-leaving-trail-web>, the Digital Advertising Alliance’s (DAA) Consumer Choice Opt-Out pages at <http://www.aboutads.info/choices> and <http://www.aboutads.info/choices-mobile> (for mobile devices), and the National Advertising Initiative (NAI) Consumer Opt-Out page at <http://www.networkadvertising.org/choices/>; the DAA and NAI pages may allow you to opt-out of some online advertising-related data collection and tracking, but we do not promise those controls will be effective. You may also be able to opt-out of some – but not all – interest-based ads served by mobile ad networks by visiting <http://youradchoices.com/appchoices> and downloading the mobile AppChoices app. You may also manage certain advertising cookies by visiting the EU-based Your Online Choices at www.youronlinechoices.eu. If you have any questions about opting out of the collection of cookies and other tracking/recording tools, you can contact us directly at hello@cequence.io.

9. Do Not Track Preferences

While we want to honor your privacy as described in this Policy, unfortunately the System does not monitor for or behave differently if your computer or browser transmits a “do not track” or similar message to us or the System.

10. Data Protection

We take the security of your personal information seriously. We take what we believe to be commercially reasonable steps to help protect personal information that we collect against loss, misuse, and unauthorized intrusion and disclosure, and these steps include without limitation firewalls, encryption techniques, and authentication procedures. The System has been designed to, among other things, meet the objectives of U.S. data privacy laws, such as the Interagency Guidelines Establishing Standards for Safeguarding Subscriber Information as set forth in Section 501(b) of the Gramm-Leach-Bliley Act, and the requirements of European Union data protection law. Despite these steps, we do not guarantee that personal information will be completely protected. For example, the transmission of information via the Internet is not completely secure. Any transmission of personal information by you is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the System, including the illegal acts of third parties (such as criminal hacking). If you have any questions about security on our System, please contact us at hello@cequence.io.

The safety and security of your information also depends on you. For example, it is important to keep your password for your account for the System confidential. We also recommend that you log out of the System when you are done using it. If you believe that any account credentials for the System have been compromised, please contact us immediately at hello@cequence.io.

11. Data Storage and Transfer

Your information may be stored and processed in the United States or any other country in which Company or its subsidiaries, affiliates or service providers maintain facilities. If you are located in the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information, including personal information, to a country and jurisdiction that offers a level of protection that may, in certain instances, be less protective of your personal information than the jurisdiction you typically reside in.

The initial transfer of your personal information to us is necessary for the performance of our contract with you. For any onward transfer of your personal information we will enter into guarantees to ensure appropriate safeguards. If we transfer information from the European Union to third parties outside the European Union and to countries not subject to schemes which are considered as providing an adequate data protection standard, we will enter into contracts which are based on the EU Standard Contractual Clauses with these parties.

12. Data Retention

We tend to keep personal information for as long as necessary for our business purposes for which we have collected the information, or as otherwise required to operate the System, comply with your requests, or comply with applicable law. We have a maximum retention for our debug data of six (6) months – at that point, we purge the data. We store anonymized data for analytics purposes indefinitely. National commercial or financial codes may require us to retain certain information for up to ten (10) years.

If you decide to terminate your use of the System, we will provide you a copy of your data at your request within 30 days of termination in a format of our choosing.

13. Information from Children

The System is not directed to children under the age of 13, and we do not knowingly collect personal information from children under the age of 13. If you are a parent or guardian of a child under the age of 13, and believe that your child may have provided us with personal information, please contact us at hello@cequence.io and we will use commercially reasonable efforts to delete that information.

14. Third Party Websites

The System may provide links to third party websites and online services. This Policy does not describe the privacy practices of those websites or services. Please review the privacy policies of those websites or services before providing personal information to them.

15. Updates to This Policy

We may amend this Policy from time to time. When we do so, we will update the “Last Revision Date” at the end of the Policy. Your continued use of the System after an updated Policy is posted constitutes your consent to the revised Policy.

16. Contacting Us

If have questions about this Policy or our privacy practices, please contact us at hello@cequence.io or Cequence s.r.o., Jesenskeho 37, 080 01 Presov, Slovakia.

17. Last Revision Date

This Policy was last revised on April 5, 2023.