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Information tracking and usage

To the extent it is permitted by applicable laws, Antavo Limited (in the following referred to as "Antavo" or "we") tracks and gathers certain information on this website that helps us to better understand our visitors' needs related to our website and our services.

This Privacy Policy describes how we manage, process and store personal data submitted in the context of providing our services. "*Personal data*" refers to any information relating to an identifiable individual or their personal identity.

Except as set forth in this Privacy Policy and our Terms and other published guidelines, we do not release Personal data about our clients or users without their permission. The use of information collected through the website shall be limited to the purpose of providing the services for which you have registered.

If you do not agree with these terms, then please do not provide any Personal data to us. If you refuse or withdraw your consent, or if you choose not to provide us with any required Information, you will not be able to use our services.

Consent

In subscribing to our services or filling in a contact form on our website (www.antavo.com, www.contests.antavo.com) or other sites owned by Antavo, you agree and accept that we may gather, process, store and/or use the personal data submitted in accordance with the rules set forth below in this Privacy Policy regulation (in the following referred to as "Privacy Policy"). By giving your consent to us, you also retain the right to have your personal data rectified, to be forgotten and/or to be erased.

Personal Data Collected

On some pages of our websites you have the option to register for various Antavo services – e.g. newsletter, download of whitepapers, case studies – using data capture forms. These forms usually require

- your first name,
- your last name,
- company e-mail address,
- company
- job title
- telephone number
- your main goals regarding our services

that is necessary to provide the requested service. You may choose to provide additional non-mandatory information that enables us to provide a more personalized service. To the extent it is permitted by applicable laws, we may also directly contact you on the basis of the information you have provided in order to promote Antavo's products. In case of requests from countries in which are not handled by Antavo itself but by affiliated companies or other representatives, we may also transfer the data to the responsible affiliated company or representative for said purpose (in each case only to the extent it is permitted by applicable laws and this Privacy Policy). You can object to the use of their data as described above at any time.

Data collected on the site

Antavo collects Information during the normal operation of the website. You give us full consent for the collection of Information by Antavo stipulated in this Privacy Policy.

When a user subscribes to our services, the following data is collected and managed:

- first name,
- last name,
- company's name,
- e-mail address,
- telephone number,
- web address,
- IP address(es) and
- domain name
- your main goals/opinion/comments on our services

By using our services, the following data is collected and managed: log-on data and browsing data where you authorise it, order history, complaints, incidents, information on subscriptions and messages on our site. Some data is collected automatically by reason of your activity on the site (see paragraph on cookies below).

Identity and contact details of the data processor

Personal data is collected on our website by Antavo Limited, a company registered under the laws of England and Wales under number 8046168 with the Companies House, and having its registered office at 107 Cheapside, 7th Floor, EC2V 6DN London, United Kingdom.

Please find our contact details further below in this Privacy Policy.

Data Protection Authority Declarations

Declarations on the automated processing of data have been registered with the Information Commissioner's Office (ICO) under number ZA140007. You may contact the Information Commissioner's Office (ICO) under the contact information provided here: https://ico.org.uk/global/contact-us/

You retain the right to lodge any complaints on data protection with this supervisory authority.

Other Types of Information Gathering

Occasionally our website gathers visitors' data via temporary marketing activities such as seminars, free trial accounts, surveys, etc. Participation in these activities is on a voluntary basis, which allows you to decide whether to disclose any personal data or not. Such data may include contact information (e.g. name, email, phone number), demographic information (e.g. zip code, date of birth) or others. The data will be used to provide you with the service requested. Data gathered via surveys will be used for improving our website and services.

We may receive Information when you send us an email message or otherwise contact us. Antavo may offer you to receive email updates either via email or another subscription service such as Facebook, blog or Twitter.

Shared Usage of Data

We reserve the right to share accumulated, general demographic data for statistical purposes with selected partners. These data do not contain any personally identifiable information.

Links

This website contains links to other sites. Please note that Antavo is not responsible for the privacy practices or the content of any other websites to which we link.

Purposes of processing and legal basis

The principal purpose of collecting your personal data is to offer you a safe, optimum, efficient and personalised experience. To this end, you agree and accept that we may use your personal data to:

- provide our services and facilitate performance, including verifications relating to you;
- resolve any problems so as to improve the use of our site and services;
- personalise, assess, and improve our services, content and materials;
- analyse the volume and history of your use of our services;
- inform you about our services as well as our partners' services and/or promotional offers;
- prevent, detect and investigate any activities that are potentially prohibited, unlawful or contrary to good practice and ensure compliance with our terms of use and sending policy;
- comply with legal and regulatory obligations.

We use the personal data submitted to us only in accordance with the applicable data protection legislation.

For our clients who have signed up on our website, we process your personal data for the performance of the contract between us to provide our services.

For our newsletter, use case studies and marketing material sign ups, we process your personal data based on the express consent you provide for this specific purpose. You may withdraw your consent any time by emailing us at https://antavo.com/contact-us/ or privacy@antavo.com.

Newsletter and marketing emails

Changing/Editing Personal data

Every email sent by Antavo allows you to change, edit or remove any information you provided to us at the time of registration for an Antavo service or the contact request on the website.

Unsubscribe

An unsubscribe link should be included in every newsletter and marketing email sent by you. For those of you that have expressly opted in to receive our Antavo newsletter, you are easily able to unsubscribe by following the "unsubscribe" links included in every email.

Email statistics

Without systematically doing so, we may analyse and track the various rates (for example: click, open, bounce rates) and the number of emails sent which you open to assess performance rates on your emailing campaigns.

Testimonials

Antavo publishes a list of Customers & Testimonials on its site with information on our customers' names and job titles. Antavo undertakes to obtain the authorisation of every customer before publishing any testimonial on its website.

If you wish to request that your testimonial or case study be removed you may do so by emailing us at https://antavo.com/contact-us/ or privacy@antavo.com.

Public forums

The website offer publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them.

To request removal of the personal data you provided Antavo from our blog or community forum, contact us at https://antavo.com/contact-us/. Your request will be processed within thirty (30) days the latest.

In some cases, we may not be able to remove the requested information you provided Antavo, in which case we will let you know if we are unable to do so and why.

Third party disclosures – External Service Providers

Antavo's website may provide links to websites operated by companies other than Antavo that we believe may be of interest to you.

Please note that we do not disclose your Personal data to these third party sites without obtaining your prior consent.

We do not endorse and are not responsible for the privacy practices of these third party sites. If you choose to link to one of these third party sites, you should review the privacy policy posted on the other website to understand how that third party sites collects and uses your personal data.

For certain activities related to this website we have retained the services of external data processors (e.g. data centers). These service providers process data only in accordance with our instructions, are therefore also bound by this privacy policy, and are subject to our control.

Antavo does not sell or rent your personal data to third parties for marketing purposes whatsoever.

In addition, Antavo does not disclose your personal data to third parties, except if:

- you (or your account administrator acting on your behalf) requests or authorises disclosure thereof
- the disclosure is required to process transactions or supply services which you have requested
- Antavo is compelled to do so by a government authority or a regulatory body, in the case of a court order, a summons to appear in court or any other similar requisition from a government or the judiciary, or to establish or defend a legal application or,
- the third party is a subcontractor or sub-processor of Antavo in the carrying out of services (for example: Antavo uses the services of an Internet provider or a telecommunications company).

Antavo will inform you immediately, to the extent we are legally authorised to do so, in case of any application or order originating from an administrative or judicial authority relating to your personal data.

Antavo also may share your Information when we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of Antavo.

In connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. In any such event, we will provide notice if your data is transferred and becomes subject to a different privacy policy.

List of Data Subprocessors

Third Party Service/Ve ndor	Data processed	Purpose	Entity Country	Privacy Policy
Mailchimp	Name, e-mail address	Newsletter	USA	https://mailchimp.com/lega l/privacy/
Wordpress (Automattic Inc.)	Name, email address	Sending requested marketing materials (case study, ebook)	USA	https://wordpress.org/abou t/privacy/ https://automattic.com/priv acy/

Recruitee	Name, email address, phone number, CV, cover letter, answers to screening questions	Recruitment (career.antavo .com)	Netherlands	https://recruitee.com/priva cy
Hubspot	Name, email address	CRM	USA	https://legal.hubspot.com/p rivacy-policy
Intercom	Name, email address, User ID, phone number, signed up, last seen, company, company type, jobtitle, number of employees, country, language, plan type	Contest Software CRM + Support (contests.anta vo.com/platfor m.antavo.com)	USA	https://www.intercom.com /terms-and-policies#privacy
Zendesk	Name, email address, language, timezone	Loyalty Software Support (help.antavo.c om)	USA	https://www.zendesk.com/ company/customers-partne rs/privacy-policy/
Hubspot	Name, email address	Newsletter	USA	https://legal.hubspot.com/p rivacy-policy

Your data protection rights

In accordance with the UK Data Protection Act 1998 and the European General Data Protection Regulation 2016/679 (GDPR) you

- may view,
- modify,
- limit,
- request information,
- request the deletion of your data,
- suspend,
- protest,
- access,
- transfer ("right to be forgotten"),
- submit a complaint at the Information Commissioner's Office (ICO),
- file for judicial remedy,

- or revoke your permission provided to Antavo for the use of your personal data any time by contacting Antavo under https://antavo.com/company/contact. Upon request by you Antavo will also delete Information of you to the requested extent.

Upon your revocation of permission for the use of your Information Antavo will delete all your personal data provided to Antavo or any other Information, which enables identification of you within thirty (30) days.

The archived Information may be deleted upon your request, except to applicable laws and regulations and the exceptions stipulated in these Privacy Policy.

Cookies/Tracking

As a general rule, Antavo uses cookies and tracking to improve and personalise its website and/or measure its audience. Cookies are files saved on your computer's hard drive when browsing on the Internet and in particular on our site. A cookie is not used to gather your personal data without your knowledge but instead to record information on site browsing which can be read directly by Antavo on your subsequent visits and searches on the site.

We use cookies on this website to:

- direct you to the relevant sections on the Website
- make sure the website delivers a consistent look across different browsers and devices
- enable complex areas of the website to function.
- track anonymised aggregate statistics about visits to the website to help us improve website performance.

In doing this, we may install cookies that collect the domain name of the user, the internet service provider, the operating system, and the date and time of access.

- First party cookies cookies set by the website being visited by the user, ie. the website displayed in the browser window.
- Session cookies cookies that expire at the end of a browser session, starting with the time when a user opens the browser window, and finishing when the user exits the browser.
- Persistent cookies cookies that 'persist' in the device after the end of a browser session and therefore can allow the preferences or actions of the user to be remembered when the site is revisited.

Please, see more details and opt-out methods at https://antavo.com/legals/cookies/.

We use both session ID cookies and persistent cookies. We use session cookies to make it easier for you to navigate on our website. A session ID cookie expires when you close your browser. Persistent cookies enable us to track and target your interests to enhance your experience on our website. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies via your browser's 'clear cookie' function. Please see allaboutcookies.org for more information about cookies in general as well as blocking cookies on your particular web browser.

You can choose to decline acceptance of all cookies, but your ability to browse certain pages of the site may be reduced. The cookies used by Antavo are intended to enable or facilitate communication, to enable the services requested by users to be supplied, to recognise users when they re-visit the site, to

secure payments which users may make, to register the language spoken by users or other preferences necessary for the service requested to be supplied.

Apart from these first party cookies we also use third party cookies, for instance Google Analytics cookies and Google Advertising cookies, which drop cookies via our website and collects information about you, so we can understand how you use our website. We do not have access to or control over these cookies, and their use is not covered by our Privacy Policy. These tools may collect your IP address and non-personally identifiable information about your visits. This is completely anonymous and does not include your name, address, email address or other personal data. Additionally, these cookies are used to gather anonymous statistical information on how the website is browsed. These cookies will expire after 10 years. To learn more please go to:

https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage

By default, cookies are not installed automatically (with the exception of those cookies needed to run the site and Antavo's services, and you are informed of their installation by a banner). In accordance with the regulations that apply, Antavo will require your authorisation before implanting any other kind of cookie on your hard drive. To avoid being bothered by these routine requests for authorisation and to enjoy uninterrupted browsing, you can configure your computer to accept Antavo cookies or we are able to remember your refusal or acceptance of certain cookies. By default, browsers accept all cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. For more information about cookies, including how to set your internet browser to reject cookies, please go to www.allaboutcookies.org or http://www.networkadvertising.org. You can specifically opt-out of Google Analytics using this tool.

When you access third party sites directing you to our website, or when you are reading integration or social media links, cookies can be created by the companies disseminating these links. These third parties may be able to use cookies in the context of Antavo's services (partners or other third parties supplying content or services available on the Antavo site) and are responsible for the cookies they install and it is their conditions on cookies which apply. Antavo assumes no liability in regard to the possible use of cookies by third parties. For more information, you are advised to check the cookie policy directly on these third party sites with regard to their use of cookies.

Data retention periods

Antavo collects your personal data based on your prior consent given to us as well as information about how and when you use our services and we retain this data in active databases, log files or other types of files so long as you use our services.

Antavo only stores your data for the time needed to provide to you our services (unless otherwise required by law). You are able to access your personal data for as long as you hold an active service with us and for a period that varies depending on the type of data concerned. Your event data (statistics, for example), will be deleted every 13 months during active use of your account. Your message content will be stored for a period of 12 months. Other data may be deleted at any time during active use of your account in accordance with the provisions set forth above in this Privacy Policy.

Location of data storage and transfers

The host servers on which Antavo processes and stores its databases are located exclusively within the European Union.

Security

Within the framework of its services, Antavo attributes the very highest importance to the security and integrity of its customers' personal data.

Thus and in accordance with the GDPR, Antavo undertakes to take all pertinent precautions in order to preserve the security of the data and, in particular, to protect them against any accidental or unlawful destruction, accidental loss, corruption, unauthorised circulation or access, as well as against any other form of unlawful processing or disclosure to unauthorised persons. To this end, Antavo implements industry standard security measures to protect personal data from unauthorised disclosure.

In order to avoid in particular all unauthorised access, to guarantee accuracy and the proper use of the data, Antavo has put the appropriate electronic, physical and managerial procedures in place with a view to safeguarding and preserving the data gathered through its services.

Nothwithstanding this, there is no absolute safety from pirvacy or hackers. That is why in the event a breach of security were to affect you, Antavo undertakes to inform you thereof without undue delay and to use its best efforts to take all possible measures to neutralise the intrusion and minimise the impacts. Should you suffer any loss by reason of the exploitation by a third party of a security breach, Antavo undertakes to provide you with every assistance necessary so you are able to assert your rights.

You should keep in mind that any user, customer or hacker who discovers and takes advantage of a breach in security renders them liable to criminal prosecution and that Antavo will take all measures, including filing a complaint and/or bringing court action, to preserve the data and the rights of its users and of itself and to limit the impacts.

Privacy Policy changes

Antavo reserves the right to update this Privacy Policy at any time, in particular pursuant to any changes made to the laws and regulations in force. We will not reduce your rights under this Privacy Policy without your explicit consent. Any modifications made will be notified to you via our Website or by email, to the extent possible, thirty (30) days at least before any changes come into force. We would recommend that you check these changes and accept them in order to access our services without any breach. We will also keep prior versions of this Privacy Policy in an archive for your review.

Contact Information

Antavo Limited 107 Cheapside, 9th Floor EC2V 6DN London UNITED KINGDOM

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Representative of the company: Gyula Tarjáni

Email: privacy@antavo.com

Contact Person of the company: Klára Németh

Email: privacy@antavo.com

Antavo's Data Protection Officer:

Fruzsina Móricz

Email: privacy@antavo.com

Version history

• <u>27 November 2015</u>