

Group Privacy Policy

F&A

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EFFICY SA/BV and its affiliated companies (herein referred to as “EFFICY”, “we”, “our” or “us”) respect your right to privacy and we take our related legal obligations seriously. We commit to be transparent at all times about our treatment of your information. Therefore, we issued this policy to cover the way we collect, use, store, disclose and transfer your information for the purpose of enabling you to make an informed decision about our relationship, so please read it carefully.

Please be aware that our website may contain third party solutions and/or cookies and links to third party websites. We take steps to ensure that these companies clearly identify themselves and handle your information accurately. However, the third parties’ use of your information will be subject to their privacy policy excluding the applicable of our policy.

1. COLLECTION AND PROCESSING OF PERSONAL DATA COLLECTED DIRECTLY FROM YOU

The type of information we collect will depend on the circumstances and the service you are using such as :

- 1.** Visit our websites;
- 2.** Visit our branded social media pages;
- 3.** Visit our offices;
- 4.** Use our products and services as an authorized user (for example, as an employee of one of our customers who provided you with access to our services) where we act as a controller of your Personal Data;
- 5.** Register for, attend or take part in our events, webinars, programs or contests;
- 6.** Act as or work for a service provider or supplier to EFFICY, to the extent EFFICY acts as a controller with respect to your Personal Data;
- 7.** Subscribe to our newsletter;
- 8.** Act as a potential customer; or
- 9.** Contact our support services.

If you provide any personal data about other individuals than yourself, you must ensure you (i) have their authorization to provide their information to us; and, (ii) have made them aware of the terms of this policy.

1.1. When you visit our website

How is personal data collected?

Efficy may use tracking technologies such as tags on our website and cookies. These technologies enable us to recognize your device and to track your interaction notably with our services, website, emails and adverts. Efficy is allowed to collect data without your consent only for providing you a service upon your express request, ie, cookies keeping the choice expressed regarding the collection of cookies. The other types of cookies are collected on the legal basis given by your consent, which can be withdrawn at any time. To know more about how we collect and use tracking technologies, please read our Cookie Policy.

What personal data is collected?

If you interact with our websites or emails, we automatically collect information about your device and your usage of our websites or emails (such as Internet Protocol (IP) addresses or other identifiers), which may qualify as Personal Data (please see Section 4 below) using cookies, web beacons, or similar technologies.

For which purposes and on which legal basis may personal data be processed?

We collect the aforementioned personal data to provide and promote our websites and services (including necessary functionality).

We process your Personal Data to perform the use of our websites and services and to fulfill our obligations according to the applicable terms of use and service.

If we have not entered into a contract with you, we base the processing of your Personal Data on our legitimate interest to operate and manage our websites and services and to provide you with the content you access and request (ie., to download content from our websites).

For how long is personal data stored?

We do not store Personal data for longer than necessary for the processing

1.2. When you visit our branded social media pages

Efficacy is present on different social medias to inform and interact with our customers. Currently, we are present on Twitter, Facebook, Instagram and LinkedIn. We will not collect any data on you unless you contact us directly.

To the extent the social media is hosted by the platforms themselves, and you click through to these from our websites, the platform may receive information showing that you have visited our websites. If you are logged in to your social media account, it is possible that the respective social media network can link your visit to our websites with your social media profile.

Your use of these social media' is subject to the terms and conditions of each social media available on their websites.

1.3. When you visit our offices

How is personal data collected?

When you visit our office, please be aware that it may be equipped with video surveillance. In this case, we will collect your image or video you might appear in.

For our and your security, Efficacy needs to be able to keep track of daily visitors and you will therefore be asked to decline your identity.

What personal data is collected?

If you attend an event or visit our offices, we may collect your image or video you might appear in.

When you register as a visitor, you may be required to provide your name, email address, phone number, company name and time and date of arrival.

For which purposes and on which legal basis may personal data be processed?

We process your Personal Data for security and safety reasons, to register visitors and to manage non-disclosure agreements that visitors may be required to sign, to the extent such processing is necessary for our legitimate interest in protecting our offices, staff and visitors and our confidential information against unauthorized access.

For how long is personal data stored?

We do not store Personal data for longer than necessary for the processing

1.4. When you use our products and services as an authorized user (for example, as an employee of one of our customers who provided you with access to our services) where we act as a controller of your Personal Data

This notice is to inform you of the collection and processing of your personal data when contracting with us as a Customer.

How is personal data collected?

According to the applicable agreement, you subscribed to our Services. To process your subscription and allow you to access our Services, we may need to have access to your personal data.

What personal data is collected?

In order to process your organisation's access to the Services under the applicable agreement, we may collect your name, job title, company, office address, telephone number, email address, physical address, VAT-number, organization number.

For which purposes and on which legal basis may personal data be processed?

We need to collect your personal data in order to fulfil our contractual obligations with you as a customer. Efficacy may also process information for marketing purposes.

Efficacy's processing of your personal information is based on agreement between us.

For how long is personal data stored?

We do not store Personal data for longer than necessary for the processing

1.5. When you register for, attend or take part in our events, webinars, programs or contests

How is personal data collected?

We collect your personal data when you register your participation online and when we control your access to the event, webinar or contest.

We might record the webinar you participate in, and in that case, we may collect some of your personal data as explained hereunder.

What personal data is collected?

Before the event, webinar or contest, in order to process your registration, we will collect your name, title, company name, address, country, phone number and email address.

If you attend an event, we may, with your further consent, scan your attendee badge, which will provide to us your information, such as name, title, company name, address, country, phone number and email address.

We might record the webinar you participate in, and in that case, we may collect some of your personal data like your image, video or name.

For which purposes and on which legal basis may personal data be processed?

We process your Personal Data to plan and host events or webinars for which you have registered or that you attend, including sending related communications to you or to perform our contract with you or where we receive your consent.

If you register for a contest, promotion, or a program, we process your Personal Data to perform our contract with you or where we seek your consent. Some contests, programs and promotions may have additional rules containing information about how we will process your Personal Data, and you can read about them in the website page specifically created for such contest or program.

For how long is personal data stored?

We do not store Personal data for longer than necessary for the processing

1.6. When you act as or work for a service provider or supplier of EFFICY, to the extent EFFICY acts as a controller with respect to your Personal Data

How is personal data collected?

Your personal data is shared with Efficacy through the sending of an email, the completion of your profile, the booking of a demo or the filling out of a contact form.

What personal data is collected?

By contacting us by email, completing your profile, booking a demo or filling out a contact form, Efficacy will receive your full name, email address, physical address, phone number, name of your employer and any other information you may choose to share with us within the "Message" box or the email you sent.

We may also collect your financial information if a financial transaction is to take place.

For which purposes and on which legal basis may personal data be processed?

We collect your personal data because we need it to perform the obligation under our contract or because you have made the necessary to enter into an agreement with us (ie, when you fill in a contact form to request information about our services or when you contact us via email or phone).

Personal data may be processed for the purposes of, through you, maintaining and developing the relationship with you as a supplier or partner, and, if you have not objected against that, marketing our services (ie, through newsletters and other mailings, and invitations to seminars and events), respectively. Such processing is carried out on the basis of our legitimate interest to maintain and develop relationships with our suppliers and collaboration partners, and to market our services, respectively.

If you have provided financial information to us, we process your Personal Data to verify that information and to collect payments to the extent that doing so is necessary to complete a transaction and perform our contract with you.

We may process your Personal Data for the purposes of fulfilling our contract with you or your employer (ei. if you are an authorized user of our products and services or work for a service provider or supplier to Efficacy). We do this where it is necessary for the performance of the relevant contract.

For how long is personal data stored?

We do not store Personal data for longer than necessary for the processing

1.7. When you act as a potential customer

If you are or want to be a customer to Efficacy, we may collect, store and otherwise process personal data relating to you in accordance with this section.

How is personal data collected?

Your personal data is shared with Efficacy through the sending of an email, the completion of your profile, the booking of a demo or the filling out of a “Contact Me” form.

If you make purchases via our websites or register for an event or webinar, we may require that you provide to us your financial and billing information.

If you communicate with us via a phone call, we may record that call in accordance with applicable laws.

What personal data is collected?

By contacting us by email, completing your profile, booking a demo or filling out a contact form, Efficacy will receive your full name, email address, physical address, phone number, name of your employer and any other information you may choose to share with us within the “Message” box or the email you sent.

If you make purchases via our websites or register for an event or webinar, we may require that you provide to us your financial and billing information, such as billing name and address, credit card number or bank account information.

We may collect any personal data shared with Efficacy during a recorded call.

For which purposes and on which legal basis may personal data be processed?

We collect your personal data pursuant to our obligation under the contract we have entered into with you or because you have initiated steps to enter into a contract with us (ie, when you fill in a contact form to request information about our services or when you contact us via email or phone).

Personal data may be processed for the purposes of, through you, maintaining and developing the relationship with you as a client, and, if you have not objected against that, marketing our services (e.g., through newsletters and other mailings, and invitations to seminars and events), respectively. Such processing is carried out on the basis of our legitimate interest to maintain and develop relationships with our clients, suppliers and collaboration partners, and to market our services, respectively.

If you have registered for an account with us, we process your Personal Data by managing your user account for the purpose of performing our contract with you according to applicable terms of service.

If you fill out a “Contact Me” web form or request user support, or if you contact us by other means including but not limited to via phone, we process your Personal Data to perform our contract with you and to the extent it is necessary for our legitimate interest in fulfilling your requests and communicating with you.

If you have provided financial information to us, we process your Personal Data to verify that information and to collect payments to the extent that doing so is necessary to complete a transaction and perform our contract with you.

We may process your Personal Data for the purposes of fulfilling our contract with you or your employer (ie. if you are an authorized user of our products and services or work for a service provider or supplier to Efficacy). This only applies where necessary for the performance of the relevant contract.

We may process your Personal Data when using our services to validate that you are a licensed user and to review compliance with the applicable usage terms in our customer's or user's contract to the extent that it is in our legitimate interest to ensure adherence to the relevant terms.

For how long is personal data stored?

We do not store Personal data for longer than necessary for the processing

1.8. When you subscribe to our newsletter

How is personal data collected?

Your personal data is shared with Efficacy when you subscribe to our newsletter available on our website.

What is the personal data collected?

By subscribing to our newsletter, you will share your email address, phone number and full name with Efficacy. We will process your Personal Data or device and usage data, which in some cases may be associated with your Personal Data, to send you marketing information, product recommendations and other non-transactional communications (e.g., marketing newsletters, telemarketing calls, SMS, or push notifications) about us and our affiliates and partners, including information about our products, promotions, news or events.

For which purposes and on which legal basis may personal data be processed?

We process your personal data to communicate with you and to send marketing to you. This communication comprises newsletters, information about Efficacy and invitations to events and seminars.

Personal data may be processed for the purpose of administering the submission to you of invitations to seminars and events, newsletters and other mailings. Such processing is carried out on the basis of our legitimate interest to submit such mailings to you in accordance with your specific preferences.

For how long is personal data stored?

We do not store Personal data for longer than necessary for the processing

1.9. When you contact our support services

When contacting our support services, you may be required to provide personal data.

How is personal data collected?

Your personal data is shared with Efficacy when you express an interest in obtaining additional information about our services; request customer support (including accessing the Help & Training Portal) or use our "Contact Us" or similar features available on our website.

What is the personal data collected?

By contacting the support, Efficacy will receive your full name, email address, phone number, company name, username, password and any other information you may need to share with us in order to process your request.

For which purposes and on which legal basis may personal data be processed?

When you contact Efficacy for a support request through the phone number or the E-mail address available on Efficacy's website, we process any data you provide to us to assist you with your request or to refer you to the relevant department at Efficacy. The legal basis for such processing is either the contract between Efficacy and you or your consent.

We may also process some of your interactions with us due to our legitimate interest in being able to understand how you use the Efficacy service in order to improve the service for the benefit of all our customers.

We may record our intervention for quality and administration purposes. If required under applicable law, we will obtain your prior consent or give you the option to object to a call being recorded.

For how long is personal data stored?

We do not store personal data for longer than necessary for the purposes of the processing.

2. PERSONAL DATA WE COLLECT FROM OTHER SOURCES

We may also collect information about you from other sources including third parties from whom we purchase Personal Data and from publicly available information. We may combine this information with Personal Data provided by you. This helps us update, expand, and analyze our records, identify new customers, and create more tailored communication to provide services that may be of interest to you. The Personal Data we collect from other sources includes identifiers, professional or employment-related information, education information, commercial information, visual information, internet activity information, and inferences about preferences and behaviors. In particular, we collect such Personal Data from the following sources:

- Third party providers of business contact information, including mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), IP addresses, social media profiles, LinkedIn URLs and custom profiles, for purposes of targeted advertising, delivering relevant email content, event promotion and profiling, determining eligibility and verifying contact information;
- Another individual at your organization who may provide us with your personal information, which may include Personal Data and special categories of Personal Data, to the extent you consent to providing it and sharing it, for the purposes of obtaining services and assessing our goals related to encouraging diversity within our vendors;

Please note that to the extent that non-personal data is combined with personal data, we treat the combined information as personal data for the purposes of this policy.

3. USE, STORE AND SECURITY

EFFICY is a European company which is headquartered in Brussels. Your information will be stored in Europe. If you have shown an interest with EFFICY ie, by downloading an EFFICY produced white book, communicate your Personal Data during an event, EFFICY will store your information if we can prove your continued interest with EFFICY. Furthermore, the EFFICY will only process your information as described in this policy in every country.

We will use the information that we collect, including your personal data, to provide, maintain, protect, improve, and promote our website, our products and our services to you in accordance with your preferences and as otherwise stated in this policy.

If we need to collect and process Personal Data by law, or under a contract we have entered into with you, and you fail to provide the required Personal Data when requested, we may not be able to perform our contract with you.

We maintain appropriate organizational and technological safeguards to help protect against loss, misuse or unauthorized access, disclosure, alteration or destruction of the personal data we hold about you. We also seek to ensure that our service providers do the same. Unfortunately, no system can be guaranteed as completely secure and there is an inherent risk in transmitting information over the Internet. It may be possible for an unrelated party to intercept or access such transmissions unlawfully. If you believe that your personal data under our control has been compromised, including access to any accounts you hold with our services, please contact us immediately using the details below.

4. SHARE AND DISCLOSE

To improve your experience of our services and brands, information about your use of our services may be shared between EFFICY companies for the purposes of research, analysis and marketing. In addition, an EFFICY company may provide data processing services on behalf of other companies within the EFFICY group. For example, most of our newsletter subscription services are managed by EFFICY SA/NV. We may also share anonymized information publicly, ie. statistics about the general use of our website and services.

Some of our online services carry embedded content controlled by third parties for services such as social sharing. When you interact with these services they may collect information from and about you and your interaction with their content. Please be aware that third parties may track your activity, through the use of cookies or similar technology, without you needing to interact with them. If this concerns you, ensure you log out of their services before using ours.

We may disclose your personal data to law enforcement agencies, government/regulatory bodies, internet service providers and content protection organizations as required or allowed by law.

We reserve the right to transfer your personal data in the event that we sell or transfer all or a part of our business or assets so that the buyer can continue to offer you the services. We will make reasonable efforts to provide you with advance notification of the transfer of your information in such circumstances.

5. YOUR RIGHTS

You have the right to exercise your rights under data protection law at any time. Right of access: You have the right to access the information we process about you. Right of rectification: You have the right to correct information about yourself and to have incomplete information about yourself supplemented. Right to deletion: In some cases, you have the right to have information about yourself deleted. For example, when the information is no longer necessary to fulfill the purposes for which it was collected or processed, or if the processing of the data is unlawful. Right to restriction: In some cases, you have the right to have the processing of your personal data restricted. Right to object: You have the right at any time to object to our otherwise lawful processing of your personal data. Right to data portability: In some cases, you have the right to receive the personal data you have provided to us in a structured, commonly used and machine-readable format, as well as to have this personal data transferred from us to another data controller. Right to withdraw consent: You have the right to withdraw consent at any time for the processing of your personal data. Right to submit

a complaint: To the local data protection authority, which is the supervisory authority in the country where you live or work.

If you wish to stop receiving marketing communications from us then please click on the “unsubscribe” link at the bottom of the relevant newsletter. Please note that this will not unsubscribe you from all communications, only the newsletter in question and as such you will need to perform this action for each of the newsletters you are subscribed to. If you are a customer, partner or supplier with an access to our services and if you wish to opt-out in a wider way, you can connect to your Extranet and manage the authorization by yourself; you may also contact us by using the details provided below. Please note that you cannot unsubscribe from some service-related messages.

To protect your privacy, we will require you to prove your identity before granting access to your personal data. Please note that we may be required to retain certain information by law and/or for own legitimate business purposes.

PLEASE NOTE that our customers are responsible for (i) their own marketing emails and other communications sent via the services provided by us; and (ii) the personal data that we may process on behalf of them in connection with the provision of such services. We can neither unsubscribe you from our customers’ communications (please note that you can use the “unsubscribe” link in the customer’s email to stop receiving marketing communications) nor adhere to any of your requests in relation to the personal data that we process on behalf of our customers. Please contact the customer directly; and, if you have received unsolicited marketing communication (spam) from the customer, report such abuse of our services to privacy@efficy.com.

6. COOKIES AND TRACKING TECHNOLOGIES

The detail of the use and purpose of the cookies we may use is described in our Cookies Policy, you may find on our website.

7. UPDATES

This policy may be updated from time to time and you should frequently check this policy for updates. When we change the policy in a material way, a notice will be posted on our website. The date of the most recent update will appear at the top of this page.

8. CONTACT US

If you have any questions or concerns about EFFICY’s collection, use, storage, disclosure or transfer of information, or the cookies and tracking technologies used, or if you believe there has been a breach of this policy, please email us at privacy@efficy.com.

. All such communications are examined and replies are issued where appropriate and as soon as possible. We may contact you during the process to seek any further clarification if necessary.