

Surecomp Privacy Policy

Last updated: March 2023

We, at Surecomp Business Solutions Ltd. including our subsidiaries and affiliates worldwide (the "**Company**", "**Surecomp**", "**we**", "**us**", or "**our**") are committed to protecting the Users' Personal Information (as this term is further defined below) and their right to privacy. This privacy policy (the "**Privacy Policy**") describes the ways we collect information from and about the Users, how we use it and what rights a User has in relation to it, so that any user may decide whether or not to provide information to us.

A "**User**" (or "**You**") may be one of the following:

- ✓ A visitor of our website ("**Visitor**"), whether due to curiosity or as a prospect customer / partner or as our customer / partner. Such a visitor may have reached our website through a commercial on another website, social media pages or by simple search.
- ✓ A Customer's authorized user ("**Authorized User**"), using our Services (as defined below) for the benefit of the Customer, and engaged by the Customer for the use of the Services. Such authorized user may be an employee, contractor, consultant or advisor of the Customer.
- ✓ A job-applicant who wants to send us an application through our website ("**Job Applicant**").

A "**Customer**" is an entity who purchased our products and/or subscribed to our Services or using our Services under a written agreement.

In this Privacy Policy, the "**Services**" means our cloud based services (such as APISure, our trade Finance as a Service solutions, including RIVO™ and more or other services we may operate from time to time), our marketplace (available at <https://marketplace.surecomp.com>), our website (available at www.surecomp.com) and/or any related services, sales, or marketing activities, in any means and media, whether it's cloud-based services, marketplace or website.

If there are any terms in this Privacy Policy that you do not agree with, please discontinue use of our Services (as defined below). By using our Services, you agree to this Privacy Policy in addition to any other agreements we might have with you and/or the Customer. If such agreements contain terms that conflict with this Privacy Policy, the terms of those agreements will prevail. If you are an Authorized User of our Customer, and your employer entered your data to our Services, and you have any issue regarding your personal information being processed by us, please contact your employer first and review the instructions on Section "What Are Your Rights?" as well.

This Privacy Policy does not govern the practices of entities that our Company does not own or control, or entities that do not own or control our company or people that our Company does not employ or manage.

This Privacy Policy applies to all information collected through our Services.

Please read this Privacy Policy carefully as it will help you make informed decisions about sharing your Personal Information with us and/or using our Services.

This Privacy Policy forms part of our website and Services, and any other terms which are applicable to our Services (e.g. the Terms of Usage found at <https://surecomp.com/acceptable-use-policy/>) or the commercial agreement with the applicable Customer regarding the relevant Services) ("**Terms of Use**") are intended to add to this Privacy Policy, and it must be read in conjunction with it.

WHAT INFORMATION DO WE COLLECT?

A. Information from which you can be personally identified, and you choose to disclose to us ("Personal Information").

In Short: We collect Personal Information that it is provided to us, whether by you (if you are a Job Applicant or wish to register to our newsletter or fill in contact information on the designated place on our Website) or your employer (if you're an Authorizes User), such as Personal Name, Email address, phone number, IP address and location, other Personal Information you may provide us as part of our correspondences in future, job application information submitted through our website and website usage data (all as applicable).

We collect Personal Information that you voluntarily provide to us when registering to the Services, when you contact us through the Services, expressing an interest in obtaining information about us or our products and services, when we correspond with you as a customer or prospective customer, when participating in our activities or otherwise contacting us.

The Personal Information we collect can include the following:

- (i) **Request to be contacted:** If you wish to be contacted by us regarding of the Services, we will collect your full name, job title, company name, email address, country, and your area of interest, to facilitate your inquiry.
- (ii) **Mailing list:** If you wish to register to our newsletter and be provided with updates on our Services, we will collect your email address if you choose to provide it and will send you the required materials.
- (iii) **Job application:** If you wish to apply for a job position that is presented on our website, we will collect your full name, email address, phone number, resume, publicly available information on your LinkedIn profile, your personal website (if you choose to share it), cover letter, portfolio, and a personal note, all of which to consider your application. Please don't include any sensitive information on your resume or cover letter.
- (iv) **Chat-bot:** If you wish to contact us via the website, you will be able to do so via an online chat bot. We will collect the information transmitted via the online chat bot to assure sufficient assistance regarding the services.
- (v) **Becoming a partner:** If you wish to become a partner of our marketplace, we will collect your name, email address, company name, and the subject of your request, in order to contact you with further details.

All Personal Information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such Personal Information.

B. Information automatically collected.

In Short: Your IP address is collected automatically when you use our Services. Additionally, your browser and device characteristics may be collected when you use our website and marketplace.

We automatically collect certain information when you use our Services. In addition, when you visit, use or navigate our website and marketplace, we may collect additional information relating to your browser and device characteristics, which may include operating system, language preferences, referring URLs, device name, country, location. This information does not reveal your specific identity (like your name or contact information) but may identify your personal identity when associated with other information you provide us.

The Personal Information that may be collected about you automatically may include the following:

- Browser type.
- Operating System.
- The end device you use.
- Language preferences.
- Any action you made on our website and/or marketplace.
- IP information.

This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

C. Anonymized aggregated information

In short: We transform Personal Information and divide it by groups or categories of users, which does not identify and cannot reasonably be used to identify an individual user.

To provide you with access to our website and/or marketplace, we may transform your information to anonymized aggregated information. All anonymized aggregated information shall not be considered as your information and all rights to this data shall vest with us if we may not use such anonymized aggregated data in a manner that links any person or you to such anonymized aggregated information without your prior written approval.

HOW DO WE USE YOUR INFORMATION?

In Short: We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

We use the Personal Information we collect from you for a range of different business purposes according to different legal bases of processing. We may use or process your personal information for the following purposes.

One or more purposes may apply simultaneously.

1. Providing the Requested Services

- We collect your Personal Information, such as your full name, job title, company name, company email address, country and any additional information you wish to add with respect to your inquiry when you contact us regarding our Services. Please do NOT send us any sensitive data on Contact page of our website.
- We collect your Personal Information such as your work email address if you choose to join our mailing list.
- We collect your Personal Information such as your full name, email address, phone number, resume, publicly available information on your LinkedIn profile, your personal website (if you choose to share it), cover letter (if you choose to attach it), portfolio and a personal note, if you choose to apply for a job at Surecomp.
- We collect your Personal Information such as the information you transmit via the online chat bot to assure sufficient assistance regarding the Services.
- We collect your Personal Information such as your name, email address, company name, and the subject of your request, if you or the Customer (your employer) interested in becoming a partner.

We process the Personal Information where it is at your consent and request (e.g., a Job Applicant or request to join our Newsletter) or it is necessary for the adequate performance of the contract with the Customer or negotiation of a contract regarding the requested Services and our products.

We collect such information which will enable us to provide you with technical and professional assistance, with regard to the Services the Customers are provided with as well as the products the Customer use or intend to use.

2. Improvement and Development of the Services

- We collect Personal Information to improve and develop our Services and understand feedback on Surecomp's Website and products and to help provide more information on the use our products quickly and easily.
- We collect Personal Information for ongoing review and improvement of the information provided on our website to ensure it is user friendly.
- We collect Personal Information to improve the management and administration of our business and maintain compliancy with our internal policies and procedures.
- We conduct surveys and research, test features in development, and analyze the information we have to evaluate and improve our website, develop new features, and conduct audits and troubleshooting activities.

We process this information in light of our legitimate interest in improving the Website, Services, and products to allow our users to have the best experience.

3. Maintain a Safe and Secure Environment

We may use your information to detect and prevent fraud, abuse, and security incidents in the following ways, especially with respect to Authorized Users.

- Verify and authenticate your identity and prevent unauthorized or illegal activity whether on our website or our products and services.

- Enhance the safety and security of our website and products.
- Conduct security investigations and risk assessments for our products and services.
- Prevent or take action against activities that are, or may be, in breach of our Terms of Use or applicable law.

We process this information in light of our legitimate interest in improving our Website and Services and enabling our users to browse and use our website, products and Services in a secure environment.

4. Personalized Content and Advertising

- As an authorized User, if you have used Surecomp Services in the past (or your employer used the Services in the past), we have a legitimate business interest for matching the data we collect with other data we had already collected through our Services.
- This enables us to understand your needs and interests, optimize the content we send the Customer (through you) and make it more suitable and relevant to the Customer's needs.
- This also enables us to improve your experience on the Services by providing you and/or the Customer with personalized content, recommendations, and features.

We process this information in light of our legitimate interest to personalize the Customer experience regarding the Services in accordance with the requirements of the Customer.

5. Marketing

- If you wish to receive marketing and promotional communications, by providing your consent, we will be able to fulfill your request and keep you updated on our latest products, marketplace news and new Services. For opting-out our marketing list, please review the "What Are Privacy Rights" section below.

We process this information only if you provide us with your consent, to offer you marketing material which includes new products and content we believe can be relevant to you.

You hereby authorize us to retain your information in the Company's databases for the purposes set forth in this Section above.

WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: We only share information with your consent, to comply with legal requirements, or to comply with the provisions of the Customer agreement, or for business purposes, to protect your rights, or to fulfill business obligations.

We only share and disclose your information in the following situations:

- **Compliance with Laws.** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests and Legal Rights.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your

data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. For example, we use analytics services (such as Google Analytics), job application management through the services of Comet (<https://www.comeet.com/>), website content management with WordPress (<https://wordpress.com/>) and customer service and marketing efforts through the use of Salesforce (<https://www.salesforce.com/eu/>), Pardot (<https://pi.pardot.com/>) and Lead Forensic ([Lead Forensics | World-Leading B2B Website Visitor Identification](#)). Such use of third party's services is subject to a suitable DPA between us and the applicable service provider. This information may be used to, among other things, analyze and track data, determine the use of certain content, assist in managing job applications and customers' requirements and better understand online activity. For any questions regarding our use of third parties' service providers, please send inquiry via email to DPO@Surecomp.com. *Unless described in this Privacy Policy, we do not share, sell, transfer, rent or trade any of your information with third parties for their promotional purposes.*

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company, subject to honoring the terms of this Privacy Policy.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any subsidiaries or other companies that we control or that are under common control with us. For international transfer of personal information please see below "IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?"

With respect to the above-mentioned third-party service providers, who process your Personal Information on our behalf, we will contractually assure that they comply with obligations similar to those which are set forth in this Privacy Policy. We will also assure, through a suitable DPA, that they will abide by all legal and security requirements and will be allowed to use the Personal Information solely for the purposes we set herein.

IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

In Short: We may transfer, store, and process your information in countries other than your own.

We are responsible for the processing of Personal Information we receive from our Customers and any onward transfers to third parties acting on our behalf in compliance with applicable law, including but not limited to, the EU General Data Protection Regulation 2016/679 ("GDPR") and its respective national implementing legislations; the Swiss Federal Act on Data Protection; the United Kingdom General Data Protection Regulation ("UK GDPR"); and the United Kingdom Data Protection Act 2018 (in each case, as amended, adopted, or superseded from time to time).

Our servers are based on renown cloud providers located in Ireland or other locations as may be specifically requested by our customers. Please be aware that your information may be transferred to, stored, and processed by us in any other country in which our Company or agents or contractors maintain facilities, and by accessing our website or marketplace and using our Services, you consent to any such transfer of information outside of your country. We will transfer your Personal Information while using appropriate and suitable safeguards, while using a variety of legal mechanisms, including contracts, to ensure your rights and protections travel with your data, and all according to the applicable law.

Certain recipients (our service providers and our affiliates) who process Personal Information on our behalf may also transfer personal data outside the country in which you are resident. Where such transfers occur, we will make sure that an appropriate transfer agreement is put in place to protect Personal Information.

If you are a resident of the EEA, the UK or Switzerland, we will protect Personal Information when it is transferred outside of the EEA, the UK or Switzerland by processing it in a territory which the European Commission has determined provides an adequate level of protection for personal data or we will rely on the Standard Contractual Clauses approved by the European Commission / ICO (as applicable).

DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: We may use cookies and other tracking technologies to collect and store information.

Our website and/or marketplace use "Cookies" for its regular operation, including to collect statistics on the use of our website and/or marketplace, to verify details, to tailor the website to your personal preferences and information security needs.

Modern browsers include the option of avoiding cookies. If you do not know how to do this, check the help file of the browser you are using.

The Company may allow other parties to manage the advertising in our website and/or marketplace. The ads you might expect when you visit our website and/or marketplace come from the same agencies' computers. To manage their advertisements, these factors place cookies on your computer. These cookies allow these factors to collect information about viewing the advertisements they have placed, and which archives they have placed. The use these cookies make is subject to their privacy policy and not our website and/or marketplace Privacy Policy. See, for example, Google's privacy policy.

The Company may use remarketing to serve relevant and tailored publications to users who have already visited our website and/or marketplace (once and above). Through the use of remarketing, such users may view text, image ads, video, and other corporate media on third-party platforms, including on the social network "LinkedIn" and on Google's platforms (such as YouTube) and / or through advertising tools, including "Adwords" and/or "AdSense" and/or equivalent programs and tools. To find out more about our cookie policy, please visit: <https://surecomp.com/hideout-app/app-uploads/2021/12/Surecomp-Cookie-Policy-Dec-7.pdf>.

Do Not Track. Some browsers have incorporated "Do Not Track" (DNT) features that can send a signal to the websites you visit indicating you do not wish for your online activities to be tracked. Currently, our systems do not recognize browser DNT requests. In the meantime, you can use the "help" portion of the toolbar on most browsers to learn how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether as explained above.

HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this Privacy Policy unless otherwise required by law.

We will only keep your Personal Information for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). When we have no ongoing legitimate business need to process your Personal Information, we will either delete or anonymize it, or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible.

HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your Personal Information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any Personal Information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your Personal Information, transmission of Personal Information to and from our Services is at your own risk. You should only access the services within a secure environment.

DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the website, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the website. If we learn that Personal Information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records.

WHAT ARE YOUR PRIVACY RIGHTS?

In Short: In some regions, such as the European Economic Area and UK, you have rights that allow you greater access to and control over your Personal Information. You may review, change, or terminate your account at any time.

In some regions (like the European Economic Area and UK), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your Personal Information, (ii) to request rectification or erasure of your Personal Information; (iii) to restrict the processing of your Personal Information; (iv) if applicable, to data portability; (v) to object to an automated decision-making (including profiling) in certain circumstances; and (vi) to request the erasure of your Personal Information in certain circumstances, such as where processing is no longer necessary for the purpose it was originally collected for, and there is no compelling reason for us to continue to process or

store it. In certain circumstances, you may also have the right to object to the processing of your Personal Information for direct marketing purposes or where our legal basis for that processing is that such processing is necessary for our legitimate interests. To make such a request, please contact us at: DPO@surecomp.com. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your Personal Information, you have the right to withdraw your consent at any time. However, as we mentioned above, If you are an Authorized User of our Customer, and if you have any issue regarding your personal information being processed by us, including if your employer entered your data to one (or more of) our Services, you need to contact your employer for any and all matters. In the event you will contact us, we will transfer your inquiry to the Customer (in the event as mentioned above, you are an Authorized User), and the Customer will be solely responsible to deal with your inquiry, for any and all matters. In addition, please note that your request to withdraw your consent will not affect the lawfulness of the processing before its withdrawal. Furthermore, in case you are an Authorized User, such a withdrawal request should only be given by you to the Customer.

Upon your request to terminate your account or the Customer request (as applicable), we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

Generally, with regard to information collected on our website only (for example job-applicant or general visitors), Surecomp is a "Data Controller". Therefore, if you wish to exercise the above-mentioned rights, please contact us, and we will make our best efforts to fulfill your request. With respect to our Services, Surecomp is considered a "Data Processor" and sometimes, also a Data Sub-Processor, so in such case, if you wish to exercise the above-mentioned rights, please contact the applicable "Data Controller" (Customer) who we provide our Services to.

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list - however, we will still need to send you service-related emails that are necessary for the administration and use of your account. You can also opt-out by:

- Noting your preferences at the time you register your account with the Services.
- Logging into your account settings and updating your preferences.
- Contacting us using the contact information provided below.

CALIFORNIA RESIDENTS' SPECIFIC PRIVACY RIGHTS

In Short: If you are a resident of California, you are granted specific rights regarding access to your Personal Information.

Surecomp may also be subject to the CCPA, the California consumer privacy law enacted in 2018, which extends to individual Californian consumers various rights with regards to their personal data/information. If you are a consumer based in California, the rights you have include:

(i) **Right to Disclosure:** right to request Surecomp to disclose to you: (a) the categories of Personal Information collected by us; (b) the categories of sources from which the Personal Information is collected; (c) the business or commercial purpose for collecting or selling Personal Information (please be noted that we don't sell your Personal Information); (d) the categories of third parties with whom we share Personal Information; (e) the specific pieces

of Personal Information we have collected about you, the consumer — in all cases upon a verifiable consumer request ("**VCR**").

If we receive a VCR to access Personal Information, we will promptly take steps to disclose and deliver, free of charge, the Personal Information required by law, which may be delivered by mail or electronically. If delivered electronically. We are not required to respond to your VCRs more than twice in a 12-month period.

We endeavor to respond to a VCR within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. Any disclosures we provide, will only cover the 12-month period preceding your verifiable request's receipt. If, for some reason, we cannot reply within such time frame, our response will include an explanation for our inability to comply. If you wish to exercise your CCPA rights, you can make a VCR either by completing our contact form on our website, or you can contact us at: DPO@Surecomp.com

(ii) **Right to Deletion:** We are required to disclose to you that you have the right to request that your Personal Information will be deleted. As explained above, if you are an Authorized User, such request may only be made by you to the Customer (in the event you will contact us, we will transfer your inquiry to the Customer for further instructions). If a deletion VCR is received by us, we will delete your Personal Information from our records and direct any of our service providers to which we have provided such information to delete your Personal Information from their records. Notwithstanding the above, we are not required to comply with your VCR to delete Personal Information if we need to retain the Personal Information for the following purposes: (a) to complete the transaction for which Personal Information was collected, such as providing a product or Service requested by you, or which is reasonably anticipated within the scope of our business relationship with you, or to perform a contract with you; (b) to detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, or prosecute those responsible for activity; (c) to debug, identify and repair errors that impair intended functionality; (d) to exercise our right to free speech or ensure the right of another consumer to exercise free speech or another right provided by law; (e) to comply with the California Electronic Communications Privacy Act; (f) to enable solely internal uses reasonably aligned with consumer expectations based on our business relationship with you; (g) to comply with a legal obligation; or (h) otherwise to use Personal Information internally in a lawful manner compatible with the context in which you provided the information. Please note that due to the complexity of our Services, and their interoperability with third parties, it may not be possible to delete all of your Personal Information, however such records shall be limited and shall only be processed for the minimum time required.

(iii) **Non-Discrimination:** The CCPA requires that no subject business shall discriminate against you if you exercise your rights under this law, including by: (a) denying goods or services to you/the consumer; (b) charging different prices or rates for goods or services, whether through discounts, other benefits or imposing penalties; (c) providing a different level of goods or services, or suggesting that you will receive a different price, rate, level or quality of goods or services.

Our obligations to you under the CCPA will not prevent our ability to:

(i) comply with federal, state or local laws. (ii) comply with civil, criminal or regulatory inquiry, investigation, subpoena or summons; (iii) cooperate with law enforcement agencies; (iv) exercise or defend legal claims; (v) use Personal Information that is de-identified or is aggregated; (vi) collect Personal Information to extent every aspect takes place outside of California; (vii) avoid violation of an evidentiary privilege under California law or provide Personal Information to a person covered by such a privilege.

ADDITIONAL INFORMATION

Limitation of Liability. To the extent not prohibited by the applicable law governing this Privacy Policy, in no event Surecomp has any liability arising out of and/or in connection with this Privacy Policy, for any indirect, special, incidental, punitive, or consequential damages, including but not limited loss of profits, revenues or goodwill, whether under contract, tort or otherwise. Without derogating the above, User is aware and consent that to the extent not prohibited by the applicable law governing this Privacy Policy, in no event, shall the aggregate liability of Surecomp arising out of and/or in connection with this Privacy Policy, exceed EUR 100 (one hundred Euros).

EU Representative. Surecomp has been designated Lars Koernig-Kron, as Surecomp's representative in the European Union for data protection matters pursuant to Article 27 of the GDPR. For any matters related to the Process of Personal Information by Surecomp you may contact our EU Representative via email EURep@Surecomp.com.

UK Representative. For any data subject, who is a UK citizen, and his/her personal information is processed by one of our affiliates, Surecomp Business Solutions Ltd is our UK Representative for any matters related to the Process of Personal Information by Surecomp's affiliates. For any such inquiry please send email to DPO@Surecomp.com.

DO WE INTEND TO UPDATE THIS POLICY?

In short: Yes.

We may update this Privacy Policy from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this Privacy Policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Policy frequently to be informed of how we are protecting your information.

HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this policy, email us at

DPO@surecomp.com.

GOVERNING LAW AND JURISDICTION

This Privacy Policy will be governed and interpreted pursuant to the laws of England and Wales, without giving effect to its choice of law rules. You expressly agree that the exclusive jurisdiction for any claim or action arising out of or relating to this Privacy Policy shall be to the competent courts in London, UK to the exclusion of any other jurisdiction.