

FinFlag – Privacy Policy

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Document control

Document Revision History

Revision	Author	Date	Description of modifications
V001	GDU	12/12/2021	V7 SaaS- Initiation
V002	GDU	20/03/2022	V7 SaaS- miscellaneous adjustments
V003	LGI	27/04/2022	Miscellaneous adjustments

Distribution List

Name	Function/Role	For <u>I</u> nfo/ <u>A</u> ction	Approved/Reviewed	Date
Clients				

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1. Context.....	Error! Bookmark not defined.
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We at FinFlag and our Affiliates are committed to protecting your privacy. This Privacy Policy applies to the information and data collected by FinFlag when you interact with us on our websites or through other channels (for example, by communicating with us or attending one of our events), and when you use our products and services. This Privacy Policy describes how we collect, receive, use, store, share, transfer, and process your Personal Data. It also describes your choices and rights with respect to your Personal Data, including your rights of access and correction of your Personal Data. If you do not agree with this Privacy Policy, you should not use our websites or the Subscription Service.

Customers may collect and manage Personal Data when using the Subscription Service. FinFlag processes such data as a processor under the direction of our customers. Our customers, as data controllers, are responsible for complying with any regulations or laws that require providing notice, disclosure, and/or obtaining consent prior to collecting their customers' Personal Data using the Subscription Service. Please see the below section "Information We Collect and Process When You Use the Subscription Service" and our legal section on FinFlag.com for more information.

We update this Privacy Policy from time to time and we encourage you to review this Privacy Policy periodically. We will post any Privacy Policy changes on this page (FinFlag.com) and, if the changes are material, we will provide a more prominent notice by sending you an email notification. Terms not otherwise defined in this Privacy Policy will have the meaning as set forth in Customer Terms of Service. For the purposes of this Privacy Policy "Personal Data" shall mean any information relating to an identified or identifiable individual where such information is protected similarly as personal data or personally identifiable information under applicable Data Protection Laws (as defined in the FinFlag Data Processing Agreement).

If you have any questions about this Privacy Policy or our treatment of your Personal Data, please write to us by mail at FinFlag, Rue Colonel Bourg, 127-129, 1140 Brussels, Belgium, Attn: Privacy and Data Protection Officer.

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1. What Information We Collect About You

a. Information You Provide to FinFlag

When you interact with us via our websites or use the Subscription Service, we may collect Personal Data and other information from you, as further described below.

When You Visit Our Websites

We collect Personal Data from you when you submit web forms or interact with our websites, for example subscribing to a FinFlag blog, signing up for a webinar, or requesting customer support. We may ask for your email address, first and last name, job title, and other similar business information. You are free to explore some of our websites without providing any Personal Data about yourself.

Other Event Information

When you register for a FinFlag event, we collect information such as name, address, phone number, and email address. We use this information to communicate with you and in some cases facilitate your registration. Additionally, we may share your registration data with service providers in order to provide event information and improve your experience at future FinFlag events.

Account and User Information

We collect Personal Data when you sign-up for a FinFlag account, create or modify user information, set preferences, or provide any other related information to access or utilize our Subscription Service.

Payment Information

We collect payment and billing information when you register for paid products or services. For example, we may ask you to provide a billing address, or a billing contact for your FinFlag account. If you give us payment information, we use it solely as authorized by you in accordance with this Privacy Policy.

You may also provide payment information, such as a credit card number or bank account numbers, when purchasing products or services. We use secure third-party payment service providers to manage payment processing, which is collected through a secure payment process.

Customer Testimonials

We post customer testimonials and comments on our websites, which may contain Personal Data. We obtain each customer's consent via email or through other agreements between customers and FinFlag prior to posting the customer's name and testimonial.

b. Information We Collect and Process When You Use the Subscription Service

Log Files

When you visit our websites or when you use the Subscription Service, we automatically collect information about your computer hardware and software. This information can include your IP address, browser type, domain names, internet service provider (ISP), the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, clickstream data, access times and referring website addresses.

Usage Data



We collect usage data when you or your users in your FinFlag account interact with the Subscription Service. Usage data includes metrics and information regarding your use and interaction with the Subscription Service such as what product features you use the most, when an object (like a ticket) is opened and closed, and how often certain features (like workflows) are triggered in your account.

Third Party Integrations

You may connect third party integrations to your FinFlag account, which may ask for certain permissions to access data or send information to your FinFlag account. It is your responsibility to review any third-party integrations you authorize.

Any permission(s) granted by you, grants these third-parties access to your data, which may include (but is not limited to) granting third-party applications access to view, store, and modify your FinFlag account data. We are not responsible for the practices of third-party integrations, so please carefully review the permissions you grant to third-party applications. For more information on integrations with third party providers, please see on our technical section on FinFlag.com.

c. Information We Collect from Other Sources

FinFlag Partners

We may receive information about you or other users of your FinFlag account from our global network of partners. We may receive this data from our deal and/or lead registration process through our partners or through our partner co-marketing agreements.

Third Parties

We may receive information from third party service providers, from related companies, and from our business and solution partners.

Other FinFlag Companies

We may receive information about you from other companies that are owned or operated by FinFlag, in accordance with their terms and policies.

d. Information We Process on Behalf of Customers

Our online Subscription Service allows our customers to collect and process Personal Data.. When customers use the Subscription Service, they may collect Personal Data such as first and last name, email address, physical address, phone number, payment means information or other information about you. We do not control the content of our customers' webpages or the types of Personal Data that our customers may choose to collect or manage using the Subscription Service. We store our customers' information on our service providers' servers but process it as a processor under our customers' instructions and in accordance with our Customer Terms of Services, which prohibit us from using the information except as necessary to provide and improve the Subscription Service and as required by law.

Our customers control and are responsible for correcting, deleting, or updating the information they process using the Subscription Service and for complying with any regulations or laws that require providing notice, disclosure, and/or obtaining consent prior to transferring the Personal Data to FinFlag for processing purposes.

2. How We Use Your Information

a. To Provide the Product and Services

To Market and Promote the Subscription Service

We use the information you provide to FinFlag to market and promote the products, services, and other offerings. For example, we use the information, like your email or physical address, to send information or FinFlag content to you which we think may be of interest to you by post, email, or other means and send you marketing communications relating to our business. We use this information to promote the use of our services to you and share promotional and information content with you in accordance with your communication preferences.

We may also reach out to you via telephone to ask about other FinFlag products or services you may be interested in. If you have a call scheduled with a FinFlag representative, we may record and transcribe the call. You will be notified prior to the call that the call is being recorded, and you will be offered an opportunity to opt-out of having the call recorded.

To Communicate with You About the Services

We use the data you provide to FinFlag when signing up for the Subscription Service to contact you via email or in-app notification about billing, account management, and other administrative matters. We send updates to you regarding our Customer Terms of Service or other legal agreements. We may also communicate with you about security incidents via email or in-app notification.

We use your information to provide customer support, such as resolving technical issues you encounter and analysing product outages or bugs.

To Provide and Improve the Subscription Service

We use your account information and Customer Data to provide the product and services to you. For example, we use the email address you provide when signing up for the product to create your user account, and we use your payment information to process payments for paid use of the Subscription Service.

We collect data about how our products and services are used by monitoring and tracking our product users. We use this data to develop and improve our products and services. For example, we use usage data to assess trends and usage across the product to help us determine what new features or integrations our users may be interested in. We may share usage data externally but will only do so in an anonymized and/or aggregated manner to build and improve product features.

To Secure and Protect our Product and FinFlag Users

We use your account information to investigate and help prevent security incidents. We may also use this information to meet legal requirements. We use your information to verify user accounts and new product sign-ups, and to detect and prevent product abuse. This includes enforcing our Acceptable Use Policy [Acceptable Use Policy](#).

For Research and Development

We may share externally or provide other companies with statistical information about our users, but this information will not be used to identify any individual user and will only be shared on an aggregate and de-identified basis.

Log Files

Log files are used by FinFlag to provide general statistics regarding use of the websites. For these purposes, we do link this automatically collected data to other personal data such as name, email address, address, and phone number. We also use log files to troubleshoot and investigate security incidents.

Third Parties

We receive information from third party service providers. We may receive and use this information from these service providers in combination with other information we collect through other means described in this Privacy Policy for the purposes of providing you with updates and an improved Subscription Service, like personalized communications, event promotion, and tailoring the websites or product to improve user experience.

We share your data with third parties when you give us consent to do so.

b. Legal Basis for Processing Personal Data (EEA and UK visitors only)

If you are a website visitor located in the European Economic Area ("EEA") or United Kingdom ("UK"), FinFlag SRL is the data controller of your Personal Data. FinFlag's Data Protection Officer can be contacted at admin@finflag.com

Our legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it. However, we will normally collect Personal Data from you only where we have your consent to do so, where we need the Personal Data to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect Personal Data from you.

If we ask you to provide Personal Data to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your Personal Data is mandatory or not (as well as of the possible consequences if you do not provide your Personal Data). Similarly, if we collect and use your Personal Data in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

3. How We Share Information We Collect

a. Third Parties and Service Providers

We employ other third parties and service providers to provide services on our behalf to our website visitors, our customers, and users of the product and services. We may need to share your information with service providers to provide information about products or services to you. Examples may include removing repetitive information from prospect lists, analysing data or performing statistical analysis on your use of the Subscription Service or interactions on our websites, providing marketing assistance, processing credit card payments, supplementing the information you provide us in order to provide you with better service, developing and improving the product and services, and providing customer service or support. These service providers are prohibited from using your Personal Data except for these purposes, and they are required to maintain the confidentiality of your information. In all cases where we share your information with such agents, we explicitly require the agent to acknowledge and adhere to our privacy and data protection policies and standards.

b. Partners

We may share data with trusted FinFlag partners to contact you based on your request to receive such communications, help us perform statistical analysis, or provide sales support, or provide customer support. Partners are prohibited from using your Personal Data except for these purposes, and they are required to maintain the confidentiality of your data.

c. Corporate Events

If we (or our assets) are acquired by another company, whether by merger, acquisition, bankruptcy or otherwise, that company would receive all information gathered by FinFlag on the websites and the Subscription Service. In this event, you will be notified via email and/or a prominent notice on our website, of any change in ownership, uses of your Personal Data, and choices you may have regarding your Personal Data.

d. Compelled Disclosure

We reserve the right to use or disclose your Personal Data if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or comply with a law, court order, or legal process. If you use the Subscription Service, Customer Data is considered Confidential Information and you should review the Confidentiality terms in the Customer Terms of Service for more information.

4. How We Transfer Data We Collect Internationally

a. International Transfers within the FinFlag Group

To facilitate our global operations, we may transfer information to other FinFlag Affiliates where we have operations for the purposes described in this policy. Please see Annex 3 of our DPA for a list of FinFlag Affiliates and their locations.

This Privacy Policy will apply even if we transfer Personal Data to other countries. We have taken appropriate safeguards to require that your Personal Data will remain protected wherever it is transferred. When we share Personal Data of individuals in the European Economic Area ("EEA"), Switzerland or the United Kingdom ("UK") within and among FinFlag's Affiliates, we make use of the Standard Contractual Clauses (which have been approved by the European Commission) as well as additional safeguards where appropriate (such as commercial industry standard secure encryption methods to protect customer data at rest and in transit, TLS for FinFlag hosted sites, web application firewall protection, and other appropriate contractual and organizational measures).

b. International transfers to third parties

Some of the third parties described in this Privacy Policy, which provide services to us under contract, are based in other countries that may not have equivalent privacy and data protection laws to the country in which you reside. When we share Personal Data of individuals in the EEA, Switzerland or UK with third parties, we make use of a variety of legal mechanisms to safeguard the transfer including the European Commission-approved standard contractual clauses, as well as additional safeguards where appropriate. Please contact us if you need more information about the legal mechanisms we rely on to transfer personal data outside the EEA, Switzerland, and UK.

5. How We Store and Secure Your Information

a. Data Storage and Security

We use a variety of security technologies and procedures to help protect your Personal Data from unauthorized access, use or disclosure. We secure the Personal Data you provide on computer

servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. All Personal Data is protected using appropriate physical, technical and organizational measures.

b. Retention of Personal Data

How long we keep information we collect about you depends on the type of information and how we collect and store it. After a reasonable period of time, we will either delete or anonymize your information or, if this is not possible, then we will securely store your information and isolate it from any further use until deletion is possible.

We retain Personal Data that you provide to us where we have an ongoing legitimate business need to do so (for example, as needed to comply with our legal obligations, resolve disputes and enforce our agreements).

When we have no ongoing legitimate business need to process your Personal Data, we securely delete the information or anonymize it or, if this is not possible, securely store your Personal Data and isolate it from any further processing until deletion is possible. We will delete this information at an earlier date if you so request, as described in the section "How to Access & Control Your Personal Data" below.

If you have elected to receive marketing communications from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our content, products, or services, such as when you last opened an email from us or ceased using your FinFlag account. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

The data our customers process in connection with the Subscription Service is retained according to FinFlag Customer Terms of Service and Data Processing Agreement.

6. Cookies and Similar Technologies

a. Cookies

When you visit our websites, sign up for a FinFlag account, attend a FinFlag virtual event, or request more information about FinFlag, we collect information automatically using tracking technologies, like cookies and tracking pixels. For more information, please refer to our Cookie Policy.

FinFlag and our partners use cookies or similar technologies (such as web beacons and JavaScript) to analyse trends, administer the website, monitor how visitors navigate around the websites, and to gather demographic information about our user base as a whole. To find out more about how we use cookies on our websites and how to manage your cookie preferences please see our Cookie Policy.

b. Third Party Tracking Technologies

The use of cookies and web beacons by any tracking utility company is not covered by our Privacy Policy or Cookie Policy.

7. How to Access & Control Your Personal Data

a. Reviewing, Correcting and Removing Your Personal Data

You have the following data protection rights:

- You can request access, correction, updates or deletion of your Personal Data.

- You can object to our processing of your Personal Data, ask us to restrict processing of your Personal Data or request portability of your Personal Data.
- If we have collected and processed your Personal Data with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Data conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your Personal Data. Contact details for data protection authorities in the EEA are available https://edpb.europa.eu/about-edpb/about-edpb/members_en.

To exercise any of these rights, please contact us at admin@finflag.com or by mail to FinFlag SRL, Rue Colonel Bourg 127-129, 1140 Brussels, Belgium, Attention: Privacy and Data Protection Officer. We will respond to your request to change, correct, or delete your data within a reasonable timeframe and notify you of the action we have taken.

If you are a customer, prospect, or otherwise interact with a FinFlag customer that uses our Subscription Service and would like to access, correct, amend or delete your data controlled by the customer, please contact the relevant customer directly. FinFlag acts as a processor for our customers and will work with our customers to fulfil these requests when applicable.

b. Anti-Spam Policy

Our Acceptable Use Policy applies to us and to our customers and, among other things, prohibits use of the Subscription Service to send unsolicited commercial email in violation of applicable laws, and requires the inclusion in every email sent using the Subscription Service of an "opt-out" mechanism and other required information. We require all of our customers to agree to adhere to the Acceptable Use Policy at all times, and any violations of the Acceptable Use Policy by a customer can result in immediate suspension or termination of the Subscription Service.

c. To Unsubscribe from Our Communications

You may unsubscribe from our marketing communications by clicking on the "unsubscribe" link located on the bottom of our e-mails, updating your communication preferences, or by contacting us at admin@finflag.com or postal mail to FinFlag SRL, Rue Colonel Bourg 127-129, 1140 Brussels, Belgium, Attention: Privacy and Data Protection Officer. Customers cannot opt out of receiving transactional emails related to their account with us or the Subscription Service.

d. To Unsubscribe from Our Customers' Communications

Our customers are solely responsible for their own marketing emails and other communications; we cannot unsubscribe you from their communications. If you are a customer, prospect, or otherwise interact with a FinFlag customer, you can unsubscribe from our customers' marketing communications by clicking on the "unsubscribe" link located on the bottom of their emails, or by contacting them directly.

8. Data Protection Officer

If you have any questions about this Privacy Policy or our privacy practices, or if you have a disability and need to access this notice in a different format, please contact us at admin@finflag.com or by mail at:

FinFlag SRL



Rue Colonel Bourg 127-129

1140 Brussels

Belgium

9. Other Important Privacy Information

a. We Never Sell Personal Data

We will never sell your Personal Data to any third party.

b. Information About Children

The websites are not intended for or targeted at children under 16, and we do not knowingly or intentionally collect Personal Data about children under 16. If you believe that we have collected Personal Data about a child under 16, please contact us at admin@finflag.com, so that we may delete the information.