

Atraxo Website Privacy Policy

(V1.0 – Mar 23, 2023)

In this Website Privacy Policy (“statement”), we, Atraxo and our other affiliates (the “Atraxo Group”), provide information about how we collect, use, disclose, and transfer personal information from you, an individual person and website visitor, through Atraxo’s publicly accessible websites of the Atraxo Group of companies (such as www.atraxo.com that can be accessed without a password) and on which we post a direct link to this statement (collectively the “site”).

Scope

This statement covers only data collected through the site and not any other data collection or processing, including, without limitation, data collection practices of webpages to which the site links, or data that we collect offline or through webpages that do not display a direct link to this statement, for example the Atraxo applications on which we host data for registered customers.

Atraxo complies with Directive 95/46/EC. To learn more about Directive 95/46/EC, please visit <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31995L0046:en:HTML>

Types of Data and Collection Methods

Through the site, we receive *personal information* as well as *other information* related to your use of the site.

Personal Information Collected:

Personal information is information that identifies you as an individual. When you request information, subscribe to a mailing list, subscribe for a service, or respond to an online survey or otherwise contact us, we usually collect personal information such as your name, e-mail address(es), mailing address(es), and telephone numbers.

You can opt out of providing information by not entering it when asked and, if such information is required in order to allow us to respond to your inquiry, you will receive a notice advising you of this. If you do not provide us with some or all of the requested information we may not be able to provide services to you.

Other Information Collected:

The site also collects information that does not reveal your specific identity or does not directly relate to an individual (“other information”). For example, when you visit the site, we also track certain information about your computer and Internet connection, such as the IP address of your computer and/or Internet service provider, the date and time you access the site, the Internet address of websites from which you link to our site, the computer technology you are using and your movements and preferences on our site. We use technology that many other websites employ, including, without limitation, “cookies” or small data files stored on your computer’s hard drive, to collect such information. There are persistent cookies and session cookies. In some instances, we use cookies to collect information in connection with future visits from that website, to recognize you as a previous visitor, or to track your activity on our site. If

you follow a link to the site from an affiliate or promotion, we store information about your arrival from that affiliate or promotion in a session cookie. A persistent cookie consists of a text file sent by a web server to web browser, which will be stored by the browser and will remain valid until its set expiry date. You do not need to have cookies turned on to visit our site. You can refuse cookies by setting your browser to decline them automatically or to give you the choice of declining or accepting the placement of cookies from the site. But, if you want to access Atraxo webpages, you need to accept a mandatory session cookie, which you can delete after you leave the site.

We also may collect information related to your company, geographic location, or other demographic information that does not personally identify you.

To the extent permitted by applicable law, we reserve the right to combine other information as defined above with personal information that you submit.

Collection Purposes, Use of Data

We collect Personal Information primarily for the purpose for which you provided the information to us and/or our affiliates or for the services you ordered. (For example, to provide information to you or sign you up for a free trial).

Additionally, we may collect personal information for marketing purposes such as contacting you to further discuss your interest in our company, the services we provide and ways we can improve them to provide information on services, promotions, and events. You can opt out of receiving marketing emails as explained below.

We collect other information primarily for purposes of administering, protecting and improving our site and our systems, to better understand the preferences of our site visitors, to identify server problems, to compile aggregated statistics about site usage, and to help personalize your experience on our site. We and our service providers may use the IP address of your device to approximate your general physical location such as city and state for purposes such as provide information on local promotions and events. We do not deliver third party online advertisements on our sites but we advertise our products and services on others' Web sites. We work with service providers to deliver retargeting advertisements and other advertisements on our behalf to visitors of our sites. We may use and disclose other information for any purpose, including all of the purposes for which we use and disclose personal information except where we are required to do otherwise under applicable law.

We will retain your personal information for the period necessary to fulfil the purposes outlined above.

Disclosures of Personal Information

We do not sell your personal information to any third parties; however, Atraxo shares your personal information within the Atraxo Group. We may also share information with trusted business partners, such as system integrators, distributors, and referral partners and as well as any other party specifically identified on the page on which you submit your information.

We engage agents and service providers who process data only on our behalf and for our purposes under confidentiality agreements. We may share your information as required by law or in the interest of protecting or exercising our or others' legal rights, e.g., without limitation, in connection with requests from law enforcement officials and in connection with court proceedings. We may share or transfer your information in connection with a prospective or actual sale, merger, transfer or other reorganization of all or parts of our business. Also, we

reserve the right to fully use and share any information that is not in personally identifiable form (such as statistics and survey results that do not identify you individually by name).

Opt-Out

To opt out of receiving marketing related communications from Atraxo, please click on the “opt-out” link in the communication or please contact us at support@atraxo.com. Please note that if you do opt-out of receiving marketing- related emails from us, we may still send you important administrative messages, and you cannot opt-out from receiving administrative messages.

Third-Party Sites

This statement does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site or service to which the site links. The inclusion of a link on the site does not imply our endorsement of the linked site or service.

Security

Transmissions over the Internet are never 100% secure or error-free. However, we take reasonable steps to protect your personal information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction.

Cross-Border Transfers

Your personal information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the site you consent to the transfer of information to countries outside of your country of residence, including the United States, which may have different data protection rules than those of your country.

Retention Period

We will retain your personal information for the period necessary to fulfil the purposes outlined in this statement unless a longer retention period is required or permitted by law.

Access

If personal information you have submitted through the site is no longer accurate, current, or complete, and you wish to update it, please send an e-mail to support@atraxo.com. Upon appropriate request we will usually be glad to update or amend your information, but we reserve the right to use information obtained previously to verify your identity or take other actions that we believe are appropriate.

Amendments

This statement is effective as of March 23, 2023. We reserve the right to change, modify, add or remove portions of this statement from time to time and in our sole discretion, but will alert you that changes have been made by indicating on the statement the date it was last updated. When you visit the site, you are accepting the current version of this statement as posted on the site at that time. We recommend that users revisit this statement on occasion to learn of any changes.

Contact Details and Complaints Handling

Please feel free to contact us with any comments, questions, complaints or suggestions you might have regarding the information practices described in this statement. You may send us an e-mail at info@atraxo.com or write to the GRC Officer at Atraxo Worldwide Holding GmbH, 1 Bödekerstr., Hannover 30161, Germany, Telephone: +49 (511) 911 633 50.