



Privacy Policy

Posted: April 1, 2020

Effective: April 16, 2020

1. Introduction

Azeus and its affiliated companies (“Azeus”, “we”, “us” or “our”) respect the privacy rights of our customers, users, website visitors and business partners and we recognize the importance of protecting and handling information collected about you in accordance with both the law and best practice. This document (“Privacy Policy”) tells you how we use and disclose the personal information we collect via our services or when you otherwise interact with us.

2. Our Processing Activities

To find out more please go to the sections of this policy that are relevant to you (at Exhibit A):

- I. **Visitors to our website**
- II. **Convene customers (Trial Users & Paid Customers)**
- III. **Business partners**
- IV. **Job applicants**

3. Security

We are committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use or disclosure.

While we take reasonable efforts to guard personal information we knowingly collect directly from you, no security system is impenetrable and due to the inherent nature of the Internet as an open global communications vehicle, we cannot guarantee that information, during transmission through the Internet or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others, such as hackers. In addition, we cannot guarantee that any passively collected personal information you choose to include in documents you store on our systems are maintained at levels of protection to meet specific needs or obligations you may have relating to that information.

You may access your account information and our services only through the use of an individual username and password. To protect the confidentiality of personal information, you must keep your password confidential and not disclose it to any other person. Please advise us immediately if you believe your password has been misused. In addition, always logout and close your browser when you finish your session.

Our information security policy is supported by a number of security standards, processes and procedures and we store information in access-controlled premises or in electronic databases requiring logins and passwords. We require our third-party data storage providers to comply with appropriate information security industry standards. All partners and staff and third-party providers with access to confidential information are subject to confidentiality obligations.

4. Location of Processing

We may store and process personal information and content in the United States and other countries or cities which include but are not limited to the United Kingdom, Australia, Hong Kong, Singapore and the Philippines.

As part of a global group of companies, Azeus has affiliates and third-party service providers within as well as outside of the European Economic Area (the "EEA") and the United Kingdom (UK). We may transfer and disclose your personal information to our affiliates and third-party service providers for any of the purposes set out in this privacy policy.

As a result, your personal information may be transferred outside the country where you are located. This includes countries outside the European Economic Area (EEA), the UK and countries that do not have laws that provide specific protection for personal information. Where we collect your personal information within the EEA or the UK, transfer outside these locations will be only:

- to a recipient in a jurisdiction approved by the European Commission (for personal information collected within the EEA) or approved by the UK-ICO (for personal information collected within the UK post-Brexit) as offering an adequate level of protection for personal data (including the U.S. for personal information transferred to organisations in the U.S under the EU-U.S. Privacy Shield) or
- under an agreement which covers the EU requirements (for personal information collected within the EEA) or the UK requirements (for personal information collected within the UK post-Brexit) as the case may be, for the transfer of personal data to data processors or data controllers outside these locations.

We use resources and servers located in various countries around the world to process your personal information. Your personal information may also be transferred to third party service providers who process information on our behalf, including providers of IT and IT services such as website hosting and management, data back-up, security and storage services. Our third-party service providers may also use their own third parties (sub-processors). Our third-party service providers and their sub-processors are bound to maintain appropriate levels of security and confidentiality and to process personal information as instructed by us.

If you have any questions in relation to the transfer of your personal information outside the jurisdiction of origin please send an email to dataprocessing@azeus.com.

5. Sharing Information with Third Parties

We will share your personal information with third parties only in the ways that are described in this Privacy Policy. We do not sell your personal information to third parties.

We may also disclose your personal information to third parties where:

- you have consented to us sharing your personal information in this way;
- we are under a legal, regulatory or professional obligation to do so (for example, in order to comply with anti-money laundering requirements) or in order to enforce or to protect the rights and interests, property, or safety of Azeus, our clients or others;
- if Azeus is involved in a merger, acquisition, or sale of all or a portion of its assets, or a bankruptcy proceeding, we may transfer your information to the acquiring company, you will be notified via email and/or a prominent notice on our website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.
- we may share aggregated or anonymized information with third parties that does not directly identify you.

6. Data Retention

We may retain your personal data for a period of time consistent with the original purpose of collection. We also may retain your personal data during the period of time needed for Azeus to pursue our legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes, enforce our agreements, if deemed necessary.

7. Your Rights

You have a right of access to personal data held by us as a data controller. We may charge for a request for access in accordance with applicable law. We will aim to respond to any requests for information promptly, and in any event within the legally required time limits.

You have a right to have any inaccurate personal information corrected. When practically possible, once we are informed that any personal data processed by us is no longer accurate, we will make corrections (where appropriate) based on your updated information.

Where we process personal data based on consent, individuals have a right to withdraw consent at any time.

You also have a right to erasure/deletion, to restrict or object to our processing of personal data and the right to data portability.

If you wish to exercise any of these rights, please send an email to dataprocessing@azeus.com.

In case you want to complain about our use of personal data, please send an email with the details of your complaint to dataprocessing@azeus.com. We will look into and respond to any complaints we receive.

8. Changes to This Privacy Policy

We will update this Privacy Policy when necessary to reflect customer feedback and changes in our services. When we post changes to this Privacy Policy, we will revise the "Posted" and "Effective" dates at the top of the Privacy Policy. If there are material changes to the statement or in how Azeus will use your personal information, we will notify you either by prominently posting a notice of such changes before they take effect or by directly sending you a notification. We encourage you to periodically review this Privacy Policy to learn how Azeus is protecting your information.

9. Contacting Us

Any questions, comments and requests regarding this Privacy Policy or the information that we hold about you should be addressed to dataprocessing@azeus.com.

You may also contact our EU/EEA and UK Representatives at the below addresses:

Convene Sociedad Limitado
Address: Calle Balmes, número 173, 4º 2ª, 08006, Barcelona
Email: dataprocessing@azeus.com

Azeus UK Limited
Address: Azeus Convene, 2.014, 3 Waterhouse Square, 138-142 Holborn, London, EC1N 2SW
Email: dataprocessing@azeus.com

Exhibit A: Specific Provisions

I. Visitors to our website

1. Information Collection

There are two types of information we collect from our website:

“Personal Data”: There are pages on our website where your personal information is collected, such as the forms to supply your details to make contact with Azeus. Such personal data identifies you or can be used to identify or contact you, and include for example your name, telephone number and email address.

“Non-Personal Data”: Non-personal data is collected through traffic data and site statistics. We keep a record of traffic data which is logged automatically by our server. Such non-personal data collected include for example the URLs visited before ours, and other anonymous statistical data involving the use of our website. We are not readily able to identify any individual from traffic data or site statistics.

We ask that you do not provide sensitive information (such as race or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; physical or mental health; genetic data; biometric data; sexual life or sexual orientation; and, criminal records) to us when using our website.

2. Use of Your Information

For “Personal Data”, we use this information solely to respond to you appropriately, for example, by providing you by e-mail with the information you may have requested, or an update of information about our services and products. The legal basis for processing this information is that it is in our legitimate interest to ensure that you are provided with the best client services and visitor services we can offer.

We may ask whether you wish to receive marketing from us and this will be presented to you as an option on the relevant page on our website where necessary. We will not send you marketing if you ask us not to. If you have agreed to receive marketing but then later change your mind and no longer wish to receive marketing, please let us know so we can remove you from our distribution lists. You can contact us at dataprocessing@azeus.com.

We may disclose your personal information to law enforcement, regulatory, or other government agencies or to other third parties as required by, and in accordance with, applicable law or regulation. We may also review and use your personal information to determine whether this disclosure is required or permitted. We may also disclose log files for security-related purposes.

For “Non-Personal Data”, we use non-personally identifiable information to analyze site usage (such as aggregated information on the pages visited by our users), which allows us to improve the design and content of our site.

3. Cookies

Cookies are small text files that websites send to your computer’s browser when you access the website. Our website uses cookies and upon visiting our site you will be invited to give consent that our system can place cookies on your computer. You can also set your web browser to reject cookies. Please refer to [here](http://www.allaboutcookies.org/manage-cookies/) (at <http://www.allaboutcookies.org/manage-cookies/>) for details on how you can control and/or delete cookies.



Cookies enable our system to recognize your computer every time you visit our website, enabling us to have an idea of your preferences – for example, what services or offerings you viewed – in order to enhance your user experience, and help us consider how we can improve our services to you.

None of this information that we collect in this way will be sold or disclosed to any other party unless required by law.

You can find out more details regarding our use of cookies from the Cookies Policy of our website.



II. Convene customers (Trial Users & Paid Customers)

1. Introduction

This Privacy Policy, together with our Convene Terms of Service at <https://www.azeusconvene.com/terms/> and any other documents referred to below tells you how we use and disclose the personal information we collect via our Services, or when you otherwise interact with us, as a trial or paid customer of our Services.

For the purposes of these **Convene customers (Trial Users & Paid Customers) specific provisions**, unless otherwise defined here the terms shall have the same meaning as defined in the Convene Terms of Service.

Please read the following carefully to understand how we will collect, use and protect your personal information.

2. What We Collect

We collect a variety of information to enable us to provide the Services, improve and enhance our users' experience of the Services. For more information about the purposes for which we use your information please see the Use of Information section below.

We collect the following information (which may include personal information):

a. Information You Provide To Us

When you register for and use the Services, apply for a trial, request a quotation or a demo, we collect information you provide directly to us. This can include:

- Your name, username, your company name, job title, email address, phone number
- The password that we generate for you when you register for our Services
- Documents you upload to our Services
- Contact made with our customer support or helpdesk via means such as emails, phone conversations or chat sessions
- Messages you send to us, such as feedback and product reviews you write

If you are providing information (including personal information) about someone else you confirm that they have appointed you to act for them and consent to the processing of their personal information and that you have informed them of our identity and the purposes (as set out in this Privacy Policy) for which their personal information will be processed.

b. Information We Collect as You use our Services

When you use our Services, we collect data to make the Services work better for you. This can include, for example, usage of the features and modules, and data about the performance of the Services.

We may also collect data including log information and the devices you use to access the Services, to optimize and remedy your technical concern related to the use of the Services.

3. Data Processor

We act as Data Processor for the data stored in the Content. We do not own, control or direct the use of any of Content stored or processed by you via Convene hosted solution or Convene application. Only the customers or users are entitled to access, retrieve and direct the use of such information. We are largely unaware of what information is actually being stored or made available by you to the Convene hosted solution or Convene application and we do not directly access such information or data except as authorized by you or as necessary to provide support services to you.

Because we do not collect or determine the use of any personal data contained in the Content and because we do not determine the purposes for which such personal data is collected, the means of collecting such personal data, or the uses of such data, we are not acting in the capacity of data controller in terms of the data protection laws and do not have the associated responsibilities under the data protection laws. We should be considered only as a processor on behalf of our customers and users as to any Content containing personal data that is subject to the requirements of the data protection laws. Except as provided in this Privacy Policy or in the Convene Terms of Service, we do not independently cause Content containing personal data stored in the Convene hosted solution or Convene application to be transferred or otherwise made available to third parties, except to third party subcontractors who may process such data on behalf of us in connection with our provision of services to customers.

The customer or the user is the data controller under the data protection laws for any Content containing personal data, meaning that such party controls the manner such personal data is collected and used as well as the determination of the purposes and means of the processing of such personal data. We are not responsible for the content of the personal data contained in the Content or other information stored on its servers (or its subcontractors' servers) at the discretion of the customer or user nor are we responsible for the manner in which the customer or user collects, handles disclosure, distributes or otherwise processes such information.

4. Use of Information

We may use the information (which may include personal information) we collect about you for a variety of purposes, including, for example, to:

- Provide, operate, maintain and improve the Services;
- Enable you to access and use the Services, including creating and joining e-meetings, uploading, downloading, collaborating on and sharing Content;
- Allow you to opt-in to participate in any interactive feature of our Services;
- Notify you about changes to our Services;
- Send you technical notices, updates, security alerts and support and administrative notices;
- Provide and deliver services and features upon your request;
- Process and complete transactions;
- Respond to your comments, questions, and provide customer service and support;
- Communicate with you, where you have agreed or where the law permits, for marketing purposes, including to periodically inform you about services, features, surveys, newsletters, offers, promotions, and events, and provide other news or information about Azeus and Convene. If you have agreed to receive marketing but then later change your mind and no longer wish to receive marketing, please let us know so we can remove you from our distribution lists. You can contact us at marketing@azeusconvene.com ;
- Monitor and analyze trends, usage, and activities in connection with the Services;
- Investigate and prevent fraudulent transactions, unauthorized access to the Services, and other illegal activities; and
- Personalize and improve the Services.

We may collect anonymous and aggregated data which does not contain personal information for the purposes of improving our Services.



5. Sharing Information with Third Parties

We do not sell your personal information to third parties.

We may provide your personal information to companies that provide services to help us with our business activities such as offering customer service. These companies are authorized to use your personal information only as necessary to provide these services to us.

We may also disclose your personal information to third parties where:

- if you are an individual Services registered user and the domain of the primary email address associated with your Services account is owned by your employer or your organization and was assigned to you as an employee or member of that organization, and such organization wishes to establish a Services corporate account, then certain information concerning use of your individual account may become accessible to that organization's administrator including your email address; and
- we may share your information with your consent, including when you choose to use any features in the Services that by their nature support sharing with third parties who you choose. Your name, email address, information from your profile, and any Content you choose to share will be shared with such third parties, and such third parties may communicate with you in connection with your use of the interactive or collaboration features of the Services. For example, third parties who you invite to join an e-meeting using the Services may also modify Content that you have shared, upload documents to Content you have shared, and provide other third parties with rights to view the Content you have shared.

6. Where We Store Your Information

We may store and process personal information and content in the United States and other countries or cities which include but are not limited to the United Kingdom (UK), Australia, Hong Kong, Singapore and Philippines.

For US customers who have adopted our software-as-a-service (hosted) Convene Services, the Content uploaded by users to the Convene hosted solution or Convene application shall reside within the United States. No content will be transferred outside of the United States without the prior consent of the customer.

For customers in Europe (other than in the UK) who have adopted our software-as-a-service (hosted) Convene Services, the Content uploaded by users to the Convene hosted solution or Convene application shall reside within the EEA. Convene environments for UK customers which were set up before 18 September 2018 will continue to reside within the EEA or the UK. Beginning 18 September 2018, new Convene environments for UK customers will reside within the UK. No Content will be transferred outside of the aforementioned locations without the prior consent of the customer.

If you have any questions in relation to the transfer of your personal information outside the jurisdiction of origin please send an email to dataprocessing@azeus.com.

7. Collaboration and Sharing Features

The Services offers collaboration and file sharing features or other tools, which allow you to share your Content through the Services. As a function of the collaborative nature of the Services and based on the permissions and settings you choose, the use of such features enables the sharing of Content with people you want to collaborate with. The access rights and setting can be managed by using the Services functionality. For more information about such collaboration and sharing features, we encourage you to review the documentation of Services provided or made available by Azeus, or to contact support@azeusconvene.com.

III. Business partners

1. Introduction

Protecting the security and privacy of personal data of contact persons (each a “Business Partner Contact”) at our customers, suppliers, vendors and partners (each a “Business Partner”) is important to Azeus and its affiliated companies (together “Azeus”). Therefore, we process personal data in compliance with applicable laws on data protection and data security.

2 Categories of Personal Data Processed, Purpose of the Processing and Legal Basis

In the context of the business relationship with Azeus, Azeus may process personal data for the following purposes:

- Communicating with Business Partners about products, services and projects of Azeus or Business Partners, e.g. by responding to inquiries or requests;
- Planning, performing and managing the (contractual) relationship with Business Partners, e.g. by performing transactions and orders of products or services, processing payments, performing accounting, auditing, billing and collection activities, arranging shipments and deliveries, facilitating repairs and providing support services;
- Administrating and performing customer surveys, marketing campaigns, market analysis, sweepstakes, contests, or other promotional activities or events;
- Maintaining and protecting the security of our products, services and websites, preventing and detecting security threats, fraud or other criminal or malicious activities;
- Ensuring compliance with legal obligations (such as record keeping obligations), Business Partner compliance screening obligations (to prevent white-collar or money laundering crimes), and Azeus policies or industry standards; and
- Solving disputes, enforce our contractual agreements and to establish, exercise or defend legal claims.

For the aforementioned purposes, Azeus may process the following categories of personal data:

- Contact information, such as full name, work address, work telephone number, work mobile phone number, work fax number and work email address;
- Payment data, such as data necessary for processing payments and fraud prevention, including credit/debit card numbers, security code numbers and other related billing information;
- Further information necessarily processed in a project or contractual relationship with Azeus or voluntarily provided by the Business Partner Contact, such as orders placed, payments made, requests, and project milestones;
- Information collected from publicly available resources, integrity databases and credit agencies; and
- If legally required for Business Partner compliance screenings: information about relevant and significant litigation or other legal proceedings against Business Partners.

The processing of personal data is necessary to meet the aforementioned purposes including the performance of the respective (contractual) relationship with Business Partners. Unless indicated otherwise, the legal basis for the processing of personal data is that (i) the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6 (1) (b) of the EU General Data Protection Regulation (GDPR)); (ii) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (Article 6 (1) (f) of the EU GDPR); or (iii) if explicitly provided by Business Partner Contacts, the consent (Article 6 (1) (a) of the EU GDPR).

If we do not collect the respective personal data, the purposes described above may not be met by us.

IV. Job applicants

1. What Information we Collect?

As part of any recruitment process, we collect and process personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

We collect a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements; and
- information about your entitlement to work in the country.

We may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

We may also collect personal data about you from third parties, such as references supplied by former employers. Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

2. Why do we Process Personal Data?

We need to process data to take steps at your request prior to entering into a contract with you. We may also need to process your data to enter into a contract with you.

In some cases, we need to process data to ensure that we are complying with its legal obligations. For example, it is mandatory to check a successful applicant's eligibility to work in the country before employment starts.

We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.