



Privacy Policy and Data Usage Rules

Effective since May 24, 2018

1. Introduction

Colobridge values your trust and bears full responsibility for protecting its users' data. As a German company, we comply with the laws of the Federal Republic of Germany. Given that Germany is one of the most advanced and reliable in terms of personal data protection in the European Union, as well as European legislation on storage and processing of personal data - GDPR (General Data Protection Regulation). This Document sets out the rules and principles of how we use information:

- 1) collected through our websites on which references to the Document are made; 2) collected through social networks accounts;
- 3) which you provide to us when registering on our websites, sending us messages via chat, e-mail and other communication channels;
- 4) while we provide our services, as well as by sending and analysing messages via email that we send to you with reference to Document.

The term "User" means any person who visits or otherwise uses our websites. By using the above resources, you agree to the provisions set forth in this Document.

This Privacy Policy does not apply to third-party companies not owned and/or controlled by Colobridge, as well as to individuals who are not employees of the company or are not in a contractual relationship with it.

In addition, this Privacy Policy does not apply to information placed by customers on our computing resources as part of getting paid services. Such information is subject to the provisions of the respective contract on providing telecommunication services.

2. What data do we log?

Personal data

Information that enables identifying a user or information relating to an identifiable person. For example, first name, last name, company name, job position, postal address, phone number and email address. By communicating another person's personal information to us or our providers, you represent that you are authorised to transfer that

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data and consent to its use under the provisions of this Document.

Payment data

All automatic payments you can make through your personal account are processed by payment systems. We do not store your payment details, but we have access to the information stored by the payment processor. This information does not include your credit card number and passwords to your accounts. It serves exclusively to identify the payment source in the system and is used exclusively to check that we have received the money in our accounts.

IP address

This is a unique network address that your Internet service provider uses to enable Internet access. Each time you visit the website, the IP address, the time when you accessed the pages and the pages you viewed are automatically recognized and recorded in our server logs. IP address logs are commonly used by many websites, applications and other services. We use IP addresses to statistically process data on website usage, identify and solve server problems and identify regions visitors come from.

Cookies and other data tracking

In order to develop, personalise and improve our services, we automatically collect certain data and store it in logs. Moreover, when you visit our pages, we may automatically collect some data from your devices. This information may include IP addresses, browser type, operating system, where the link to our site comes from (URL), date and time. To collect this information, we use cookies - data that allows our web services to identify you. We store information collected using cookies and logs in order to take your preferences and interests into account. We may also collect information on how you use our services, resources and their features, and how often you visit and interact with them.

Data on using our services

To make sure quality services are provided, monitor systems operation, develop new services and features, protect our services and customers, and provide technical support, we keep resource usage logs, namely memory, processor load, data storage usage, and other indicators.

We may also receive publicly available data about you from third parties and link it to the data we already have.

The purpose for data collection or data logs in each of the forms provided for this will be clear from the context where the form is placed and/or is explained additionally in the form itself.

3. What do we use personal data for?

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We use personal data to:

- respond to and process requests from our users, in particular, to send documents, information on our products and services, and to send emails;
- to communicate with you and provide respective services;
- send administrative information, for example, about the website and changes to our commercial terms and guidelines;
- improve, change and personalise the website, provide customers with information about products that best meet their expectations and needs;
- improve and change the services provided, develop new products, and expand our commercial activities;
- evaluate how effective advertising campaigns are;
- inform users on marketing promotions (sweepstakes, contests, etc.) and provide users with the opportunity to participate in them;
- use it for official purposes: for example, for data analysis and audits, ➤ keep accounting and financial reporting in accordance with applicable German law, monitor and prevent fraud, expand and detect current trends in products and services use;
- create a comprehensive analysis using Business Intelligence tools which enables making our commercial activities more efficient.

Moreover, we use your personal data, if needed:

- under current legislation (including regulations outside the country where you reside);
- to comply with legislation;
- if we receive an official request from authorities (including government institutions outside the country where you reside);
- to introduce our commercial terms and conditions;
- to protect our operations;
- to protect Colobridge and users' rights, confidentiality, security and property and that of others; to file complaints or limit damages.

4. Transferring personal data

Colobridge company has the right to transfer personal data to third parties only where it is necessary to provide services to customers or where it is necessary for the company's operations. In all other cases, personal data may be transferred only with the owner's consent. Colobridge is responsible for the use of data transferred to third parties.

5. Protection of personal information

We take the best possible steps to protect your personal information from any loss, unauthorised access, misuse, alteration, distortion and disclosure.

Separately, we emphasise that information security methods in place cannot ensure full protection of your data from unauthorised access or hacker attacks. That is why the transfer of personal information online always entails a certain risk. If you have a reason to believe that your interaction with us has become unsafe (for example, if you suspect that

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there is a threat to your account), please notify us immediately by any convenient means.

6. How can I access my data to edit, add or delete it?

If you want to access, change, add, delete, or limit the use or disclosure of your personal data recorded and stored by us, please notify us by email privacy@colobridge.net. After receiving the letter, we will be able to check and process your request in accordance with the applicable German legislation.

For security purposes, when we receive requests related to personal data, we only process data related to the email address from which we received the request. Please note that certain information must be maintained for mandatory record keeping and/or operations initiated prior to receiving a request to access, modify, or delete your data.

To protect you and your data, we may take reasonable steps to identify you when we receive requests to delete or amend your data.

Your data deletion request may be restricted where, if carried out, it will result in:

- Colobridge violating legislation in force;
- Colobridge being unable to investigate, defend and present evidence at trial;
- disclosing other persons' confidential information;
- violating Colobridge or third parties commercial secrets.

7. How can I influence the way my data is collected?

At any time, a user can refuse to disclose any information about himself/herself. However, in this case, we will not be able to provide you with full services and will not be able to process all your requests.

You have several options to refuse Colobridge marketing communications: send a request by email to marketing@colobridge.net, follow the link in the email to suspend or deactivate the newsletter, or contact us through one of the feedback forms on the company's website.

We will respond to your request or requests as soon as possible. Please note that even if you have refused to receive marketing communications by email, we reserve the right in some cases to send you important administrative communications in the future.

8. Third-party websites

Our websites allow the user to visit other web resources through direct links or through features such as "Share" or "Like" buttons. It works vice versa: you can visit our websites from other sites. However, please note that in this case the data protection principles and the content of other websites are indicated in the Privacy Policy of the website you are visiting, and not in this Document.

We recommend that you familiarise yourself with the Privacy Policy of the websites,

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services and applications you visit as regards registration and use of your personal or other data.

We are not responsible for registration policies and practices, use and disclosure of information (including security) of other organisations such as, for example, Facebook, Apple, Google, Microsoft or application developers and providers, social network providers, operating systems, mobile phone companies or hardware manufacturers. This rule also applies to all personal information you disclose to us through/in connection with the use of applications, and social media pages in relation to other companies.

9. Third-party services

Advertising

We use third-party services, namely Google Adwords, Facebook to display relevant advertising. Advertising messages from these platforms are displayed within their advertising networks when you use them. All data collected by these systems is stored and processed on servers of these services.

Analytics

We use Google Analytics and services to analyse how efficient our websites are.

We use Personyze to better understand our users' needs and optimize our service and customer experience. Personyze is a technology service that helps us analyze user interactions (e.g., time spent on pages, link clicks, preferences, etc.), enabling us to improve the service based on feedback.

Personyze uses cookies and other technologies to collect data about user behavior and their devices, including:

- IP addresses (in anonymized form),
- device screen size and type (unique identifiers),
- browser information,
- country and preferred language.

The collected data is used solely for our services and is not shared with third parties.

Please read the data processing terms set by the above services:

<https://www.google.com/policies/technologies/partner-sites/>

<https://www.facebook.com/business/gdpr>

<https://www.personyze.com/website-personalization-opt-out/>

Sending messages by email

We use Mailchimp services to send emails to our contacts.

The terms of this service's privacy policy are set out here: <https://mailchimp.com/legal/privacy/>

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10. Children's personal data

Colobridge does not intentionally collect children's personal data. Colobridge services are not intended for children under the age of 16. If you become aware that a child under the age of 16 has provided us with personal data in violation of this agreement, please notify us immediately by email privacy@colobridge.net.

11. Amendments to Privacy Policy

We reserve the right to amend this Privacy Policy. The above "effective since" informs about the latest amendments to the Document. Amendments to the Privacy Policy take effect from the moment the amended version is published on the website. Our customers and other resource users will be notified by email of these amendments. If you use the website after such amendments are introduced, please familiarise yourself with the effective version of this Document.

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