

# REIZ TECH PRIVACY POLICY

Effective date: 2023.03.29

## I. INTRODUCTION

This Privacy Policy applies to your use of <https://www.reiz.tech/> and any other websites, SaaS (consisting of applications, modules "Assessment", "IDP" and "Feedback", the application servers, the configurations, the access), other applications, or services and (or) products, provided by Reiz Tech (with its affiliates, "Reiz Tech", "we" or "us"). This Cookie Policy applies to any Reiz Tech product or service that links to this Privacy Policy or incorporates it by reference.

In this Privacy Policy, personal information (or personal data) means information that (either in isolation or in combination with other information) enables you to be directly or indirectly identified ("Personal Data" or "Personal Information").

One of the Reiz Tech's products is SaaS (consisting of applications, modules "Assessment", "IDP" and "Feedback", the application servers, the configurations, the access). Our "Services" and "Products" has the same meaning as defined in the SOFTWARE AS A SERVICE SUBSCRIPTION AGREEMENT or elsewhere. They include the software and other applications, which can be accessed on mobile, web, any device with a browser and internet connection. We also have support centre, blog and other and we may collect your information through other means like surveys, emails, and social media.

We receive remuneration from paid subscriptions and the sale of digital (and sometimes physical) asset, not from selling your personal information to third parties.

## II. PERSONAL INFORMATION REIZ TECH COLLECTS

### II.1. You provide Personal Information to us:

From the Services and (or) Products: We receive and store the Personal Information you provide directly to us. For example, when setting up new users or accounts, we may collect Personal Information, such as name, e-mail address, postal address, phone number, age, password, nickname, etc. We collect commercial information, such as records of the purchased Services, Products.

From websites, applications: We may collect Personal Information when you interact with us. If you contact us through the websites (or other Services, Products), we will keep a record of our correspondence.

From your taken actions: We collect information about your use of and activities on the Services. This includes the persons you add, content moderation decisions you make, and other related actions.

From other provided information: You may choose to participate in certain our programs, surveys, which requires that you provide additional information about yourself.

Our customers will typically act as data controllers for any Personal Data related to them or Personal Data that third parties upload in our Services, Products. Reiz Tech will typically act as a data processor in accordance with applicable Service and/or Product Terms of Service.

## **II.2. Personal Information we automatically collect:**

When you use the Services (or Products): network activity information may also be collected when you use the Services (or Products):

- *Information collected by cookies (or other technologies);*
- *Usage information*– we keep track of user activity in relation to the types of Services users use and performance metrics related to their use of the Services;
- *Log information*– we log information about users when they use one of our Services, including their IP addresses;
- *User feedback*– while using the Services (or Products), you may be asked to provide feedback (e.g., in the application, game directly or after receiving assistance from our support team).

When you use the websites, applications, SaaS: when you visit our websites or use applications, we collect network activity information through the use of cookies and other trackers. The information we collect may include but is not limited to your device's Internet Protocol ("IP") address, referring website, what pages your device visited, and the time that your device visited our website. We may also rely on analytics and tools used to prevent spam and other security risks related to the use of abusive automated software.

Device information: We collect information about the device you are using to access the Services, Products, like IP address, browser information, settings information (like your microphone and/or camera).

Other information: When we advertise for Reiz Tech SaaS, other Services (Products) (including on third party platforms), if you click on the advertisement, we may receive information about which ad you saw and on which platform.

## **II.3. Information we collect from trusted third parties:**

If your Personal Information has been collected as you interacted or used our Service, Product, website and alike, your Personal information, as stored in our CRM service provider, may be updated to ensure it is accurate and up to date, and achieves the purpose for which it was originally collected.

Reiz Tech also may obtain additional information from services you use, or social media networks for which you have approved our access. When you access the Services through social media networks or when you connect the Services to social media networks, you are authorizing Reiz Tech to collect, store, and use such additional information and content in accordance with this Privacy Policy. We use this information to supplement the information we collect about you in order to improve the Services, analytics, and advertising.

### III. HOW AND ON WHAT GROUNDS DO WE USE YOUR PERSONAL INFORMATION

Collected Personal Information is used to allow to operate, develop, enhance the features, functionalities of the Services, Products; provide security for our websites, products, software, or applications; manage relationships with Reiz Tech account holders as well as including making or receiving payment; providing content recommendations, advertising and marketing messages.

Personal Information is used for the following purposes:

**Conclusion, performance or termination of the contract (relationship):** If you register with one of our Services and/or enter into another contract with us (e.g. buy a Product from us), we process the data required for the conclusion, performance or termination of the contract (relationship), which usually includes: (1) first name, last name, (2) invoice and delivery address, (3) email address, (4) billing and payment information, (5) date of birth, (6) phone number (7) account settings, (8) other.

The legal basis for this is Article 6 (1) a and b General Data Protection Regulation (GDPR), i.e., you provide us with the information on the basis of the respective contractual relationship (e.g., management of the customer/user account, processing of a purchase contract) between you and us.

We store the data collected for the processing of the relationship (contract) - unless we use it for our own marketing purposes - for the duration of the respective contract. After expiry of this period, we retain the information required by commercial and tax law relating to the contractual relationship for the periods specified by law. Furthermore, the following data processing is required for the execution of a purchase contract via our Services: payment data will be passed on to payment service providers commissioned by us to process the payment(s).

**To provide customer service.** We use your Personal Information to respond to your questions about our Services and Products, and to analyse errors or other issues.

**To provide you with the Services, Products.** We use your Personal Information to provide you with the Reiz Tech Services, Products. We collect and store the messages you send and display them as you direct. We also use the information you provide to us to create and manage your account and to facilitate purchases.

**Use of Personal Information for fraud, abuse prevention purposes.** The information you provide when ordering may be used to check whether an atypical order transaction has occurred (e.g., simultaneous ordering of a large number of Services, Products to the same address using different user accounts). We also use your information to monitor for and take action against users and content that violate our Terms of Service and other policies. This includes responding to user reports, detecting fraud and malware, and proactively scanning attachments and other content for illegal or harmful content. The legal basis for the processing is Article 6 (1) f GDPR.

**Transmission of information to partner companies.** Through our Services, you have the option to take advantage of offers from third-party companies. In these cases, you may conclude a contract directly with one of our partners, to whom the data required for the execution of the contract (e.g., first name, last name, billing and delivery address, e-mail address, billing and payment data, date of birth, phone number) will be transmitted. Such advantage offers of our partners are recognizable and marked as partner offers.

**To personalize the Product, Services.** We use your information to provide, personalize and improve our Services. The legal basis for the use of personal data for marketing purposes is Art. 6 (1) f GDPR.

**To ensure network, information security, and business performance improvement.** Our direct marketing purposes are based on your consent (for example when you request a demo, contact us directly, agree to receive communications after an event, and similar circumstances). We may also rely on our legitimate interests to improve business and marketing practices or contact you to offer similar Services or Products that you may have bought from us, requested a demo, or negotiated (otherwise engaged) with us.

**To report on our performance.** We use your information to track the fundamental metrics of our business, to perform financial reporting, to respond to regulatory obligations, and to debug billing issues.

**To comply with our legal obligations.** We retain and use your information in connection with potential legal claims when necessary and for compliance, regulatory, and auditing purposes. When you exercise any of your applicable legal rights to access, amend, or delete your personal information, we may request identification and verification documents from you for the purpose of confirming your identity.

**With your consent.** We may also collect and use personal information with your consent. You can revoke your consent at any time (mostly through our Services directly). However, please note that you might not be able to use any Service or feature that requires collection or use of that Personal Information.

**To contact you.** We use your information to contact you in connection with your account, such as to verify or secure it with authentication. We may also use your information to contact you about Services, Products you have purchased, or just to let you know about new Services, Products or their features. You may opt-out of receiving marketing communications. The legal basis for the use of personal data for marketing purposes is Art. 6 (1) f GDPR.

**For payments.** We process your payment information for the purpose of payment processing, e.g., when you purchase or use a Service, Product. Depending on the payment method, we forward your payment information to third parties (e.g., in the case of credit card payments to your credit card provider). The legal basis for this data processing is Article 6 (1) a, Article 6 (1) b GDPR and Art. 6 (1) f GDPR).

**Social media plug-ins.** We may use social plug-ins of the social networks (e.g., Facebook, Twitter) in our Services on the basis of Article 6 (1) a GDPR in order to make us better known. The responsibility for data protection compliant operation is to be ensured by their respective providers. If plug-ins are activated, your web browser establishes a direct connection with the web servers of the respective social network and the content of the plug-in is transmitted by the social network directly to your web browser and integrated by it into our website. By integrating the plug-ins, the social network receives the information that you have accessed the corresponding page of our website and can collect device and access data. If you are logged in to the social network, it can also assign the visit to your account with the respective social network. If you do not want social networks to assign the data collected via our website directly to your profile, you must log out of the corresponding social networks before visiting our website. You can also completely

prevent the loading of the plugins with add-ons for your browser, e.g., with the script blocker "NoScript", which can be found at: [www.noscript.net](http://www.noscript.net).

#### **IV. HOW REIZ TECH SHARES YOUR INFORMATION**

Reiz Tech shares such information as described below:

**To comply with the law.** We may share information in response to a request for law enforcement requirements. Reiz Tech also reserves the right to disclose information that it reasonably believes is appropriate or necessary to protect Reiz Tech from potential liability or from fraudulent, abusive, or unlawful uses; investigate and defend us against third-party claims; protect the security or integrity of the Services; or protect the rights, property, or safety of Reiz Tech, our users, or others.

**With our suppliers and vendors.** We may share information with suppliers we engage to carry out specific work for us. This includes payment processors, cloud providers that host our data and our services, providers website hosting, maintenance, and security services; fulfil orders; conduct data analysis and create reports; offer certain functionality; or assist Reiz Tech in improving the Services and creating new services and features. We may also share limited information with advertising platforms to help us reach people that we think will like our Services, product and to measure the performance of our ads shown on those platforms. We require that these parties process such information in compliance with this Privacy Policy, we authorize them to use the information only for the purposes for which it is provided to them.

**With our associated companies.** We may share information with our related companies, including parents, affiliates, subsidiaries, and other companies under common control and ownership. We may also share information if Reiz Tech is evaluating and/or engaging in a merger, acquisition, reorganization, bankruptcy, or sale, transfer, or change in ownership of Reiz Tech or any of its assets.

**Aggregated information.** We may share information about you that has been aggregated or anonymized such that it cannot reasonably be used to identify you (e.g., aggregated user statistics in order to describe our business to partners or the public).

**When you instruct us to.** When you add your content to the Services, you are instructing us to share that content with certain communities, groups people, or in the case of public spaces, with anyone who accesses it.

#### **V. YOUR RIGHTS**

In addition to the right to revoke your consent given to us, you are entitled to the following further rights if the respective legal requirements are met:

**The right of access about your personal data stored by us (Article 15 GDPR),** in particular you can request information about the processing purposes, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, the origin of your data, if it has not been collected directly from you;

**The right to have inaccurate data corrected or correct data completed (Article 16 GDPR),** the right to have your data stored by us deleted (Article 17 GDPR), insofar as no legal or contractual retention periods or other legal obligations or rights to further storage are to be observed by us;

***The right to restrict the processing of your data (Article 18 GDPR)***, insofar as the accuracy of the data is disputed by you, the processing is unlawful, but you object to its erasure; the controller no longer requires the data, but you need it to assert, exercise or defend legal claims or you have objected to the processing in accordance with Article 21 GDPR;

***The right to data portability according to Article 20 GDPR***, i.e., the right to have selected data stored by us about you transferred in a common, machine-readable format, or to request the transfer to another responsible party.

***The right of withdrawal.*** If we process data on the basis of your consent, you have the right to revoke this consent at any time. The revocation of consent does not have the consequence that the data processing carried out on the basis of consent up to the time of the revocation becomes ineffective. Please note that revocation may impair Service provision to you.

## **VI. ACCOUNT CLOSURE AND DATA RETENTION**

If you would like to close your account and delete your profile information on <https://www.reiz.tech/> go to <https://www.reiz.tech/>. For Reiz Tech Services other than <https://www.reiz.tech/> you may update or delete information tied to your account, or close an account, by submitting a help ticket to that service. If you close your account, Reiz Tech may retain certain information about you for the activities described in this Privacy Policy, or as permitted or required by applicable law. By way of example, we retain personal information for as long as it is needed for the purposes for which we collected it. If your account is inactive for more than two years, we may delete it, and we may delete or anonymize any personal information associated with your account.

## **VII. SERVICES OFFERED BY THIRD PARTIES AND WEBSITES**

We invoke third party developers to develop certain features or other services and offer them within the Reiz Tech services. These third-party services need to follow all policies that apply to them. As part of these policies, we require developers to have a privacy policy that makes clear what they do with your information. Please review these privacy policies, as they describe what bots and apps may do with your information. Because these services are operated by third parties, we don't control them or what information they collect. It's up to you whether to participate in a server that uses bots, and whether to engage with third-party services in general.

Reiz Tech Services, Products may link to third-party websites or services. If you connect to a third-party service (such as Facebook, Twitter, or another) through the Reiz Tech Services or otherwise link your Reiz Tech account with a third-party service, you are requesting and authorizing us to share or grant access to information on your behalf (such as your credentials, username, the fact that your connection originated from the Reiz Tech Services, and other relevant usage and diagnostic information) with such third party. We may also make Persona Information available to app developers, publishers to facilitate purchases.

## **CHILDREN'S PRIVACY**

IF YOU ARE UNDER 14 YEARS OF AGE, THEN PLEASE DO NOT USE OR ACCESS THE REIZ TECH SERVICES AT ANY TIME OR IN ANY MANNER.

With the purpose to protect the privacy of young children, Reiz Tech does not knowingly collect or maintain personal from persons under 14 years-of-age. If Reiz Tech learns that personal

information of persons under 14 has been collected on or through the Reiz Tech Services, Reiz Tech will take appropriate steps to delete this information.

If you are the parent or legal representative of a child under 14 who has become a Reiz Tech Services member, then please contact Reiz Tech at [privacy@reiz.tech](mailto:privacy@reiz.tech) to have that child's account terminated and personal information deleted.

### **VIII. ANALYTICS AND ADVERTISERS**

Reiz Tech may work with third-party advertisers to target (and measure the performance of) ads to you both on and off the Reiz Tech Services. We may share with these third parties (or they may directly collect) data such as cookie and mobile ad identifiers in order to engage in advertising activity (including to understand how you respond to advertisements and to serve relevant ads).

Advertisers working on their behalf may use technology to serve ads that appear on our Services directly to your device. They automatically receive certain data, such as your IP address, may also use cookies (or similar technologies) to measure the effectiveness of their ads and to personalize ad content. We cannot control the tracking technologies and activities of Reiz Tech advertisers and you should consult their respective privacy policies.

Reiz Tech may also use third-party Web analytics services in connection with the Reiz Tech Services. They use a variety of tracking technologies to analyse how users use the Reiz Tech Services. Such automatically collected information may be shared with or collected directly by these services and processed to evaluate your use of the Reiz Tech Services.

### **IX. DO NOT TRACK**

Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. We are committed to providing you with meaningful choices about the information collected on our website, Services. However, Reiz Tech may not recognize or respond to browser initiated DNT signals.

### **X. DATA SECURITY**

Reiz Tech uses a variety of organizational, technical, technological and physical measures to protect the integrity and security of your information. These measures may vary based on the sensitivity of your information. However, no security precautions or systems can be completely secure. We cannot ensure or warrant the security of any information you transmit to Reiz Tech, and you do so at your own risk. We cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by Reiz Tech or any of our physical, technical, technological or organizational safeguards.

### **XI. HOW YOU CAN CONTROL YOUR PRIVACY**

You can manage cookies. You can take one or more of the following steps to control how information is collected and used from cookies on the Services, i.e.:

- You can disable and manage some cookies through your browser settings. You can find instructions for how to manage cookies by referring to [Reiz Tech Cookies Policy](#) or in

popular browsers such as [Internet Explorer](#), [Firefox](#), [Chrome](#), [Safari \(iOS\)](#), [Safari \(Mac\)](#), and [Opera](#).

- To disable analytics cookies, you can use the browser controls discussed above or, for certain providers, you can use their individual opt-out mechanisms, such as [Google Analytics Opt-Out](#).
- Your mobile device may also include browser settings to manage the use of cookies. Your device may also have settings to control the collection and use information in your apps.
- Third party groups also enable you to limit how cookies are used for advertising purposes by participating third parties. You can learn more at [Network Advertising Initiative](#), the [Digital Advertising Alliance](#), and for users in the EU, the [European Interactive Digital Advertising Alliance](#).

If you disable or remove cookies, some parts of the services may not function properly. Information may be collected to remember your opt-out preferences.

## **XII. INTERNATIONAL DATA TRANSFERS**

Reiz Tech is an EU based company, however operating globally. Therefore, Personal Information of individuals who visit our websites and/or who use our Services, Products or otherwise interact with us may be transferred and accessed from around the world, such as from countries where Reiz Tech its affiliates, or our service providers operate.

### **Information for users in the European Economic Area (“EEA”) or in the United Kingdom (“UK”):**

Operating globally, Reiz Tech may transfer Personal Information from the EEA or the UK to the United States of America and other countries, including Personal Information we receive from individuals residing in the EEA or the UK who visit our websites and/or who may use our Services or otherwise interact with us. Please note that the term Personal Information used in this Privacy Policy is equivalent to the term “personal data” under applicable European and UK data protection laws for individuals located in the EEA or the UK.

When Reiz Tech engages in such transfers of Personal Information, it relies on:

- Adequacy Decisions, as adopted by:
  - European Commission, based on Article 45 of Regulation (EU) 2016/679 (GDPR)
  - UK Secretary of State, based on Article 45 of the UK GDPR and Section 17A of the Data Protection Act 2018; or
- Standard Contractual Clauses as issued by:
  - European Commission
  - Information Commissioner’s Office (ICO)

The European Commission and the ICO have determined that the above Standard Contractual Clauses may provide sufficient safeguards to protect personal data transferred outside the EEA and

the UK. For more information, please visit [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en) and <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/international-data-transfer-agreement-and-guidance/>.

### **The “Schrems II” judgment**

Following i) invalidation of the EU-US Privacy Shield Framework in Case C-311/18 by the Court of Justice of the European Union and ii) the opinion of the Swiss Federal Data Protection and Information Commissioner (FDPIC) of 8 September 2020, Reiz Tech no longer relies on i) the EU-US Privacy Shield and ii) the Swiss-U.S. Privacy Shield Frameworks as mechanisms of international data transfer, until further notice.

However, Reiz Tech remains committed to maintaining complying with Privacy Shield Principles, as an additional measure of protection of its users' privacy, until further notice. By way of example, in compliance with these principles, we are committed to resolve complaints about your privacy and our collection or use of your Personal Information. Individuals located within the EEA, the UK, or Switzerland with inquiries or complaints regarding this Privacy Policy should first contact Reiz Tech at [privacy@reiz.tech](mailto:privacy@reiz.tech). We will investigate and attempt to resolve any complaints or disputes regarding the use or disclosure of Personal Information within 45 days of receiving your complaint.

Under certain limited circumstances, individuals in the EEA, the UK, and Switzerland may invoke binding Privacy Shield arbitration as a last resort, if all other forms of dispute resolution (discussed above) have been unsuccessful. To learn more about this resolution method and its availability to you, please visit <https://www.privacyshield.gov/>.

Reiz Tech is subject to the jurisdiction of the Republic of Lithuania for purposes of Personal Information processing enforcement.

### **Additional information for California consumers – The California Consumer Privacy Act**

Under the California Consumer Privacy Act (the 'CCPA'), California residents have certain rights regarding the Personal Information that businesses have about them. This includes the rights to request access or deletion of your Personal Information, as well as the right to direct a business to stop selling your Personal Information.

#### **Personal Information disclosed for business purposes:**

Reiz Tech shares and has shared in the preceding 12 months personal information as necessary for specific business purpose. This includes sharing personal identifiers, commercial information, internet or other electronic network activity with payment processing providers, customer relationship management, consulting, email, product feedback, and helpdesk services. While Reiz Tech does not sell Personal Information in exchange for any monetary consideration, we do share Personal Information for other benefits that could be deemed a "sale". This includes sharing personal identifiers, commercial information, and internet or other electronic network activity with advertising networks, website analytics companies, and event sponsors. Reiz Tech does not sell Personal Information of consumers who are under 16 years of age.

### **The CCPA rights**

**Right to opt-out of sale:**

While Reiz Tech does not sell personal information in exchange for any monetary consideration, we do share Personal Information for other benefits that could be deemed a "sale". We support the CCPA and wish to provide you with control over how your Personal Information is collected and shared.

You have a right to direct Reiz Tech not to sell your Personal Information. With respect to cookies, you can always customize your settings at any time. Please note that we may still use aggregated and de-identified Personal Information that does not identify you or any individual.

**Right to request disclosure:**

You have the right to request disclosure about what categories of Personal Information Reiz Tech has sold or disclosed for a business purpose about you and the categories of third parties to whom the personal information was sold or disclosed. You have a right to request disclosure of specific pieces of Personal Information. Below is a complete list of the Personal Information that you can include in your request.

- The categories of Personal Information that Reiz Tech has collected about you.
- The categories of sources from which Reiz Tech collected the Personal Information.
- The business or commercial purpose for collecting or selling Personal Information.
- The categories of third parties with whom Reiz Tech shares Personal Information.
- The specific pieces of Personal Information Reiz Tech has collected about you.
- The categories of Personal Information that Reiz Tech disclosed about you for business purpose.
- The categories of Personal Information that Reiz Tech has sold about you, as well as the categories of third parties to whom Reiz Tech sold your Personal Information.

**Right to request deletion:**

You have the right to request that Reiz Tech delete any Personal Information about you that Reiz Tech has collected from you. Please note that there are exceptions where Reiz Tech does not have to fulfil a request to delete Personal Information, such as when the deletion of information would create problems with completing a transaction or compliance with a legal obligation.

**Right to non-discrimination:**

Reiz Tech will not discriminate against you (e.g., through denying goods or services or providing a different level or quality of goods o/r services) for exercising any of the rights afforded to you.

**How do we handle your requests?**

We endeavour to respond to a verifiable consumer request within the required timeframes. If we need more time, we will inform you of the reason and extension period in writing. If you submit your privacy request electronically, we will deliver our written response to the verified email associated with the request. If you did not submit the request with us via the online

webform, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain why we cannot comply with a request, if applicable. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### **XIII. CHANGES AND UPDATES TO THIS PRIVACY POLICY**

Reiz Tech reserves the right to change, modify, add, or remove portions of this Privacy Policy at any time (for example to reflect updates to the Reiz Tech Services or to reflect changes in the law). Please check this Privacy Policy periodically for those changes. Your continued use of the Reiz Tech Services after the posting of changes constitutes your binding acceptance of such changes. You are responsible for periodically reviewing this Privacy Policy.

### **XIV. CONTACT US**

If you have questions, requests, or concerns regarding your privacy and rights, please let us know how we can help. Email us at [privacy@reiz.tech](mailto:privacy@reiz.tech) with any questions about this Privacy Policy or how we process your Personal Information, as well as reaching out our Data Protection Officer (when appointed by the e-mail referred hereto).

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