# **Data Privacy Statement**

KENGAGE, LDA (vaibe) takes the protection of your personal data very seriously. We treat your personal data confidentially and in accordance with the provisions of data protection law. The purpose of this Privacy Policy is to inform you how, to what extent and for what purposes we process personal data during use of the website of vaibe.

#### 1. Collection, processing and use of personal data on request

Our website can be used without providing personal data. You are not obliged to access this website or provide personal data. If you do not provide us with any personal data, you may not be able to use individual functions of this website. There will be no other consequences for you. If personal data (e.g. your name, address or e-mail addresses) are collected on our website, this takes place voluntarily except in the cases described below in more detail. We wish to point out that data transfers in the Internet (e.g. during communication by e-mail) may be subject to security breaches. It is not possible to protect personal data completely against access by third parties.

#### 2. Contact form; Request for information material

When you contact us using the contact form, we will process your personal data (especially your name and salutation, your contact details, the name of your company, the country and your message) and process them in order to answer your inquiry. This also applies when you ask for information material. If you choose to give us your telephone number, we may contact you by phone to discuss your project or query and put you in touch with suitable contact partners.

If necessary to answer your inquiry or your inquiry is so intended, we may transmit your personal data to another company in the Körber Group (e.g. if your inquiry relates to a contract or a customer relationship with another company in the Körber Group or to its products). Depending on the purpose of your inquiry, related data processing is permitted to the extent necessary to handle your inquiry.

If you request to receive information by e-mail about the latest products and services of vaibe, vaibe may verify your identity (Double-Opt-In) and will send requested information by e-mail. Your personal data will for this purpose be processed in a distribution list. You may revoke your consent at any time with effect for the future. For this purpose, you may e.g. use the Unsubscribe link in every automated e-mail or send a letter to KENGAGE, LDA, Rua do Heroísmo, 283, 4300-259 Porto, Portugal or an e-mail to unsubscribe@vaibe.com.

#### 3. Data processing enabling website use

When you visit our website, we will collect the personal and non-personal data necessary to facilitate your website use. This includes your IP address and information about the start, end and purpose of your use of the website, as well as any identification data (e.g. your login data if you log into a secure area). These data will be used to provide and organize the service in accordance with users' needs. The data will normally be deleted as soon as they are no longer required and there are no retention obligations.

#### 4. Consent for cookies and web analysis

When you access our website, a so-called "cookie banner" appears, with which we ask you for your consent to set cookies. We use cookies to store your preferences when using our website, to statistically analyze your usage behavior, and to display personalized advertising on third-party websites or social media. This data may be used by us and our partners to enrich usage profiles.

When making your decision, please bear in mind that your personal data stored to the respective cookie may be transferred to countries outside the EU in which no level of data protection comparable to that in the EU is guaranteed. This applies in particular to the USA, where unsolicited access by government agencies is possible. You can find more information on the legal situation in the USA <u>here</u>. By selecting the relevant cookies, you consent to such a third-country data transfer.

If you consent to our use of cookies, we will proceed as described in more detail in the following sections. There you will also find information on how you can revoke your consent at any time and prevent the setting of cookies or web analytics. Change your consent

# a) Cookies

Cookies are small files that are automatically created by your browser and stored on your end device (laptop, tablet, smartphone or similar) when you visit our site. Cookies do not cause any damage on your terminal device, do not contain viruses, Trojans or other malware. Information is stored in the cookie that is related to the specific terminal device used. However, this does not mean that we obtain direct knowledge of your identity.

The use of cookies makes the use of our website more pleasant for you. For example, we use so-called session cookies to recognize that you have already visited individual pages of our website. These are automatically deleted when you leave our

site. We also use cookies to record the use of our website statistically and to evaluate it for the purpose of optimizing our offer for you (see section 5). These cookies enable us to automatically recognize that you have already been on our website when you visit it again. These cookies are automatically deleted after a defined period of time.

#### b) Consent management tool

We use the Consent Management Tool of Usercentrics A/S Havnegade 39, 1058 Kopenhagen Denmark (hereinafter: cookiebot). In this context, date and time of the visit, browser information, information on consents, device information and the IP address of the requesting device are processed. The legal basis is Art. 6 para. 1 sentence 1. lit. f GDPR (legitimate interest). The obtaining and administration of legally required consents is to be regarded as a legitimate interest within the meaning of the aforementioned provision. cookiebot stores consents and revocations on our behalf and on our instructions. Further information on data protection at cookiebot can be found <u>here.</u>

# 5. Web analysis (Google Analytics)

When you visit our website and give us your consent (see Section 4), we use Google Analytics, a web analysis service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (Google). Google Analytics uses cookies (see Section 4) in order to analyze your use of the website. The information generated by the cookie about your use of this website such as:

Browser type/version, operating system used, referrer URL (the previously visited page), Host name of the accessing computer (IP address).

Time of the server request are transmitted to a Google server in the USA and stored there.

However, your IP address is first truncated by Google in member states of the European Union or in other signatory states of the Agreement of the European Economic Area and is therefore anonymized. Only in exceptional cases will your full IP address be transmitted to a Google server in the USA and truncated there.

In the event that personal data is transferred to the USA by way of exception, Google has integrated the EU standard contractual clauses into its Terms and Conditions of Use and thus offers a guarantee that European data protection principles and the local level of data protection are also guaranteed in the context of data processing

taking place in the USA.

On behalf of the operator of this website Google will utilize the above mentioned information to evaluate your use of the website, compile reports on the website activities and provide other services to the website operator in connection with the use of the website and the Internet. The IP address transmitted by your browser within the framework of Google Analytics will not be combined with other Google data.

You can revoke your consent for web analysis and the related use of cookies as follows: First of all, you can prevent cookies from being stored by adjusting your browser software accordingly (see Section 4). Secondly, you can prevent storage and transmission of the data relating to your use of the website (including your IP address) to Google, and processing of these data by Google by downloading and installing the browser plug-in available under the following link. Alternatively, you can prevent Google Analytics from storing the data by setting a so-called "opt-out cookie" on your computer; Please use the following link in this case:

Disable Google Analytics:

https://www.google.com/settings/u/0/ads/plugin?hl=de

You can find further information relating to data protection with Google Analytics at: <a href="https://www.google.de/intl/de/policies/">https://www.google.de/intl/de/policies/</a>

# 6. Google Ads, Google DoubleClick, Google Dynamic Remarketing and Google Conversion Tracking

We use other Google services in line with legal requirements and to the extent applicable with your consent (see Section 4), namely Google Ads, Google DoubleClick, Google Dynamic Remarketing and Google Conversion Tracking Cookies. Data from Google Analytics and other pseudonymous usage data are evaluated here for statistical purposes. In order to improve our services, we can therefore analyze, for example, how successful campaigns are and whether users visit our website after an advertisement is displayed. You also receive interest-related advertising through these services.

In addition to the consent and consent modification means described in above Section 4, the following applies:

If you do not want to see advertising selected by the Google Ads Tool, you can disable it using the Google Ads Preferences Manager: https://adssettings.google.com.authenticated

Google DoubleClick sets a cookie on your computer in order to record your surfing activities on different websites (tracking) and display interest-related advertising. If you want to stop this permanently, you can download a plug-in under the following link to disable the double-click cookie:

### https://www.google.com/settings/u/0/ads/plugin?hl=de

#### 7. Google Tag Manager

This website uses the Google Tag Manager. Google Tag Manager is a solution that allows marketers to manage website tags through one interface. The Tag Manager tool itself (which implements the tags) is a cookie-less domain and does not collect any personal information. The tool triggers other tags that may collect data. Google Tag Manager does not access this data. If deactivation is made at the domain or cookie level, it will remain in effect for all tracking tags implemented with Google Tag Manager.

#### 8. Processing of your data, if you contact us for business purposes

If you contact us as a interested party, supplier, service provider or other business partner, we process your personal data such as contact data or correspondence to the extent that this is necessary to process your enquiry (legitimate interest according to Art. 6 para. 1 letter f GDPR) or to initiate or process the respective transaction (Art. 6 para. 1 letter b GDPR) and, if necessary, store the data within the scope of statutory storage obligations (due to statutory obligations according to Art. 6 para. 1 letter c GDPR).

The same applies if you are an employee of an interested party, supplier, service provider or other business partner and we receive your personal data in this context; the legal basis in this case is our legitimate interest in establishing or carrying out the business relationship with your employer (Art. 6 para. 1 letter f GDPR).

#### 9. Electronic communication

You are welcome to communicate with us by e-mail at any time. Please be advised that we use an E-mail Gateway of an external provider of security technologies to defend against SPAM e-mail, other threatening e-mail, threatening e-mail attachments and URLs. In doing so, this external provider may process your first and last name, e-mail address and IP address. The legal basis is our legitimate interest in preventing unauthorized access to communications networks, the spread of malicious code and damage to computers and electronic communications systems (Art. 6 para. 1 lit. f GDPR in conjunction with Recital 49).

#### **10. Newsletter**

On our website we offer you the possibility to register for our newsletter. To ensure that no mistakes are made when entering the email address, we use the so-called double opt-in process: After you have entered your email address in the registration field, we will send you a confirmation link. Only when you click on this confirmation link will your email address be added to our mailing list. At this point, the processing of your electronic contact data is based solely on your consent (Article 6(1)(a)

DSGVO). You can revoke your consent thus declared at any time with effect for the future. To do so, simply send a short note by email to the email address given under 2. or click on the "unsubscribe" button at the end of each newsletter.

# 11. LinkedIn Ads, LinkedIn Analytics and LinkedIn Marketing Solutions

We use the services of Linked Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland ("LinkedIn"). Within the scope of these services LinkedIn collects and stores usage data in pseudonymous profiles in order to permit statistical analyses of website use, evaluate the success of advertisements and provide interest-related advertising on our website, on LinkedIn and on websites of Linked partners. If you are a LinkedIn user, LinkedIn may also combine the data with your user account. LinkedIn also sets cookies to collect data (see Section 4). In addition to the consent and consent modification means described in above Section 4, you can disable cookies and the associated collection of data via the following websites: https://www.linkedin.com/psettings/guest-

controlshttps://optout.aboutads.info/https://www.youronlinechoices.com/de/pr aferenzmanagement/

You can find further information relating to data protection with LinkedIn services at: <a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a>

#### 12. HubSpot

When you visit our website and give us your consent (see Section 4), we use tracking technology of HubSpotInc., 24 First St, 2nd Floor, Cambridge/MA 02141, United States ("HubSpot"). This technology may include cookies (see Section 4). HubSpot collects and stores usage data in pseudonymous profiles in order to provide interest-related advertising. You can revoke your consent for user-tracking and the associated recording of your user behavior by HubSpot by disabling cookies (see Section 4).

Please refer to the consent and consent modification means described in above Section 4. You can find further information relating to data processing by HubSpot on the HubSpot website:

https://www.hubspot.de/data-privacy/gdpr

# 13. Legal basis for data processing

The legal basis for data processing depends each time on the purpose for which the data are processed and may in particular result from Art. 6 (1) (a, b, c or f). of the General Data Protection Regulation (GDPR).

# 14. Third country data transfers

A transfer of personal data to a third country or an international organisation will only take place if we inform you of this and if the conditions of Art. 44 et seqq. GDPR are given.

A third country is defined as a country outside the European Economic Area (EEA) in which the GDPR is not directly applicable. A third country is deemed to be unsafe if the EU Commission has not issued an adequacy decision for this country in accordance with Art. 45 (1) GDPR, confirming that adequate protection for personal data exists in the country.

The USA is a so-called unsafe third country. This means, that the US does not offer a level of data protection comparable to that in the EU. The risks involved in transferring personal data to the US are as follows: There is a risk that US authorities may gain access to personal data on the basis of the PRISM and UPSTREAM surveillance programs based on Section 702 of the FISA (Foreign Intelligence Surveillance Act), and on the basis of Executive Order 12333 or Presidential Police Directive 28. EU citizens have no effective means of redress against such access in the US or the EU.

We will inform you in this privacy policy when and how we transfer personal data to the USA or other unsafe third countries. We will only transfer your personal data if

- the recipient provides appropriate safeguards in accordance with Art. 46 GDPR for the protection of personal data,
- you have explicitly agreed to the transmission, after we have informed you of the risks, in accordance with Art. 49 para. 1 lit. a) GDPR,
- the transmission is necessary for the fulfilment of contractual obligations between you and us
- or another exception from Art. 49 GDPR applies.

Safeguards under Art. 46 GDPR can be so-called standard contractual clauses. In these standard contractual clauses, the recipient assures to protect the data sufficiently and thus to ensure a level of protection comparable to that provided by the GDPR.

# **15. Deletion**

The data collected by means of Google Analytics in the form of pseudonymous usage profiles will be erased at the latest 38 months after the last new entry in the particular usage profile. We will also erase your personal data when they are no longer required for collection and processing purposes, and provided there are no statutory retention obligations preventing erasure of your personal data.

# 16. Data security

vaibe has implemented technical and organizational measures to protect the personal data, against loss, destruction, manipulation and unauthorized access. Our employees and everyone involved in data processing are obliged to comply with data

protection laws and handle personal data confidentially. Our employees are trained accordingly. Both internal and external checks ensure that all data protection processes are observed at vaibe.

In order to protect the personal data of our users, we utilize a secure online transmission method, i.e. so-called "Secure Socket Layer" (SSL) transmission. You can recognize this by the addition of an "s" to the address component http:// ("https://") or when you see a green locked lock symbol. By clicking on the symbol, you obtain information about the utilized SSL certificate. Display of the symbol depends on the browser version which you are using. SSL encryption ensures encrypted and complete transmission of your data.

# 17. Your data subject's rights

As a data subject, you have the right to confirmation as to whether personal data relating to you are processed, the right to access this personal data, the right to rectification of incorrect personal data, the right to erasure, the right to restrict processing of your data and the right to object to the processing and transmission of personal data. Whether and to what extent these rights are effective in individual cases and under what conditions they apply is stipulated by law. In particular including the General Data Protection Regulation. You also have the right to submit a complaint to the responsible data protection supervisory authority. However, if you have any questions or complaints relating to data protection at vaibe, we recommend that you first contact our Data Protection Officer (see below Section 19).

# 18. No automated individual decisions

We do not use your personal data for automated individual decisions in the meaning of Art. 22(1) GDPR.

# 19. How can you contact us?

If you want to exercise your data subjects' rights or have any questions relating to data protection in our company or this Data Protection Declaration, you can contact us under the following email address:

dpo@vaibe.com

# 20. Changes to the Privacy Statement

New legal regulations, business decisions or technical development may require amendments to this Privacy Statement. You can always find the latest version on our website.