

## Privacy Notice

At Organto, we are committed to protecting and respecting your privacy. This policy, and any other documents we refer to in this policy, set out how we will use your personal information and who it will be shared with. Please read the following carefully.

By using our website, you signify your acceptance of this privacy policy, and you acknowledge the terms and conditions posted here. By submitting your information, you agree that it will be governed by our privacy policy.

### What information do we collect about you?

1.1 We may collect and process the following data about you ("your information"):

1.1.1 information that you submit online via our site through making requests;

1.1.2 any correspondence you send to us or communications you have with us (e.g. our contact centre, social media or applications that interact with our site);

1.1.3 details of your visits to our site and the resources that you access (which may include, amongst other things, traffic data and communication data);

1.2 We are aware that your information may be confidential, and we will protect the confidentiality of your information in accordance with our normal procedures and legal requirements.

1.3 We only collect and process your personal data for the uses described under section 2 below.

### How will we use your information?

2.1 We use your information in the following ways:

2.1.1 to ensure that our site's content is presented as effectively as possible for you as a visitor (legitimate interests of Organto);

2.1.2 for our internal purposes, such as research and analysis, quality control, detection of fraud, site performance, system administration, so that we can provide you with enhanced services (legitimate interests of Organto);

2.1.3 to provide you with information, products or services that you request from us, or which we feel may interest you, provided of course that you agreed to this (consent);

2.1.4 to create reports to assist with future marketing (legitimate interests of Organto);

2.1.5 to contact you to ask you for your view and opinions or to take part in surveys we complete from time to time, when you agree to participate (consent);

2.1.6 for complaint handling purposes (compliance with a legal obligation by Organto);

2.1.7 for answering questions and replying to feedback (legitimate interests of Organto).

2.2 We may monitor your use of our site, including your IP address, operating system and browser type, for system administration. This is statistical information about our users' browsing actions and patterns and does not identify any individual.

2.3 We only keep your information for as long as is necessary.

### Cookies

3.1 We may use "cookies" to collect the information referred to and to track your use of our site. Cookies are small data files which gather information about your use of our site and help us to provide you with a good experience when you browse our site.

## Marketing

4.1 We may contact you with information about our products and services from time to time, provided of course that you agree (consent).

## Where do we transfer your information to?

5.1 Our site is hosted in Europe and we may transfer your information to, or store it in countries outside the European Economic Area ("EEA"). Such information may be processed by our service providers, suppliers and agents, who may be involved in the provision of hosting and support services (amongst other things).

5.2 We will only carry out such transfers where we are confident that the level of protection applied to your information will be similar as if it had remained within the EEA. For transfers outside of the Organto, we enter into 'model clause' data transfer agreements or rely on some other approved data transfer method to ensure adequate protection.

5.3 Please do not send us your information if you do not want it to be transferred to or stored outside the EEA. By providing your information to us, you agree and consent to us transferring to, and storing your information at, a destination that may be outside the EEA.

## Who do we share your information with?

6.1 We may share your personal information with subsidiaries which are part of Organto.

6.2 We may have to share your personal information to comply with legal or regulatory requirements, or to enforce or apply our terms and conditions or any other agreements or to protect our rights, property or our customers etc. This may involve exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

6.3 We may also share your personal information with selected third parties for the purposes of website hosting, data analysis and customer support, amongst others.

## How do we keep your information secure?

7.1 We will only disclose your personal information to third parties with whom we have a processing agreement or that have agreed in writing to provide an adequate level of protection for your personal information. In general, the third-party providers used by us will only collect, use and disclose your personal information to the extent necessary to allow them to perform the services they provide to us.

7.2 If you have a username, password or other login details which enable you to access certain parts of our site, you must not allow any other person to use them and must treat them as confidential. If you believe or suspect that someone else knows your login details you must contact us as soon as possible.

7.3 To protect your personal information, we take reasonable precautions and follow industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed.

7.4 Unfortunately, the transmission of information via the internet is not completely secure. Although we will apply our normal procedures and comply with legal requirements to protect your information, we cannot guarantee the security of your information transmitted to our site and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

7.5 Our site may from time to time contain links to and from other websites. If you follow a link to any of those sites, please note that those sites ought to have their own privacy policies and that

we do not accept any responsibility or liability for those sites or for their privacy policies. Please check those privacy policies before you submit your information to those sites.

## Children

8.1 Protecting the privacy of the very young is especially important. For that reason, we will never collect or maintain information from those we actually know are under 16, and no part of our site is structured to attract anyone under 16.

8.2 By using this site, you represent that you are at least the age of majority in your country of residence, or that you are the age of majority in your country of residence and you have given your consent to allow any of your minor dependents to use this site. As a parent, you can provide us with your consent by contacting us through this email address: [info@organto.com](mailto:info@organto.com)

## Your rights as a data subject

9.1 According to European data protection laws, you have certain rights regarding your personal information. We are dedicated to making sure that you have:

9.1.1 Right to access: You have the right to know what personal information we process and why. You also have the right to obtain a copy of the personal information we have on you. Please direct any request for your information by contacting us using this email address: [info@organto.com](mailto:info@organto.com)

9.1.2 Right to rectification: If you believe we store wrong or incomplete information about you, such as your name or address, you can ask us to correct this. Please contact us using this email address [info@organto.com](mailto:info@organto.com). In case we cannot rectify it, we will delete it.

9.1.3 Right to erasure / right to be forgotten: You have the right to have your personal information erased, in case:

- your personal information is no longer necessary for the purpose of collection or processing;
- you withdraw your consent;
- you have objected to processing under legitimate interests, to which there were no overriding legitimate grounds for us to do so;
- you have objected to processing for direct marketing purposes;
- your personal data was unlawfully collected and used;
- there is a legal obligation under EU or a national law of an EU Member State which states that your personal information must be erased; or
- if you are a child and your personal information was collected in relation to an offer of an information society services, such as direct marketing, competitions or newsletters.

9.1.4 Right to restriction of processing: You have the right to ask us to restrict usage of your personal information:

- for the period of investigation, if you notified us that the personal information is inaccurate;
- if the collection or usage of your personal data was unlawful, but you do not want us to delete it;
- if we do not need your personal data for any other purpose than establishment, exercise or defence of legal claims; or
- if you objected to collection and processing based on our legitimate interests, for the duration while we are verifying your case.

9.1.5 Right to objection to processing: You have the right to object to collection and (further) usage of your personal data based on our legitimate interests, if you feel that your interests and your fundamental rights and freedoms are unduly harmed. Furthermore, you have the right to ask us not to process your information (or pass your information to other companies or organizations) for marketing purposes. In case you receive newsletters which relate to a product or a service you

bought from us, you can unsubscribe from the email newsletter at any time by using the unsubscribe link provided at the bottom of each email newsletter.

9.1.6 Right to data portability: If we we have collected and used your personal information based on consent or performance of a contract and the processing is carried out by electronic means, you have the right to receive a machine-readable copy of your personal information, which you are free to transmit to another company.

9.1.7 Right to withdraw consent: If you gave us your consent for the collection and usage of your personal information, you have the right to withdraw this consent at any time. This can be done either by using the unsubscribe link provided at the bottom of each email newsletter or by sending us an e-mail at [info@organto.com](mailto:info@organto.com)

9.1.8 Right to lodge a complaint at a supervisory authority: If you have a complaint about how we have used your information, you have the right to complain to the Autoriteit Persoonsgegevens, or to the supervisory authority of the country in which you live, work, or where the alleged infringement took place.

### **Changes to this privacy policy**

10.1 Any changes we may make to our privacy policy in the future will be posted on this page. Such changes will take effect immediately upon their posting on the site. You should therefore review this policy on a regular basis to ensure that you are aware of the up to date version from time to time. Where we consider appropriate, we will also notify you by e-mail.

### **How to contact us**

11.1 For the processing activities specified in this privacy policy, Organto Europe BV is the “controller” in terms of the GDPR Questions, comments or requests concerning this privacy policy are welcome and should be addressed to us at: [info@organto.com](mailto:info@organto.com)

11.2 Organto Europe BV is registered in the Netherlands with company number 65154835 and has its registered office at Ginnekenweg 213 ,4835 NA Breda.

11.3 The processing activities specified in this privacy policy also comply with the principles of the Personal Information Protection and Electronics Document Act (“PIPEDA”) in Canada.