



human-driven marketing solutions

PRIVACY POLICY

1. INTRODUCTION

Humanteq (“**Humanteq**”, “**we**”, “**us**” or “**our**”) provides analytics, attribution and optimization software-as-a-service, which (i) enables tracking, analysis and optimization of users’ activities and (ii) analyses certain events and actions on mobile applications (respectively the “**Apps**” and the “**SaaS**”). The SaaS is available to App developers and/or publishers (collectively, “**Customer(s)**”) through implementation of the Humanteq Software Development Kit (“**Humanteq SDK**”).

Humanteq is fully committed to protect the privacy of our Customers, along with the privacy of their Apps’ users (“**End Users**”), in compliance with applicable privacy and personal data laws and regulations. Customer and End Users are hereby referred to hereunder as “you” or “your”.

We take extra care in protecting the personal information that Customers share with us in connection with their use of the SaaS, the Humanteq SDK, including information concerning our Customers Apps’ End Users (the “**Services**”).

This Privacy Policy describes Humanteq’s privacy practices in relation to the information collected from Customers and End Users and received by Humanteq when Customers use our Services or interact with the Services, and the manner in which we may use such information, and the choices and rights available to you.

2. END USER DATA RECEIVED AND PROCESSED BY HUMANTEQ

When a Customer uses the Services, the following End User information may be received and processed by Humanteq (collectively, “End User Data”):

Usage Data

Humanteq SDK collects data about how Users use their Devices, together with the applications and systems on those Devices – this information includes:

- What applications are installed on the Users’ Device

- End-User events, pre-defined by the applicable Customer

The Usage Data collected by the Humanteq is not limited to Usage Data that directly relates to the App in which the Humanteq SDK is integrated. Rather, the Humanteq SDK collects Usage Data from all applications and systems on the Device on which an App is installed.

Technical Information

Humanteq SDK collects technical Information relating to Users' Devices, that includes technical information related to an End User's mobile device such as: device type and model, CPU, system language, memory, OS version, time stamp and zone, device motion parameters and carrier.

Identifiers

Humanteq SDK links the Usage Data and Technical Information it collects listed above to certain device and user identifiers it collects from Users and their Devices, which include:

- Device's unique Advertising ID, such as Google AAID or Apple IDFA.
- IP Address.
- Unique user ID

All User Data we collect is associated with these Identifiers.

Other information

User Data includes any other information (including personal data) that may be submitted to us directly (for example, through a User submitted form or survey response).

Our policy towards children

In accordance with applicable European Union guidance on the practice, we do not knowingly collect User Data from children or use any User Data to target adverts to children. Accordingly, we do not collect or use User Data to target children under 16 years old. If you believe we have inadvertently collected User Data from or about a child, please contact us using the details provided under the heading "Contact Us" below.

Humanteq have no direct relationships with the individual End Users. Therefore, it is our Customers responsibility to obtain the necessary consents and permissions from the End Users of the mobile application, including without limitation through Customer's Privacy Policy, to permit Humanteq and our representatives to access, collect, store, process and use personal information concerning the End Users ("End User Data") in accordance with the terms of privacy policy.

Please take into consideration that certain portions of such above mentioned information may also be collected from End User devices or software, when the App is running in the background, i.e. when it has been launched but not used.

While End User Data does not generally contain any information that directly identifies an individual, such as names, addresses, credit cards or other similarly regulated financial information, health information, or any other type of sensitive personal information, we acknowledge that under certain jurisdictions the End User Data we do receive when a Customer uses the Services may be deemed personal data as it is associated with a Technical Identifier, and therefore, where applicable, will be treated as such.

3. HOW DATA IS USED

Purpose of Use:

We may use personal information that we collect about End Users solely for the purposes of providing the services to our Customers and in accordance with the Data Processing Agreement and Service Terms of Use.

- To create segmentation and separate between users' sessions within the Services.
- To store and process End-User Data for the preparation and delivery of our Services, including compiled analytics Reports to our Customers.
- To create cumulative statistical data and other cumulative information and/or other conclusive information that is non-personal, in which we might make use, in order to operate and improve our Services;
- To provide Customers with analysis and statistical reports regarding End Users' application habits and preferences.
- To provide our Customers with the SaaS;
- To provide and improve our Services and its various functions and features and to manage our business;

4. SHARING DATA

- Humanteq does not share or disclose Customer Data with any third party, except:
Upon our Customer's request;
- To our subsidiaries and global branches as necessary to help us support and maintain the Services provided to Customers;
- When legally required (e.g. court orders or other lawful requests by public authorities), including to meet national security or law enforcement requirements;
- As part of any merger or acquisition of Humanteq, in which case End User Data may be transferred to the surviving or acquiring entity.

5. PROTECTING, TRANSFER AND DATA STORE

Humanteq implements appropriate technical and organizational measures designed to protect against unauthorized access, accidental loss, destruction or damage of Customer Data.

Personal information regarding the Customers, End-Users and Visitors will be maintained, processed and stored by us and our authorized affiliates and service providers in Germany and as necessary, in other territories in secure cloud storage, provided by our third party service provider.

Humanteq may need to transfer Customer Data to countries other than the country from which the Data originated. Any such transfer shall be done in compliance with all applicable laws.

Humanteq will not retain End User Data, Registration Information, Log Data or Platform Data for more time than is needed to serve the legitimate business need for which it was collected. We then either delete such personal information from our systems or anonymize it without further notice.

While the data protection laws in the above jurisdictions may be different than the laws of Customer's or End User residence or location, please know that we, our affiliates and our service providers that store or process your personal information on our behalf are each committed to keep it protected and secured, pursuant to this Privacy Policy and industry standards, regardless of any lesser legal requirements that may apply in their jurisdiction.

Specifically, each of our services providers who stores or processes your personal information either, (i) assured us that it provides adequate safeguards to protect your

rights to privacy, or (ii) holds and processes such information on our behalf in a jurisdiction which has been determined to ensure an adequate level protection by the EU Commission which if in the US, includes certification under the EU-US Privacy shield framework.

6. RELATIONSHIP, LAWFUL BASIS AND END USER CHOICES

Under the laws of certain jurisdictions, when processing End User Data in connection with the provision of Services to a Customer, Humanteq is deemed a 'data processor' while its Customers are deemed 'data controllers'.

Therefore, End Users should closely review the Privacy Policies of the Applications they use in order to learn about the privacy practices of our Customers.

Where Humanteq may be deemed a data controller under the laws of certain jurisdictions (e.g. in connection with its processing of Log Data or Registration Information), Humanteq shall comply with all applicable laws related to its status as a data controller and shall only use the data as described in this Privacy Policy. With regards to Registration Information and Log Data, the lawful basis Humanteq relies on is its need to perform its obligations under the Agreement between Humanteq and Customer and on its legitimate interests to maintain, analyze and improve the Services.

The laws of certain jurisdictions may provide End Users with various rights in connection with the processing of End User Data, including:

- The right to withdraw any previously provided consent;
- The right to access certain information about you that we process;
- The right to have us correct or update any Personal Information;
- The right to have certain Information erased;
- The right to have us temporarily block our processing of certain Information;
- The right to have Information exported into common machine-readable format;
- The right to object to our processing of Information in cases of direct marketing, or when we rely on legitimate interests as our lawful basis to process your information; and
- The right to lodge a complaint with the appropriate data protection authority.

Where Humanteq is deemed a data processor, End Users should contact our Customers to pursue any such legal data subject rights. Humanteq will cooperate with its Customers to support and comply with any such data subject rights requests.

Where Humanteq is deemed a data controller, End Users may exercise their rights by contacting Humanteq at: compliance@humanteq.io We will respond to your requests within a reasonable timeframe. Please note these rights may be limited in

certain circumstances as provided by applicable law. In any event, Humanteq provides End Users with the ability to opt-out of being measured by the Services by emailing a request to compliance@humanteq.io. You may also send any question regarding your exercise of data subject rights to compliance@humanteq.io.

7. UPDATES AND QUESTIONS

Humanteq may update this Privacy Policy from time to time. Any material changes will be notified to the Customer either through the Services, email or as otherwise agreed by the parties in the Agreement. We will also indicate that an update has occurred on the top of this page so Customers and End Users are encouraged to review this Privacy Policy from time to time.

For any questions relating to this Privacy Policy or to contact our data protection officer please send us a mail to: compliance@humanteq.io

For the purposes of Article 27 of the General Data Protection Regulation, the representative within the EU of Humanteq is **EKO Concept GmbH** Im Stöckig 8,69427, Mudau, Germany (contact: compliance@humanteq.io)

Date: February 11, 2020.