

ume Privacy Policy

Last Updated: 2 July 2021

This privacy policy informs you about the processing of your personal data, meaning information that relates to you directly or indirectly, in relation to the operation of our B2B platform (<https://app.ume.solutions>) and our website (www.ume.solutions), as well as about your rights in accordance with the General Data Protection Regulation (GDPR).

We may change this privacy policy from time to time, in which case you will be duly informed. You will find a copy of this privacy policy, as well as any subsequent changes, on our website.

1. Who is the data controller and who to contact?

We, ume Luxembourg S.A., having our registered office at 9 Rue du Laboratoire L- 1911 Luxembourg, and registered with the Trade and Companies Register of Luxembourg under number B212727, are the controller for the processing of your personal data described in this privacy policy.

If you have any questions or comments or want to exercise your rights, you may contact us by sending a letter to our registered office or via e-mail at support@ume.solutions.

2. How do we receive your personal data and what kind of personal data do we process?

We may receive your personal data either directly from you or from a person that is using our B2B software as a service (SaaS) platform.

In particular, the data we process about you includes:

- identification data and contact details (e.g. name, e-mail, telephone number);
- electronic identification data (e.g. IP addresses, cookies, traffic data);
- employment and occupation (e.g. employer, function, title, place of work, specialisation);
- KYC information (name, date of birth, nationality(ies), country of residence);
- communications (e.g. exchange of letters or emails with you).

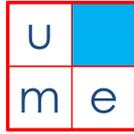
We do not process special categories of personal data.

3. For which purposes do we process your personal data (processing purposes) and on which legal basis?

Below, we inform you about the purposes and legal basis of the processing of your personal by us.

3.1. For the performance of contractual obligations

We may process your personal data for the performance of our contracts with you, that is carrying out any obligations owed to you when you are using our website and/or B2B platform, such as ensuring



their operation or allowing you to log into the B2B platform. This includes, where appropriate, the use of cookies that are strictly necessary for the operation of our website, allowing to:

- keep the choice you have expressed regarding cookies;
- securely access your account;
- maintain the connection to your account;

We may also process your personal data in order to take steps at your request prior to log in on our B2B platform.

3.2. For the purposes of a legitimate interest

We may also process your personal data on the basis of a balance of interests to pursue our or a third party's legitimate interests. This is carried out for the following purposes:

- general management and development of services, including our B2B platform and our website;
- ensure the security and continuity of our B2B platform and our website;
- anonymize your personal data;
- in the case of a business reorganisation, transfer, disposal, merger or acquisition of ume;
- advertisement and marketing research;
- the establishment, exercise and defence of legal claims; and
- the prevention and investigation of crime, as well as risk management and fraud prevention.

Our interest for the respective processing of personal data is based on the respective purposes and is generally of commercial nature (efficient task fulfilment, sales, and avoidance of legal risks).

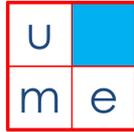
3.3. With your consent

Insofar you have given us your consent for the processing of personal data, such consent will serve as a legal basis for the referred processing.

This includes your potential consent that you may have given to receive emails about new features, products, or other information you have requested from us or that we feel you may find useful and interesting.

It also includes your consent to the use of functional and/or analytics cookies.

Functional cookies are intended to facilitate and/or personalize access to our B2B platform. They allow to maintain the connection to your account from one browsing session to the next.



Analytics cookies on our website www.ume.solutions enable us to measure the use of our website in order to optimise our offer. When we receive from our service providers statistics that have been compiled using cookies on our site, we only receive such data in aggregated form. We do not have access to any information about a specific visitor's interaction with our site.

You have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. The withdrawal only affects future processing.

3.4. For the compliance with a legal obligation

We may also process your personal data to comply with our accounting, reporting and tax obligations, in particular our legal retention obligations in this regard.

4. Do I have the obligation to provide the personal data?

In the context of our business relationship, you only have to provide those personal data that are necessary for the formation, performance, and termination of a business relationship or that we are required by law to collect from you.

Please inform us about any changes to your personal data or if you become aware that we have inaccurate personal data.

Without those personal data, we will generally refuse to sign or to perform the contract, or stop performing or, where appropriate, terminate an existing contract.

We cannot enter into the desired business relationship with you, if you do not provide us with the necessary information and documents.

5. Use of Cookies

ume is using cookies, which are small text files that are stored on your computer. The cookies we use may typically contain an identification number allowing to recognize your browser when you interact with our B2B platform and our website. In some case, they may just contain a simple “yes” or “no” response, for example to remember your choice with regard to cookies.

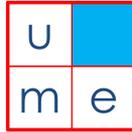
You may find information about the processing of personal data through such cookies in the respective sections of this privacy policy, including about the purposes of such processing.

You may oppose the use of cookies by selecting the appropriate settings in your browser. However please note that if you do this you may not be able to use the full functionalities of our website. If the use of cookies is based on your consent, you may withdraw such consent on our website.

6. Who receives my personal data?

We will only disclose your personal data to third parties if necessary for the purposes described above. The following entities may receive your personal data:

- processors (i.e. service providers) appointed by us that process your personal data on our instructions, such as IT service providers; this includes Amazon Web Services for hosting our B2B platform and Google for providing analytics services on our website ;



- administrations, public services, local authorities and institutions in the case of a statutory or regulatory obligation;
- the respective shareholders, agents, employees, consultants, representatives, authorized representatives, financial intermediaries, auditors, service providers;
- as the case may be, any affiliates or subsidiaries of ume (and their respective agents, employees, consultants, representatives, authorized representatives);
- entities that act on behalf of you or which have a business relation with you;
- the counterparties with whom you decided to share your data on the B2B platform (user content);
- based on your consent.

In other cases, your personal data will not be supplied to third parties, except when required by law.

7. How long will we keep your personal data?

As far as necessary, we will keep your personal data for the duration of our business relationship with you or the person that provided us with your personal data.

In addition, we are subject to various retention and documentation obligations, which *inter alia* follow from the commerce code (*code de commerce*). The retention periods provided by those laws vary from five to ten years.

The retention period will also be determined by the applicable legal limitation periods. The general limitation period under the commerce code is of ten years.

8. Are there any transfers of personal data to a third country or to an international organisation?

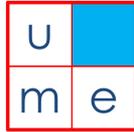
Our B2B platform and website are hosted with Amazon Web Services, exclusively on servers within the European Economic Area (EEA).

The analytics cookies on our website www.ume.solutions, may be transferred to countries located outside of the EEA where Google or any of its sub-processors maintain facilities. Information about the locations of Google data centres is available at <https://www.google.com/about/datacenters/locations/>. Certain countries in which recipients and data processors may be located and to which personal data may be transferred may not have the same level of protection of personal data as the one afforded in the EEA.

9. What data protection rights do I have?

Right to information. You are entitled to obtain at no costs, within reasonable intervals, and in a timely manner, a copy of your personal data being processed, as well as all information on the origin of those data.

Right of access, right to rectification. You have the right to access your personal data and, if applicable, request from us the rectification or erasure of personal data which is incorrect, out dated or redundant.



Right to restriction of processing. In cases where the lawfulness of the processing or the accuracy of the personal data is contested, or where you need the personal data for the establishment, exercise or defence of legal claims, you may obtain a restriction of processing.

Right to data portability. Where the processing is based on your consent or the performance of a contract with you, you have the right to receive your personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

Right to object. You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data, which is based on legitimate interests. If you object, we will no longer process your personal data, unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Right to object where your personal data are processed for direct marketing purposes. We may, within the legal limits, process your personal data for direct marketing purposes. You have the right to object at any time to processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing. If you object to processing for direct marketing purposes, your personal data will no longer be processed for such purposes. Your right to object is not bound to any formalities.

Right to withdraw consent. Where the processing is based on your consent, you may withdraw such consent at any time. If you withdraw your consent, we will no longer process your personal data, unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Right to lodge a complaint with the competent data protection authority. You also have the right to lodge a complaint with the competent data protection authority. In Luxembourg, such authority is :

Commission nationale pour la protection des données
Service des plaintes
1, avenue du Rock'n'Roll
L-4361 Esch-sur-Alzette
Grand Duchy of Luxembourg

10. How to contact us

If you have any concern regarding the protection of your personal data or would like to submit a request, please let us know at: support@ume.solutions. We will use our best endeavours to investigate your concern and, where possible, address it in an appropriate manner.