

## **PRIVACY & COOKIES POLICY**

This Policy provides an overview of how Neattech LLC collects your personal data, how it handles it, and how it protects your privacy.

### **Your personal data controller**

Neattech LLC acts as joint controllers of your personal data. It means that Neattech LLC determines the purposes and means of personal data processing.

Neattech LLC data protection officer can be contacted at [contracts@neattech.io](mailto:contracts@neattech.io)

### **Personal information we collect and use**

Neattech may collect your personal data that you provide to it, for example, when you contact Neattech electronically or respond to an email from Neattech. Neattech may collect your business contact details when you exchange business cards with Neattech representatives at meetings and events, or when you provide your contacts to sign up for Neattech events.

When submitting your request/inquiry on Neattech websites, you may be asked for information such as, but not limited to, your full name, email address, phone number, company you work for or own and/or country where you reside or work.

When contacting Neattech through live chats on its websites, you may be asked for information such as, but not limited to, your name and email address. This is needed when we are not ready to answer you immediately and need more time to handle your request. When you give Neattech your personal data in live chat, we assume that you consent to processing it by Neattech.

By using cookies, Neattech may collect details of your visits to its websites such as, but not limited to, the pages you visited, the date, time and duration of your visit and/or your IP address as well as the browser you use and its version, your operating system and its version, your city and state.

It is Neattech policy to collect only the minimum information required to handle and complete your request/inquiry or to reach other purposes for which Neattech processes your personal data. If you believe Neattech websites have collected excessive information about you, please contact Neattech through the request/inquiry form to raise your concerns.

Neattech does not intend to collect sensitive information through its websites unless it is legally required to do so. Examples of sensitive information include race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, genetic data, biometric data, sexual life or sexual orientation, and criminal records. Neattech asks that you do not provide sensitive data of such nature when using its websites.

When you submit your request/inquiry on Neattech websites, Neattech uses your data on the basis of your consent. In other cases, when you voluntarily exchange business contact details with Neattech, Neattech sends you information or marketing communications on the basis of its legitimate interests in maintaining a business relationship with you or companies you work for or represent and/or on the basis of your consent (when it is technically possible to collect your freely given, specific, informed and unambiguous consent). Cookies are used on the basis of your consent and/or Neattech legitimate interest described below.

## **Purposes for which Neattech uses your personal data**

Neattech may use your data to interact with you and/or respond to your requests/inquiries, to negotiate, perform or facilitate a contract with you or related to you, to send you invitations to events it organizes, to share with you information you might be interested in and/or to inform you about its services. Neattech may also use your personal data to comply with law, regulations, public authority requests or court orders.

These are examples of purposes for which Neattech may use personal data you provide to it:

- to administer and manage Neattech websites;
- to understand how people use the features and functions of its websites in order to improve user experience;
- to determine the company, organisation, institution, or agency that you work for or represent or with which you are otherwise associated;
- to develop its businesses and services;
- to analyze the usage of Neattech websites;
- any other purposes for which you provided information to Neattech.

Neattech websites do not collect or compile personally identifying information for sale to third parties for consumer marketing purposes.

## **Cookies**

Cookies are small text files that may be placed and stored on your computer/device allowing internet access when you visit Neattech websites.

Neattech uses cookies to collect your IP address and browsing information. Neattech websites also remember your system and preferences. Cookies are placed on your computer/device only if you consent to it, unless cookies are necessary for strictly technical functionality of Neattech websites.

In order to record and analyze how visitors use Neattech websites as well as to improve visitors' experience, Neattech collects details of your visits by using Google Analytics. Google Analytics places and uses cookies that allow Neattech to track website traffic and users' interaction with Neattech websites.

Neattech may use cookies to record your consents on its websites (e.g. the consent to the use of cookies).

Neattech uses cookies on the basis of its legitimate interest in ensuring the technical functionality of its websites. When Neattech uses cookies to remember your choices or for analytics, the legal basis for the use is your consent. You can opt-out from analytics by disabling cookies through your browser settings or by visiting <https://tools.google.com/dlpage/gaoptout/>.

If you want to disable other cookies, you can learn how to do it by visiting <http://www.allaboutcookies.org>.

Please note that if you disable or refuse cookies, Neattech websites or their parts may become inaccessible, not function properly or you may not be able to use some of the interactive features of Neattech websites.

### **Who may access your personal data**

Neattech may disclose your personal data to (1) its employees who are in contact with you or who are responsible for marketing, (2) third-party service providers.

Statistical data about Neattech websites' visitors may be accessed by (1) Neattech employees in marketing and/or IT departments who are responsible for analysing such data and for improving Neattech websites, (2) third-party service providers.

### **Transfers to third countries**

Neattech has offices in more than one country. For this reason, your personal data may be transferred to and stored outside the country where you are located. This includes countries outside the European Economic Area with no adequate level of personal data protection (third countries).

As some of the countries where our offices are situated are not yet recognized by the European Commission as countries with an adequate level of personal data protection, these offices have access to personal data on the basis of instruments that cover the European Union requirements for the transfer of personal data to data controllers/processors outside the European Union (Standard Contractual Clauses approved by the European Commission). You may ask Neattech to inspect copies of these clauses by contacting its data protection officer.

### **Third-party providers**

When Neattech transfers personal data, it does so for the purposes for which the information has been collected/submitted, for the purposes listed above, for the administration and maintenance of its websites and associated systems, and/or other internal or administrative purposes. Neattech also may transfer personal data to third parties providing identity management, website hosting and management, data analysis, data backup, security and storage services.

Neattech works only with those third-party providers that are bound to maintain appropriate levels of security and confidentiality, to process personal data only as instructed by Neattech and to flow those same obligations down to their sub-processors.

### **Retention of your personal data**

Neattech will retain your personal information in its systems only for as long as Neattech needs it, given the purposes for which it was collected, or as required to do so by law.

### **Rights in relation to your personal data**

Under your local laws and the European Union legislation, you may exercise the following rights by submitting your request/inquiry on Neattech websites:

- right to require access to your personal data,
- right to require rectification of your personal data,
- right to require erasure of your personal data,
- right to withdraw your consent regarding processing of your personal data.

In some cases, you may also have a right (1) to request restriction on processing of your personal data or (2) to object to processing of your personal data.

There are cases when Neattech can retain copies of the personal data you requested it to erase. They concern the necessity to protect legitimate interests of Neattech or third parties, comply with governmental orders, resolve disputes, troubleshoot problems, or enforce any agreement you have formed with Neattech.

### **Right to lodge a complaint with a supervisory authority**

You have the right to lodge a complaint with your local data protection regulator if you think your privacy rights have been violated.

### **Contact Neattech**

If you have any questions or comments regarding this Privacy and Cookies Policy, you can contact Neattech via the feedback form on this website.