

Privacy Policy

Purpose

DigiLEAN AS respects your privacy and feels it is important for you to know how we handle the information we receive via our website at www.digilean.com (the “Site”) and through our on-demand business productivity software (app.digilean.tools), our support platform, mobile applications and tools and services offered on the Site and mobile application (the “Service”). This Privacy Policy explains our information practices, the kinds of information we may collect, how we use and share that information, and how you can opt-out of a use or correct or change that information. This Privacy Policy is incorporated by reference into DigiLEAN Terms of Service (the “Terms”). All other terms not defined in this Privacy Policy will have the meanings set forth in the Terms.

Scope

As used in this Privacy Policy, the term “Personal Information” shall mean any information relating to an identified or identifiable natural person. This Privacy Policy applies to Personal Information that DigiLEAN collects and processes in the course of our business, including on the Site and the DigiLEAN platform. This policy also describes the choices available to you regarding our use of your Personal Information and how you can access and update this information. The use of information collected through our service shall be limited to the purpose of providing the service for which DigiLEAN’s client has engaged us. This Privacy Policy is intended to meet requirements globally, including those in Europe, North America, APAC, and other jurisdictions.

Types of Information We Collect and How We Use It

Information Clients Provide

When you create an account, use the Services, respond to surveys, request services or information, or contact us directly, we may ask you to provide some or all of the following types of information:

Account Information: When you register to use the Service with an email address, we collect your full name, company or organization name, email address and password you create. When signing up for a paid plan, DigiLEAN may also collect credit card information and use a third-party intermediary to manage credit card processing. This intermediary is not permitted to store, retain, or use your billing information except for the sole purpose of credit card processing on DigiLEAN's behalf.

Communications With Us. When you contact us inquire about the Services, request customer service or technical support, or request other information, we may collect your name, email address, phone number or mailing address.

Surveys. We may contact you to participate in online surveys. If you decide to participate, you may be asked to provide certain information which may include Personal Information.

Automatic Data Collection. As is true of most web sites and mobile applications, we gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), GPS, referring/exit pages, operating system, date/time stamp, and clickstream data, and mobile device identifiers. We use this information to analyze trends, to administer the site, to track users' movements around the site and to gather demographic information about our user base as a whole.

Information Related to Data Collected for our Clients

DigiLEAN provides customer relationship management services to its clients and collects and processes information under the direction of its clients.

DigiLEAN has no direct relationship with the individuals whose personal data it processes.

Cookies and Tracking Technologies

We, as well as third parties that provide content, analytics, advertising, or other functionality on our Services, may use cookies, pixel tags, local storage, and other technologies (“Technologies”) to automatically collect information through the Services.

Cookies. Cookies are small text files placed in visitors’ computer browsers. These technologies are used in analyzing trends, administering the site, tracking users’ movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

Local Storage. We use Local Storage (LS) such as HTML5 to store content information and preferences. Third parties with whom we partner to provide certain features on our site use LS such as HTML5 to collect and store information. Various browsers may offer their own management tools for removing HTML5 LS.

How DigiLEAN Uses the Information We Collect

We acquire, hold, use, and Process Personal Information for a variety of business purposes, including:

- **To Provide Services or Information Requested by Clients.** DigiLEAN may use Personal Information to provide the Service, fulfill requests for products, Services, or information, including information about potential or future Services.
- **Administrative Purposes.** DigiLEAN may use Personal Information about you for its administrative purposes, including to:
 - Measure interest in DigiLEAN’s Services;

- Develop new products and Services;
 - Ensure internal quality control;
 - Verify individual identity;
 - Send email to the email address a Client provides to us to verify your Account and for informational and operational purposes, such as Account management, customer service, or system maintenance;
 - Process payment for products or services purchased;
 - Process applications and transactions;
 - Prevent potentially prohibited or illegal activities;
 - Enforce our Terms.
- **Marketing DigiLEAN Products and Services to Clients.** DigiLEAN may use Personal Information to provide you with materials about offers, products, and Services that may be of interest, including new content or Services. You may contact us at any time to opt-out of the use of your Personal Information for marketing purposes, as further described below.
 - **Research and Development.** DigiLEAN may use Personal Information to create non-identifiable information that we may use alone or in the aggregate with information obtained from other sources, in order to help us to optimally deliver our existing products and Services or develop new products and Services.
 - **Anonymous and Aggregated Information Use.** DigiLEAN may use Personal Information and other information about you to create anonymized and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access DigiLEAN's Services, or other analyses we create. Anonymized and aggregated information is used for a variety of functions, including the measurement of visitors' interest in and use of various portions or features of the Services. Anonymized or aggregated information is not Personal Information, and DigiLEAN may use such information in a number of ways, including research, internal analysis, analytics, and any other legally permissible purposes. We may share this information within DigiLEAN and with Third Parties for our or their purposes in an anonymized or aggregated form that is designed to prevent anyone from identifying you.

- **Sharing Content with Friends or Colleagues.** DigiLEAN's Services may offer various tools and functionalities. Email addresses that you may provide for a friend or colleague will be used to send your friend or colleague the content or link you request but will not be collected or otherwise used by DigiLEAN or any other Third Parties for any other purpose.
- **Other Uses.** DigiLEAN may use Personal Information for which we have a legitimate interest, such as direct marketing, individual or market research, anti-fraud protection, or any other purpose disclosed to you at the time you provide Personal Information or with your consent.

How DigiLEAN Shares the Information We Collect

DigiLEAN does not sell or otherwise disclose Personal Information about you, except as described in this Policy or as you explicitly consent to. We may share your information as described in this Privacy Policy:

- **Vendors and Service Providers.** We may share Personal Information we receive with vendors and service providers only as necessary to provide the Services to us. The types of service providers (processors) to whom we entrust Personal Information include service providers for: (i) provision of IT and related services; (ii) provision of information and services you have requested; (iii) payment processing; (iv) customer service activities; and (v) in connection with the provision of the Site. DigiLEAN has executed appropriate contracts with the service providers that prohibit them from using or sharing Personal Information except as necessary to perform the contracted services on our behalf or to comply with applicable legal requirements.
- **Business Partners.** DigiLEAN may share Personal Information with our business partners, and affiliates for our and our affiliates' internal business purposes or to provide you with a product or service that you have requested. DigiLEAN may also provide Personal Information to business partners with whom we may jointly offer products or services, or whose products or services we believe may be of interest to you. In such cases, our business

partner's name will appear, along with DigiLEAN. DigiLEAN requires our affiliates and business partners to agree in writing to maintain the confidentiality and security of Personal Information they maintain on our behalf and not to use it for any purpose other than the purpose for which DigiLEAN provided them.

- **User Testimonials.** We display personal testimonials of satisfied customers on our site in addition to other endorsements. With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us at contact@digilean.com.
- **Social Media Widgets.** Our web site includes social media features, such as the Facebook Like button and widgets, such as the 'Share This' button or interactive mini-programs that run on our site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our web site. Your interactions with these features are governed by the privacy policy of the company providing it.
- **Disclosures to Protect Us or Others** (e.g., as Required by Law and Similar Disclosures). We may access, preserve, and disclose your Personal Information, other Account information, and content if we believe doing so is required or appropriate to: (i) comply with law enforcement or national security requests and legal process, such as a court order or subpoena; (ii) respond to your requests; (iii) protect yours', ours' or others' rights, property, or safety; (iv) to enforce DigiLEAN policies or contracts; (v) to collect amounts owed to DigiLEAN; (vi) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vii) if we, in good faith, believe that disclosure is otherwise necessary or advisable.
- **Merger, Sale, or Other Asset Transfers.** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. In such event, DigiLEAN will endeavor to direct the transferee to use Personal Information in a manner that is

consistent with the Privacy Policy in effect at the time such Personal Information was collected.

- **Privacy Shield.** With respect to transfers to third parties that process Personal Information pursuant to our instructions, Privacy Shield requires that DigiLEAN remain liable should its vendors and service providers process Personal Information in a manner inconsistent with the Privacy Shield Principles.

Data Transfers

We may store all Personal Information we collect anywhere in the world, including but not limited to, in the United States, in the cloud, on our servers, on the servers of our affiliates or the servers of our service providers.

Data Retention

DigiLEAN will retain your information for as long as your account is active or as needed to provide you services. We will also retain personal data we process on behalf of our clients for as long as needed to provide services to our client. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

How to Opt-Out

- **Mobile App Push Notifications and Location Data.** Our mobile app may occasionally send you push notifications. You may at any time opt-out from receiving these types of communications by changing the settings on your mobile device. DigiLEAN may also collect location-based information if you use our mobile applications. You may opt-out of this collection by changing the settings on your mobile device.
- **“Do Not Track”.** Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. Please note that we do not

respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

Rights of Access, Rectification, Erasure, and Restriction

Clients. You may inquire as to whether DigiLEAN is Processing Personal Information about you, request access to Personal Information, and ask that we correct, amend, or delete your Personal Information where it is inaccurate by contacting us at contact@digilean.com. Please include your full name, email address associated with your Account, and a detailed description of your data request. Such requests will be processed in line with local laws. We will respond to any requests for access to personal information within 30 days.

Data Controlled by Clients. We process information at the direction of our clients. An individual who seeks access, or who seeks to correct, amend, or delete data that is processed by DigiLEAN for its client should direct his query to the DigiLEAN client (the data controller). If the client requests DigiLEAN to remove the data, we will respond to their request within 30 business days.

Children's Personal Information

The Service and Site are not intended for, nor does DigiLEAN knowingly collect any personal information from children under the age of 16.

Protection of Information

The security of your personal information and our clients' information is important to us. DigiLEAN maintains reasonable security measures to protect your information from loss, destruction, misuse, unauthorized access or disclosure. When you enter sensitive information, such as a credit card number, on our order forms and login credentials on our platform login page, we encrypt the transmission of that information using secure socket layer

technology (SSL). These technologies help ensure that your data is safe, secure, and only available to you and to those you provided authorized access. However, no data transmission over the Internet or information storage technology can be guaranteed to be 100% secure due to the nature of the distributed network that is the Internet. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our Web site, you can contact us at contact@digilean.com.

DigiLEAN is SOC 2 compliant and maintains reasonable security measures to protect your information from loss, destruction, misuse, unauthorized access, or disclosure.

Links to 3rd Party Sites

Our service may include links to other web sites whose privacy practices may differ from those of DigiLEAN. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any web site you visit.

Single Sign-On

You can log in to our site using sign-in services from Microsoft. These services will authenticate your identity and provide you the option to share certain personal information with us such as your name and email address to pre-populate our sign-up form.

Accountability

In compliance with the Privacy Shield Principles, DigiLEAN commits to resolve complaints about our collection or use of your personal information. European Union individuals with inquiries or complaints regarding our Privacy Shield policy should first contact DigiLEAN at the address listed at the bottom of this privacy policy.

DigiLEAN has further committed to cooperate with EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved Privacy Shield complaints. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact the EU DPAs or Swiss FDPIC for more information or to file a complaint. The services of EU DPAs and Swiss FDPICs are provided at no cost to you.

Changes to Privacy Policy

DigiLEAN may update this policy from time to time. You can review the most current version of this privacy policy at www.digilean.tools. Your continued use of the Site or Service constitutes your agreement to be bound by such changes to the privacy policy. Your only remedy, if you do not accept the terms of this privacy policy, is to discontinue use of the Site and Service. If we make any material changes, we will notify you or our client by email sent to the e-mail address on your account or by means of a notice on the Site prior to the change becoming effective.

Business Transactions

DigiLEAN may assign or transfer this privacy policy, and your user account and related information and data, to any person or entity that acquires or is merged with DigiLEAN, you will be notified via email and/or a prominent notice on our web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

Terms of Service

When you access and use the Service, you are subject and bound to the DigiLEAN Terms of Service.

Contact Us

If you have questions regarding this privacy policy or about the security practices of DigiLEAN, please contact us by email at contact@digilean.com.

DigiLEAN AS

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