



QREDO.COM

16 02 2023

Qredo.com – Privacy Policy

1. Scope

This Policy covers Qredo's Website which can be accessed at www.qredo.com ("Our Site"), our mobile application ("Our App"), our API ("Our Software") as well as our services made available through the Qredo Network and/or accessed via the Site and surveys conducted by the Company, including those hosted on other websites, collectively ("Our Products").

This Privacy Policy applies only to the use of Our Products.

2. Definitions

In this Policy the following terms shall have the following meanings:

Account means a unique user membership comprised of a username and password created for You to access or use certain areas or features of Our Products.

Company (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Qredo Services Limited, Floor 4, Banco Popular Building, Road Town, Tortola, VG1110, British Virgin Islands. For the purpose of the GDPR, the Company is considered the Data Controller.

Consumer, for the purpose of the CCPA (California Consumer Privacy Act), means a natural person who is a California resident. A resident, as defined in the law, includes (1) every individual who is in the USA for other than a temporary or transitory purpose, and (2) every individual who is domiciled in the USA who is outside the USA for a temporary or transitory purpose.

Cookies means a small text file placed on Your computer, mobile device or any other device when You access or use certain areas or features of Our Products.

Device means any a functional unit that can be used to visit Our Site such as a computer, a cellphone or a digital tablet.

GDPR means the General Data Protection Regulation (EU Regulation 2016/679)

Personal Data is any information about You that enables You to be identified. Personal Data not only covers information such as Your name and contact details, but may also include information that is less recognisable such as identification numbers, electronic location data, and other online identifiers.

- For the purposes of GDPR, Personal Data means any information relating to You such as a name, an identification number, location data, online identifier or to one or more



factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

- For the purposes of the CCPA, Personal Data means any information that identifies, relates to, describes or is capable of being associated with, or could reasonably be linked, directly or indirectly, with You.
- For the purpose of the Data Protection Act 2018, Personal Data means any information relating to an identifiable person who can be directly or indirectly identified by reference to an identifier.

Service Provider means any natural or legal person that processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the operation of Our Products, to provide Our Products on behalf of the Company, to perform services related to Our Products or to assist the Company in analyzing how the Our Products are used. For the purpose of the GDPR, Service Providers are considered Data Processors.

Usage Data refers to data that is collected automatically, either generated by the use of the Our Products or from Our Software infrastructure itself (for example, the duration of a page visit).

You means the individual visiting Our Site or accessing or using other areas or features of Our Products, or the company, or other legal entity on behalf of which such individual is accessing or using these, as applicable. Under GDPR (General Data Protection Regulation), You can be referred to as the Data Subject or as the User.

3. Policy

Qredo.com Privacy Policy

Last updated: February 16, 2023

Owner: Qredo Privacy Team: privacy@qredo.com

We understand that Your privacy is important to You and that You care about how Your Personal Data is used. We respect and value the privacy of everyone who visits Our Site and/or accesses or uses Our Products.

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You visit Our Site or access or use Our Products and tells You about Your privacy rights and how the law protects You.

We use Your Personal Data to provide and improve Our Products, and We will only collect and use Personal Data in ways that are described here, and in a way that is consistent with our obligations and Your rights.

By using Our Products You agree to the collection and use of information in accordance with this Privacy Policy.

3.1 Collecting and Using Your Personal Data



3.1.1 What Data Do We Collect and How?

Personal Data

To activate Your Account You do not need to submit personally identifiable information other than Your name and email address. To use Our Products thereafter, You may need to submit further personally identifiable information which may include, but is not limited to:

- Phone number
- Address, State, Province, ZIP/Postal code, City
- ID number

For companies or legal entities on behalf of which an individual is accessing or using certain areas or features of Our Products, You may need to submit:

- Full legal name
- Phone Number
- Company Domain
- Address, State, Province, ZIP/Postal code, City
- Nature of activity
- Beneficiary and Director information
- Any other relevant information necessary for us to identify and verify the business

Usage Data

Usage Data is collected automatically when using Our Products.

To improve the quality of Our Products, We track information provided to us by Your browser or by Our Software, such as the type of browser You use, the device from which You connected, the time and date of access and other diagnostic data.

Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Products and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyse Our Products. The technologies We use may include:

- **Cookies or Browser Cookies.** *You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent.*
- **Web Beacons.** Certain areas or features of Our Products and our emails may contain small electronic files known as Web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related Website statistics (for example, recording the popularity of a certain area/feature and verifying system and server integrity).

Tracking technologies and Cookies enable us to keep a record of Your preferences when using Our Products.



For more information about the Cookies We use and Your choices regarding cookies, please visit our Cookies Policy.

3.1.2 How Do We Use Your Personal Data?

We will always have a lawful basis for using Your Personal Data. We will always work to fully protect Your rights and comply with Our obligations. You will not be sent any unlawful marketing or spam.

We may use Personal Data for the following purposes:

- **To provide and maintain Our Products**, including to monitor the usage of Our Products.
- **To manage Your Account**, namely, to manage Your registration as a user. The Personal Data You provide can give You access to different functionalities of Our Products that are available to You as a registered user.
- **For the performance of a contract**, namely, the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the use of Our Products.
- **To contact You** by email, telephone calls, SMS, or other regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide You** with news, special offers and general information about other goods, services and events which We offer that are similar to those that You have already purchased or enquired about unless You have opted not to receive such information.
- **To manage Your requests**: To attend and manage Your requests to Us.
- **To deliver targeted advertising to You**: We may use Your information to develop and display content and advertising (and work with third-party vendors who do so) tailored to Your interests and/or location and to measure its effectiveness.
- **For business transfers**: We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Users is among the assets transferred.
- **For other purposes**: We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Products, marketing and Your experience.

We will only use Your Personal Data for the purpose(s) for which it was originally collected unless We reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use Your Personal Data for that purpose. If We do use Your Personal Data in this way and You wish us to explain how the new purpose is compatible with the original, please contact us using the methods below.

Email address: privacy@qredo.com

3.1.3 Retention of Your Personal Data

We will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our



legal obligations (for example, if We are required to retain Your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of Our Products, or We are legally obligated to retain this data for longer time periods.

Your Personal Data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Marketing Data: 3 years from sign up.

Customer Data: 6 years from the end of Your customer relationship.

3.1.4 Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to – and maintained on – computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

For GDPR and CCPA provisions on the treatment of Personal Data transfer, please refer to the GDPR and CCPA notices below (sections 5 and 6 respectively).

3.1.5 Delete Your Personal Data

You have the right to delete or request that We assist in deleting the Personal Data that We have collected about You.

Our Products may give You the ability to delete certain information about You.

You may update, amend, or delete Your information at any time by signing into Your Account, if You have one, and visiting the account settings section that allows You to manage Your personal information. You may also contact Us to request access to, correct, or delete any personal information that You have provided to Us.



Please note, however, that We may need to retain certain information when We have a legal obligation or lawful basis to do so.

3.1.6 Disclosure of Your Personal Data

We may share Your Personal Data in the following situations:

- **With Law Enforcement:** Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).
- **With Service Providers:** We may share Your personal information with Service Providers to monitor and analyse the use of Our Products, to advertise on third party Websites to You after You visited our Site, to contact You.
- **For business transfers:** If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred.
- **With Affiliates:** We may share Your information with Our affiliates, in which case We will require those affiliates to honour this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **With business partners:** We may share Your information with Our business partners to offer You certain products, services or promotions.
- **With other users:** when You share Personal Data or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- **With Your consent:** We may disclose Your Personal Data for any other purpose with Your consent.

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with Our Products
- Protect the personal safety of Users of Our Products or the public
- Protect against legal liability

3.1.7 Personal Data Processing from Service Providers

The Service Providers We use may have access to Your Personal Data. These Service Providers collect, store, use, process and transfer information about Your activity on Our Products in accordance with their Privacy Policies.

We may use Service Providers such as Web developers, analytics services, customer relationship management services, email services and payment processing services to (i) monitor and analyse the use of Our Products, (ii) to contact You with newsletters, marketing or promotional materials and other information that may be of interest to You, (iii) to advertise to You after You accessed or visited our Service, or (iv) for other legitimate reasons.



For more information about Personal Data Processing from Service Providers, please contact us using the methods below.

3.2 How to contact us

To contact us about anything to do with Your Personal Data and data protection, including to make a subject access request, please use the following methods (marked for the attention of Privacy Officer):

Email address: privacy@qredo.com

3.3 Changes to this Privacy Policy

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if We make changes to our business in a way that affects Personal Data protection. Any immaterial changes will be immediately posted on Our Site and You will be deemed to have accepted the terms of the Privacy Policy on Your first use of Our Site or Our Products following the alterations. We recommend that You check this page regularly to keep up-to-date. Any material changes to our business or Personal Data protection will also be communicated directly to customers and users using the contact information We have on file.

4. GDPR Notice

This Privacy Notice section for EU residents supplements the information contained in Our Privacy Policy and it applies solely to You if You are within the EU.

In the event of a conflict between the terms of this notice and the Privacy Policy, the terms of the Notice shall prevail.

4.1 Legal Basis for Processing Your Personal Data Under GDPR

We may process Personal Data under the following conditions:

- **Consent:** You have given Your consent for processing Personal Data for one or more specific purposes.
- **Performance of a contract:** Provision of Personal Data is necessary for the performance of an agreement with You and/or for any pre-contractual obligations thereof.
- **Legal obligations:** Processing Personal Data is necessary for compliance with a legal obligation to which the Company is subject.
- **Vital interests:** Processing Personal Data is necessary in order to protect Your vital interests or of another natural person.
- **Public interests:** Processing Personal Data is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Company.



- **Legitimate interests:** Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the Company.

In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

4.2 Your Rights Under GDPR

The Company undertakes to respect the confidentiality of Your Personal Data and to guarantee You can exercise Your rights.

You have the right under Our Privacy Policy, and by law if You are covered by this Notice:

- **The right to be informed about our collection and use of Your Personal Data.** This Privacy Policy and the supplemental GDPR notice should tell You everything You need to know, but You can always contact Us using the methods below to find out more or to ask any questions.
- **The right to access the Personal Data We hold about You.**
- **The right to rectification.** This right enables You to have any incomplete or inaccurate data We hold about You corrected, though We may need to verify the accuracy of the new data You provide to Us.
- **The right to be forgotten**, i.e., the right to ask Us to delete or otherwise dispose of any of Your Personal Data that We hold. You also have the right to ask Us to delete or remove Your Personal Data where You have successfully exercised Your right to object to processing (see below), where We may have processed Your information unlawfully or where We are required to erase Your Personal Data to comply with local law.
- **The right to restrict (i.e. prevent) the processing of Your Personal Data.** This enables You to ask us to suspend the processing of Your Personal Data:
 - o If You want Us to establish the data's accuracy.
 - o Where Our use of the data is unlawful but You do not want Us to erase it.
 - o Where You need Us to hold the data even if We no longer require it as You need it to establish, exercise or defend legal claims.
 - o If You have objected to Our use of Your data but We need to verify whether We have overriding legitimate grounds to use it.
- **The right to object to Us using Your Personal Data** where We are relying on a legitimate interest (or those of a third party) and there is something about Your situation which makes You want to object to processing on this ground as You feel it impacts on Your fundamental rights and freedoms. You also have the right to object where We are processing Your Personal Data for direct marketing purposes. In some cases, We may demonstrate that We have compelling legitimate grounds to process Your information which override Your rights and freedoms.
- **The right to withdraw consent.** This means that, if We are relying on Your consent as the legal basis for using Your Personal Data, You are free to withdraw that consent at any time.
- **The right to data portability.** This means that, if You have provided Personal Data to Us directly, We are using it with Your consent or for the performance of a contract, and that data is processed using automated means, You can ask Us for a copy of that Personal Data to re-use with another service or business in many cases.



- **Rights relating to automated decision-making and profiling.** We do not use Your Personal Data in this way. For further information on each of those rights, including the circumstances in which they apply, please contact us.

4.2.1 Exercising Your Rights Under GDPR

You may exercise Your rights of access, rectification, cancellation and opposition by contacting Us. Please note that We may ask You to verify Your identity before responding to such requests.

If You want to know what Personal Data We have about You, You can ask us for details of that Personal Data and for a copy of it (where any such Personal Data is held). This is known as a “subject access request”.

There is not normally any charge for a subject access request. If Your request is ‘manifestly unfounded or excessive’ (for example, if You make repetitive requests) a fee may be charged to cover Our administrative costs in responding. We will respond to Your subject access request within two Weeks and, in any case, not more than one month of receiving it. Normally, We aim to provide a complete response, including a copy of Your Personal Data within that time. In some cases, however, particularly if Your request is more complex, more time may be required up to a maximum of three months from the date We receive Your request. You will be kept fully informed of our progress

You have the right to complain to a Data Protection Authority about Our collection and use of Your Personal Data.

4.2.2 Transferring Personal Data Outside of the EEA

To the extent that We transfer any of Your Personal Data outside of the European Economic Area (the EEA), We will only transfer Your Personal Data to firms outside of the EEA (i) with which We have entered into EU Standard Contractual Clauses (SCCs), (ii) that have legally binding corporate rules in place or (iii) where the jurisdiction of the relevant firm has the benefit of a European Commission adequacy decision. We use third party tools and may ask those third parties to process specific data. Where We do, We assess their policies on data security practices to meet the requirements set out in the applicable legislation.

5. CCPA Notice

This Privacy Notice section for California residents supplements the information contained in Our Privacy Policy and it applies solely to all visitors, users, and others who reside in the State of California.

In the event of a conflict between the terms of this Notice and the Privacy Policy, the terms of the Notice shall prevail.



5.1 Your Rights under the CCPA

The CCPA provides California residents with specific rights regarding their personal information. If You are a resident of California, You have the following rights:

- **The right to notice.** You have the right to be notified which categories of Personal Data are being collected and the purposes for which the Personal Data is being used.
- **The right to request.** Under CCPA, You have the right to request that We disclose information to You about Our collection, use, sale, disclosure for business purposes and share of personal information. Once We receive and confirm Your request, We will disclose to You:
 - The categories of personal information We collected about You
 - The categories of sources for the personal information We collected about You
 - Our business or commercial purpose for collecting or selling that personal information
 - The categories of third parties with whom We share that personal information
 - The specific pieces of personal information We collected about You
 - If We sold Your personal information or disclosed Your personal information for a business purpose, We will disclose to You:
 - The categories of personal information categories sold
 - The categories of personal information categories disclosed
 - The right to say no to the sale of Personal Data(opt-out). You have the right to direct Us to not sell Your personal information. To submit an opt-out request please contact Us.
 - The right to delete Personal Data. You have the right to request the deletion of Your Personal Data, subject to certain exceptions. Once We receive and confirm Your request, We will delete (and direct Our Service Providers to delete) Your personal information from our records, unless an exception applies. We may deny Your deletion request if retaining the information is necessary for Us or Our Service Providers to:
 - Complete the transaction for which We collected the personal information, provide a good or service that You requested, take actions reasonably anticipated within the context of our ongoing business relationship with You, or otherwise perform our contract with You.
 - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
 - Debug products to identify and repair errors that impair existing intended functionality.
 - Exercise free speech, ensure the right of another Consumer to exercise their free speech rights, or exercise another right provided for by law.
 - Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
 - Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if You previously provided informed consent.
 - Enable solely internal uses that are reasonably aligned with Consumer expectations based on Your relationship with Us.
 - Comply with a legal obligation.
 - Make other internal and lawful uses of that information that are compatible with the context in which You provided it.
 - **The right not to be discriminated against.** You have the right not to be discriminated against for exercising any of Your Consumer's rights, including by:
 - Denying goods or services to You



- Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties
- Providing a different level or quality of goods or services to You
- Suggesting that You will receive a different price or rate for goods or services or a different level or quality of goods or services

5.2 Exercising Your Rights Under CCPA

In order to exercise any of Your rights under the CCPA, and if You are a California resident, You can contact Us:

- By email: privacy@qredo.com

Only You, or a person registered with the California Secretary of State that You authorize to act on Your behalf, may make a verifiable request related to Your personal information.

Your request to Us must:

- Provide sufficient information that allows Us to reasonably verify You are the person about whom We collected personal information or an authorized representative
- Describe Your request with sufficient detail that allows Us to properly understand, evaluate, and respond to it

We cannot respond to Your request or provide You with the required information if We cannot:

- Verify Your identity or authority to make the request
- And confirm that the personal information relates to You

We will disclose and deliver the required information free of charge within 45 days of receiving Your verifiable request. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary and with prior notice.

Any disclosures We provide will only cover the 12-month period preceding the verifiable request's receipt.

For data portability requests, We will select a format to provide Your personal information that is readily usable and should allow You to transmit the information from one entity to another entity without hindrance.