

PRIVACY POLICY

Thank you for choosing Roomle!

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The column on the right provides a short explanation of the terms of use and is not legally binding.

I. APPLICABILITY OF THIS PRIVACY POLICY

§ 1.1 This Privacy Policy applies to the services (the “Services”) made available on www.roomle.com and other websites owned by us (the

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whenever you browse our Websites, or use our Services, please observe this Privacy Policy.

“Websites”) and other interactions (e.g., customer service inquiries, user conferences, mobile or desktop applications, etc.) you may have with us. If you do not agree with the terms, do not access or use the Services, Websites or any other aspect of our business.

§ 1.2 This Privacy Policy does not apply to any third party applications or software that integrate with the Services through the Website (“Third Party Services”), or any other third party products, services or businesses. In addition, a separate agreement governs delivery, access and use of the Services (the “Customer Agreement”), including the processing of any messages, files or other content submitted through Services accounts (collectively, “Workspace Data”). The organization (e.g., your employer or another entity or person) that entered into the Customer Agreement (“Customer”) controls its instance of the Services (its “Workspace”) and any associated Workspace Data. If you have any questions about specific Workspace settings and privacy practices, please contact the Customer whose Workspace you use. If you have received an invitation to join a Workspace but have not yet created an account, you should request assistance from the Customer that sent the invitation.

§ 1.3 “We,” “our” and “us” refer to the person specified in Art. XV.

II. INFORMATION WE COLLECT AND RECEIVE

§ 2.1 Workplace Data. Customers or individuals granted access to a Workspace by a Customer (“Authorized Users”) routinely submit Workplace Data to us when using the Services.

§ 2.2 Other Information. We also collect, generate and/or receive other information and data (“Other Information”):

- (a) *Workspace and Account Information*. To create or update a Workspace account, you or your Customer (e.g., your employer) supply us with an email address and password, domain and/or similar account details. The user or Customer may also add

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there’s content you deliberately upload to our Websites, and there’s other information we collect and receive from you as you browse our Websites and use our Services. Please read on regarding our obligations in connection with such information.

further data to their personal user account, e.g.: postal code/city; date of birth; and gender.

- (b) In addition, Customers that purchase a paid version of the Services provide us, or our payment processors, with billing details such as credit card information, banking information and/or a billing address.
- (c) *Usage Information.*
 - i. *Services Metadata.* When an Authorized User interacts with the Services, metadata is generated that provides additional context about the way Authorized Users work. For example, we may log the Workspaces, channels, people, features, content and links you view or interact with, the types of files shared, and what Third Party Services are used (if any).
 - ii. *Log data.* As with most websites and technology services delivered over the Internet, our servers automatically collect information when you access or use our Websites or Services and record it in log files. This log data includes the Internet Protocol (IP) address, the address of the web page visited before using the Website or Services, browser type and settings, the date and time the Services were used, information about browser configuration and plugins, language preferences and cookie data.
 - iii. *Device information.* We collect information about devices accessing the Services, including type of device, what operating system is used, device settings, application IDs, unique device identifiers and crash data.
 - iv. *Location information.* We receive information from you, your Customer and other third-parties that helps us approximate your location. We may, for example, use a business address submitted by your employer, or an IP address received from your browser or device to determine approximate location. We may also collect location

information from devices in accordance with the consent process provided by your device.

- (d) *Cookie Information.* We use cookies and similar technologies in our Websites and Services to help us collect Other Information. The Websites and Services may also include cookies and similar tracking technologies of third parties, which may collect Other Information about you via the Websites and Services and across other websites and online services. For more details about how we use these technologies, and your opt-out opportunities and other options, please see our Cookie Policy.
- (e) *Newsletter.* You have the option of subscribing to our free newsletter. This newsletter is sent out at regular intervals and features the latest news and information about our company and customised advertising. In order to receive our newsletter, you will need a valid email address. We will verify the email address you enter into our registration form to ascertain whether you do actually wish to receive newsletters. To do this, we will send an email to the email address you have specified. This email contains a link you can click on to confirm receipt. Once you have confirmed that you have received this email, you will be signed up for our newsletter (double opt-in). When you first sign up for our newsletter, we will store your IP address, and the date and time of your registration. This is for security purposes, in case your email address is being used by a third party to subscribe to our newsletter without your knowledge. We do not collect or process any other data for your newsletter subscription and the data is used solely for the purposes of delivering the newsletter to you. Unless you raise an objection, we will transmit your data within our company for the purposes of analysis and in order to transmit information for advertising purposes. The data you have provided for the purposes of your newsletter subscription will be compared with any other data we may have collected for other purposes (e.g. to book a service) within the company. We will not disclose the data you have submitted to sign up for our newsletter to third parties who are not part of our company. You can cancel

your newsletter subscription at any time. Details on how to unsubscribe can be found in the confirmation email and in each individual newsletter.

- (f) *Third Party Services.* A Customer can choose to permit or restrict Third Party Services for its Workspace. Typically, Third Party Services are software that integrate with our Services, and a Customer can permit its Authorized Users to enable and disable these integrations for its Workspace. We may also develop and offer our own applications that connect the Services with a Third Party Service. Once enabled, the provider of a Third Party Service may share certain information with us. For example, if a cloud storage application is enabled to permit files to be imported to a Workspace, we may receive the user name and email address of Authorized Users, along with additional information that the application has elected to make available to us to facilitate the integration. Authorized Users should check the privacy settings and notices in these Third Party Services to understand what data may be disclosed to us. When a Third Party Service is enabled, we are authorized to connect and access Other Information made available to us in accordance with our agreement with the Third Party Provider and any permission(s) granted by Customer, including, by its Authorized User(s). We do not, however, receive or store passwords for any of these Third Party Services when connecting them to the Services.
- (g) *Third Party Data.* We may receive data about organizations, industries, lists of companies that are customers, Website visitors, marketing campaigns and other matters related to our business from parent corporation(s), affiliates and subsidiaries, our partners, or others that we use to make our own information better or more useful. This data may be combined with Other Information we collect and might include aggregate-level data, such as which IP addresses correspond to zip codes or countries.

Or it might be more specific: for example, how well an online marketing or email campaign performed.

- (h) *Additional Information Provided to Us.* We also receive Other Information when submitted to our Websites or in other ways, such as if you participate in a focus group, contest, activity or event, apply for a job, enroll in a certification program or other educational program hosted by us or a vendor, request support, interact with our social media accounts or otherwise communicate with us.

§ 2.3 Generally, no one is under a statutory or contractual obligation to provide any Workplace Data or Other Information (collectively, “Information”). However, certain Information is collected automatically and, if certain Information, such as Workspace setup details, is not provided, we may be unable to provide the Services.

III. HOW WE USE INFORMATION

§ 3.1 We will use Workplace Data in accordance with Customer’s instructions, including any applicable terms in the Customer Agreement and Customer’s use of Services functionality, and as required by applicable law. We are a processor of Workplace Data and Customer is the controller. Customer may, for example, use the Services to grant and remove access to a Workspace, assign roles and configure settings, access, modify, export, share and remove Workplace Data and otherwise apply its policies to the Services.

§ 3.2 We use Other Information in furtherance of our legitimate interests in operating our Services, Websites and business. More specifically, we use Other Information:

- (a) to provide, update, maintain and protect our Services, Websites and business. This includes use of Other Information to support delivery of the Services under a Customer Agreement, including in a form tailored to Customer’s location, prevent or address service errors, security or technical issues, analyze and monitor

Basically,

we only use the data we hold to provide and improve our Services, and for related business purposes. Of course, we always comply with all applicable laws.

usage, trends and other activities, or at an Authorized User's request;

- (b) as required by applicable law, legal process or regulation;
- (c) to communicate with you by responding to your requests, comments and questions. If you contact us, we may use your Other Information to respond;
- (d) to develop and provide search, learning and productivity tools and additional features. We try to make the Services as useful as possible for specific Workspaces and Authorized Users;
- (e) to send emails and other communications. We may send you service, technical and other administrative emails, messages, and other types of communications. We may also contact you to inform you about changes in our Services, our Services offerings, and important Services-related notices, such as security and fraud notices. These communications are considered part of the Services and you may not opt out of them. In addition, we sometimes send emails about new product features, promotional communications or other news about our business. These are marketing messages, so you can control whether you receive them. If you have additional questions about a message you have received from us, please reach out through the contact mechanisms described below;
- (f) for billing, account management and other administrative matters. We may need to contact you for invoicing, account management, and similar reasons and we use account data to administer accounts and keep track of billing and payments; and
- (g) to investigate and help prevent security issues and abuse.

§ 3.3 If Information is aggregated or de-identified, so that it is no longer reasonably associated with an identified or identifiable natural person, we may use it for any business purpose. To the extent Information is associated with an identified or identifiable natural person and is

protected as personal data under applicable data protection law, it is referred to in this Privacy Policy as “Personal Data.”

IV. DATA RETENTION

- § 4.1 We will retain Workplace Data in accordance with a Customer’s instructions, including any applicable terms in the Customer Agreement and Customer’s use of Services functionality, and as required by applicable law. Depending on the Services plan, Customer may be able to customize its retention settings. Customer may also apply different settings to messages, files or other types of Workplace Data. The deletion of Workplace Data and other use of the Services by Customer may result in the deletion and/or de-identification of certain associated Other Information.
- § 4.2 We may retain Other Information pertaining to you for as long as necessary for the purposes described in this Privacy Policy. This may include keeping your Other Information after you have deactivated your account for the period of time needed for us to pursue legitimate business interests, conduct audits, comply with, and demonstrate compliance with, legal obligations, resolve disputes, and enforce our agreements.

V. HOW WE SHARE AND DISCLOSE INFORMATION

- § 5.1 This section describes how we may share and disclose Information. Customers determine their own policies and practices for the sharing and disclosure of Information, and we do not control how they or any other third parties choose to share or disclose Information.
 - (a) *Customer’s Instructions.* We will solely share and disclose Workplace Data in accordance with a Customer’s instructions, including any applicable terms in the Customer Agreement and Customer’s use of Services functionality, and in compliance with applicable law and legal process.

Basically,

we retain information for as long as it is needed to provide our Services or legitimate to do so in support of our business.

Basically,

we don’t sell your data or share it otherwise with third parties, unless it helps provide our Services or we are legally required to do so.

- (b) *Displaying the Services.* When an Authorized User submits Other Information, it may be displayed to other Authorized Users in the same or connected Workspaces. For example, an Authorized User's email address may be displayed with their Workspace profile.
- (c) *Customer Access.* Owners, administrators, Authorized Users, and other Customer representatives and personnel may be able to access, modify, or restrict access to Other Information. This may include, for example, your employer using Service features to export logs of Workspace activity, or accessing or modifying your profile details.
- (d) *Third Party Service Providers and Partners.* We may engage third party companies or individuals as service providers or business partners to process Other Information and support our business. These third parties may, for example, provide virtual computing and storage services, or we may share business information to develop strategic partnerships with Third Party Service providers to support our common customers. Prior to engaging any third party Subprocessor, we perform diligence to evaluate their privacy, security and confidentiality practices, and executes an agreement implementing its applicable obligations. The Subprocessors we may regularly use, and the purposes we use them for, are listed on a website made available at <https://www.roomle.com/en/subprocessors>.
- (e) *Tools and applications linked to our Platform & Services.*
 - a. We use Google Analytics, a web analysis service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. This service uses so-called "cookies" (see above). The information generated by the cookies about your usage of the website is generally transferred to a Google server in the USA and stored there. Google will, on our behalf, use this information to evaluate your usage of our website, to compile reports on website activities, and to provide the website operator with additional services associated with website and Internet usage.

The IP address that your browser sends as part of the Google Analytics service will not be merged by Google with other data.

You can prevent the cookies required by Google Analytics from being stored by using the appropriate options in your browser settings. This may, however, prevent you from being able to use all of the website's functions to their fullest extent. You can prevent cookie-generated data relating to your usage of the website (including your IP address) from being collected, transmitted, and processed by Google by downloading and installing the browser plugin available in the link below: <http://tools.google.com/dlpage/gaoptout?hl=de>

b. In order to analyse our users' experiences and rectify application performance issues more quickly, we use www.dynatrace.com, headquartered at 1601 Trapelo Road, Suite 116, Waltham, MA 02451, USA. Again, anonymised data are transmitted to Dynatrace. This enables continuous improvements in Roomle's services and improved stability.

c. Should you require any further information on the type, scope and purposes of the services described in points a to b, we recommend that you read the companies' respective data protection policies.

d. We also include links to other websites on our website and in our apps. These are for informational purposes only. We have no control over these websites, which means that they are not covered by the provisions of this data protection policy. If you activate a link, the operator of the website may collect data on you and process this in accordance with their own data protection policy, which may deviate be different from ours.

Tools and applications that go beyond the platform.
In addition, you have the option of interacting with a range of social networks on our website and in our apps via plugins. A list

of such social networks is set forth on <https://www.roomle.com/en/subprocessors>. Clicking on a plugin for one of these social networks will activate it and the plugin will establish a connection to the server of the respective network. We have no influence on the scope or the content of the data that is transmitted to the operator of the respective social network when you click on the plugin.

- (f) *Third Party Services.* Customer may enable or permit Authorized Users to enable Third Party Services. We require each Third Party Service to disclose all permissions for information access in the Services, but we do not guarantee that they do so. When enabled, we may share Other Information with Third Party Services. Third Party Services are not owned or controlled by us and third parties that have been granted access to Other Information may have their own policies and practices for its collection, use, and sharing.
- (g) *Corporate Affiliates.* We may share Other Information with our corporate affiliates, parents and/or subsidiaries.
- (h) *During a Change to our Business.* If we engage in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of our assets or stock, financing, public offering of securities, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities, some or all Other Information may be shared or transferred, subject to standard confidentiality arrangements.
- (i) *Aggregated or De-identified Data.* We may disclose or use aggregated or de-identified Other Information for any purpose. For example, we may share aggregated or de-identified Other Information with prospects or partners for business or research purposes.
- (j) *To Comply with Laws.* If we receive a request for information, we may disclose Other Information, if we reasonably believe disclosure is in accordance with or required by any applicable

law, regulation, or legal process. Please see the Data Request Policy under www.roomle.com/en/data-request-policy to understand how we respond to requests to disclose data from government agencies and other sources.

- (k) *To enforce our rights, prevent fraud, and for safety.* To protect and defend the rights, property, or safety of ourselves or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud or security issues.
- (l) *With Consent.* We may share Other Information with third parties when we have consent to do so.

VI. SECURITY

§ 6.1 We take security of data very seriously. We work hard to protect Other Information you provide from loss, misuse, and unauthorized access or disclosure. These steps take into account the sensitivity of the Other Information we collect, process and store, and the current state of technology. To learn more about current practices and policies regarding security and confidentiality of the Services, please see our Security Pages at <https://www.roomle.com/en/security>. Given the nature of communications and information processing technology, we cannot guarantee that Information during transmission through the Internet or while stored on our systems or otherwise in our care will be absolutely safe from intrusion by others. When you click a link to a third-party site, you will be leaving our site and we don't control or endorse what is on third-party sites.

VII. AGE LIMITATIONS

§ 7.1 To the extent prohibited by applicable law, we do not allow use of our Services and Websites by anyone younger than 16 years old. If you learn

Basically,

we constantly try to improve the security of our system to protect your data. It is a top concern for us.

Basically,

if you are below 16, you must not use our Services.

that anyone younger than 16 has unlawfully provided us with personal data, please contact us and we will take steps to delete such information.

VIII. CHANGES TO THIS PRIVACY POLICY

§ 8.1 We may change this Privacy Policy from time to time. Laws, regulations, and industry standards evolve, which may make those changes necessary, or we may make changes to our services or business. We will post the changes to this page and encourage you to review our Privacy Policy to stay informed. If we make changes that materially alter your privacy rights, we will provide additional notice, such as via email or through the Services. If you disagree with the changes to this Privacy Policy, you should deactivate your Services account. Contact the Customer if you wish to request the removal of Personal Data under their control.

IX. INTERNATIONAL DATA TRANSFERS

§ 9.1 We may transfer your Personal Data to countries other than the one in which you live. As a safeguard, we offer European Union Model Clauses, also known as Standard Contractual Clauses, to meet the adequacy and security requirements for our Customers that operate in the European Union, and other international transfers of Workplace Data. A copy of our standard data processing addendum, incorporating Model Clauses, is available on www.roomle.com.

X. DATA PROTECTION OFFICER

§ 10.1 To communicate with our Data Protection Officer, please email privacy@roomle.com.

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please check regularly as this Privacy Policy might change over time.

Basically,

we have contracts in place to make sure that all your data is safe, even if it is processed outside the EU.

Basically,

this is the person you can approach for any concerns regarding data protection.

XI. IDENTIFYING THE DATA CONTROLLER AND PROCESSOR

§ 11.1 Data protection law in certain jurisdictions differentiates between the “controller” and “processor” of information. In general, Customer is the controller of Workplace Data. In general, we are the processor of Workplace Data and the controller of Other Information.

XII. YOUR RIGHTS

§ 12.1 Individuals located in certain countries, including the European Economic Area and the United Kingdom, have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, you may have the right to request access to Information, as well as to seek to update, delete or correct this Information. We will strive to let you do this using the settings and tools provided in your Services account. If you cannot use the settings and tools, contact the Customer who controls your workspace for additional access and assistance.

§ 12.2 To the extent that our processing of your Personal Data is subject to the General Data Protection Regulation, or applicable laws covering the processing of Personal Data in the United Kingdom, we rely on our legitimate interests, described above, to process your data. We may also process Other Information that constitutes your Personal Data for direct marketing purposes, and you have a right to object to our use of your Personal Data for this purpose at any time.

XIII. YOUR CALIFORNIA PRIVACY RIGHTS

§ 13.1 This section provides additional details about the personal information we collect about California consumers and the rights afforded to them under the California Consumer Privacy Act or “CCPA.”

§ 13.2 For more details about the personal information we have collected over the last 12 months, including the categories of sources, please see Art. II. We collect this information for the business and commercial

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we acknowledge our responsibilities in handling you data and our crucial role in keeping it secure and safe.

Basically,

you have the right to know which personal data we hold regarding you as an individual.

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this section has information that is particularly relevant if you are resident in California.

purposes described in Art. III. We share this information with the categories of third parties described in Art. V. We do not sell – as such term is defined in the CCPA – the personal information we collect and will not sell it without providing a right to opt out. Please note that we do use third-party cookies for our advertising purposes as further described in our *Cookie Policy* under www.roomle.com/en/cookies.

- § 13.3 Subject to certain limitations, the CCPA provides California consumers the right to request to know more details about the categories or specific pieces of personal information we collect, including how we use and disclose this information, to delete their personal information, to opt out of any “sales” that may be occurring, and to not be discriminated against for exercising these rights.
- § 13.4 California consumers may make a request pursuant to their rights under the CCPA by contacting us at privacy@roomle.com We will verify your request using the information associated with your account, including email address. Government identification may be required. Consumers can also designate an authorized agent to exercise these rights on their behalf.

XIV. DATA PROTECTION AUTHORITY

- § 14.1 Subject to applicable law, you also have the right to
 - (a) restrict our use of Other Information that constitutes your Personal Data; and
 - (b) lodge a complaint with your local data protection authority or the Austrian Data Protection Authority, which is our lead supervisory authority in the European Union. If you are a resident of the European Economic Area and believe we maintain your Personal Data within the scope of the General Data Protection Regulation (GDPR), you may direct questions or complaints to our lead supervisory authority:

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our handling of data protection matters is supervised by government authorities that you can turn to, if you have question or concerns.

Austrian Data Protection Authority

Barichgasse 40-42,

1030 Vienna

Austria / Europe

Telephone: +43 1 52 152-0

E-Mail: dsb@dsb.gv.at

- § 14.2 If you are a resident of the United Kingdom and believe we maintain your Personal Data within the scope of the applicable laws relating to personal data in the United Kingdom, you may direct questions or complaints to the UK supervisory authority, the [Information Commissioner's Office](#).

XV. CONTACT INFORMATION

- § 15.1 Please also feel free to contact us if you have any questions about this Privacy Policy or our practices, or if you are seeking to exercise any of your statutory rights. We will respond within a reasonable timeframe. You may contact us at privacy@roomle.com or at our mailing address below:

Roomle GmbH, Peter-Behrens-Platz 2, 4020 Linz, Austria.