

PRIVACY POLICY

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PRIVACY POLICY SWIPEGUIDE B.V.

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Introduction

We are SwipeGuide B.V. (hereafter: SwipeGuide), a private company (*besloten vennootschap*) under Dutch law, based at John M. Keynesplein 12-46, 1066 EP Amsterdam. SwipeGuide is a software company that develops the most intuitive software solution to standardize work in the manufacturing industry. We are committed to protecting your privacy and personal data and we ensure that our business operations comply with the relevant regulations in this respect.

When visiting our website (www.swipeguide.com) and/or using our mobile and web based application (hereafter: Website and Application) it is possible that personal data is collected and processed. This privacy policy explains what information SwipeGuide collects and the way SwipeGuide processes your personal data.

Who is responsible for the processing of my personal data?

SwipeGuide is the controller of your personal data as described in this privacy policy, unless specified otherwise. Our Application is provided as a software as a service, offered to a customer. The customer is responsible for the processing of the personal data through our Application. Furthermore, via our Website we might link to other websites (e.g. via social media buttons). Browsing and interaction on any other website, including websites that are linked to our Website, are subject to their own terms and (privacy) policies. SwipeGuide is not responsible for any of those employed practices.

What is personal data?

By personal data we mean (pieces of) information which identify you or that could allow you to be identified when combined, such as your name or telephone number. This definition corresponds with the relevant privacy laws.

From whom do we process personal data and how do we get this data?

We collect your personal data, if you request information, or use our Application or our services, or request customer support. We may ask you to provide information such as your name, address, zip code, phone number, email address, job title, IP address, and information about your device. Not all of the personal data SwipeGuide holds about you, will always come directly from you. It may, for example, come from your employer to create an account for our Application. SwipeGuide collects personal data about you when you interact with this website and/or utilize services offered on this site. We may for instance use a third party service provider to assist us with some features of our site. Our service provider will receive your information on our behalf and will not be permitted to use it for any other purpose.

How do we use of your personal data

We can only use your personal data if we have a proper reason for doing so. According to the law, we can only use your data for one or more of these reasons:

- To fulfil a contract we have with you, or
- If we have a legal duty to use your data for a particular reason, or
- When you consent to it, or
- When it is in our legitimate interests.

Legitimate interests are our business or commercial reasons for using your data, but even so, we will not unfairly put our legitimate interests above what is best for you.

SwipeGuide uses information provided to us for our general business use. This may include the following purposes:

- To respond to your requests;
- To provide services to you including customer services issues;
- To send communications to you about our current services, new services or promotions that we are developing, and opportunities that may be available to you;
- To alert you to new features or enhancements to our services;
- To communicate with you about job or career opportunities about which you have inquired;
- To ensure that our Website, Application and services function in an effective manner for you;
- To create an account to use our Application;
- To measure or understand the effectiveness of advertising and outreach;

- **Marketing:** we use personal information to deliver marketing communications to you across various platforms, such as email, telephone, direct mail, and online. If we send you a marketing email, it will include instructions on how to opt out of receiving these emails in the future. Please remember that even if you opt out of receiving marketing emails, we may still send you important service information related to your accounts and subscriptions.
- **Legal obligations:** We may be required to use and retain personal information for legal and compliance reasons, such as the prevention, detection, or investigation of a crime; loss prevention; or fraud. We may also use personal information to meet our internal and external audit requirements, information security purposes, and as we otherwise believe to be necessary or appropriate:
 - To respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence;
 - We endeavour to collect only such information that is reasonably necessary to perform services for you or to respond to your inquiries.
 - You are responsible for ensuring that the information you provide is accurate, complete and current; we will take reasonable steps to ensure that the information we collect and use is relevant to its intended use.
 - Under applicable law, which may include laws outside your country of residence;

Our Website and Application is not intended to collect or maintain personal data from persons under 16 years old. If SwipeGuide learns that personally identifiable information of a person under 16 years old has been collected without verifiable parental consent, then SwipeGuide will take the appropriate steps to delete such information.

Who will your personal data be shared with?

SwipeGuide does not share your data with third parties, unless this is necessary or when this is required by law. For some of our business operations it is necessary to make use of other processors, for instance to host our web services, use a CRM system or use an applicant tracking system. We do not actively share your personal data with other parties for other purposes than mentioned above – unless we are legally obliged to do so.

How long will we keep your personal data?

We will retain your personal information if we have a business need to do so or for as long as is needed to fulfil the purposes outlined in this privacy policy, unless a longer retention period is required by law (for example, to comply with applicable legal, tax or accounting requirements). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

As a rule we will delete or anonymize your personal data in case you have not used our services for five years, unless we are legally obliged to keep the data longer.

Where do we process your personal data?

Our servers are hosted in the Netherlands and therefore fall under the legislation of the GDPR. We collaborate with third parties such as cloud hosting services, suppliers, and technology support located around the world to serve the needs of our business, workforce, and customers. We take appropriate steps to ensure that personal data is processed, secured, and transferred according to applicable law. When we transfer personal information from the European Economic Area to other countries in which applicable laws do not offer the same level of data privacy protection as in your home country, we take measures to provide an appropriate level of data privacy protection. In other words, your rights and protections remain with your data.

How do we protect your personal data?

SwipeGuide highly values properly securing your personal data. We do this by using appropriate and adequate safety measures on our Website and Application. These include manually and automated testing of our Application before releasing new software, technical measures such as authentication processes for editors and admin users of the Website and Application and encryption of our services

using Secure Socket Layer (SSL). Every year, we conduct a yearly security check-up to assess all aspects, both technical and logical, of our Website and Application. Whenever we use processors we make sure our processor agreements adhere to the relevant privacy laws and security aspects of data processing. We do, however, point out that it is the user's own responsibility to keep their account credentials secured and that any transmission of personal information is at the user's own risk.

Do we use cookies?

We make use of cookies on our Website and Application. For more information, [see our cookie policy](#).

What rights can you exercise with regard to your personal data?

If you have an account it is possible to update (and rectify) the information there via your own account. Furthermore, you have the right to:

- Request a copy of the personal data we have processed about you;
- Request us to correct, update, shield or delete your personal information in our records;
- Report any misuse of your personal information, either to us or the Dutch Data Protection Authority;
- Request to transfer your data to another party.

Will this privacy policy be updated?

Although significant changes are rare, this policy may be amended as new features, technology, or legal requirements arise. We encourage you to periodically review this privacy policy to stay informed about our data processing. Changes come into effect as soon as they are published on this Website.

How can you contact us?

If you have any questions, comments or concerns about how we handle your personal data, please contact us at hello@swipeguide.com.

SwipeGuide B.V.

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