

## Clinck Privacy Notice

Seffie ("Clinck" or "we" or "us" or "our") provides a mobile application to send digital business cards via email (the "Services"). We recognize and respect the importance of maintaining the privacy of our customers and, as a result, we have established this Privacy Notice. This Privacy Notice explains the type of information we collect and how we make use of such information, received from our customers that use the mobile application or visit Clinck's website (jointly the "App"). This Privacy Notice also explains how we may process, transfer, store and disclose the information collected, as well as your ability to control certain uses of the collected information. "You" means any adult user of the App, or any parent or guardian of any minor whom you allow to use the App and the Services, and for whom you will be held strictly responsible.

To use our Services, you must be at least sixteen (16) years of age (or such greater age required in your country) or you must obtain the permission of your parent or guardian prior to using the App or Services. If you do not obtain such permission, do not use the App or Services.

Seffie is the data controller in respect of the processing activities outlined in this Privacy Notice. Our registered office is Beysterveld 217, 1083KD Amsterdam and our registration number 54907896.

### Privacy Notice Key Points

The key points listed below are presented in further detail throughout this Privacy Notice. These key points do not substitute the full Privacy Notice.

- **Personal Information We Collect.** When you visit and/or use our App and/or Services, we collect Personal Information (as defined below) provided by you, such as your name and email address. We also (automatically) collect information about your use of the Services. If you contact us for questions or complaints, we will collect the information related to your inquiry.
- **Basis for Processing Your Personal Information.** Processing your Personal Information is necessary for the provision of the Services to you. Processing for the purposes of developing and enhancing our products and services, for analytics and usage analysis, for fraud prevention and security and for our recordkeeping and protection of our legal rights – are all necessary for the purposes of legitimate interests that we pursue
- **Using the Information We Collect.** We use the information (including Personal Information) we collect mainly to administer and provide the Services, contact you with administrative information, and improve the Services.
- **Sharing the Personal Information We Collect.** We may share the Personal Information we collect with our service providers and subcontractors who assist us in the operation of the App and/or Services and process the Personal Information on our behalf and under our instructions.
- **International Transfer.** We may use service providers and/or subcontractors located in countries other than your own, and send them your Personal Information. We will ensure to have agreements in place with such subcontractors and service providers ensuring the same level of privacy and data protection as set forth in this Privacy Notice. You hereby consent to such international transfer.
- **Your Rights.** Subject to applicable law and additional rights as set forth below, you may have a right to access, update or delete your Personal Information and obtain a copy of the Personal Information we have collected about you.
- **Retention.** We retain information for as long as necessary for the purposes set forth in this Privacy Notice.
- **Security.** We implement measures to reduce the risks of damage and unauthorized access or use of Personal Information, but they do not provide absolute information security.

- **Changes to the Privacy Notice.** We may change this Privacy Notice from time to time and shall notify you of such changes.

## **Information We Collect**

We collect Personal Information (as defined below) from you when you choose to visit our App and/or use our Software. In order to use our Services, you will be required to register and provide us with certain Personal Information. We also collect Personal Information when you request information from us, complete online forms, or contact us for any other reason.

It is your voluntary decision whether to provide us with any such Personal Information, but if you refuse to provide such information we may not be able to register you to use the Services.

“**Personal Information**” means any information that refers, is related to, or is associated with an identified or identifiable individual or as otherwise may be defined by applicable law. Examples of the Personal Information that we collect from you include your name, email address, location (subject to your consent) and other contact details and/or information you provide when using the Services, such as a profile picture, company name, title, and any contact information of other people, etc.

By providing us with any information, picture, logo and/or contact information of other people, such as you (business) contacts, you represent and warrant that you have all legal right to provide us with such information, logo, picture and/or contact and that, in case of a contact, such person has given his/her consent to our use thereof.

In addition, when you use the App and/or Services, certain information may be automatically gathered about your computer or mobile device, such as IP address and/or device identifier, browser name, the type of computer and technical information about your means of connecting to our App and/or Services, operating system the Internet service providers utilized, subject to your consent as required under applicable law (geo)location and other similar information.

## **Using the Information we Collect**

### General

We and any of our trusted third-party subcontractors and service providers may use the Personal Information we collect from and about you for any of the following purposes: (1) to provide you with the App and/or Services; (2) to respond to your inquiries or requests, contact and communicate with you and provide customer support; (3) to develop new products or services and to review and analyze the usage and operations of our App and/or Services, including by creating and using statistical information in an aggregated and non-specific format or on a per user and/or per organization basis; (4) to contact you with informational newsletters and promotional materials relating to our App and/or Services; and (5) to prevent fraud, protect the security of our App and/or Services, and address any problems with the App and/or Services.

### Statistical Information

By analyzing all information we receive, including all information concerning users, we may compile statistical information across a variety of users (“**Statistical Information**”). Statistical Information helps understand trends and user needs so that new products and services can be considered and so existing products and services can be tailored to user desires. Statistical Information does not indicate individuals’ identities, and we will not link Statistical Information to any Personal Information. We may share Statistical Information with our partners, without restriction, on commercial terms that we can determine in our sole discretion.

### Analytics

We, or our trusted services providers or sub-processors, may use certain tools, such as Google Analytics ("**Tools**") or other internet and application analytic services in order to receive an analysis of the use of the App. Google Analytics collects information such as how often users visit the App, what pages they visit when they do so, and what other websites and/or applications they used prior to coming to ours. We use the information we get from Google Analytics only to improve our App and Services. Google's ability to use and share information collected by Google Analytics about your visits to the App is restricted by the Google Analytics Terms of Use located at <http://www.google.com/analytics/terms/us.html> and the Google Privacy Policy located at <http://www.google.com/policies/privacy/>.

#### Legal uses

We may use your Personal Information as required or permitted by any applicable law.

#### **Sharing the Personal Information We Collect**

We may share your information, including Personal Information, as follows:

##### Business Partners and Subcontractors

We may disclose information, including Personal Information we collect from and/or about you, to our trusted service providers and subcontractors, who may use such information to: (1) help us provide you with the App and/or Services; and (2) aid in their understanding of how users are using our App and/or Services.

##### International Transfer

We may use subcontractors and service providers who are located in countries other than your own and send them information we receive (including Personal Information). We will ensure that these subcontractors and service providers will be subject to written agreements ensuring the same level of privacy and data protection as set forth in this Privacy Notice. You hereby consent to such international transfer.

##### Business Transfers

We may transfer our databases containing your Personal Information if we sell our business or part of it.

##### Law Enforcement Related Disclosure

We will fully cooperate with any law enforcement authorities or court order requesting or directing us to disclose the identity, behavior or digital content, including in the event of any user suspected to have engaged in illegal or infringing behavior. We may also share your Personal Information with third parties: (i) if we believe in good faith that disclosure is appropriate to protect our rights, property or safety (including the enforcement of this Privacy Notice); (ii) to protect the rights, property or safety of third parties; (iii) when required by law, regulation subpoena, court order or other law enforcement related issues; or (iv) as is necessary to comply with any legal and/or regulatory obligation. You can request such Personal Information as specified herein by emailing us at [info@clinck.me](mailto:info@clinck.me).

##### Other Uses or Transfer of Your Information

We allow you to use our Services in connection with third-party services, sites, and/or mobile applications. If you use our App and/or Services with or through such third-parties, we may receive information (including Personal Information) about you from those third parties. Please note that when you use third-parties services with our App and/or Services, their own terms and privacy policies will govern your use of those services.

#### **How we Protect Information**

We follow generally accepted industry standards to protect the Personal Information submitted to us, both during transmission and once we receive such information. No method of transmission over the Internet or method of electronic storage is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

### **Your Rights**

You have certain rights in relation to the Personal Information that we hold about you, as detailed below. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any information and/or comply with any of your requests, as detailed below:

- **Right of Access and Data Portability.** You have a right to know what Personal Information we collect about you and, in some cases, to have the information communicated to you. Subject to the limitations in applicable law, you may be entitled to obtain from us a copy of the Personal Information you provided to us (excluding information that we obtained from other sources) in a structured, commonly-used, and machine-readable format, and you may have the right to (request that we) transmit such Personal Information to another party. If you wish to exercise this right please contact us letting us know what information in particular you would like to receive and/or transmit. Subject to applicable law, we may charge you with a fee. Please note that we may not be able to provide you with all the information you request, for instance, if the information includes Personal Information about another person. Where we are not able to provide you with information that you have asked for, we will endeavor to explain to you why. We will try to respond to any request for a right of access as soon as possible.
- **Right to Correct Personal Information.** Subject to the limitations in applicable law, you may request that we update, correct or delete inaccurate or outdated Personal Information and/or that we suspend the use of Personal Information, the accuracy of which you may contest, while we verify the status of that Personal Information. We will correct your Personal Information within a reasonable time from the receipt of your written request thereof.
- **Deletion of Personal Information.** In certain circumstances you have a right to have Personal Information that we hold about you deleted. Should you wish to have any Personal Information about you deleted, please contact us, using the contact information specified in this Privacy Notice. Subject to applicable law, we will delete Personal Information provided to us by a user within a reasonable time from the receipt of a written (including via email) request by such user to delete such collected information. We cannot restore information once it has been deleted. Please note that to ensure that we do not collect any further Personal Information, you should terminate your account with us and ease our App from your device. We may retain certain Personal Information (including following your request to delete) for audit and record-keeping purposes, as well as other purposes, all as permissible and/or required under applicable law. We may also retain your information in an anonymized form.
- **Right to Object.** Subject to applicable law, you may have the right to object to processing of your Personal Information for certain purposes.
- **Supervisory Authority.** If you are a European Citizen, you may have the right to submit a complaint to the relevant supervisory authority.

### **Retention**

We retain information as necessary for the purposes set forth above. We may delete information from our systems, without notice to you, once we deem it is no longer necessary for the purposes set forth above.

### **Communications**

Subject to your consent as may be required under applicable law, we may send you messages about us or our products and services. You can remove your Personal Information from our mailing list and stop receiving future communication from us by following the unsubscribe link located at the bottom of each communication or by emailing us at [info@clinck.me](mailto:info@clinck.me).

You will also be given the opportunity to unsubscribe from commercial messages in any such message we send. Please note that we reserve the right to send you service related communications, including service announcements and administrative messages, relating either to your account or to your transactions on the App and/or Services, without offering you the opportunity to opt out of receiving them unless you cancel your account and/or stop using the Service.

### **Children**

Clinck does not knowingly collect personally identifiable information from children under the age of 16. In the event you become aware that an individual under the age of 16 has enrolled without parental permission, please advise us immediately.

### **Changes**

Clinck may update this Privacy Notice from time to time - we encourage you to review it periodically. By continuing to access or use the App and/ or Services after those changes become effective, you agree to be bound by the revised Privacy Notice. We will post the updated Privacy Notice on this page. Please come back to this page every now and then to make sure you are familiar with the latest version. Any new Privacy Notice will be effective from the date it is accepted by you.

### **Comments and Questions**

If you have any comments or questions about our Privacy Notice, or if you wish for us to exercise any of your rights, please contact us at [info@clinck.me](mailto:info@clinck.me)

*Last Updated: May 2018*