

Privacy Policy

Last Updated: 21 April 2022

FINKOPER, Inc. (“ FINKOPER”) is committed to protecting your privacy. We have prepared this Privacy Policy to communicate our practices regarding the Personal Data (as defined below) we collect from users of our website, located at <https://FINKOPER.com> (“Site”), and hosted platform services (“Platform Services”) (collectively, the “ FINKOPER Services”). In connection with these Services, we may process personal information of individuals and our purpose for processing this information is to provide FINKOPER Services. Your personal information is considered to be sensitive information that should remain confidential and protected from unauthorized collection, use, access, or disclosure. FINKOPER management values the protection of all confidential and personal information within our organization; therefore, we have established privacy practices that facilitate the protection of your personal information.

Reference the following links to access the FINKOPER Terms of Use, Terms of Service, and Security pages for a description of additional service commitments and security data protection practices performed to protect the security, availability, and confidentiality of your information:

- Terms of Use: https://finkoper.com/terms_of_use_en.pdf
- Terms of Service: https://FINKOPER.com/security_and_privacy_en.pdf

Data Subject Privacy Rights

The following include the principle rights for data subjects under data protection and privacy laws:

- Right to be Informed - You are entitled to being informed about how we process your data
- Right to Access - You can request copies of your personal data

- **Right to Rectification** - You can ask us to rectify inaccurate personal data and to complete incomplete personal data
- **Right to Erasure** - You can ask us to erase your personal data
- **Right to Restrict Processing** - You can ask us to restrict the processing of your personal data;
- **Right to Object Processing** - You can object to the processing of your personal data;
- **Right to Data Portability** - You can ask that we transfer your personal data to another organization or to you
- **Right to Complain to a Supervisory Authority** - You can submit complaints about our processing of your personal data to a supervisory authority
- **Right to Withdraw Consent** - To the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

These rights are subject to certain limitations and exceptions.

User Consent

By submitting Personal Data through the FINKOPER Services, you agree to the terms of this Privacy Policy and you expressly consent to the collection, use, and disclosure of your Personal Data in accordance with this Privacy Policy.

Types of Data We Collect

"Personal Data" means data that allows someone to identify or contact you, including, for example, your name, address, telephone number, e-mail address, as well as any other non-public information about you that is associated with or linked to any of the foregoing data. "Anonymous Data" means data that is not associated with or linked to your Personal Data. Anonymous Data does not, by itself, permit the identification of individual persons. We collect, use, and store Personal Data and Anonymous Data, as described within the practices below. To the extent that Anonymous Data is linked to your Personal Data, we will treat it as Personal Data.

Data Collected by FINKOPER Service - Information You Provide to Us

The following includes the types of information that we may collect from you during your use of FINKOPER Services:

- We may collect Personal Data from you, such as your first and last name, e-mail and mailing addresses, country, username, and password when you register to create an account with us (“Account”).**
- We may collect information relating to any transactions carried out between us on or in relation to the FINKOPER Services, including publishing notice and agenda information.**
- We may collect information that you provide to us for the purpose of subscribing to the Platform Services or otherwise using the Platform Services, email notifications and/or newsletters (including name and email address).**
- We may collect information you have provided us for the purpose of managing your practice, such as project information, scheduling information and information about your clients and client contacts (which may include name, email address, contact information, emails, images, documents, meeting information).**
- We retain information on your behalf, such as files and messages that you store using your Account.**
- We may collect information that you provide if you submit a job application through our Site.**
- If you use our Application or Site on your mobile device, we may collect your phone number and the unique device id number.**
- When connecting to Application or Site via a service provider that uniquely identifies your mobile device, we may receive this identification and use it to offer extended services and/or functionality.**
- Certain FINKOPER Services may require our collection of your phone number. We may associate that phone number to your mobile device identification information.**

- **If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply.**
- **We also collect other types of Personal Data that you provide to us voluntarily, such as your operating system and version, product registration number, and other requested information if you contact us via e-mail regarding support for the FINKOPER Services.**
- **We may also collect Personal Data at other points in the FINKOPER Services that state that Personal Data is being collected.**

Information Collected via Technology

The following includes a description of information collected via technology associated with the FINKOPER Services:

- **Information Collected by Our Servers.** To make our FINKOPER Services more useful to you, our servers (which may be hosted by a third-party service provider) collect information from you, including your browser type, operating system, Internet Protocol (“IP”) address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit.
- **Log Files.** As is true of most websites, we gather certain information automatically and store it in log files. This information includes IP addresses, browser type, internet service provider (“ISP”), referring/exit pages, operating system, date/time stamp, and click stream data. We use this information to analyze trends, administer the Site, track users’ movements around the Site, gather demographic information about our user base as a whole, and better tailor our FINKOPER Services to our users’ needs. Except as noted in this Privacy Policy, we do not link this automatically collected data to Personal Data.
- **Cookies.** Like many online services, we use cookies to collect information. “Cookies” are small pieces of information that a website sends to your computer’s hard drive while you are viewing the website. We may use both session Cookies (which expire once you

close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Site. This type of information is collected to make the Site more useful to you and to tailor the experience with us to meet your special interests and needs.

- **Pixel Tag.** In addition, we use “Pixel Tags” (also referred to as clear Gifs, Web beacons, or Web bugs). Pixel Tags are tiny graphic images with a unique identifier, similar in function to Cookies, that are used to track online movements of Web users. In contrast to Cookies, which are stored on a user’s computer hard drive, Pixel Tags are embedded invisibly in Web pages. Pixel Tags also allow us to send e-mail messages in a format users can read, and they tell us whether e-mails have been opened to ensure that we are sending only messages that are of interest to our users. We may use this information to reduce or eliminate messages sent to a user. We do not tie the information gathered by Pixel Tags to our users’ Personal Data.
- **Analytics Services.** We may perform analytics on the Platform Services or use third party analytics services, including but not limited to Google Analytics, on the Site or Application (collectively, “Analytics Services”), to help analyze how users use our FINKOPER Services. We use the information we get from Analytics Services only to improve our FINKOPER Services. The information generated by the Cookies or other technologies about your use of our FINKOPER Services (the “Analytics Information”) is transmitted to the Analytics Services. The Analytics Services use Analytics Information to compile reports on user activity. The Analytics Services may also transfer the Analytics Information to third parties where required to do so by law, or where such third parties process Analytics Information on their behalf. Each Analytics Service’s ability to use and share Analytics Information is restricted by such Analytics Service’s Terms of Use and Privacy Policy. By using our FINKOPER Services, you consent to the processing of data about you by Analytics Services in the manner and for the purposes set out above. For a full list of Analytics Services, please contact us at the email address provided above.

- **Social Media Features.** The FINKOPER Services may also include social media features (“Features”), such as buttons that let you share through Facebook or Twitter. These Features may collect your IP address, the page that you are visiting on our Site, as applicable, and may set a Cookie to enable the Features to function properly. Features are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing them.
- **Information Collected from Third Party Companies.** We may receive Personal Data from third party sources. We may add this information to the information we have already collected from you directly via the FINKOPER Services.

Access to Your Data

Access. Users of the FINKOPER Service input their data, including personal information, into our application, in connection with their use of the FINKOPER Service. Users can access their data by authenticating to the application and accessing their information within their application environment (“tenant”).

Use of Your Personal Data

General Use. In general, Personal Data you submit to FINKOPER is used either to respond to requests that you make, or to aid in improving the FINKOPER service. We use your Personal Data in the following ways:

- **Facilitate the creation of and secure your Account on our network;**
- **Identify you as a user in our system; provide improved administration of our FINKOPER Services;**
- **Enable your use of the Platform Services and provide the Platform Services you request;**
- **Improve the quality of experience when you interact with our FINKOPER Services;**

- **Send you administrative e-mail notifications, such as security or support and maintenance advisories;**
- **To send statements and invoices to you, and collect payments from you;**
- **Respond to your inquiries related to employment opportunities or other requests; and**
- **Send newsletters, surveys, offers, and other promotional materials related to our Platform Services and for other marketing purposes of FINKOPER.**

User Testimonials and Feedback. We often receive testimonials and comments from users who have had positive experiences with our Platform Services. We may post user feedback on the Site from time to time. We will share your feedback with your first name and last initial only. If we choose to post your first and last name along with your feedback, we will obtain your consent prior to posting you name with your feedback.

Creation of Anonymous Data. We may create Anonymous Data records from Personal Data by excluding information (such as your name, email address, content of email) that makes the data personally identifiable to you. We use this Anonymous Data to analyze request and usage patterns so that we may enhance the content of our FINKOPER Services and improve Site navigation.

Disclosure of Your Personal Data

We disclose your Personal Data as described below and as described elsewhere in this Privacy Policy.

- **Third Parties Designated by You.** When you use the FINKOPER Services, the Personal Data you provide will be shared with the third parties that you designate to receive such information, including clients and business associates.
- **Users.** We will share your Personal data with other users of the Platform Services that you designate and authorize solely for the purpose of providing you with the Platform Services.
- **Third Party Service Providers.** We may share your Personal Data with third party service providers to: provide you with the FINKOPER

Services; to conduct quality assurance testing; to facilitate creation of accounts; to provide technical support; and/or to provide other services to FINKOPER.

- **Affiliates.** We may share some or all of your Personal Data with our parent company, subsidiaries, joint ventures, or other companies under a common control (“Affiliates”), in which case we will require our Affiliates to honor this Privacy Policy.
- **Corporate Restructuring.** We may share some or all of your Personal Data in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Personal Data may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Policy.
- **Other Disclosures.** Regardless of any choices you make regarding your Personal Data (as described below), FINKOPER may disclose Personal Data if it believes in good faith that such disclosure is necessary (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas or warrants served on FINKOPER; (c) to protect or defend the rights or property of FINKOPER or users of the FINKOPER Services; and/or (d) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms of Use.

Third Party Websites

Our Site may contain links to third party websites. When you click on a link to any other website or location, you will leave our Site and go to another site, and another entity may collect Personal Data or Anonymous Data from you. We have no control over, do not review, and cannot be responsible for, these outside websites or their content.

Please be aware that the terms of this Privacy Policy do not apply to these outside websites or content, or to any collection of your Personal Data after you click on links to such outside websites. We encourage you to read the privacy policies of every website you visit. The links to third party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content or websites.

Your Choices Regarding Information

You have several choices regarding the use of information on our FINKOPER Services:

- **Email Communications.** We will periodically send you free newsletters and e-mails that directly promote the use of our Platform Services. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly by email at info@FINKOPER.com. Despite your indicated e-mail preferences, we may send you service related communications, including notices of any updates to our Terms of Use or Privacy Policy.
- **Cookies.** If you decide at any time that you no longer wish to accept Cookies from our FINKOPER Services for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting Cookies or to prompt you before accepting a Cookie from the websites you visit. Consult your browser’s technical information. If you do not accept Cookies, however, you may not be able to use all portions of the FINKOPER Services or all functionality of the FINKOPER Services. If you have any questions about how to disable or modify Cookies, please let us know by emailing us at info@FINKOPER.com.
- **Customer Data and Data Requests.** Customers own all data they input into FINKOPER. Customer data is retained for as long as they remain a FINKOPER customer.

- **Changing or Deleting Your Personal Data.** You may change any of your Personal Data in your Account by editing your Account through the FINKOPER Services or by contacting us directly using the contact information provided above. You may request deletion of your Personal Data by us, and we will use commercially reasonable efforts to honor your request, but please note that we may be required to keep such information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). When we delete any information, it will be deleted from the active database, but may remain in our archives. We may also retain your information for fraud or similar purposes.
- **Applications.** You can stop all collection of information by the Application by uninstalling the Application. You may use the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network.

Changes To This Privacy Policy

This Privacy Policy is subject to occasional revision, and if we make any material changes in the way we use your Personal Data, we will notify you by sending you an e-mail to the last e-mail address you provided to us and/or by prominently posting notice of the changes on our Site. Any changes to this Privacy Policy will be effective upon the earlier of thirty (30) calendar days following our dispatch of an e-mail notice to you or thirty (30) calendar days following our posting of notice of the changes on our Site. These changes will be effective immediately for new users of our FINKOPER Services.

Please note that at all times you are responsible for updating your Personal Data to provide us with your most current e-mail address. In the event that the last e-mail address that you have provided us is not valid, or for any reason is not capable of delivering to you the notice described above, our dispatch of the e-mail containing such notice will nonetheless constitute effective notice of the changes described in the notice. If you do not wish to permit changes in our use of your Personal Data, you must notify us prior to

the effective date of the changes that you wish to deactivate your Account with us. Continued use of our FINKOPER Services, following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

Contacting FINKOPER - Questions and Reporting Violations

If you have any questions or concerns or complaints about our privacy practices, data collection or processing practices, or if you want to report any security violations, please contact us by email at info@FINKOPER.com or mail us at the following address:

Alfa Solution spol. s.r.o.

**Za Porickou branou 4/334
18600 Prague
Czech Republic**