

MetrixAnalytics

Privacy Policy

1. Our Policy's Aims

1.1 The MetrixAnalytics Privacy Policy applies to MetrixAnalytics. ("MetrixAnalytics") and unless specified, its subsidiaries, including Poly-Cure Research , Schoonmaakinbeeld.nl and any contractors, representatives, agents, and resellers while they are working on our behalf (collectively "we," "us" or "our").

1.2 Our Privacy Policy explains the processing of your personal data by us and establishes what information we collect, or which is provided to us, and how we use and protect your personal data in compliance with applicable law.

1.3 Personal data refers to any information relating to an identified or identifiable natural person ("data subject"), where this identification can be made directly or indirectly, by means of identifiers such as your name, identification number, email address, phone number, online identifiers such as cookies in some circumstances, your location, your genetic, economic, cultural or social identity or other information that is specific to you.

1.4 We do not mean information that only refers to a business corporation or organization. We also do not mean information that has been "anonymized," either by removing or de-identifying all specific identifiers. Anonymous data is not personal data when the anonymization is irreversible. When we refer to anonymous data, we mean data that cannot be reversed into personal data.

1.5 As a data controller, we commit ourselves to protecting the privacy of our website visitors and users of our products and services with respect to the processing of your personal data.

1.6 Where we collect and process your personal data, we will limit the collection and retention to what is adequate, relevant and necessary for our purposes and it will be kept in a form which allows for your identification no longer than necessary for the purpose for which we process your personal data. We refer to this as data minimisation.

1.7 Where we store your personal data for longer periods for statistical purposes, as permitted, we will use appropriate safeguards. Applicable law defines 'statistical purpose' as any collection of personal data, where the result of processing is for aggregate data, so the personal data we collect from you is anonymized or pseudonymized. For example, the processing of your personal data may be for the business-related process of counting users, products, sales and various metrics. We also share statistical data that has been anonymized and aggregated

geographically and so, cannot be used to identify individuals, with third parties for trend analytics.

1.8 Our policy provides you with the legal bases for the collection of your personal data, lets you know how long personal data is stored and the reasons why, and how in some circumstances, they are necessary to retain. The length of this retention and how you may choose to request that we delete some or all your personal data and the consequences of the deletion are explained in this policy.

1.9 Some of the legal bases we rely on are contractual and service necessity, consent, legitimate interests and compliance with legal obligations.

1.10 We want you to have the necessary and relevant understanding of how and why we process your personal data so that you can make fully informed decisions on whether to allow us to retain your personal data or delete them. Section 2 explains your rights under applicable law and section 3 lets you know when the Privacy Policy applies.

1.11 We strive to keep the policy easy to understand and transparent, and so we refrain from technical information overload. If you wish to have further details on how we process your personal data, please contact us.

2. Talk to Us about Your Data

2.1 We try to ensure that the users of our products and services always have an open line of communication with us. You can contact us at any time if you any questions, queries or requests about your personal data and, if European law applies to the processing of your data, about your right to request access to, modify, remove or export your data, or object to our processing of your data. We appreciate if you reach out to us first before you approach any supervisory authorities or courts.

2.2 In order to make it easier for you to reach out to us and obtain the necessary information and action changes, corrections or deletions of your personal data, we have decided to provide you with a privacy preference portal.

2.3 Aside from the privacy preference portal, you can also submit your requests through more traditional channels. We will action your request within one month of receiving a request from you concerning any one of your rights as a data subject. Should we be inundated with requests or particularly complicated requests, the time limit may be extended to a maximum of another two

months. If we fail to meet these deadlines, we would, of course, prefer that you contact us to settle the matter informally.

2.4 There could be instances where you are using our products or services, but we do not have your personal data, even though you have purchased our products or services. These include situations where you purchase our products from our service provider, a reseller, or an app store. Because your relationship in these cases is with that service provider, reseller or an app store, we do not actually have your personal data and will not be able to perform your request to access or delete your information. In such circumstances, please contact your service provider, reseller, or app store where you purchased the products or services, as this person is the primary controller of your personal data.

3. When Our Privacy Policy Applies

You should know that our Privacy Policy applies to the following situations and activities:

3.1 Online activities

Any personal data collected from you when you visit our websites or use our products or services

3.2 Phone contacts

Any personal data collected from you when you call us for sales, service, or customer support.

3.3 Offline contacts

Any personal data collected from you at a "live" or in-person event such as a trade show or promotion.

3.4 Reseller information

Any personal data, including contact information such as telephone number and email address, collected from MetrixAnalytics resellers or sub-resellers.

3.5 Other circumstances

Any personal data collected from you when you contact us by email or by clicking a link on our website or by requesting online service or support, or opening a support ticket, or through our media contact or news subscription services, or other occasions.

4. When Our Privacy Policy Does Not Apply

4.1 Third Party Sites

· Clicking on a thumbnail or profile link on our "Community" pages
This will take you to the third-party site from which the thumbnail or link was imported. By using a user ID from a third-party site, you agree to be governed by the terms and conditions, privacy

policy, and data security policy of the third party. You also agree that we are not responsible for any loss or damage you may suffer from your dealings with the third party, or your use of or reliance on any of that party's content.

- Submitting a search query

When you submit a search query via an app or through MetrixAnalytics Secure Browser, you are indicating that you consent to having your search query and history transmitted to third party search providers and to being redirected to third party sites, where the privacy policies of the third parties apply.

- Third party links

Third parties may also provide links to other websites and mobile applications (apps). Any sharing of data with third parties through access to and use of third party advertisements, their linked websites or mobile apps is not governed by this privacy policy, but instead is governed by the privacy policies of those third parties.

- Third party privacy practices

We are not responsible for the privacy practices of third parties. Your use of a third-party site will be governed by the terms and conditions, privacy policy, and data security policy of the third-party site.

5. Disclosing Your Personal Data to Third Parties

5.1 Disclosure to third parties

We are required to disclose your personal data to unrelated third parties in limited circumstances:

- where necessary to satisfy a legitimate government request or order;
- in compliance with a legal requirement by a court of law or in the public interest;
- in response to a third-party subpoena, if we believe on the advice of our attorneys that we are required to respond;
- where we hire a contractor to perform a service for us, such as product development or market research (but not if doing so would violate the terms of our privacy policy, or laws governing personal data);
- if we obtain your permission; or
- if necessary to defend ourselves or our users (for example, in a lawsuit).

5.2 We are also required in a few limited situations to share our users' personal information with third parties. For example, if you request a specific service or product from us, and if that product or

service is administered by a third party working for us, we may share your personal information with the third party to respond to your request. This third party may also transmit back to us any new information obtained from you in connection with providing the service or product.

5.3 When you contact us or a third-party service provider working on our behalf, our service provider may suggest upgrades to our products or services. Our service provider may also suggest products or service that the service provider offers which are not MetrixAnalytics products or services. In this case, you will be clearly advised that the product or service is offered by the third party and not by MetrixAnalytics, and you will be subject to the terms and conditions, end user license agreement (EULA), and privacy policy of the third-party service provider.

5.4 When we offer third party browsers to new users of certain products. Whether you install the third party browser is in your discretion.

5.5 For certain mobile products, we offer third party ads. While we do not share your personal data with the ad network, data from your device including its IP Address, is used by the ad network to enable the delivery of the ads. If you do not want to view third party ads, you have the choice to change to a paid version of the product. If you are served a third party ad and you click on the ad, your data will be governed by the relevant third party whose ad you clicked on.

5.6 We reserve the right to store and use the information collected by our software. We may publish or share that information with third parties that are not part of the MetrixAnalytics, but we will only ever do so after anonymizing the data.

6. International Transfers of Your Personal Data

6.1 We do not store, process or transfer personal data outside of the EEA.

7. Sharing of Information among MetrixAnalytics Entities

7.1 Our data collection and management practices do not vary by location. We follow the same "data minimisation" procedure with respect to all personal data in our possession, regardless of the jurisdiction from which it was collected, and regardless of whether the data is transferred from one member of the MetrixAnalytics to another.

7.2 We reserve the right to store and use the information collected by our software and to share such information among the MetrixAnalytics to improve our current and future products and services, to help us develop new products and services, and to better understand the behaviour of our users.

7.3 Any reference in this policy to “MetrixAnalytics” means MetrixAnalytics, its, direct and indirect, parent companies and any company that is, directly or indirectly, controlled by or under common control with MetrixAnalytics or its parent companies.

8. Storage, Retention, and Deletion of Your Personal Data

8.1 Storage of Information

We store information that we collect on our servers or on the servers of our subsidiaries, affiliates, contractors, representatives, contractors, agents, or resellers who are working on our behalf.

The data on our servers can only be accessed from our physical premises, or via an encrypted virtual private network (“VPN”). Access is limited to authorised personnel only, and company networks are password protected, and subject to additional policies and procedures for security.

8.2 Access by our contractors

We or our contractors, subsidiaries, affiliates, representatives, agents, or resellers who are working on our behalf undertake regular maintenance of your personal data. All third parties must agree to observe the privacy of our users, and to protect the confidentiality of their personal information. This means your personal data cannot be shared with others, and there must be no direct marketing by the third parties.

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8.3 Retention and Deletion of Your Personal Data

We retain data for limited periods when it needs to be kept for legitimate business or legal purposes. We collect data when you purchase and as you use our services. What we collect, why we collect it, and how you can manage your information are described in our Privacy Policy. For each type of data, we set retention timeframes based on the reason for its collection and processing. Some data is deleted automatically as soon as we do not need it for our legitimate business or legal purposes. We do not delete data that we need for our legitimate or legal purposes, even upon request, until the purposes expire. We also take steps to

anonymize certain data within set time periods. For example, we strive to anonymize IP Addresses by substituting city and country after thirty days. We may also amend the personal data we keep in such a way that you cannot be identified, for example, by hashing. We may retain a “key” to the hashing, but we will securely store it separately from the hashed data.

When the data is deleted, we remove it from our servers or retain it only in anonymized form.

The following describes why we hold onto different types of data for different periods of time.

- We keep your data for the life of your subscription or account, if it’s necessary for the service (such as for activation, billing, support, communication) or if it helps us understand how users interact with our features and how we can improve our services.
- If you registered an account with us, we will keep data in your account until you choose to delete the account.
- If you subscribe to a recurring newsletter, we will keep your information to continue to fulfil your subscription request. In the case of the Forum, the Support Portal, or news and blogs, your account data is kept active until you delete it.

We have business and legal requirements that require we retain certain personal data, for specific purposes, for an extended period of time. For example, when our authorized partner processes a payment for you, or when you make a payment, your data will be retained for as long as required for tax or accounting purposes. Reasons we might retain some data for longer periods of time include:

- Security, fraud & abuse prevention
- Financial record-keeping
- Complying with legal or regulatory obligations, including for investigations, enforcement, or when legally actionable
- Ensuring the continuity of our services
- Direct communication with you and our authorized partners, such as for service activation, billing, support, and marketing.

9. Data Security

9.1 Safeguards for protection of personal information

We maintain administrative, technical, and physical safeguards for the protection of your personal data.

9.2 Administrative safeguards

Access to the personal data of our users is limited to authorized personnel who have a legitimate need to know based on their job descriptions, for example, employees who provide technical support to end users, or who service user accounts. In the case of third-party contractors who process personal information on our behalf, similar requirements are imposed. These third parties are contractually bound by confidentiality clauses, even when they leave. Where an individual employee no longer requires access, that individual's credentials are revoked.

9.3 Technical safeguards

We store your personal information in our database using the protections described above. In addition, we utilize up-to-date firewall protection for an additional layer of security. We use high-quality antivirus and anti-malware software, and regularly update our virus definitions. Third parties who we hire to provide services and who have access to our users' data are required to implement privacy and security practices that we deem adequate.

9.4 Physical safeguards

Access to user information in our database by Internet is not permitted except using an encrypted virtual private network (VPN). Otherwise, access is limited to our physical premises. Physical removal of personal data from our location is forbidden. Third-party contractors who process personal data on our behalf agree to provide reasonable physical safeguards.

9.5 Proportionality

We strive to collect no more personal data from you than is required by the purpose for which we collect it. This, in turn, helps reduce the total risk of harm should data loss or a breach in security occur: the less data we collect, the smaller the overall risk.

9.6 Notification in the event of breach

In the unlikely event of a breach in the security of personal data, we will notify all users who are actually or potentially affected.

We may tailor the method of notice depending on the circumstances. Where the only contact information that we have for you is an email address, then the notification will necessarily be by email. We may also elect to give you notice via our in-product messaging system. Where we believe there are affected users for which we have no contact information on file, we may give notice via publication on our company website.

We reserve the right to delay notification if we are asked to do so by law enforcement or other authorities, or if we believe that giving

notice immediately will increase the risk of harm to our user body overall.

10. Other Jurisdictions

N.A.

11. Policy Changes

11.1 Updates to our Privacy Policy will occur from time to time and we will publish these changes on our website.

11.2 We suggest that you check our Privacy Policy every so often to keep yourself informed.

11.3 Where the changes are major, we will notify you by email if you have an MetrixAnalytics account or through posts on our website.

12. Contacting Us

12.1 We are registered as MetrixAnalytics and our registered address is Campstede 13, Postal Code 6983 HJ in Doesburg, The Netherlands.

12.2 Dispute resolution

We make every effort to conduct our business in a fair and responsible manner. In the unlikely event of a disagreement or complaint about the way that your personal data is handled, please contact us.

12.3 Contact Details

· You can always reach us by email at info@metrixanalytics.com. Please type "PRIVACY REQUEST" in the message line of your email so we can have the appropriate member of the MetrixAnalytics team respond.

· If you prefer, you can send paper mail to METRIXANALYTICS Campstede 13, Postal Code 6983 HJ in Doesburg, The Netherlands. Be sure to write "Attention: PRIVACY" in the address so we know where to direct your correspondence.

13. Data Protection Officer

13.1 As required under the GDPR, we have a data protection officer (DPO) to monitor our compliance with the GDPR, provide advice where requested and cooperate with supervisory authorities. You can contact our data protection officer via info@metrixanalytics.com.