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PRIVACY POLICY

SwipeGuide.

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PRIVACY POLICY SWIPEGUIDE B.V.

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Who are we?

We are **SwipeGuide**. We respect your privacy. We comply with the relevant legislation, and in particular with the General Data Protection Regulation (EU 2016/679) which has become effective as per 25 May 2018.

What is this?

This is a **Privacy Policy**. In this document, we explain what kind of personal data we collect when you use the services that we offer via swipeguide.com and its subdomains, hereafter: the **Website** and **the Webapp**. We also explain how we store, protect and use your personal data and for which purposes.

What is 'personal data'?

Personal data means: (pieces of) information that could allow you to be identified. This definition is in accordance with the relevant legislation.

Your permission

SwipeGuide will not process or use your personal data without your permission. That is why we ask you to agree to this Privacy Policy before you can create an account and use our Website and Webapp. You are not obliged to create a user account, or to agree to this Privacy Policy, but you cannot use our Website and Webapp in that case.

Are you sixteen years or younger?

If you are sixteen years or younger, you cannot use our Website and Webapp without permission of your parents or legal guardian.

Which personal data do we process and how do we use it?

In the schedule below we explain which data our Website and Webapp collect and for which purposes.

Data processed by the Website and Webapp

How we use your data

(User)name, email address, phone number, IP address, chat messages you send us, company details and payment details.

- Creation of your user-account;
- Sending periodic emails about your order or other (related) products and services;
- Sending emails with information and updates regarding your trial and/or license;
- Sending emails about company news, updates or service information;
- Follow ups after correspondence via email, chat or phone;
- Quick processing of your transactions and orders;
- Sending notifications to our contact in case of changes.

Cookies.

- Personalization of your experience and delivery of the type of content you're interested in;
- Improvement of our Website and Webapp;
- Display Advertisement and Remarketing via Google Analytics, Google AdWords and social media platforms (like Facebook);

We may also process non-personal data whenever you interact with our Website. This data may include your browser name, the type of your computer and technical information about your means to connect to our Website (such as the operating system, the utilized internet service providers and the language on your device).

How long will we keep your personal data?

We keep your personal data no longer than necessary for the abovementioned purposes. As a rule we will delete your data in case you have not used our services for five years, unless we are legally obliged to keep the data longer.

Do we share your personal data with others?

Your information will not be shared with any other company for any reason without your consent. We will only share your information for the express purpose of delivering the purchased product or service requested. Besides the above, we will **not** share your data with third parties – unless we are legally obliged to do so.

Generic (non-personal) data

We may convert your personal data into non-personal data. This means the data will be fully and irreversibly anonymized: they will not contain your personal data anymore and therefore fall without the scope of relevant privacy legislation. We may share such generic aggregated data with our business partners for industry analysis, demographic profiling, improvement of our services and other purposes.

How do we protect your personal data?

We work hard to protect your personal data. We do this by manual and automated testing before releasing new software. We have an authentication process for the editors and admin users of the Website and Webapp. Besides this we do a yearly security check-up to assess all aspects, both technical and logical, of our Website and Webapp. We also have a processor agreement with all parties that may process user data, which covers all legal and security aspects of processing this data. We encrypt our services using Secure Socket Layer (SSL).

Do we use cookies?

We use the following types of cookies on our Website:

Technical cookies: these are cookies that are essential for the operation of our Website, they enable you to move around our Website and use our features.

Analytical/statistical cookies: we use these cookies to track visitor statistics. We use these statistics to continuously improve the Website and mailings, and thus offer you relevant content. These cookies also allow us to recognize and count the number of visitors and to see how visitors navigate when they're using our Website. This helps us to improve user navigation and to ensure users to find what they need more easily.

Tracking cookies: these cookies monitor clicking behaviour and surfing habits. By means of these cookies we can see whether and when you view your profile, and whether you click through to our website.

You can change your cookie settings in your browser, if you don't want cookies to be sent to your device. Please note that some Website features or services of our Website may not function properly without cookies.

What about third party websites?

You may find advertising or other content on our Website that link to the websites and services of our clients, partners, suppliers, advertisers, sponsors, licensors or other third parties. We do not control the content or the

links that appear on these websites and we are not responsible for the practices employed by websites linked to or from our Website. In addition these websites or services, including their content and links, may be constantly changing. These websites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites that are linked to our Website, are subject to the terms and policies of that website.

What if this privacy policy is updated?

We may update our Privacy Policy from time to time. When we change this Privacy Policy in a significant way, we will post a notification on our Website along with the updated Privacy Policy.

What are your rights?

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.

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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