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INDEVCO Privacy and Data Protection Policy

Introduction

INDEVCO, along with its affiliated companies and subsidiaries (collectively referred to as 'INDEVCO', 'we', 'us', or 'our'), is committed to privacy and ensuring the protection of personal information in compliance with relevant data protection laws. INDEVCO's Global Data Privacy Department addresses inquiries regarding this Privacy and Data Protection Policy ('Policy') and the handling of personal data. This Policy applies to our subsidiaries that have access to your personal information, and a list of these affiliates and subsidiaries can be found on our [website](#).

This Policy outlines how we collect, use, and share your personal data (as specified in Section 1 – Table 1) when INDEVCO serves as the data controller (i.e., when INDEVCO determines how and why your data is processed), unless otherwise specified in an agreement or required by law.

The Policy covers personal information collected directly from you through our websites, mobile apps, and portals ('Website'), as well as through communication methods such as emails, phone calls, texts, or faxes. It also applies when you use our products and services, participate in business transactions with us, and engage in webinars, events, marketing activities, or through third parties, such as business partners.

If we provide links to other organizations' websites, this Policy does not cover how those organizations handle personal data. We encourage reviewing the privacy policies of any other sites or social platforms you visit. Unless otherwise specified, this Policy does not apply when INDEVCO processes personal data as a processor or service provider acting on behalf of customers.

Marketing Preferences/Opt-Out Option:

INDEVCO allows you to choose the type of communications you'd like to receive about our products and services. You may subscribe to newsletters or opt to receive marketing offers via email. You can change your preferences at any time using the unsubscribe link or opt-out option in our marketing communications, or by contacting us directly.

Even if you opt out of marketing messages, you may still receive service-related or market research communications from us. Please note there might be a brief delay in updating our records after you opt out.

For contact details, see the Contact Information section below.


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1. What personal information we collect and why we use it

The personal information we process about you depends on the INDEVCO products or services you use, your interactions with INDEVCO, and any personal data shared with us by third parties who have permission to do so.

For further details on the types of personal information we collect and the purposes for processing it, please refer to Table 1 below. Specific examples for each purpose are provided in Table 2.

Table 1 - Reasons for handling personal data

Categories of information collected	Processing Reasons
Device Information and Identifiers This refers to the configuration of devices registered for use with our products and services. It includes details such as IP address, browser type and language settings, operating system, platform, device model, software and hardware characteristics, and unique device or application identifiers.	<ul style="list-style-type: none"> • Delivering services • Managing access to our services and users • Customizing your experience • Verifying identity and fulfilling legal requirements
Financial and transactional information For example: Credit card details, debit card information, digital wallet accounts, banking data, or other payment-related information.	<ul style="list-style-type: none"> • Offering services • Managing payment transactions • Ensuring user authentication and meeting legal obligations

Categories of information collected	Processing Reasons
Connection and usage data For example: Details about files you download, domain names, landing pages, usage patterns, content viewed or accessed, access dates and times, pages visited, forms you complete or partially complete, search queries, uploads or downloads, email opens and interactions, access times, error logs, URLs accessed, and other related information.	<ul style="list-style-type: none"> • Offering services • Customizing your experience • Managing access to our services and users • Authenticating users and meeting legal requirements
Contact and account registration information For instance: Full name, residential address, email address, phone number, login credentials, country of residence, and preferred language (collectively referred to as "Account Information").	<ul style="list-style-type: none"> • Engaging in communication with you • Delivering services • Tailoring your experience • Safeguarding our services and users • Verifying user identity and fulfilling legal obligations
Other information For example: Any additional information you choose to provide to us, either directly or indirectly, in relation to your use of our products and services or while visiting our platforms and websites.	<ul style="list-style-type: none"> • Engaging with you • Delivering services • Customizing your experience • Managing access to our services, products, and users • Verifying user identity and fulfilling legal purposes


Table 2 – Examples of processing activities

Purpose	Examples
Protecting our services and users	<ul style="list-style-type: none"> • Monitoring, preventing, and detecting fraudulent activity, including verifying your identity • Managing and controlling access to our services and users • Preventing and addressing spam, malware, and other security threats • Continuously monitoring, enforcing, and enhancing the security of our services
Providing services	<ul style="list-style-type: none"> • Handling and fulfilling your requests related to products and services • Honoring our contractual obligations to you • Conducting analysis, research, and reporting to gain insights into your use of our products and services for improvement • Backing up, restoring, and archiving data • Identifying and resolving issues reported with our services or products • Maintaining records and managing billing
Communicating with you	<ul style="list-style-type: none"> • Setting up and managing accounts • Responding to information requests and providing more efficient customer service and technical support • Monitoring communications for quality assurance and training purposes • Providing transactional updates and information on products and services (e.g., product updates, account details, or transaction-related notifications) • Contacting you via email, mail, phone, or other channels for marketing purposes, in compliance with legal requirements • Collecting feedback and opinions on our services through surveys • Managing event registrations and participation • Notifying users of changes to products and services

Purpose	Examples
	<ul style="list-style-type: none"> Communicating about events, surveys, contests, sweepstakes, and promotions Enabling participation in discussion boards or other social media features on the website
Personalizing your experience	<ul style="list-style-type: none"> Customizing the user experience and presenting personalized content Performing internal research and development to enhance our products, services, and user experience Improving our website to ensure content is optimized for your device and to refine our product and service offerings Managing our website for internal purposes, including troubleshooting, data analysis, testing, research, statistical evaluation, and surveys Assessing the effectiveness of our advertising and allowing our service providers to present relevant ads, including interest-based (or "online behavioral") advertising
Defending our legal rights and compliance with the law	<ul style="list-style-type: none"> Adhering to applicable laws, regulations, and procedures Establishing, exercising, or defending our legal rights (e.g., enforcing compliance with our Terms of Use, Privacy Policies, or protecting our services, users, or others) Fulfilling obligations stated in any agreements

2. How we collect your personal information

We gather personal information through various channels, such as our websites, order forms, and while delivering products or services. This includes information obtained from third-party service providers, customer support interactions, surveys, polls, and during meetings, exhibitions, or events (both in-person and online). Your employer, as a customer or partner of INDEVCO, might share your contact details as necessary for providing INDEVCO products or services. Additionally, we may collect personal information if you or your employer are customers of a business we acquire. We

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may also record information about you via CCTV and logbooks when you visit our premises, in line with security and crime prevention measures as required by law. The Website(s) may also collect information about your visits to the Website without you actively submitting such information through cookie technology.

2.1 Cookies and tracking technologies: INDEVCO utilizes cookies to gather data on how its website(s) are used, either independently or through third-party tracking partners. For additional information, please review our Cookie Policy.

2.2 Personal information collected from third parties: INDEVCO gathers personal information from third parties. For instance, we may collect information about you from companies, affiliates, and subsidiaries that sell or distribute INDEVCO products through licensed co-branded or private-label websites. Additionally, our partners involved in marketing, reselling, and distributing our products and services—including payment gateways—may provide us with personal information to assist in fulfilling orders and delivering services. We might also obtain your personal information from public sources or data brokers (such as LinkedIn and other commercial investigation firms), in accordance with local regulations.


2.3 API Services: For specific limited services offered by INDEVCO, we utilize both third-party and in-house API services. The third-party APIs used in INDEVCO products only access data that you allow INDEVCO to retrieve from those platforms. This data may include your content stored on third-party sites, related metadata, and account information associated with those sites. Information collected via these APIs may be used by INDEVCO to archive content and related metadata that you upload to those third-party sites. Additionally, this data may facilitate authentication and authorization processes for accessing your information on those platforms. Please note that third-party email, social media, and communication services are not managed or controlled by INDEVCO, and we are not responsible for how these parties transmit, access, process, store, or use data provided to us. Such services are also governed by their own terms and privacy policies.

In certain situations, if you do not provide the personal information we need, we may be unable to offer specific products or services to meet legal or commercial requirements. The legal basis for collecting and using your personal information will depend on the type of information involved, relevant privacy laws, and the specific context in which we gather it, including:

- Consent when required by law.
- When processing is necessary for fulfilling a contract or commitment made with you and/or us.
- When required to comply with legal obligations.
- When processing is necessary for our legitimate interests, considering individual rights.

3. How we share your personal information

INDEVCO may share your personal information with its affiliates, subsidiaries, related entities, and business partners, including those involved in reselling or distributing our products and services. This also extends to service providers such as website, software, infrastructure, and application vendors, payment gateways, customer service teams, event and campaign organizers, cloud hosting providers, credit reference and debt agencies, professional advisers, marketing agencies (including

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event partners or sponsors), third-party networks and websites, social media platforms, database providers, backup and disaster recovery specialists, analytics and email service providers, and agents acting on our behalf.

We may also be required to share personal information with third parties or authorities when necessary to comply with legal obligations, regulatory requirements, or to protect the rights or property of INDEVCO or others. This may include responding to lawful requests from competent authorities or fulfilling national security or law enforcement obligations.

If INDEVCO undergoes a reorganization, sale, or joint venture with another entity, your personal information may need to be shared with that organization. Similarly, we may receive personal information when acquiring another company, part of their business, or entering a joint venture.

When third parties process personal information on our behalf, they are required to implement appropriate technical and organizational security measures to protect the data and ensure compliance with local privacy laws.

Your personal information may be processed outside your country of residence by our affiliates, partners, service providers, or agents acting on our behalf. INDEVCO and its affiliates and subsidiaries will ensure that any transfer to other countries complies with applicable data protection laws. This may involve mechanisms such as adequacy decisions or appropriate safeguards, including EU Model Clauses approved by relevant authorities (e.g., the European Commission, Information Commissioner's Office, or Federal Data Protection and Information Commissioner), or other approved alternative methods.

For further details regarding the recipients of your personal information and the measures in place for international transfers, please contact us using the information provided in the "Contact Information" section below.


4. How we protect your personal information

Safeguarding your personal information, both online and offline, is a top priority for us, and we make every effort to ensure its protection. We have implemented robust technical and organizational measures to secure your personal information from unauthorized access, accidental loss, disclosure, or destruction, ensuring a level of security that matches the potential risks. Our dedicated security teams regularly review and enhance these measures to keep your data secure.

All employees are bound by confidentiality agreements and receive training in the proper handling of personal data, ensuring compliance with privacy laws. INDEVCO remains fully committed to protecting personal information and adhering to its obligations under applicable data protection regulations.

5. How long we store your personal information

INDEVCO will retain personal information for as long as necessary to provide the relevant products or services or to fulfill the purposes for which it was collected, in accordance with any applicable contractual terms. Additionally, INDEVCO may retain and use this information for a longer period if

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permitted or required by law, to meet legal, tax, or regulatory obligations (e.g., audit and accounting requirements), manage disputes, exercise or defend legal claims, and enforce our agreements. We ensure that any personal information we no longer need is either securely de-identified or destroyed.

6. Your privacy rights


- **Customer Data:** If your personal information has been provided to us by or on behalf of a customer who controls that information (acting as the data controller) while we act as the data processor, you will need to contact that customer directly to exercise any rights under applicable data protection laws. Should you submit a request to us, we will require the name of the customer who provided your data, and we will forward your request to them. Your local laws may grant you specific rights regarding the collection, use, and sharing of your personal data. As a baseline, we strive to enable individuals to exercise the privacy rights listed below. However, please note that the availability of these rights and the conditions for exercising them (including response times) may vary depending on your location.

For example, under European Union (EU) data protection laws, you are entitled to certain rights, which may vary depending on the purpose of processing your information:

- **Right of access:** You can request copies of your personal data. This right always applies, but there may be exceptions where certain information cannot be shared.
- **Right to rectification:** You can request corrections if you believe any personal information we hold is inaccurate or incomplete. This right is always available.
- **Right to erasure:** You can request that we delete your personal data under specific circumstances.
- **Right to restrict processing:** You may ask us to limit the processing of your information under certain conditions.
- **Right to object to processing:** You have the right to object to our processing of your data when processing is based on public interest or our legitimate interests.
- **Right to data portability:** You can request that we transfer your data to another organization or directly to you. This right applies only to data provided by you, processed based on your consent or a contract, and where the processing is automated.

7. Children's privacy rights

INDEVCO encourages parents and guardians to be actively involved in their children's online activities. Our services are not intended for individuals under the age of 18, and we do not knowingly collect personal information from children without proper parental or guardian consent. If you believe that we may have inadvertently collected personal information from a child under the

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age of 13 (or the applicable age of consent) without the required consent, please submit a written request to the address provided in the Contact Information section.

8. Contact information

If you have questions regarding this Privacy and Data Protection Policy or our privacy practices

- Contact INDEVCO's Data Protection Officer or INDEVCO Global Data Privacy Department at DPO@indevcogroup.com or call 009619209100 (ext. 3336)
- Write to the INDEVCO entity of which you are a customer or interacting with.

When contacting us, please include your country of residence along with your questions or concerns, and we will respond promptly.

If you believe your rights, as outlined in this Privacy and Data Protection Policy or under applicable data protection laws, have been violated, please reach out to us first for immediate resolution. If the issue is not adequately addressed as required by law, you may then file a complaint with the appropriate data protection authority.

9. Amendments to this Privacy and Data Protection Policy

INDEVCO may update this Policy periodically in accordance with applicable data and privacy laws. If any changes are made, we will post the updated version here, so we encourage you to check this page regularly for updates.

If we make any changes that significantly impact your rights or substantially alter how or why we use personal information, we will notify you via a pop-up on our website, where permitted by law.

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