



Smartnotation B.V. (**Smartnotation**, licensor, we, us, our, party or together parties), headquartered in the Netherlands, offers software solutions to manage meeting minutes (collectively: **SN Apps**) and offers professional services to support the SN Apps (collectively: **SN Services**).

By purchasing, downloading, installing and/or using SN Apps or registering as a member of SN Apps or by using SN Services (collectively: **SN Solutions**) in any way, you (**Licensee**, you, yours, party or together parties) accept these Privacy Policy as an integral part of the Terms of Service of Smartnotation.

## Privacy

At Smartnotation, we are committed to protecting your privacy and in this section we explain what information we collect, how your information is collected, and how we may use it to improve SN Solutions and our Website.

If after reviewing this section you have any further questions, please contact us at [info@smartnotation.com](mailto:info@smartnotation.com)

This policy applies where we are acting as a data processor with respect to your personal data when you are using SN Solutions. It describes what information we collect and how we process that information. In other words, we explain why and how we process your personal data.

Our website incorporates privacy controls which affect how we will process your personal data. For example, if you no longer wish to receive our newsletters you may unsubscribe by following the link located within our emails.

### Information we collect

*Information you provide to us (account, profile and transaction data):* When you register for and use SN Solutions, you are providing us with information which we collect. This information may include your name, billing and mailing address, email address, phone number, social media usernames, employer details, transaction details and credit card information. We use a third-party intermediary to manage credit card processing. This intermediary is not permitted to store, retain or use your billing information for any other purpose except for credit card processing on our behalf.

*Information from your use of SN Solutions (usage data):* This information may include IP Address, location information, date and time, browser type and any other information you provide us while using SN Solutions.

*Information from communication with us (correspondence data):* We may process information contained in or relating to any communication that you send to us. Our services will generate metadata associated with communications made using SN Solutions and support portal contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is the proper administration of our website and business and communications with users.

*Support tickets (enquiry data):* We may process information contained in any enquiry you submit to us regarding SN Solutions. The enquiry data may be processed for the purposes of marketing and offerings relevant to you.



**Cookies:** We store "cookies", strings of code, on your computer when you use SN Solutions. We use these cookies to collect information about when you visit our Website, when you use SN Solutions, which browser you are using, your operating system and other similar information. Most browsers allow you to block and delete cookies. However, if you block our cookies, SN Solutions and our Website may not work properly.

**Third Party Cookies:** The use of cookies by third parties is not covered by our Privacy Policy. We do not have access or control over these cookies. Third parties use session ID cookies to make it easier for you to navigate our Website.

*Do not supply any other person's personal data to us, unless we request you to do so.*

#### How we use your information

- To create your account.
- To bill you for SN Solutions.
- To provide customer support.
- To transfer your information in the case of a sale, merger, consolidation, or acquisition.
- To better understand your requirements and interests.
- To send newsletters and relevant emails.
- To personalize your experience.
- To improve our services and our products.
- To send you updates and alerts and to contact you about your account.

We may process and disclose any of your personal data identified in this policy where necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

If you no longer wish to receive our newsletters, you may unsubscribe by following the link available within our emails.

#### Information sharing

We may disclose your personal data to any member of our subsidiaries, our ultimate holding company and all its subsidiaries, as reasonably necessary for the purposes, and on the legal bases, set out in this policy.

We do not share your personal information with third parties other than those that need your information to provide you with SN Services.

Financial transactions relating to our services are handled by our payment services providers, Stripe and Mollie B.V.. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at <https://stripe.com/nl/privacy> and <https://www.mollie.com/nl/privacy>.



## International transfers of your personal data

We have offices and facilities in The Netherlands. The hosting facilities are located in the European Union. Transfers to The Netherlands will be protected by appropriate safeguards.

You acknowledge that personal data that you submit for publication through our website or SN Solutions may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

## **Your Data**

- The ownership of all user data remains the property of the user.
- You are responsible for the data you delete in SN Apps. In order to maintain high performance in SN Apps, the items that are marked for deletion are permanently purged from the database after a certain grace period.
- We store all data within the European Union.

## Retaining and deleting your data

- Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- Your account profile and enquiry data will be retained for 90 days after you terminate the use of SN apps and services.

## Your rights under the data protection law

- The right to access your data: Providing the rights and freedom of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.
- The right to rectify or erase your data: You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed. You also have the right to erase your data without undue delay. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defense of legal claims.
- The right to restrict processing.
- The right to data portability.
- The right to complain to an authority.
- The right to withdraw consent. By withdrawing consent or restricting processing you effectively terminate the usage of SN apps and services.



## Information Security

Smartnotation uses commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of our systems.

In particular:

- We encrypt our services using TLS;
- We monitor our information collection, storage and processing practices to guard against unauthorized access to systems;
- We restrict access to personal information to Smartnotation employees and contractors who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.
- Smartnotation account passwords are hashed. Our own staff can't even view them. If you lose your password, it can't be retrieved, it must be reset.
- All our forms (from our website and mobile apps) pass data via TLS.
- Logins via our website and API have brute-force protection and anti-robot protection.

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