

March 2021, Frankfurt am Main

PRIVACY POLICY

Rating-Agentur Expert RA GmbH (*hereinafter* – the Agency, RAEX-Europe) is committed to respecting and protecting your privacy. Therefore, we established this Policy explaining when and why we collect personal information about people who contact us or visit our website, how we use it, where we store it and whether we disclose it.

1. Which information can be collected?

1.1. Personal data

To provide you our services, we must collect personal information relating to an identified or identifiable natural person. The personal information we collect can include your first name, surname, telephone number, e-mail address, the name of organization you work for, country and your title. You provide us with this information or part of it voluntarily by filling the contact form on our website, registering to our webinars and other events; purchasing the reports via website; contacting us by phone, email or otherwise; applying for the open positions published on our website (see below Section 1.3.).

1.2. Information collection related to purchases and transactions

Additional information is requested when ordering RAEX-Europe products, services, or registering for paid events. This information includes:

- Financial information (such as credit card number, expiry date) for billing purposes. For secure credit card transactions, we use intermediaries, Wix Payments (<https://www.wix.com/payments>), and eveno (<https://eveno.com/de/>). Wix Payments and eveno return the transaction status and the name of the card holder to us. We do not receive the credit card number. Wix Payments and eveno may collect, store and process certain personal information solely on behalf of the Agency and at our directions. These providers do not retain, share, store or use personally identifiable information for any secondary purposes.
- Billing and shipping address. This information is collected when paying online on our website and when paying with an invoice. It is used for billing purposes and in a case of an offline payment – to send the originals of the transaction documents if needed. When it is necessary, RAEX-Europe uses the information to contact customers while performing its services/processing its order.

1.3. Job applications

We also collect information that is voluntarily provided to us by job candidates (*hereinafter* – Applicants), when they apply to any of the open positions published on our website by sending us an e-mail or through the contact form on our website. There is no

a rigid application form, therefore, the types of the information which applicants provide us with, vary and might include:

- Personal data listed in the Section 1.1, as well as residential address, employment and educational history, language proficiencies and other work-related skills, date of birth, gender, national insurance number, citizenship and work authorization status, references as well as their contact information, resume or any document you may choose to send to us as a part of your application, qualifications for employment, work and salary expectations.
- With your application you might provide us some sensitive information or special category data related to your disability status, racial or ethnic origin. Submission of this type of information is strictly voluntary. We will obtain your consent to process special category data if you wish to share it with us on our later communication regarding your application. If this is not possible we will destroy such data and erase any copy in our possession.

1.4. Information which may be available to us, or collected automatically with the use of cookies or analytical tools

We might get some information from our visitors by recording how they interact with the website while using cookies or similar analytics tools.

2. How do we collect information from you?

We obtain information about you when you:

- Correspond with the Agency on its services and products;
- Share your contact details with an employee of RAEX-Europe over e-mail, at a meeting or event;
- Apply for open positions published at our website;
- Register to our webinars and other events;
- Purchase the reports via our website;
- Visit our website via browser's cookies.

3. How is collected information used?

We may use your information to:

- Carry out our obligations arising from any contracts with the Agency you entered into;
- Comply with applicable laws;
- Send you communications that may be of interest to you. These may include information about our activities, events, webinars or other projects;
- Facilitate networking at RAEX-Europe events. We may distribute the list of registrations to participants, however in such cases, authorization is requested on the registration form or via subsequent communications;
- Provide you with assistance on our services, only upon your request;

- Process a job application. Personal information supplied to RAEX-Europe during a recruitment process will only be used for the purpose of recruitment, will be stored securely and will be destroyed within the appropriate timescales if an applicant is not successful;
- Analyze our performance and marketing activities;
- Help us improve engagement and user journeys on our websites.

4. What are the legal bases for processing personal data?

We process all personal data lawfully, fairly and in a transparent manner. We use the data we collect for the purposes listed in the article 6 of the General Data Protection Regulation (Regulation (EU) 2016/679 of 27 April 2016). In particular, our actions on processing personal data pursue the following purposes:

- 4.1. To perform the pre-contract activities and our contractual obligations. By contacting us about our products and services we assume that processing of the personal data is necessary for establishing a business relationship or in order to take steps prior to entering into a business relationship, and, therefore, the lawful basis is performance of the contract and our legitimate interests.
- 4.2. We might hold your information for as long as it is necessary to comply with our legal obligations after the contractual relationship between you and us elapses. As the data subject you have rights related to maintenance, storage and processing of your personal data, which are specified in the Section 7.
- 4.3. To inform you about our activities, events, webinars or other projects using the data you voluntarily provided to us. The lawful basis for such processing is our legitimate interests to promote our services and events, as well as to inform those who might be interested in our activities. Our messages always include a clear and easily accessible an opt-out opportunity and the required legitimate interests assessment was carried out.
- 4.4. We might use your automatically collected data such as IP address and browser data for our website improvement, such as:
 - To administer our site and for internal operations, including data security, troubleshooting, testing, statistical and survey purposes;
 - To ensure that content from our website is presented in the most effective manner for you and for your device. The lawful basis for such processing is legitimate interests.

5. With whom do we share your information?

We do not rent, sell, or share personal information about you with other people or non-affiliated companies without your consent except to provide products or services you've requested, or under the following circumstances:

- 5.1. We provide the information to trusted partners, who work on our behalf under confidentiality agreements and might store, maintain or process your data.

These companies do not have any independent right to share this information. The types of third parties we may share the elements of your personal data with include:

- Payment processors engaged by us to securely store or handle payment information (for example, Wix Payments, eveno);
 - Providers of email management and distribution tools engaged by us to manage the delivery of newsletters or messages related to particular online webinars or events (for example, SendPulse). Our mailing lists are stored on a secure SendPulse server. The mentioned provider does not monitor, review or read such information without the permission of the Agency, except to the extent required to assure the proper functioning of all SendPulse service related systems. The provider is not allowed, under any circumstances, to sell the mailing lists we store on the server.
 - Providers of data aggregation and analytics software services.
- 5.2. We may transfer your information within the international group RAEX, which means that the information that was originally collected in the EU, may be transferred to the country which does not have the same data protection laws as the country in which you provided the data. When we transfer your data to other countries, we will protect your data as described in this Privacy Policy and applicable legal requirements for the transfer of data to countries outside the EEA. We may only transfer your personal data to our parental company RAEX Analytics, which is a subject to binding corporate rules on data privacy.
- 5.3. We may disclose your information to third parties when we reasonably believe we are obligated to do so by law, and in order to investigate, prevent, or take action regarding suspected or actual prohibited activities, including but not limited to, fraud and situations involving potential threats to physical safety of any person.
- 5.4. In the event we are acquired by or merged with a third party entity or undergo another change of control, we reserve the right to transfer information to a successor entity. In this event, we will notify you by electronic means before information about you is transferred and becomes subject to a different privacy policy.

6. How do we store your data?

The Agency securely stores your data on the web server (*hereinafter* – Storage) located in the office of the Agency.

We are legally obliged to hold some types of information and we will only keep your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

We may retain submitted Applicants Information even after the applied position has been filled or closed. This is done so we could re-consider Applicants for other positions and opportunities; so we could use their Applicants' information as reference for future applications submitted by them; and in case the Applicant is hired, for additional employment and business purposes related to his/her work. Applicants have rights related to maintenance, storage and processing of your personal data (see the Section 7 below).

7. What are your data protection rights?

The Agency would like to make sure that you are fully aware of all your data protection rights. Every data subject is entitled to the following:

- **The right to access** – You have the right to request the Agency for copies of your personal data.
- **The right to rectification** – You have the right to request the Agency to correct any information you believe is inaccurate or outdated. You also have the right to request the Agency to complete the information you believe is incomplete.
- **The right to erasure** – You have the right to request the Agency to erase your personal data, under certain conditions.
- **The right to restrict processing** – You have the right to request the Agency to restrict the processing of your personal data, under certain conditions. When processing is restricted, we will store your personal data, but not further process it.
- **The right to object to processing** – You have the right to object to the Agency's processing of your personal data, under certain conditions.
- **The right to data portability** – you have the right to request that the Agency transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have two weeks to respond to you. If you would like to exercise any of these rights, please contact us at our email: compliance@raexpert.eu.

8. What are cookies?

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

9. How do we use cookies?

We might use cookies to recognize you when you visit our website or use our services, remember your preferences, and give you a personalized experience:

10. What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:

- **Functionality cookies** – the Agency uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- **Security cookies** – We use cookies for our security features, and to help us detect malicious activity.
- **Performance, Analytics and Research** – Cookies help us to analyze our website performance. We use cookies to improve our products, features, and services, including to create logs and record when you access our site.
- **Third-party cookies** – We might use them for website analytics and advertising purposes, i.e. cookies which are set and can be accessed by servers respectively domains of our third-party providers.

11. How to manage cookies?

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

12. Privacy policies of other websites

The Agency website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

13. Changes to our privacy policy

The Agency keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on the 10th of March 2021.

14. Your communication choices

How do you opt out of receiving mailings from RAEX-Europe?

Any emails we send you will enable you to opt-out of receiving further emails from us.

How to contact us?

If you have any questions about the Agency's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email us at: compliance@raexpert.eu

Call us at: tel. +49 69 3085 4500 ext. 1214

Or write to us at: Walter-Kolb-Strasse 9-11, 60594 Frankfurt am Main, Germany.

How to contact the appropriate authority?

Should you wish to report a complaint or if you feel that the Agency has not addressed your concern on data privacy in a satisfactory manner, you may contact the competent

authority. This authority is the Hessen Commissioner for Data Protection and Freedom of Information, Gustav-Stresemann-Ring 1, 65189 Wiesbaden, Tel. +49 (0)611 1408-0, E-Mail: poststelle@datenschutz.hessen.de.

General information (in German language) regarding data protection can be found on the website of the Hessen Commissioner for Data Protection and Freedom of Information (www.datenschutz.hessen.de).