INTROW PRIVACY STATEMENT

*In offering and through the use of our services, products and information (collectively referred to as the "**Services**") through our application or any other platform (collectively referred to as the "**Platform**"), Introw BV (hereinafter referred to as "**Introw**", "**we**", "**us**", "**our**") will process certain personal data about the users of its Platform/Services (hereinafter referred to as the "**User**") as so-called "data controller". We may also collect and process data from visitors of our website www.introw.com (referred to as the "**Website**"). Users and Website visitors are hereinafter jointly referred to as "**you**" / "**your**".*

Introw values the privacy of its Users and Website visitors and wishes to inform in the most transparent manner possible about its processing activities and the Users' and Website visitors' rights in this respect. With this in mind, please first find a brief summary of these processing operations below, supplemented by more comprehensive information. If you have any further questions, please do not hesitate to contact Introw.

In order to make this Privacy Statement as clear as possible, it is structured as follows:

- *Part A: Summary of our Privacy Statement*
- *Part B: Contact details and information about this Privacy Statement*
- *Part C: What data do we process from our visitors and users, on what legal basis and for what purposes?*
- *Part D: In what ways do we share your data?*
- *Part E: Protection, integrity and retention of personal data*
- *Part F: Data subject rights and obligations*
- *Part G: Do you have any questions?*

Part A: Summary of our Privacy Statement

Introw BV processes different categories of personal data according to whether you are a User or a mere visitor of our Website.

Data we collect from a User is processed primarily to provide the User with the Services on our Platform and to improve the same. We do not use User data for purposes the User cannot reasonably expect, we do not resell it, etc. For Website visitors we only collect a limited amount of data which is primarily based on the Website visitor's consent or when in our legitimate interest.

Introw in principle does not share User or Website visitor data with third parties other than for providing the Website / Services, unless it is obliged to do so or to a limited extent with its service providers who provide the necessary guarantees. We do not sell any data to third parties.

Privacy legislation grants an individual, within certain conditions, all kinds of rights (right to access, right to erasure, right to restriction, etc.). Introw wants to facilitate the exercise of the User's and the Website visitor's rights by allowing to easily contact Introw to this end. Introw will promptly follow up on any questions and has provided a central point of contact and streamlined process for all privacy questions.

Part B: Contact details and information about this Privacy Statement

1. About Us

The Platform and Website are operated by Introw BV, with registered office at Dok Noord 9, bus 202, 9000 Ghent, Belgium and with company and VAT number (BE)0798.161.431.

Any questions or comments can be sent by post to this address or by e-mail to privacy@introw.io. All questions regarding privacy or personal data will be directed to our central point of contact for this purpose. Introw will do its utmost best to answer any question or concern as soon as possible, and always within the boundaries of applicable laws.

2. Information about this Privacy Statement

This Privacy Statement informs the User and Website visitor about how Introw collects and processes personal data when a User uses the Services and Platform and/or when a visitor browses our Website. Privacy and the protection of personal data are of utmost importance to Introw. Introw will respect Belgian law (in particular the Act of 30 July 2018 on the processing of personal data), as well as the European General Data Protection Regulation 2016/679 of 27 April 2016 (also referred to as the "GDPR" (Regulation)).

The present Privacy Statement should be read together with our Terms and Conditions (in which we explain to the User under which conditions the User may access and use the Platform and Services) and the Cookie Statement (in which we explain to you how we use cookies on the Website and the Platform, and for what purposes). The Terms of Conditions, the present Privacy Statement and the Cookie Statement form a binding agreement between the User / Website visitor and Introw, and are collectively referred to as the "**Terms**".

Please note that in certain instances involving the processing of data, Introw acts as a so-called "data processor" on the instruction of its customer (and its authorised Users). Such instructions are set out in a written data processing agreement between Introw and its customer. These processing activities do not fall within the scope of the present Privacy Statement. In such event, the customer and its Users remain responsible for properly informing the data subjects concerned and to obtain all necessary consents and approvals where necessary, in order to make full and legally compliant use of the Platform and the Services. For these processing activities, see our Data Processing Agreement.

The Terms apply throughout a visit to the Website and during the term of use of the Platform / Services and by accessing the Website and/or Platform, the visitor / User agrees to the processing activities described in this Privacy Statement.

Please read the Terms carefully and make sure to understand them before using the Platform, the Services and/or visiting the Website, as appropriate. The Terms contain important clauses. In the event that a visitor or User does not understand or agree with the Terms, he/she should refrain from further accessing or using our Platform, Services and/or the Website (as appropriate) and contact Introw at the above contact details.

By using the Platform and/or visiting the Website, the User / Website visitor confirms to have read, understood and accepted the Terms. On some occasions, the User / Website visitor will also be asked to explicitly accept the Terms. In doing so, the User / Website visitor expressly agrees that checking a box counts as an informed, specific, free and full consent such as a signature to agree to contractual documents.

In any event, Introw recommends that each User / Website visitor keeps a copy of this Privacy Statement for its records.

Introw may amend this Privacy Statement from time to time. When using the Platform / visiting the Website, the latest version of the Privacy Statement will always apply. Introw therefore recommends that the User / Website visitor checks the Privacy Statement regularly. The latest revision date can always be found at the bottom of the document.

The provisions of the Terms and Conditions shall also apply *mutatis mutandis* to this Privacy Statement, unless explicitly stated otherwise herein.

Part C: What data do we process from our Users and Website visitors, on what legal basis and for what purposes?

3. What data do we collect from our Users and Website visitors, and for what purposes is this data used?

Depending on whether you visit the Website or use the Platform, different types of information are collected and these are used for different purposes. Below, an overview of these processing activities can be found as well as the legal basis for the processing of these data.

Of course, the relevant data will only be processed when falling within one or the other category, and also only if making use of certain functions as described below.

3.1. Data which Introw processes when visiting the Website

For some processing activities, you have given your consent when you visit our Website. In certain circumstances, you may voluntarily provide information yourself, for example to request information, a demo, etc. You can also subscribe to our waiting list by providing email and name.

(i) For example, you can contact us via our Website. In doing so, you can provide the information you require, which we will then of course have to process in order to follow up on your request and possibly act upon the information you have provided us with. Self-evidently, you are under no obligation to contact us.

(ii) The information concerned may include name, email, contact details.

(iii) Follow-up and commercial communication with prospects. When you contact us through our Website, for example by requesting a demo, a quote or more information, we register you in our CRM as a business prospect. We use your name, business email address, company, job title and the information you share with us to:

(a) follow up on your request, including scheduling and preparing the demo and sending you the information you asked for; and

(b) send you occasional emails about Introw, our Platform and partner management topics (such as product updates, content and event invitations) that we believe are relevant to

you in your professional capacity.

We process your data for (a) to take steps at your request before entering into an agreement (article 6.1(b) GDPR), and for (b) on the basis of our legitimate interest in promoting our Services to professionals who have shown interest in them (article 6.1(f) GDPR). We have weighed this interest against your interests and rights, and we limit these emails to business-related content.

Every commercial email contains an unsubscribe link. You can also object at any time, free of charge and without giving reasons, by emailing privacy@introw.io. We will then stop sending you commercial emails and keep your email address on a suppression list only to respect that choice. If you do not engage with our emails for 24 months, we stop sending them.

We may carry out some processing activities in the legitimate interest of Introw. In some cases, the processing of personal data is not required by a legal obligation, nor based on an agreement, nor has consent been given, but Introw nevertheless believes that it has a legitimate interest in processing the personal data of a Website visitor.

Thus, when visiting our Website, we collect general and statistical information regarding the use of the Website / Platform (for example, IP address, date, time and duration of the visit, pages visited and webpage from which the Website is accessed). The purpose of collecting this information is to detect errors, defects and bugs in our Website, to ensure the security and proper functioning of the Platform and Website, but also to optimise the use of our Website (and Platform) and to generate aggregate and statistical information about such use. Introw may also use this information to improve communication with its Website visitors and Users. To the extent that this information is collected through the use of cookies and other tracking technologies, please refer again to our Cookie Statement.

Introw ensures that this data has the least possible impact on a visitor's privacy and takes all necessary measures to protect the data.

In addition, Introw may log certain activities of its Website visitors for evidentiary purposes and to detect and resolve any problems that may arise.

3.2. Data which Introw processes when you are a User

Introw has to carry out some of the processing of User data because it is necessary for the performance of our contract. Indeed, when registering as a User, we will collect and process User data to identify the User, create an account and to allow the User to gain access to the Platform. Otherwise, the User will not be able to use the Platform and Services. Personal data include name, family name, User status, email and sometimes also profile picture.

Once the User account is created, Introw must obviously also process the data linked to that User account (including all actions undertaken on the Platform), so as to make all functionalities offered on the Platform available to the User and allow the latter to use the Services.

We will also use User data to send important information from or about the Platform and the functionalities that it offers. This information can be categorised as follows:

- **Product information**: Purely functional messages linked to the operation of the Platform. For example: if you send an invite to a business partner or the same has been accepted, we may send you a confirmation.

- **Notifications**: These are messages about subjects that the User has indicated may be of interest.

- **Commercial information**: As an existing customer, we add each User to receive newsletters and other interesting facts about Introw and the Platform / Services. A User may unsubscribe from these at any time.

The User is provided with unsubscribe options which the User can activate at any time.

Without the processing of the above data, the execution of the agreement is not possible (except where a User can opt out from receiving messages) and the User hereby explicitly confirms that these processing activities fall within the scope of the agreement and services desired by the User.

Customer and User information will also be used for all customer relationship management purposes, including invoicing, contract follow up, etc.

For some processing operations, you have given your consent yourself. In this respect reference is made to point 3.1(a) above, which of course also applies to Users.

A User may also sign up for certain offers that are only open to our Users.

Some processing may be carried out in the legitimate interest of Introw. In this respect, we refer to point 3.1(b) above, which of course also applies to Users.

3.3. General

Introw may also process data of Website visitors and Users in the event it is legally required to do so.

Part D: How do we share your data?

4. What data do we share with third parties?

Introw wants to protect privacy as much as possible. To that end, Introw will limit the sharing of data with third parties to a minimum as follows.

As a general rule, Introw never transfers personal data obtained to third parties other than for the purpose of executing the agreement and as stipulated in this Privacy Statement as follows:

(a) With competent authorities who are authorised to request such information or to whom we have to disclose information, or when required by law or as a result of legal proceedings or court proceedings;

(b) In addition, Introw may disclose data if Introw determines that such disclosure is reasonably necessary to enforce the Terms or to protect its business or other Website visitors and/or Users;

(c) Introw may share data with third-party service providers acting as "processors" on behalf of our company, for example a cloud service provider to offer our Platform, the provider of a CRM package, third party provider sending Platform messages, etc. – in this case, Introw will always ensure that it has the necessary (contractual) guarantees that the service provider in question has taken appropriate measures with regard to privacy (including any transfer of data to countries outside the European Economic Area);

(d) At the User's / Website visitor's request, e.g. when using products or services that requires Introw to share data with third parties;

(e) With companies within our corporate group, when this is necessary for the performance of the contract (e.g. customer management) or to fulfil a specific request;

(f) Furthermore, the User / Website visitor agrees that Introw may at any time transfer or share personal data in the event of a reorganisation and/or restructuring of its business (e.g. in the event of a takeover, branch demerger, merger, split-off, investment, etc.). Introw does not require the consent of its Website visitors and Users for this, but will take reasonable efforts to inform them of such an event. In this case, Introw will also ensure that the acquirer or partner takes appropriate privacy measures to protect privacy rights as best as possible.

Introw generally does not intend to transfer personal data to other third persons or to countries outside the European Economic Area; however, should this occur, please refer to clause 4.1(c) above and Introw will ensure that appropriate and suitable safeguards are put in place. In that case a copy of those safeguards can always be obtained by writing to Introw using the contact details set out in section 1 above or by emailing us at privacy@introw.io.

Part E: Protection, integrity and retention of personal data

5. Protection of personal data

Introw takes the security of personal data very seriously. Introw protects personal data during transmission and at rest. If personal data is held on company premises, Introw uses computer systems with limited access in locations with physical security measures.

The Website visitor / User is solely responsible for the personal data it chooses to share with Introw and when making use of the Website / Platform, and the Website visitor / User warrants that it has obtained all relevant rights.

6. Integrity of personal data

If you want to change data, Introw can always be contacted (see also point 1 this Privacy Statement). Some Users may also have data modifications rights.

7. Retention period of personal data

Introw will retain personal data for the period necessary to fulfil the purposes set out in this Privacy Statement, unless a longer retention period is required or permitted by law:

(a) When you are a visitor of our Website, the data Introw collects (as stated in 3.1) will be collected for a period of three (3) years. When this period comes to an end, Introw will delete such data.

(b) When you are a User of our Platform, the data Introw collects (as stated in 3.2) will be collected during the execution of the contract and stored up until one (1) year after the end of the contract between us, unless explicitly requested differently by the User.

Part F: Data subject rights and obligations

8. Your rights

Privacy legislation sets out a number of rights which an individual (e.g. Website visitor or User) can exercise under certain circumstances and conditions.

More specifically it concerns the rights as described below, which are further detailed in the relevant article of the European General Data Protection Regulation 2016/679 of 27 April 2016, also referred to as the "GDPR", which you can consult here:

https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1655305638628&uri=CELEX%3A32016R0679.

(a) **Right of access:** as a data subject, you have the right to obtain from us a confirmation as to whether or not personal data concerning you are being processed and, where that is the case, to obtain access to that personal data and to accompanying information such as the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipients of the personal data, the period for which the personal data are expected to be stored, your rights, any available information on the source of the data, and the existence of automated decision-making and meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject. This right is further described in Article 15 of the GDPR Regulation;

(b) **Right to rectification:** as a data subject, you have the right to obtain from the controller (i.e. Introw), without undue delay, the rectification of inaccurate personal data concerning you. Subject to the purposes of the processing, as a data subject you have the right to have incomplete personal data completed, including by means of providing a supplementary statement. This right is described in Article 16 of the GDPR Regulation;

(c) **Right to erasure:** as a data subject, you have the right to obtain from the controller (i.e. Introw) the erasure of personal data concerning you and we are obliged to erase personal data when, among other things, the personal data is no longer necessary in relation to the purposes, you withdraw your consent, you object to the processing in certain circumstances, the personal data has been processed unlawfully, etc. However, this right is subject to limitations, although we will always act in line with the law. This right is further described in Article 17 of the GDPR Regulation;

(d) **Restriction of processing:** as a data subject, you have the right, within the limits set out in law, to obtain from the controller (i.e. Introw) the restriction of processing where one of the following

applies: (a) the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data, (b) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead, (c) we no longer need the personal data for the purposes of the processing, but you need it for the establishment, exercise or defence of legal claims, (d) you have objected to the processing, pending the verification whether our legitimate grounds override those of the data subject. This right is further described in Article 18 of the GDPR Regulation;

(e) **Right to object:** as a data subject, you have the right to object at any time, on grounds relating to your particular situation, to processing of personal data concerning you on the basis of our legitimate interests. This right may be exercised under the conditions laid down by law. When your personal data are processed for the purposes of direct marketing, you have the right to object at any time to the processing of personal data concerning you for such marketing. This right is further described in Article 21 of the GDPR Regulation;

(f) **Right to data portability:** as a data subject, you have the right to receive the personal data relating to you, which you have provided to us as a controller, in a structured, commonly used and machine-readable format, and you have the right to transmit such data to another controller, without hindrance from the data controller to whom the personal data have been provided, and this under the conditions set out in law (the processing is based on consent or on a contract, and the processing is carried out by automated processes). This right is further described in Article 20 of the GDPR Regulation.

Our company and its employees take all questions regarding privacy seriously and will deal with them promptly. In order to streamline this process, we ask any data subject to email us at privacy@introw.io when you request to exercise your rights. You may also contact us in any other way. However, we reserve the right to verify the identity of the requesting party, as we obviously need to protect the privacy of third parties as well!

In certain cases, we may refuse requests or may first investigate further and/or request the necessary additional information, for example if these requests are very unclear or suspicious, endanger the privacy of others, are extremely impractical, etc. In doing so, we will always act in line with applicable legislation.

It is important to note that for those cases where we process your personal data on the basis of your consent (see those cases under section 3 above), you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing based on consent before the withdrawal.

9. What if you do want to file a complaint

If you have any complaints or questions, we of course always prefer to try and find a solution first. We will do our utmost best to achieve this.

In any event, you have the right to lodge a complaint with a supervisory authority at any time. In Belgium, the supervisory authority is the Belgian Data Protection Authority or Gegevensbeschermingsautoriteit (see www.gegevensbeschermingsautoriteit.be; address: Drukpersstraat 35, 1000 Brussels; Telephone: +32 (0)2 274 48 00; E: contact@apd-gba.be).

10. Your obligation

The data you as a Website visitor and/or User provide must be accurate and complete. If this is not the case, Introw reserves the right to suspend the Services or to take any other measures Introw deems

appropriate. Furthermore, you expressly confirm that you have obtained all necessary rights and consents to provide us with the information you send us, and you shall indemnify us for any damages resulting from any non-compliance with this obligation.

Part G: Do you still have questions?

11. Further questions?

Let us know:

(a) By post to Introw BV, Dok Noord 9, bus 202, 9000 Ghent, Belgium

(b) By e-mail to privacy@introw.io

All questions concerning privacy or your personal data are handled by our central point of contact.