

PRIVACY POLICY for the web-based virtual 3D platform of Innology GmbH

Last updated: March 10, 2021

This Platform Privacy Policy explains how Innology GmbH collects, stores, uses and shares personal data. The services related to our virtual events, conventions and virtual environments include collection, storage and processing. In this policy, "personal data" means information that identifies or can be used to identify an individual.

The 3D Virtual Platform is a tool used by businesses (including direct customers of Innology GmbH and indirect customers accessing the Platform) and their employees, agents and authorized users (the "Business Customers") to deliver virtual reality events and other content to registrants, visitors, attendees and other end users (those end users, together with Business Customers are the "Platform Users").

## **1. COVERAGE**

This Policy applies to the personal data that Innology GmbH's Business Customers submit to us through the Platform and to the personal data that we collect, access, store, use or otherwise process (collectively, "process") on behalf of Business Customers through the Platform, including Registration Data, Other Data and User Communications (each defined below) and other personal data that we process from end users of the Platform (collectively, the "Platform Data").

### **EU data protection law**

Innology GmbH stores Platform Data in accordance with EU data protection laws (including the laws implementing the EU General Data Protection Regulation, or "GDPR").

In addition, Innology GmbH processes Platform Data only as instructed by customers, as set forth in applicable customer agreements, and as otherwise required by applicable EU data protection laws. Our customers are data controllers with respect to Platform Data. This Policy does not apply to the processing of Platform Data or other personal data collected through the Platform by customers, which are subject to their own policies and practices.

## **2. DATA COLLECTED**

### *Information collected directly*

*Account Information:* To access various parts of the Platform and to create workshops and events, you must have an online account. To register for an account on the Platform, you must provide your name, email address, company name, and other information necessary to confirm that you are an Authorized Business User (if relevant). We may also collect additional information, such as your job title, information about your company (such as its country and industry), and other user profile information such as gender, zip code, and areas of particular interest to you. Our processing of account information is governed by the Innology GmbH Privacy Policy.

*End User Information:* To access events, virtual environments, and other events managed by Business Customers through the Platform as an end user, you must register. While our Business Customers determine what information to collect from end users, the personal information requested typically

includes a name, email address, company name and job title, and information about your company (such as its country and industry).

*Affiliated Websites:* We provide services in connection with other websites or vendors when requested. Personal information you provide to these sites may be sent to us in order to provide these services. We process such information in accordance with this policy.

*Other Information:* Innology GmbH's Business Customers may require the completion of additional information, such as surveys or polls, in some events or virtual environments.

### **Automatically collected information**

When you use the 3D Platform, our servers record information in a server log that your browser sends. The server logs may include information such as your web request, internet protocol address, browser type, browser language, the date and time of your request, and one or more cookies that can uniquely identify your browser.

Cookies, Clear GIFs, etc. The Platform may use cookies (small pieces of information stored by your browser on your computer's hard drive), Clear GIFs, Java Script, and other technologies to collect and store information about your use of the Platform, such as your search activity, the pages you view and the date and time of your visit, your browser type, the type of computer or mobile device you use, browser language, IP address, mobile carrier, unique device identifier, location information, and requested and referring URLs. We may combine this information with other information we have collected about you, possibly including your username, name, and other personal information. For more information, please see the "Cookies and Other Tracking Mechanisms" section below.

### **Aggregated and de-identified information**

The Platform may process (i.e., collect, use and disclose) aggregate de-identified information and other information that is not personally identifiable for research, analysis and other purposes, provided that such information cannot and will not be used to identify a particular Business Customer or end user.

## **3. USE OF INFORMATION**

Innology GmbH uses the personal data we collect through the web-based 3D Platform to provide our services to Business Customers, including operating and improving the Platform and our services, providing Platform Users' accounts, conducting transactions requested by Platform Users through the Platform, and responding to Platform Users' inquiries.

As mentioned above, Innology GmbH processes personal data collected via the 3D Platform. Business Customers are data controllers with respect to Platform Users' personal data; this Policy does not apply to the processing (including collection, use and disclosure) of Platform Users' personal data by Business Customers.

Business Customers may use the Personal Data they collect through the Platform for additional purposes, such as to deliver targeted content within the Platform, to contact end users about their use of the Platform, for marketing and promotional purposes, and for other purposes; you should read their privacy policies for more information about how they collect, use, and share personal data collected through the Platform.

#### **4. DISCLOSURE OF INFORMATION; ONWARD TRANSMISSION**

As noted above, information of Platform Users, including personal data of end users, is disclosed to the Business Customer on whose behalf the information was collected or the Platform is operated; this Policy does not apply to, and we are not responsible for, the processing (including collection, use and disclosure) of personal data of Platform Users by Business Customers.

- Innology GmbH will not disclose personal data from Platform Users to third parties except to provide the products or services you have requested, with your consent, or in the following circumstances:
- We provide personal information to the Business Customer on whose behalf the personal information was collected, as explained above.
- We may share personal information with our agents, service providers, contractors and others acting on our behalf. These parties have no independent right to use or disclose this information.
- We may share the information we collect from you with affiliates of Innology GmbH; however, when we do so, their use and disclosure of your information is subject to this Policy.

Third parties who process personal data on our behalf must undertake to use this personal data only for the purpose for which it was provided by us, and they must contractually undertake to provide adequate protection for personal data; Innology GmbH remains liable for the transfer of personal data to these third parties.

We may also disclose personal information in response to lawful requests by public authorities, including to comply with national security or law enforcement requests, and in cases where it is necessary to comply with applicable laws, regulations, legal process or enforceable governmental requests, to enforce our User Agreement and investigate violations thereof, to prevent, detect and correct fraud, security or technical issues, or to protect the rights and property of Innology GmbH. If we are acquired by or merged with another company, if substantially all of our assets are transferred to another company (including as due diligence and for other purposes prior to the closing of such transaction), or as part of bankruptcy proceedings, we may transfer the information we collect (including personal information) to the acquiring company.

#### **5. ACCESS, MODIFICATION AND LIMITATION OF THE USE OF YOUR PERSONAL DATA**

Individuals have the right to access and, in some cases, restrict the use and disclosure of personal information held about them. Registered Platform Users may log into their account to view and modify certain personal information in their profile. EU and Swiss end users who wish to request access to, limit the use of, or restrict the disclosure of their personal information collected through the Platform by a Business Customer should contact such Business Customer directly; EU and Swiss end users may also make such requests by contacting us at [info@innology.ch](mailto:info@innology.ch) and providing the Business Customer's name. We will forward such requests to that Business Customer and assist it in responding to your request, if necessary.

## **6. SECURITY**

To protect your personal information, access to your data is password protected, and sensitive information is protected by encryption when it is exchanged between your web browser and our website. It is your responsibility to keep your password confidential and not to share this information with third parties. Although we implement the security measures described above, the transmission of information over the Internet is not completely secure, and therefore transmission over the Internet is at your own risk.

## **7. COMPLAINTS AND DISPUTES**

Individual users of the Platform who have questions, complaints, or disputes regarding this Policy or the manner in which Innology handles or protects personal information may contact us at [info@innology.ch](mailto:info@innology.ch). We will promptly investigate and attempt to resolve all complaints and disputes and will respond within 45 days of receiving such complaint.

## **8. MODIFICATIONS**

Innology GmbH may update this policy from time to time, so you should review it regularly. If we make any material changes in the way we treat users' personal information, we will notify you by email.

## **9. CONTACT**

Please contact Innology GmbH with any questions or comments regarding this privacy policy by emailing us at [info@innology.ch](mailto:info@innology.ch) or writing to us at: Innology GmbH, Akazienstrasse 4, CH-4142 Münchenstein.