

## **PRIVACY POLICY**

**Effective Date: 5 May, 2021**

### **1. INTRODUCTION**

This **Privacy Policy** (hereinafter referred to as "Policy") defines the processing and protection procedure of your personal data through your use of the HexaLive Platform and sets out the procedures to prevent any applicable law violations of personal data.

This Policy has been developed in accordance with the laws of Romania and the European Union, in particular with the General Data Protection Regulation (RGPD) adopted by the European Parliament and the European Council on 27 April 2016.

The document explains the personal data we collect from you, how and where we may use it, how we protect it, who has access to it, with whom we share it, and how you may correct it. Our goal is to ensure information and network security by providing quality products and services while also respecting privacy and personal data of website visitors, customers, suppliers, business partners, employees and other individuals.

Data protection law in certain jurisdictions differentiates between the "controller" and "processor" of information. Hexagon and the Event Hosts (as defined in the Terms and conditions) are independent controllers of certain types of your personal data, such as your registration data (like name and email) and attendance data (like Event name, date and time of Event, and Event sessions attended). Please keep in mind that Event hosts are the controller, and Hexagon is the processor of Event data, such as information and materials submitted to or during an Event.

We collect only that personal data absolutely necessary for the specified purposes, on a best efforts basis. We do not sell your data. For the collected information and data, we strive to apply adequate solutions to anonymize it, or to pseudonymize it.

We are protecting your right to privacy in all the regions where we operate and while complying with local laws, we are committed to implementing the personal data protection standard imposed by the General Data Protection Regulation adopted by the European Parliament and the European Council on 27 April 2016 (hereinafter referred to as the "**GDPR**") across all entities.

Our Data Protection Officer can be found at the following email address: [contact@hexagonevents.ro](mailto:contact@hexagonevents.ro)

### **2. DEFINITIONS**

The following definitions of terms used in this Policy are drawn from and coordinated with Article 4 of the GDPR and are presented for informational purposes:

- **Personal Data:** Any information relating to an identified or identifiable natural person (the "Data Subject") who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Sensitive Personal Data:** Personal data which are, by their nature, particularly sensitive in relation to fundamental rights and freedoms merit specific protection as the context of their processing could create significant risks to the fundamental rights and freedoms. Those personal data include personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
- **Data Controller:** The natural or legal person, public authority, agency or any other body, which alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Data Processor:** A natural or legal person, public authority, agency or any other body which processes personal data on behalf of a Data Controller.
- **Processing:** An operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of the data.
- **Anonymization:** Irreversibly de-identifying personal data such that the person cannot be identified.
- **Pseudonymization:** The processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.
- **Cross-border processing of personal data:** Processing of personal data which takes place in the context of the activities of establishments in more than one Member State of a controller or processor in the European Union where the controller or processor is established in more than one Member State; or processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect data subjects in more than one Member State;

### 3. HOW AND WHY WE USE INFORMATION WE COLLECT

Below are the specific purposes for which we use the information we collect about you.

- (i) to provide the Services, namely to give you access to the Platform so you can attend the Events hosted on the Platform
- (ii) to ensure network and information security by assuring correct and efficient operation of its products and services, according to the technical specifications, and for their improvement, including analysing the reported IT security issues, delivering and customizing the related services to the Customers' needs and developing new technologies.
- (iii) to support or communicate with the Customers about the Services  
We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash information, and to repair and improve the Services. We might also share information with a third party expert for the purpose of responding to support-related requests.  
We use your contact information to send communications via email and within the Services, including responding to your comments, questions and requests, providing customer support, and sending you technical notices, updates, security alerts, and administrative messages.
- (iv) to make statistical analysis and market studies and for marketing purposes
- (v) to protect our legitimate business interests and legal rights  
Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions.
- (vi) in certain cases, with your consent  
We use personal data where you have given us consent to do so for a specific purpose not listed above, e.g. we may publish testimonials or featured customer stories to promote the Services, with your permission.

#### **4. BASIC PRINCIPLES REGARDING PERSONAL DATA PROCESSING**

The data protection principles outline the basic responsibilities for organizations handling personal data. Article 5(2) of the GDPR stipulates that "*the controller shall be responsible for, and be able to demonstrate, compliance with the principles.*"

- (i) **Lawfulness, fairness and transparency:** Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject.
- (ii) **Purpose limitation:** Personal data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- (iii) **Data minimization:** Personal data must be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed. The Company must apply anonymization or pseudonymization to personal data if possible to reduce the risks to the data subjects concerned.

- (iv) **Accuracy:** Personal data must be accurate and, where necessary, kept up to date; reasonable steps must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified in a timely manner.
- (v) **Storage period limitation:** Personal data must be kept for no longer than is necessary for the purposes for which the personal data are processed.
- (vi) **Integrity and confidentiality:** Taking into account the state of technology and other available security measures, the implementation cost, and likelihood and severity of personal data risks, the Company must use appropriate technical or organizational measures to process Personal Data in a manner that ensures appropriate security of personal data, including protection against accidental or unlawful destruction, loss, alteration, unauthorized access to, or disclosure. Appropriate technical or organizational measures are to be taken in order to comply with this requirement: such data security measures can include the use of encryption and authentication and authorisation mechanisms.
- (vii) **Accountability:** Data Controllers must be responsible for and be able to demonstrate compliance with the principles outlined above.

## 5. LEGAL BASIS FOR PROCESSING (FOR EEA USERS)

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have a legal basis for doing so under applicable EU laws. The legal basis depends on the Services you use and how you use them. This means we collect and use your information only where:

- We need that information as to provide you the Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests;
- You give us consent to do so for a specific purpose; or
- We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. We are using your information because we or a third party have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

## 6. PERSONAL DATA COLLECTED

We collect information about you when you provide it to us and when you use our Services, as further described below.

## 6.1 **Personal data directly provided by a Customer**

We collect information about you when you input it into the Services or otherwise provide it directly to us.

### (i) **Account and Profile Information**

As a controller, we collect information about you when you register for an account, create or modify your profile, set preferences or sign-up for the Services. For example, you provide your contact information (name, surname, email address, job title,) when you create an account. You also have the option of adding a display name, profile photo, job title/name of employer, and other details to your profile information to be displayed in our Services.

### (ii) **Content you provide through our products**

Your Content which includes data you submit as part of an Event or as a result of your interactions with the Services such as Event materials, videos, chats, and messaging. Please note, the host of the Event is the controller of this data.

### (iii) **Information you provide through our support channels**

The Services also include our customer support, where you may choose to submit information regarding a problem you are experiencing with a Service. Whether you designate yourself as a technical contact, open a support ticket, speak to one of our representatives directly or otherwise engage with our support team, you will be asked to provide contact information, a summary of the problem you are experiencing, and any other documentation, screenshots or information that would be helpful in resolving the issue.

## 6.2 **Information we collect automatically when you use the Services**

We collect information about you when you use our Services, including taking certain actions within the Services.

### (i) Your use of the Services

We keep track of certain information about you when you visit and interact with any of our Services. This information includes the features you use; the links you click on; the type, size and filenames of attachments you upload to the Services; frequently used search terms; and how you interact with others on the Services.

### (ii) Device and Connection Information

We collect information about your computer, phone, tablet, or other devices you use to access the Services. This device information includes your connection type and settings when you install, access, update, or use our Services. We also collect information through your device about your operating system, browser type, IP address, URLs of referring/exit pages, device

identifiers, and crash data. We use your IP address and/or country preference in order to approximate your location to provide you with a better Service experience. How much of this information we collect depends on the type and settings of the device you use to access the Services.

Server and data center Service administrators can disable collection of this information via the administrator settings or prevent this information from being shared with us by blocking transmission at the local network level.

### (iii) Cookies and Other Tracking Technologies

The Platform uses Cookies. Cookies are small text files containing a string of characters that can be placed on your computer or mobile device that uniquely identifies your browser or device. We may use technologies like cookies to deliver, secure, and understand products, services, and ads. Cookies and other technologies allow a site or services to know if your computer or device has visited it before. These technologies can then be used to deliver products, services, and ads, help us understand how the site or service is being used, help you navigate between pages efficiently, help remember your preferences, and generally improve your experience in using our services.

Legal basis for processing personal data Art. 6 para.1 lit. f GDPR (legitimate interest). Our legitimate interest consists in maintaining the full functionality of our product, increasing its usability and enabling a more individual approach to users.

The cookies are set by our Platform in order to maintain the full functionality of our Platform and to improve usability. In addition, cookie technology enables us to recognize individual visitors by means of pseudonyms, e.g. an individual, arbitrary ID, so that we are able to offer more individual services.

The length of time a cookie will stay on your computer or mobile device depends on whether it is a "persistent" or "session" cookie. Session cookies will only stay on your device until you stop browsing. Persistent cookies stay on your computer or mobile device until they expire or are deleted.

We use cookies to provide you with increased user comfort. In order to use our comfort functions, we recommend that you allow the acceptance of cookies for our website. The possibilities for objection and erasure of data are also governed by the general regulations on the right of objection under data protection law and the right of erasure described in the following in this data

## **7. WHAT WE DO WITH IT**

Your personal data is shared by us with our employees, collaborators, third-party service providers who help us operate, promote and improve our Services and with national or European authorities to comply with legal obligations and to protect and defend our rights and property.

We do not transmit personal information to any other third parties (except in circumstances when this is necessary for our legitimate professional and commercial needs in order to meet your requests and/ or if required or permitted by law or professional standards). You will be notified if we decide to future transfer your personal data to any other third parties (whether private individual or legal entity, public authority or any other entity) except in the cases mentioned above or when such transfer or disclosure is expressly provided for by European Union law or by national law.

## **8. HOW WE STORE AND SECURE PERSONAL DATA**

### **8.1 Storage and security**

We use industry standard technical and organizational measures to secure the information we store. While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that information, during transmission through the Internet or while stored on our systems or otherwise in our care, is safe from intrusion by others.

The personal data we collect will be stored on secure servers located in the UE.

### **8.2 Duration of storage**

How long we keep information we collect about you depends on the type of information, as described in further detail below.

- (i) We retain your account information for as long as your account is active and a reasonable period thereafter in case you decide to re-activate the Services. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, and to continue to develop and improve our Services.
- (ii) For marketing purposes, if you have elected to receive marketing emails from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our Services. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

After such time, we will either delete or de-identify your information or, if this is not possible, then we will securely store your information and isolate it from any further use until deletion is possible.

The information collected as a processor shall be kept and operated according to the Collector's (the Event Host ) instructions.

## **9. CUSTOMER CONTENT**

Customer content is the information you give us directly through your use of the Services, such as meeting recordings, files, chat logs, and transcripts, and any other information uploaded while

using the Services. We use customer content only in connection with providing the Services – we do not monitor, sell or use customer content for any other purposes. Please keep in mind that Event hosts are the controller, and Hexagon is the processor of the Customer Content.

We do not control the actions of anyone with whom you or any other Service user may choose to share information. Therefore, we cannot and do not guarantee that any customer Content you or any user provides to the Services will not be viewed by unauthorized persons. Nor can we control the information a user may choose to share during a meeting. Please be aware that no security measures are perfect or impenetrable and that we are not responsible for circumvention of any security measures contained on the Services. You should be cautious about the access you provide to others when using the Services, and the information you choose to share when using the Services.

## **10. WHAT ARE YOUR RIGHTS?**

According to the GDPR, the Data Subjects shall have the right to access to data, rectification, erasure, restriction on processing, objection to processing and right to data portability, as follows:

- (i) **Request access to your personal data.** This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- (ii) **Request correction of your personal data.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- (iii) **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.
- (iv) **Request restriction of processing your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- (v) **Object to processing of your personal data.** You may object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.
- (vi) **Right to withdraw consent.** Where we are relying on consent to process your personal data, you may withdraw that consent. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.



For exercising these rights, you may send a written request, dated and signed and send it to Hexagon headquarters mentioned bellow or via email to the data protection officer at [contact@hexagonevents.ro](mailto:contact@hexagonevents.ro)

You also have the right to lodge a complaint with a competent supervisory authority on data protection.

## **11. RETENTION**

We will retain personal data for as long as required to do what we say we will in this agreement, unless a longer retention period is required by applicable law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide our services to you (for example, for as long as you have an account with us or keep using our services);
- Whether we have a legal obligation to keep the data (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Customers can delete their own accounts.

## **12. SECURITY**

We are committed to protecting your personal data. We use reasonable and appropriate technical and organizational measures to protect personal data from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of the personal data.

If you wish to contact us for more details about how we have handled your personal data or to exercise your rights in accordance with the European Union law or with the national law, please contact us at: [contact@hexagonevents.ro](mailto:contact@hexagonevents.ro) or at our headquarters in Romania, Bucharest, 7 Tabacarilor Street, Building Corp B- C 16,.

If you still feel that your personal data has not been handled appropriately and/or according to the law, you can contact the Romanian Data Protection Authority.

## **13. GUIDELINES FOR ESTABLISHING THE LEAD SUPERVISORY AUTHORITY**

Whether acting as a Controller or as a Processor, we have as a Lead Supervisory Authority the Romanian Data Processing Authority, namely **Autoritatea Națională de Supraveghere a Prelucrării Datelor cu Caracter Personal**.

Contact details:

28-30 G-ral. Gheorghe Magheru Boulevard, District 1, Bucharest, Romania  
[anspdcpc@dataprotection.ro](mailto:anspdcpc@dataprotection.ro)

Phone numbers: +40.318.059.211 / +40.318.059.212  
Fax number: +40.318.059.602

#### **14. RESPONSE TO PERSONAL DATA BREACH INCIDENTS**

When we learn of a suspected or actual personal data breach, The Legal Counsel/Lawyer must perform an internal investigation and take appropriate remedial measures in a timely manner. Where there is any risk to the rights and freedoms of data subjects, we must notify the relevant data protection authorities without undue delay and, when possible, within 72 hours after having become aware of the personal data breach.

#### **15. CONFLICTS OF LAW**

This Policy is intended to comply with the laws and regulations in the place of establishment and of the countries in which the Company operates. In the event of any conflict between this Policy and applicable laws and regulations, the latter shall prevail. For clarification purposes, the EU General Data Protection Regulation 2016/679 on the protection of natural persons (GDPR) shall apply as of the 25th of May 2018 in addition to any applicable national law.

#### **16. CONTACT DETAILS**

Data Subject can raise their questions in relation to their rights or to address any questions in relation to this Policy by:

Written notification sent to our headquarter in : headquarters in Romania, Bucharest, 7 Tabacarilor Street, Building Corp B- C 16, OR by contacting us via email at [contact@hexagonevents.ro](mailto:contact@hexagonevents.ro)  
Each request will be reviewed as soon as possible, but no later than 30 days since its submission.

#### **17. DISCLAIMERS**

We reserve the right to modify and update this Policy from time to time. We will send notice of any such modifications in order for you to review our most recent Policy. If you use this website after any such modification or update to this Policy, you consent to those modifications or updates. Modifications will not be applied retroactively.