

Initreon B.V. GDPR Privacy Policy

Initreon is strongly committed to protecting your privacy and complying with your choices. Both personal and non-personal information collected is safeguarded according to the highest privacy and data protection standards adopted worldwide. We have a robust and effective data protection program in place which complies with existing law and abides by the data protection principles. However, we recognise our obligations in updating and expanding this program to meet the demands of the GDPR.

Our Commitment

- Your information will not be shared, rented or sold to any third party.
- We use state-of-the-art security measures to protect your information from unauthorized users.
- We give you the possibility to control the information that you shared with us (opt-out)

Initreon is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step 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 without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

- **NOTICE**

We will clearly inform you when information that personally identifies you ("personal information") is asked for and you will have the choice to provide it or not. Generally, this information is requested when you [install/download/subscribe] to product updates, newsletters or other online services.

- **USAGE**

We use your personal information for the following purposes:

- To provide you information that will allow you to use our services
- To automatically customize your documents with your information
- To alert you of software upgrades, updates, discounts or other services from Initreon

We collect your email when you request information in order to send you informational communications about our services, such as their purpose and the best use you can make of them. We also collect your email to send you our related offers where appropriate.

We may also collect your name, language, operating system, document searched and country information for a better experience with Initreon products / services.

When you place your order with us, we collect your email in order to provide support and related communications. We also collect your phone number in order to contact you in case these emails bounce back because of a typo in your email address and if we cannot figure out what the correct email address is.

We also use our clients' email in order to notify of the release of updated versions of the software, new services or related promotional offers.

- **CONSENT**

When you provide your personal information, you consent that it can be used for the above purposes and that Initreon is an authorized holder of such information. In each promotional communication from us you will have the opportunity to unsubscribe from further communications; alternatively, you may contact us to express your choices at the address provided at the bottom of this page.

- **ACCESS TO YOUR INFORMATION**

You are entitled to review the personal information you have provided us and ensure that it is accurate and current at all times. To review or update this information simply request that we send you this information.

- **SECURITY OF INFORMATION**

Initreon is strongly committed to protecting your information and ensuring that your choices are honored. We have taken strong security measures to protect your data from

loss, misuse, unauthorized access, disclosure, alteration, or destruction. All sensitive data is stored behind multiple security layers on secure servers with restricted employee access.

- **RETENTION OF INFORMATION**

We retain information as long as it is necessary to provide the services requested by you and others, subject to any legal obligations to further retain such information.

Information associated with your account will generally be kept until it is no longer necessary to provide the services or until you ask us to delete it or your account is deleted whichever comes first. Additionally, we may retain information from deleted accounts to comply with the law, prevent fraud, resolve disputes, troubleshoot problems, assist with investigations, enforce the Terms of Use, and take other actions permitted by law. The information we retain will be handled in accordance with this Privacy Policy. Finally, your data could also be stored for sales statistical purposes.

- **EU AND EEA USERS' RIGHTS**

If you are habitually located in the European Union or European Economic Area, you have the right to access, rectify, download or erase your information, as well as the right to restrict and object to certain processing of your information. While some of these rights apply generally, certain rights apply only in certain limited circumstances. We describe these rights below:

You have the right to access your personal data and, if necessary, have it amended or deleted or restricted. In certain instances, you may have the right to the portability of your data. You can also ask us to not send marketing communications and not to use your personal data when we carry out profiling for direct marketing purposes. You can opt out of receiving email newsletters and other marketing communications by following the opt-out instructions provided to you in those emails. Transactional account messages will be unaffected if you opt-out from marketing communications.

- **WHAT WE DO WITH THE INFORMATION YOU SHARE**

Your information is never shared outside the company without your permission. Inside the company, data is stored behind multiple security layers on secure servers with restricted user access.

When you contact us you are asked to provide your contact information, including a valid email address. We use this information to send you updates about Initreon order confirmations and information about our services.

In very rare instances Initreon may disclose your personal information, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on Initreon or the site; (b) protect and defend the rights or property of Initreon and its family of websites and

properties; and (c) act in urgent circumstances to protect the personal safety of users of Initreon, its websites, or the public.

- **HOW TO OPT-OUT**

We provide users with the opportunity to opt-out from receiving updates on our products, newsletters and other communications from us. You can opt-out by clicking on the link provided in our electronic mailings or by contacting us at the address at the bottom of this page.

- **CHANGES TO THIS POLICY**

If we make changes to our Privacy Policy, we will post these changes here so that you are always aware of what information we collect, how we use it and under what circumstances, if any, we disclose it. If at any point we decide to use your information in a manner different from that stated at the time it was collected, we will notify you by email.

- **ENFORCEMENT OF POLICY**

If for some reason you believe Initreon has not adhered to these principles, please notify us and we will do our best to promptly make corrections.

- **QUESTIONS OR COMMENTS**

If you have questions or comments about this privacy policy, please email us or write us at:

Email: hello@initreon.com

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**For more information about how to contact Initreon please visit our
contact page.**