

VeprIT Privacy Policy

v.001 - April 27, 2021

Owner and Data Controller

The VeprIT Privacy Policy describes the privacy practices of VeprIT's apps and websites. VeprIT is registered in the Netherlands, and the laws of the Netherlands apply. With questions please write to contact@veprIT.com.

This Privacy Policy governs data collection, processing and usage practices of VeprIT. The Privacy Policy sets out the basis on which any Personal Data (as defined below) collected from you will be processed by us. You may provide Personal Data through your use of any VeprIT software, applications, SaaS products, any website where this Privacy Policy is posted (a "Website"), or through your downloading, accessing, and/or use of, any third party products or applications we make available for purchase, access and/or use, and codes or trial versions of our products or those of our suppliers ("Products"). This Privacy Policy also describes your choices regarding use, access, and correction of your Personal Data. If you do not agree with the data practices described in this Privacy Policy, you should not use the Products or Website.

This Privacy Policy does not apply to third party websites that you may be able to access via links on the Website, links within Products and/or activities offered by third parties. It applies to the use of Personal Data by VeprIT, for data collected when you download Products through any website of an authorized provider or authorized reseller. VeprIT is not responsible for the collection or use of your Personal Data by any third party when you use other websites or products.

Types of collected data

Personal data may be freely provided by the user, e.g. when filling forms on websites or within apps. For example:

- when downloading or purchasing products
- when contacting us for support, provide feedback, etc.

- when subscribing for a newsletter

In addition, some usage data may be collected automatically when using apps or websites. This mostly includes anonymous technical information collected with the purpose to help you when you contact support. As well as anonymous usage data collected to improve products. The data may include the type of device, operating system, and the apps' usage logs.

With your permission, the apps may access photographs in your Photos Library and/or in files. The photographs or their metadata are only processed on your device and never transferred outside of it. Thus, unless you send us some photos yourself e.g. to facilitate support, we never access your photos.

In addition, among the types of Personal Data that our apps and websites may collect, by themselves or through third parties, there are: cookies, usage data, email address, the Internet Protocol (IP) address used to connect your device to the Internet, browser type and version, and time zone.

In some cases we may receive Personal Data from third party sources, including business partners with which we offer co-branded services or engage in joint marketing activities, resellers and distributors of Products, and social media websites.

Purpose and legal basis for processing personal data

We, either directly or through our processors, may use the collected personal data for the following purposes:

- To fulfill a contract, or to take actions connected to a contract. This applies if you have registered to use our products, both paid and free/trial, or websites. This includes:
 - Providing you with the apps or websites for which you have registered, and any other services or products that you have requested.
 - Verifying your identity and processing payments, using a third party payment processing partner.
 - Sending necessary communications by e-mail or other means. For example, related to your payments or subscriptions.
 - Providing customer service or support.

- As required to conduct our business and pursue our legitimate interests, in particular:
 - Providing you with apps and websites for which you have registered and any other products and services you have requested.
 - Diagnosing problems in our apps and websites.
 - Investigating and responding to any comments, feedback, or complaints that you may send us directly or indirectly (e.g. via social media).
 - Improving security of the apps and websites
 - Detecting, preventing, or otherwise addressing fraud, security or technical issues.
 - Analyzing our apps' and websites' usage and measuring effectiveness to improve them, as well as engage and retain users.
 - Sending you important information about our products and services you registered for.
 - Checking the validity of any payment information you have submitted, such as bank account or credit/debit card number, or other payment method that you have submitted (e.g., PayPal), in order to prevent fraud. Note that we use third parties to resell our Products, process payments and/or fulfill orders, and that they have their own privacy policies which may be in effect with regard to your transactions.
 - Using information in connection with legal claims, compliance, regulatory and investigative purposes. Including disclosure of information as required by law enforcement authorities or any litigation.
- With your consent, or otherwise consistent with your choices:
 - Sending you information about our (or our business partners') products and services, special offers and similar information.
 - Conducting surveys and other market research to collect and analyze information about our customers, their interests, the effectiveness of our marketing campaigns, and customer satisfaction (where your consent is required).
- For legal reasons:
 - Responding to requests by government or law enforcement authorities conducting an investigation.
 - To detect, prevent, or otherwise address fraud, security or technical issues and software piracy. E.g., to confirm that

software is genuine and properly licensed, helping to protect you as well as VeprIT.

Methods and place of processing

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located. Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own.

The Data Controller takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the data.

The data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for. Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner. In particular, Users have the right to do the following:

- **Withdraw their consent.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** You have the right to request that we rectify or delete any Personal Data that we hold about you, unless we have the legal right to retain it, and you may withdraw your consent to our use of your Personal Data. This right does not extend to non-Personal Data. Further, if you request that we erase certain Personal Data required for use of a Product or to enable us to provide services to you, you may no longer be able to use the Product or receive the services.

- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- **Unsubscribe From Our Communications.** You may unsubscribe from our marketing communications by clicking on the “unsubscribe” link located on the bottom of our marketing e-mails, updating your communication preferences, or sending us an e-mail at contact@veprit.com.
- **Complaints.** If for any reason you are not happy with the way that we have handled your Personal Data, please contact us. If you are still unsatisfied, you may bring a claim before the High Court of The Hague.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner at contact@veprit.com.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of Products or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please contact us at contact@veprit.com.

How “Do Not Track” requests are handled

Currently our products and websites do not support “Do Not Track” signals.

To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time. Any changes we make to our Privacy Policy will be posted on this page and when possible, also sent by e-mail. It is strongly recommended to check this page often, referring to the date of the last modification listed at the top. Continued use of the Products and/or Website will signify that you agree to such changes.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.