

## **Odaseva Privacy Policy**

Last Updated: July 1, 2024

Odaseva, together with its affiliates, (collectively, "*Odaseva*", "*Data Controller*", "*we*", "*our*", "*us*") provides data management products and services for salesforce.com applications (collectively, our "*Services*"), we consider privacy and data protection to be of the utmost importance at.

This privacy policy (the "***Privacy Policy***") covers:

- personal information of web visitors provided, collected and/or processed when they access to and use Odaseva-operated websites, including odaseva.com (collectively, the "*Site*"), and
- personal information provided by our customers' authorized users through their use of our Services, including via logins and passwords,

This Privacy Policy is designed to help you understand how, through the Site and through the provision of our Services, we collect, use, and share the personal information of web visitors and customer's authorized users (collectively referred to as: "*User(s)*", "*you*", "*your*") and to help you understand and exercise your privacy rights.

This Privacy Policy does not cover the personal information that our customers may upload to our SaaS platform for use of our Services ("*Customer Data*"). Our customers' respective privacy policies govern the collection and use of Customer Data. Our processing of Customer Data in the name and on behalf of our customers is governed by contractual agreements we have in place with our customers.

If you have any questions or comments regarding this Privacy Policy, please contact us at [data-privacy@odaseva.com](mailto:data-privacy@odaseva.com).

### **1. What is Personal Data?**

"*Personal Data*" is information that, either alone or in combination with other information, identifies you or can be used to identify you. When we combine other information (*i.e.*, information that does not, on its own, identify you) with Personal Data about you, we treat the combined information as Personal Data.

### **2. Our collection of Personal Data through the Site and Services**

The Personal Data provided allows us to:

- enable the Site and the Services to be accessed to and used;
- provide the information requested or the Services;
- send personalized requests or answers by e-mail;
- improve the Users' experience;
- ensure that the content of the Site and the Services is presented in the most effective way possible for Users;
- manage the security of the Site and Services.

We are able to collect Personal Data through:

- your use of and interaction with the Site;
- your use of and interaction with the Services;
- our association with a number of third-party services and organizations involved in the provision of the Site and/or Services;
- automated collection of information from your device, such as your Internet protocol (IP) address, User settings, MAC address, cookie identifiers, mobile carrier, and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider; and
- cookies, pixel tags, and other technologies of Odaseva or authorized third-party contributors to our Site. Cookies use small text files to collect User preferences. Pixel tags (or web beacons) collect information about how you engage with our Site, such as which pages you browsed.

We do not collect Personal Data through your use of any third-party links provided on our Site or with the Services. However, as explained in Section 12, the third-party owners or administrators of those sites may collect and use your information in accordance with their privacy policies.

### 3. What Personal Data Do We Collect and For What Purposes

We may collect the following type of information through your use of the Site and/or of the Services:

- **Contact, Account, and Billing Information:** We process Personal Data that you provide as part of the messages sent through the “*contact*” or “*newsletter*” or “*questions*” or “*demo*” form sections of the Site, and/or through creation and management of our customer’s Services’ account, such as your name, e-mail address, job title, phone number, customer identity and payment information. We process this Personal Data only as necessary to answer your requests on the Site and/or to provide the Services to you under the terms of contractual agreements we have with our customers or for our legitimate interests in providing a Service that meets your needs and expectations. For example, we use this information to bill our customer for your use of the Services; respond to your inquiries regarding the Services; facilitate our account recovery services in the event you forget your log-in credentials; and for other purposes related to the reasons for which you provide Personal Data;
- **Email Address:** We use your email address to contact you from time to time in furtherance of our legitimate interests in providing you with information regarding the Services, such as invoices, payment receipts, and information regarding critical updates to your subscription. Unless you opt out using the process described in Section 6 below, we will also send you a newsletter, as well as information on new features available with an upgrade to your subscription;
- **User ID and Password Information.** We process customers’ authorized Users ID and password information to enable them to log into and use the Services. We process this Personal Data only as necessary to provide the Services to you under the terms of contractual agreements we have with our;
- **IP Address, Header Information, and Audit Trails:** We automatically collect certain

information when you visit our Site, such as IP address and Header Information. We also provide our customers' administrators with detailed audit trails. Header information is information such as browser type, operating system, language, screen resolution, referring URL, etc. provided to our web server by your browser. We have a legitimate interest in using such information to assist in log-in, systems administration purposes, information security and abuse prevention, and to track User trends.

#### 4. **How We Use Cookies and Your Ability to Control Cookies.**

Cookies and similar technologies enable us to personalize the Site and help make our Site load faster (through "load balancing" technology). These technologies may allow us to store and manage your preferences and settings; measure and analyze how you use the Site and effectiveness of our communications; administer the Site, offer targeted products, programs, and services; and help us improve Site, our products, Services, and security.

You have the right to make your own decisions about how cookies are used during your visit to our Site or when you use our Services.

You can tailor your preferences regarding cookies by accepting, rejecting, or deleting cookies in your browser settings at any time. If you clear all types of cookies, some features of our Site and Service may not be available or some functionality may be limited or unavailable it might affect how certain features work.

If you choose to reject cookies or similar technologies, some features of our Site and Service may not be available or some functionality may be limited or unavailable.

#### 5. **To Whom We Disclose Personal Data**

Your Personal Data are collected, processed and used by us, acting as Data Controller. We will not disclose Personal Data about you to third parties, except as set forth in this Privacy Policy or with your prior consent.

This section describes to whom we disclose Personal Data, and for what purposes:

- **Our Service Providers.** We employ service providers to perform tasks on our behalf and to assist us in providing the Site and Services. For more information, please see our [List of Service Providers](#), which may be updated from time to time.
- **Google Analytics.** We use Google Analytics, an analytics service, to help us analyze the traffic on our Site. For more information on Google Analytics' processing of Personal Data, please see "[How Google uses data when you use our partners' sites or apps.](#)";
- **Companies Involved in Mergers and Acquisition Transactions and Other Corporate Reorganizations.** In some cases, Odaseva may choose to buy or sell assets. In these types of transactions, data (including Personal Data) is typically one of the business assets transferred. Moreover, if Odaseva, or substantially all of its assets, were acquired, User data would be one of the assets that is reviewed and transferred or acquired by a third party;
- **Law Enforcement, Government Agencies, Supervisory Authorities and Courts:** We may disclose Personal Data at the request of law enforcement or government agencies or data supervisory authorities or in response to subpoenas, court orders, or

other legal process to establish, protect, or exercise our legal or other rights or to defend against a legal claim or as otherwise required or allowed by law, or to protect the rights, property, or safety of a customer or any other person. We may also disclose Personal Data to investigate or prevent a violation by you of any contractual or other relationship with us or your illegal or harmful activity.

## 6. How You Can Opt-Out

- **Email Opt-Out.** Users may choose not to receive marketing emails from us and can opt out of such e-mails through their account settings or by utilizing the opt-out functionality included in each marketing email.

## 7. International Transfers of Personal Data

All information processed by us may be collected, transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws.

If we transfer your Personal Data out of the European Economic Area (“EEA”), we implement at least one of the two following safeguards:

- we take steps to ensure that the recipient is bound by European Union (“UE”) standard contractual clauses, approved by the European Commission to protect your Personal Data, as well as by appropriate technical or organizational measures to ensure security and confidentiality of your Personal Data.
- we transfer your Personal Data to countries that have been recognized by the European Commission as providing an adequate level of data protection according to EEA standards and to companies in the United States that participate in the Data Privacy Framework Program which provides a legal mechanism for U.S. companies, such as Odaseva.com, Inc. to receive transfers of personal data from the EEA, Switzerland and the United Kingdom. For more information about the Data Privacy Framework (DPF) program, please visit <https://www.dataprivacyframework.gov/>, where you can also verify our participation. Please also see, our statement regarding the Data Privacy Framework Program, provided in [Annex I to this Privacy Policy](#).

In compliance with the principles of the Data Privacy Framework, we commit to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our performance of the Data Privacy Framework Principles should first contact Odaseva at [DPO@odaseva.com](mailto:DPO@odaseva.com). Odaseva has further committed to refer unresolved complaints to JAMS, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please visit JAMS at: <https://www.jamsadr.com/DPF-Dispute-Resolution>. The services of JAMS are provided at no cost to you.

## 8. Your Rights

As Data Controller of the Personal Data collected by or through the Site and in connection with your use of the Services, we take steps to help ensure that you are able to exercise rights regarding Personal Data about you in accordance with applicable law.

If you would like to access, amend, erase, export (*i.e.*, data portability or right to be forgotten), or object to or restrict the processing of Personal Data collected via the Site and/or in connection with your use of the Services, you may submit a request to [data-privacy@odaseva.com](mailto:data-privacy@odaseva.com). We

will promptly review all such requests in accordance with applicable laws. Our opt-out feature, described in Section 6, also enables you to exercise your right to object to certain processing activities.

Depending on where you live, you may have a right to lodge a complaint with a data supervisory authority or other regulatory agency if you believe that we have violated any of the rights concerning Personal Data about you. We encourage you to first reach out to us at [data-privacy@odaseva.com](mailto:data-privacy@odaseva.com), so we have an opportunity to address your concerns directly before you do so.

## **9. Personal Data Relating to Children**

We do not knowingly provide access to the Sites and Services to children under the age of sixteen (16). If we learn that we have collected Personal Data from children, we will promptly take steps to delete such Personal Data.

## **10. Retention of Personal Data**

We will retain Personal Data for the periods strictly necessary to fulfill the purposes for which Personal Data has been collected, as outlined in this Privacy Policy, unless a longer retention period is required by law. We dispose of data, including Personal Data, on a regular schedule.

## **11. How We Protect the Confidentiality and Integrity of Personal Data**

We have implemented security measures to protect Personal Data from loss, misuse, and alteration. We use industry-standard practices such as encrypted storage, firewalls, and password protection systems to safeguard the confidentiality of Personal Data. We take steps to help ensure our employees and contractors are aware of their information security obligations, and we restrict employee and contractor access to Personal Data.

## **12. Links to Third Party Websites**

Our Site may contain links to third party websites. Please be aware that we are not responsible for the privacy practices of third party websites you choose to visit. If you provide any information directly to parties other than us, different rules may apply to the use or disclosure of that information. We encourage you to investigate and ask questions before disclosing Personal Data to third parties.

## **13. Changes to this Privacy Policy**

We may revise and update this Privacy Policy from time to time and will post the updated Privacy Policy to the Site. If these changes are material (*i.e.*, changes we believe you will find important), we will provide notice to you by email or by posting notice of the changes on our Site and/or when you log to the Services. Where required by applicable law, we will obtain your consent. You can see when this Privacy Policy was updated by reviewing the Last Updated legend on the top of this Privacy Policy. **UNLESS OTHERWISE INDICATED, ANY CHANGES TO THIS PRIVACY POLICY WILL APPLY IMMEDIATELY UPON POSTING TO THE SITE.**

## **14. Supplemental Notice for Nevada Residents**

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Information to third parties who intend to license or sell that Personal Information. You can exercise this right by contacting us at [data-privacy@odaseva.com](mailto:data-privacy@odaseva.com) with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account. Please note that we do not currently sell your Personal Information as sales are

defined in Nevada Revised Statutes Chapter 603A.

## 15. Supplemental Notice for California Residents

This Supplemental California Privacy Notice only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 (“CCPA”). The CCPA provides California residents with the right to know what categories of personal information Odaseva has collected about them and whether Odaseva disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding 12 months. California residents can find this information below:

Category of Personal Information Collected by Odaseva	Category of Third Parties Information is Disclosed to for a Business Purpose
<b>Identifiers.</b> A real name, online identifier, Internet Protocol address, email address, account name.	Service providers
<b>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))</b> A name, signature, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information.	Service providers
<b>Commercial information</b> Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Service providers
<b>Internet or other electronic network activity</b> Browsing history, search history, information on a consumer's interaction with an internet website, application, or advertisement.	Service providers
<b>Professional or employment-related information (job applicants only)</b> Current or past job history or performance evaluations.	Service providers

The categories of sources from which we collect personal information and our business and commercial purposes for using personal information are set forth above.

### “Sales” of Personal Information under the CCPA

For purposes of the CCPA, Odaseva does not “sell” personal information, nor do we have actual knowledge of any “sale” of personal information of minors under 16 years of age.

### Additional Privacy Rights for California Residents

**Non-Discrimination.** California residents have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the CCPA.

**Authorized Agent.** Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To designate an authorized agent, please contact us as set forth below.

**Verification.** To protect your privacy, we will take the following steps to verify your identity before fulfilling your request. When you make a request, we will ask you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include your name, email

address, username, and password.

If you are a California resident and would like to exercise any of your rights under the CCPA, please contact us as provided below. We will process such requests in accordance with applicable laws.

**Accessibility.** This Privacy Policy uses industry-standard technologies and was developed in line with the World Wide Web Consortium's Web Content Accessibility Guidelines, version 2.1. If you wish to print this policy, please do so from your web browser or by saving the page as a PDF.

**California Shine the Light.** The California "Shine the Light" law permits Users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed such User's personal information (if any) for the third parties' direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties.

## 16. Supplemental Notice for EU processing and/or EU Residents

The EU data protection laws require a legal basis for our use of Personal Data. Our basis varies depending on the specific purpose for which we use Personal Data:

- performance of a contract: when we provide you with Services or communicate with you about them. This includes when we use your Personal Data to deliver such Services;
- our legitimate interests and the interests of our customers: when we improve our Site and Services, when we detect and prevent fraud and abuse in order to protect our security and the security of our Users;
- your consent: when we ask for your consent to process your Personal Data for a specific purpose that we communicate to you. When you consent to our processing your Personal Data for a specified purpose, you may withdraw your consent at any time and we will stop processing of your data for that purpose;
- compliance with a legal requirement: when we use your Personal Data to comply with laws and/or regulations, depending on the purpose for which we use personal information.

## 17. Contacting Us

If there are any questions regarding this Privacy Policy you may email us at [data-privacy@odaseva.com](mailto:data-privacy@odaseva.com) or contact us using the information below:

Odaseva Technologies SAS  
Attn: Privacy Officer  
144, avenue Charles de Gaulle,  
92200 Neuilly-sur-Seine,  
FRANCE