

PRIVACY POLICY – INCONTROL

This Privacy Policy applies to Incontrol Basic, Professional and Premium user licenses.

This Privacy Policy applies to all the information, including Personal Information, which may be obtained through the use of Incontrol's Services. By using Incontrol's Services, you acknowledge that you agree to this Privacy Policy. If you do not agree to this Privacy Policy, you must not use Incontrol application and its Services. Incontrol is a proprietary software application of Maxd'Oro B.V. (www.maxdoro.nl). The terms "We," "Us," "Our," or "Incontrol" includes Incontrol and Maxd'Oro. It explains how we may collect, use, and disclose information we obtain through "Incontrol's Services." Incontrol processes personal information in compliance with applicable European data protection laws, including the General Data Protection Regulation 2016/679 ("GDPR").

Information We Collect

We collect data about you from a variety of sources, including:

- Information you provide to us directly;
- Information we collect in connection with your use of Incontrol's Services; and
- If applicable, information we collect from Incontrol plug-ins and integrations with third-party products, such as Google Apps, Dropbox and OneDrive.

How We Use Your Information

We use the information we collect to:

- Provide the services you request;
- Communicate with you, including customer support;
- Report anonymized, aggregate usage statistics;
- Deliver marketing and other offers or information related to Incontrol's Services; and
- Improve Incontrol's Services.

How We Share and Disclose Your Information

We do not share your Personal Information with other people or non-affiliated companies for their marketing purposes (including direct marketing purposes). We may use and share Non-Personal Information for our marketing purposes including to display advertisements on other websites. We may share information:

- With our third-party service suppliers and vendors;
- If Incontrol is merged or sold to another company;
- To protect and defend the rights and property of Incontrol (including enforcing our End User Agreement); and
- When required by law.

Definitions

"Incontrol's Services" include the software application (including the desktop(web) application and mobile applications), services, plug-ins, downloadable software, and websites, including www.Incontrol.nl, but not those created by third parties, even when they are accessed through Incontrol.nl or Incontrol's Services.

"Incontrol's Public Services" are Incontrol's Services provided over the public Internet and excludes Incontrol's Services installed on private infrastructure by our clients for their use only.

We consider "Personal Information" to include information that alone or when in combination with other information may be used to readily identify, contact, or locate you, such as: name, address, email address, or phone number. We do not consider Personal Information to include information that has been anonymized so that it does not allow a third party to easily identify a specific individual.

"Non-Personal Information" is all information other than Personal Information.

PRIVACY POLICY – INCONTROL

Information We Collect

Personal Information Collection. Incontrol's Services may collect Personal Information from you, including when you register to evaluate, subscribe or obtain a license to a product or service; purchase a product or service; participate in surveys, contests, or sweepstakes; submit bugs; or contact customer service. The categories of Personal Information Incontrol's Services may collect about you include: your name, email address, username, password, location, and billing and credit card information. Incontrol's Public Services may also collect Personal Information you post while using Incontrol's Services, including in free-text fields or during group chat sessions. You should avoid posting your Personal Information in public areas because that information may be viewable to users of Incontrol's Public Services and possibly the Internet.

Non-Personal Information Collection. Incontrol may collect Non-Personal Information as you use Incontrol's Services. When you use Incontrol's Public Services, Incontrol, third-party service providers (e.g. Google Analytics), and partners may receive and record Non-Personal Information from cookies, server logs, and similar technology from your browser or mobile device, including your IP address. Cookies are small text files that are placed in visitors' computer browsers to uniquely identify and store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, Incontrol's Public Services may not work properly. Incontrol may also use persistent cookies to collect Non-Personal Information for marketing purposes as users browse the Internet. Third-party products to Incontrol's Services are not authorized by Incontrol to collect Personal Information through cookies or similar technologies without your permission. We may combine some Non-Personal Information with the Personal Information we collect. Where we do so, we will treat the combined information as Personal Information if the resulting combination may be

used to readily identify or locate you in the same manner as Personal Information alone.

By using Incontrol's Services, you are authorizing us to gather, parse, and retain data related to the provision and use of Incontrol's Services for our use as described in this Privacy Policy.

Use of Incontrol's Services with Third Party Plug-ins and Integrations. If you choose to use Incontrol's Services in connection with third-party products and services, Incontrol's Services may have access to information from such third party products or services. Incontrol's Services may collect information through your access of the third-party products and services, such as your name, username, email address along with NonPersonal Information about your third party plug-in usage.

Incontrol's Services may also collect information as you use Google Apps or OneDrive. For example, if you choose to embed a Google document into Incontrol's Service, Incontrol may collect information, including the document title, authors, type, ID, and URL. Incontrol's Services collect only links to the content of Google Apps; they do not collect the actual content. For example, Incontrol's Services do not store the contents of email, calendar meetings, or documents from Google Apps.

How We Use Your Information

Internal and Service-Related Usage. We use Personal Information for internal and servicelated purposes only. There are very limited circumstances in which we may provide it to third parties to allow us to facilitate Incontrol's Services.

To Improve Incontrol's Services. We may use any information you provide to:

- Provide customer support;
- Track the types of questions we receive;
- Analyze trends;
- Personalize your experience; and
- Otherwise operate and enhance Incontrol's Services.

PRIVACY POLICY – INCONTROL

Communications. We shall send you a welcome email to verify your account and other transactional emails for operational purposes, such as product information, billing, account management, customer support or system maintenance. You may only stop those emails by terminating your account. We may also send you promotions, product announcements, surveys, newsletters, developer updates, product evaluations, and event information or other marketing or commercial e-mails. You can opt out of receiving these email communications from Incontrol at any time by unsubscribing using the unsubscribe link within each email, updating your e-mail preferences or emailing us to have your contact information removed from our email list or registration database. Although opt-out requests are usually processed immediately, please allow ten (10) business days for a removal request to be processed.

Marketing. We do not rent, sell, or share Personal Information about you with other people or nonaffiliated companies for marketing purposes (including direct marketing purposes) without your permission. We may use and share Non-Personal Information for our marketing purposes, including, without limitation, marketing on other websites. For example, we may use the information to control the number of times you have seen an ad, deliver ads tailored to your interests, and measure the effectiveness of ad campaigns. You can prevent us from tailoring our ads to you on other websites by deleting your cookies.

Aggregate Data. Incontrol may anonymize and aggregate data collected through Incontrol's Services and use it for any purpose, including for research and reporting usage. This anonymized aggregate information may be viewable to other users of Incontrol's Services.

How We Share And Disclose Your Information

Vendors and Suppliers. Incontrol's Services uses Personal Information for internal and servicelated purposes only and may provide it to third parties to allow Incontrol to offer Incontrol's Services. For

example, Incontrol may share billing and credit information with our payment service provider for the purposes of processing payment transactions.

As Required By Law and Similar Disclosures. We may access, preserve, and disclose your Personal Information, other account information, and content if we believe doing so is required by law or if those actions are reasonably necessary to:

- Comply with legal process, such as a court order or subpoena;
- Enforce this Privacy Policy or our End User Agreement;
- Respond to claims that any content violates the rights of third parties;
- Respond to your requests for customer service;
- Respond to law enforcement;
- Investigate and prevent unauthorized transactions or other illegal activities; or
- Protect our or others' rights, property, or personal safety.

Merger, Sale, or Other Asset Transfers. We may disclose information we possess about you as part of a merger, acquisition, sale of company assets, or transition of service to another provider, as well as in the unlikely event of insolvency, bankruptcy, or receivership in which your Personal Information would be transferred as one of the business assets of the company. We do not guarantee that any entity receiving such information in connection with one of these transactions will comply with all terms of this Privacy Policy.

To Others Within Your Organization or with Your Permission. After a person demonstrates proof that he belongs to a certain organization, we may disclose to that person the names of that organization's members who have evaluated or purchased our software. We may also disclose your Personal Information with your permission.

Security Of Your Information

We take steps to ensure that your information is treated securely and in accordance with this

PRIVACY POLICY – INCONTROL

Privacy Policy. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure.

By using Incontrol's Services or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of Incontrol's Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on Incontrol's Services or sending an email to you. You may have a legal right to receive this notice in writing. To receive a free written notice of a security breach (or to withdraw your consent from receiving electronic notice), please notify us at info@maxdoro.nl (attention to our Privacy Officer).

Update And Delete Your Information

You may update or remove some of your information using Incontrol's Services or by sending us your request to info@maxdoro.nl.

International Users

By choosing to visit Incontrol's Services or otherwise providing information to us, you agree that any dispute over privacy or this Privacy Policy will be governed by Dutch law.

If you are visiting from the Australia and the United States or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your Personal Information to the European Union to us. By providing your Personal Information, you consent to any transfer and processing in accordance with this Policy.

You also consent to the adjudication of any disputes arising in connection with us or Incontrol's Services in accordance with the End User Agreement, as applicable.

Additional Information

New Uses of Personal Information and Other Information. From time to time, we may use information, including Personal Information, for new, unanticipated uses not previously disclosed in our Privacy Policy. If our information practices change regarding information previously collected, we will take reasonable efforts to provide notice and obtain consent to any such uses as required by law.

Posting of Revised Privacy Policy. We will post any changes to this Privacy Policy on the website of Incontrol.nl. The revised version will be effective at the time it is posted. If you are concerned about how your information is used, bookmark this page and read this Privacy Policy periodically.

Other Websites, Apps, and Plug-ins. When you navigate away from Incontrol's Services to websites or apps controlled by third parties, you leave Incontrol's Services, at which point this Privacy Policy no longer applies. You will not receive a warning when you leave Incontrol's Services. If you use third-party products available through Incontrol's Services, this Privacy Policy does not control how they collect, use, and disclose information. However, we require third parties who publish their products for distribution through Incontrol's Services to provide privacy notices and agree to reasonably adequate privacy and security measures, as required by law.

If you have questions regarding this Privacy Policy, please email us at info@maxdoro.nl (attention to our Privacy Officer) or write us to the following address:

Maxd'Oro BV
Attn: Privacy Offer
Vanadiumweg 11L
3812Px Amersfoort The
Netherlands.

This Privacy Policy was last updated on 26 June 2018.