

\*Important Information: Please read this Privacy Statement carefully.

# FSS Global Privacy Statement

This Version is Effective May 25, 2018

We understand that the privacy of your information is important to you, and we are committed to being transparent about how we use, share, and protect your information. To help further our commitment, we have developed this Privacy Statement to help you better understand the types of information we collect, why we collect it, how we will use it, and the various options you have to manage the privacy of your personal information.

## Scope of this Privacy Statement

This Privacy Statement describes our privacy practices for information we collect from or about individuals who are located in the European Economic Area (“EEA”) through our services, sites, products, software that are directed to the EEA (collectively, “Services”) and other initiatives directed to the EEA such as marketing and product trainings.

This Privacy Statement only applies where we process personal information about you as a data controller. It does not apply to Services where we process personal information as a data processor on behalf of a controller. When we are a processor, the privacy statement of the relevant controller on whose behalf we process will apply.

This Privacy Statement includes some important information, please take the time to read the entire Privacy Statement. Of course, if you have any questions please reach out to us.

## 1. What Information We Collect.

### Information You Give Us.

- Using our website contact form. When you reach out to us for support give us feedback, participate in optional surveys, product research or trainings, we may collect information that you choose to share.

### Information We Get When You Use the Service.

- Usage Information. We may collect usage information such as the pages you viewed, the features you use, your browser type, error reports, and any links you click on to leave or interact with our Website.
- Location Information. Certain Service features may collect your precise location data, device motion data, or both, if you grant permission to do so in your device settings.
- Content. We may also collect content that you provide through the Services, such as information about your business such as name, industry, location details; content you post on our community pages; content you provide to our customer care agents; and feedback you provide about the Services.
- Information from Cookie and other Technologies. FSS Global and our service providers may use commonly-used tools such as cookies, web beacons, pixels, local shared objects, and similar technologies (collectively, "Cookies") to provide the Service you requested, recognize your visit, track your interactions with our Services, and improve

your and other customers' experience. You have control over some of the data we collect from Cookies and how we use it in the Settings section of your browser.

#### Information We Get From Third Parties

We may also get information about you from other third parties where permitted by applicable law. For example, we receive information from:

- third parties with whom you have an account or receive a service when you: choose to receive marketing or product updates information from them or their partners
- third-party service providers who help us to supplement the information you have provided and to ensure the accuracy of your information. For example, we use third party service providers to validate your mailing address.

#### Required Information

Some of the functionalities in our Service may require you to provide information in order for you to use the Service. If you do not wish to provide the required information, you may not be able to use certain features or the Service. We will try to let you know what information is required and what information is optional. We may also combine information that you provided us with information about you that we get from other sources, in accordance with applicable law.

2. How Do We Use Your Information. We use your information in various ways, including to:

- Provide, Improve, Protect, and Deliver the Services. To provide you with the Services that you have accessed or requested; to personalize your experience; to provide technical support; to protect the security and safety of the Services
- Communicate with You. From time to time we may communicate with you, including to:
  - - provide you with important information about the Services we provide
  - - give you offers for third-party products and services that we think may be of interest to you.
  - - send you information about FSS Global, other FSS Global products and services, special offers, and new product releases.
- Analyze Your Information. We may use both manual and automated systems, such as machine learning and artificial intelligence, to: analyze your information to improve our Services; personalize your experience; automate certain aspects of the Service; provide you certain features; and protect the safety and security of FSS Global, our Services, our customers and others.

In general, we will use the personal information we collect from you only for the purposes described in this Privacy Statement or for purposes we provide at the time we collect your personal information. However, we may also use your personal information for other purposes that are not incompatible with the purposes if and where this is permitted by applicable law. We will provide you with further information on any such additional processing when this happens, in accordance with applicable data protection laws.

3. How We Share Your Information. From time to time, we may need to share your information, but we will only share your personal information for the following reasons:

- With your consent. We may share your personal information with your consent.
- With third parties: We may share your personal information with third parties, but only for the following reasons:
  - - *With your consent.*
  - - *To provide functions and services on our behalf.* We may share your information with third parties who provide various functions on our behalf and enable us to provide our Services and operate our business, such as service providers and business partners.
  - - *For Research.* We may share your information with third-parties for research purposes or to publish academic or policy-related materials. We only share combined, unidentifiable customer data, but only in a way that would not allow the customer or any person to be identified.
  - - *For Joint Sales, Promotions, and Events.* We may share your information with third-parties who are jointly providing sales initiatives, promotions or events with us.
  - - *For legal reasons.* We may share your information with third-parties for legal reasons, including:
    - - when we reasonably believe disclosure is required or permitted in order to comply with a court order, or other applicable law, regulation or legal process;
    - - to protect the rights, property, or safety of FSS Global, our Services, our customers, or others;
    - - to protect against or defend our Services against attacks;
    - - to enforce, remedy, or apply our Terms of Service and other agreements; or
    - - to prevent fraud and for debt collection.
- With our Affiliates and Subsidiaries. We may share your information with and among our affiliates and subsidiaries.
- With Social Media Platforms. Some of our Services enable you to share information on third-party social media platforms, like Facebook, LinkedIn and Twitter. Any information you choose to share on social media may potentially be visible to a global audience and will be subject to the third-party social media provider's privacy policies (not this Privacy Statement). You should take care only to share information on social media that you are comfortable sharing.

#### 4. Processing Personal Information

Our legal basis for collecting and using the personal information described in this Privacy Statement will depend on the type of personal information and the specific context in which we collect it. However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you, including details of any legitimate interest we rely on to process your personal information.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the "How To Contact Us" heading below.

5. What You Can Do To Manage Your Privacy. You have choices when it comes to managing the privacy of your personal information.

- Manage Marketing Communications from us. We honor your choices when it comes to receiving marketing communications from us. To update your preferences (including to opt-in or opt-out of marketing communications) you can respond with STOP to our marketing emails.
- Cookies and Other Tracking Technologies. You can find information on changing your browser settings to opt-out of Cookies in your browser settings.

6. Data Retention.

Unless you specifically ask us to delete your personal information as explained in Section 7 “Your Rights”, we retain your information as long as is necessary to provide you with our Services. Once you have cease using our Services, we will no longer retain your information except to the extent necessary:

- to send you marketing communications in accordance with your marketing preferences (which you can change at any time – see Section 5);
- for our legal or regulatory compliance (e.g. maintaining records of transactions you have made with us), to exercise, establish or defend legal claims, and to protect against fraudulent or abusive activity on our Service; or
- for general product improvement purposes in accordance with this Privacy Statement, provided that any data retained for this purpose will be used only for a limited period and handled securely and in confidence.

If we no longer need your information for the above purposes, we will generally delete or de-identify it in accordance with our standard data retention practices. However, there may be occasions where we are unable to fully delete or de-identify your information due to technical or other operational reasons, for example where your information has been archived onto back-up systems. Where this is the case, we will take reasonable measures to securely isolate your information from any further processing until such time when we are able to delete or de-identify it.

7. Your Rights. You have certain rights with respect to your personal information that we collect and process. We respond to all requests we receive from individuals in the EEA that are using a Service directed to the EEA wishing to exercise their data protection rights in accordance with applicable data protection laws. To file a request or take action on one of your rights, please contact us at the contact details provided under Section 10, “How to Contact Us”.

- Access, Correction or Deletion. You may request access to, correction of, or deletion of your personal information.

Please note that even if you request for your personal information to be deleted, certain aspects may be retained for us to: meet our legal or regulatory compliance (e.g. maintaining records of transactions you have made with us); exercise, establish or defend legal claims; and to protect

against fraudulent or abusive activity on our Service. Data retained for these purposes will be handled as described in Section 6 “Data Retention”, above.

- Objection and Restriction. You may object to our processing of your personal information or ask us to restrict processing of your personal information.
- Portability. You may request portability of your personal information.
- Withdraw Consent. If we have collected and processed your personal information with your consent, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- File a complaint. You have the right to file a complaint with a supervisory authority about our collection and processing of your personal information.

#### 8. Third-Party Services, Links and Integrations.

- Third-Party Services. Third-party products, services and applications may use or integrate with our Services, or otherwise be offered through our Services (“Third-Party Services”). If you choose to use any of these Third-Party Services, your interactions with these Third-Party Services are governed by the privacy statement of the company providing the relevant Third-Party Service.
- Third-Party Advertising and Analytics. FSS Global may use advertising networks and other third -parties to display advertising on our Services or to manage our advertising on other sites. Our third-party partners may place Cookies on our Services and unaffiliated websites in order to serve advertisements that may be relevant to you based on your browsing activities and interests, and to determine the effectiveness of such advertisements. If you wish to opt-out of interest-based advertising, visit [Your Online Choices](#).
- Even if you opt-out of such Cookies or otherwise opt-out of interest-based advertising, you will still receive advertisements, they just won't be tailored to your interests. If you opt-out and later delete your Cookies, use a different browser, or buy a new computer, you may need to renew your opt-out choices.

9. Security of Your Information. We understand that the security of your information is important to you. We provide appropriate technical and organizational security controls to protect your information. But, even with our best efforts, we cannot ensure or warrant the security of your information. You can find out more about how we protect your information and the steps you can take to help protect your information by contacting us using the contact details in section “How to Contact Us”

10. International Data Transfers. We may transfer your personal information to and process and store your information in other countries in compliance with applicable law. Some of these countries may have data protection laws that are different from the laws of your country (and, in some cases, may not be as

protective). However, we have taken appropriate safeguards to require that your personal information remain protected.

11. How to Contact Us. If you have questions or comments about this Privacy Statement or our practices, please contact us:

- Email: [dpo.gdpr@fssglobal.com](mailto:dpo.gdpr@fssglobal.com)
- Direct Mail:  
Art Business Center  
Str. Buzesti Nr. 50-52 Etaj 1  
Sector 1 Bucuresti 011015  
Romania

12. Changes to Our Privacy Statements. From time to time we may change or update our Privacy Statement. We reserve the right to make changes or updates at any time. If we make material changes to the way we process your personal information, we will provide you notice via our Service or by other communication channels, such as by email or community post and if required by applicable data protection laws seek your consent to those material changes.

You can see when this Privacy Statement was last updated by checking the “last updated” date displayed at the top of this Privacy Statement. Please review any changes carefully.

13. Collection and Use of Children’s Personal Information. Our Services are intended for and directed to individuals 18 or over and we do not knowingly collect personal information from minors.