

This is Waves Enterprise AG's privacy notice (last update as of 15 November 2019).

Waves Enterprise AG ("**Company**") respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website <http://wavesmeetup.com/> or its subdomains (collectively "**Website**"), when you attend our events ("**Events**") and tell you about your privacy rights and how the law protects you.

This Privacy Policy explains how we use the personal information that Company collects or generates both in relation to this website and our products and services. We may update this Privacy policy from time to time. The updated version will be indicated by the date of the last update above. If we make material changes to this Privacy Policy we may notify you thereupon by posting a notice at the Website or by sending notification to you directly. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

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1. **BACKGROUND**

1.1 Waves Enterprise AG with its registered office at Bahnhofstrasse 29, 6300 Zug, Switzerland and its affiliates collect and use certain Personal Data. Company is responsible for ensuring that it uses that Personal Data in compliance with data protection laws.

1.2 We respect the privacy of our clients and we are committed to keeping all your Personal Data secure. This Privacy Policy governs the handling of Personal Data by Company in the course of carrying on commercial activities.

1.3 We use the following definitions in this Privacy Policy:

"Company", "we or "us" means Waves Enterprise AG and our affiliates.

"Personal Data" means any data which relates to a living individual who can be identified from that data or from that data and other information which is in the possession of, or is likely to come into the possession of, Company (or its affiliates, representatives or service providers). In addition to factual information, it includes any expression of opinion about an individual and any indication of the intentions of Company or any other person in respect of an individual.

1.4 Waves Enterprise AG is responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice). Our office is situated at Bahnhofstrasse 29, 6300 Zug, Switzerland.

1.5 **Data Protection Officer**

1.6 Waves Enterprise AG has designated a Data Protection Officer - Robert Niedermeier (DPO), who you can reach out to about anything related to your Personal Data processing. You can easily contact our DPO:

via email: mail@legislator.de

1.7 in writing: Hauptstrasse 4, 85579 Neubiberg/ Munich

1.8 You have the right to make a complaint at any time to the Federal Data Protection and Information Commissioner (FDPIC), the Swiss supervisory authority for data protection issues (<https://www.edoeb.admin.ch/edoeb/en/home.html>). We would, however, appreciate the chance to deal with your concerns before you approach the FDPIC so please contact us in the first instance at support@wavesplatform.com.

2. **THE PRODUCTS AND SERVICES WE PROVIDE**

2.1 This Privacy Policy concerns the following categories of information that we collect about you when providing the Website and Company events:

(A) Information we receive through the Website <http://wavesmeetup.com/>;

(B) Information we receive when you participate in or sign up to our events or related activities (any contest, promotional activity, giveaway, events, education, career, partnership offers, including at the Events).

(C) Information we receive when you fill our surveys, forms and inquiries,

(D) Information we receive when you subscribe to our newsletters,

(E) Information we receive when you communicate with our support service, give us feedback (for example, when you communicate with us by customer support form, e-mail, phone, mail or otherwise)

3. **THE TYPES OF PERSONAL DATA WE COLLECT**

3.1 Many of the services offered by Company require us to obtain Personal Data about you in order to perform the services we have been engaged to provide. In relation to each of the services described at paragraph 2.1 above, we will collect and process the following Personal Data about you:

- **Information that you provide to Company.** This includes information about you that you provide to us. The nature of the services you are requesting will determine the kind of Personal Data we might ask for, though such information may include (by way of a non-exhaustive list):
 - basic Personal Data (such as first name; family name; personal email, personal phone number, occupation, job, position in the company; company name; company email address; business phone number; business address; city; postcode; country; social networks profiles) that you provide to us when you

register at the Website, register for Events or otherwise provide us;

- **Information that we collect.** This includes (by way of non-exhaustive list)
 - photos and videos that we may take of you when you participate in the events and other activities organized by us (including at the Events). Participating in the in the events and other activities organized by us (including at the Events) you agree that we may use videos, pictures with you for any purposes (including for marketing of the events and related products and services).
- **Automatically collected Information.** As you interact with our Website, we may automatically collect technical data about your equipment, browser features, browsing actions and patterns This includes (by way of non-exhaustive list):
 - When you visit Company Websites, cookies are used to collect technical information about the services that you use, and how you use them. For more information on the cookies used by Company please see our [Cookie Policy](#) .
 - We automatically collect traffic and customer behavior reports that include information on the Website usage by users (e.g. what webpages of the Website were visited by the user, any documents downloaded, etc.).
- **Information we obtain from other sources.**
 - information that we obtain using Google Analytics, Facebook, Twitter, LinkedIn and other social network websites.
- **Anonymized data**
 - In addition to the categories of Personal Data described above, Company will also process further anonymized information and data that is not processed by reference to a specific individual.

4. **HOW WE USE YOUR INFORMATION**

4.1 Your Personal Data may be stored and processed by us in the following ways and for the following purposes:

- for ongoing review and improvement of the information provided on Company Website, to ensure they are user friendly and secure;
- to allow us to provide you with access to our events and other activities (including promotional and marketing activities);
- to set up customers to use the Website;
- for statistical monitoring and analysis;
- to understand feedback on Company Events, other activities and related products and services and to help provide more information on those events quickly and easily;
- to communicate with you in order to provide you with information about Company Events;
- to understand customer needs and interests;
- for the management and improvement of our business;
- in order to comply with applicable laws, rules and regulations, and internal policies and

procedures.

4.2 When we use your Personal Data we make sure that the usage complies with law and the law allows us and requires us to use Personal Data for a variety of reasons. These include:

- we need to do so in order to perform its contractual obligations with its customers;
- we have obtained your consent;
- we have legal and regulatory obligations that we have to discharge;
- we may need to do so in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- the use of your Personal Data as described is necessary for our legitimate business interests, such as:
 - allowing us to effectively and efficiently manage and develop the operation our business;
 - maintaining compliance with internal policies and procedures;
 - monitoring the use of our copyrighted materials;
 - enabling quick and easy access to information on Company events.

4.3 We will take steps to ensure that the Personal Data is accessed only by employees of Company that have a need to do so for the purposes described in this Privacy Policy.

5. **DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES**

5.1 We may share your Personal Data within the affiliated persons of the Company for the purposes described above.

5.2 We may also share your Personal Data outside of the Company group for the following purposes:

- with our business partners. For example, this could include our partners who assist us with the organization of Company Event(s). These third parties will be subject to appropriate data protection obligations and they will only use your Personal Data as described in this Privacy Policy;
- with third party agents and contractors for the purposes of providing services to us (for example, Company's professional advisors, IT and communications providers, etc.). These third parties will be subject to appropriate data protection obligations and they will only use your Personal Data as described in this Privacy Policy;
- to the extent required by law, for example if we are under a duty to disclose your Personal Data in order to comply with any legal obligation (including, without limitation, in order to comply with court orders, reporting requirements and disclosures to regulators), or to establish, exercise or defend our legal rights;
- if we sell our business or assets, in which case we may need to disclose your Personal Data to the prospective buyer for due diligence purposes; and
- if we are acquired by a third party, in which case the Personal Data held by us about you will be disclosed to the third party buyer.

6. **INTERNATIONAL TRANSFERS OF PERSONAL DATA**

- 6.1 Company conducts its business globally. Our customers and our operations are spread around the world. As a result we collect and transfer Personal Data on a global basis. That means that we may transfer your Personal Data to locations outside of your country or European Economic Area (EEA).
- 6.2 Where we transfer your Personal Data to another country outside the EEA, these countries may have less stringent privacy laws than EEA do, and any information they hold can become subject to their laws and disclosure requirements, including disclosure to governmental bodies, regulatory agencies and private persons. However, we will ensure that transferred Personal Data is protected and transferred in a manner consistent with this Privacy Policy.
- 6.3 You can obtain more details of the protection given to your Personal Data when it is transferred outside EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your Personal Data) by contacting us at support@wavesplatform.com.

7. **HOW WE SAFEGUARD YOUR INFORMATION**

- 7.1 We have extensive controls in place to maintain the security of our information and information systems. Client files are protected with safeguards according to the sensitivity of the relevant information. Appropriate controls (such as restricted access) are placed on our computer systems. Physical access to areas where Personal Data is gathered, processed or stored is limited to authorised employees.
- 7.2 As a condition of employment, Company employees are required to follow all applicable laws and regulations, including in relation to data protection law. Access to sensitive Personal Data is limited to those employees who need to it to perform their roles. Unauthorised use or disclosure of confidential client information by a Company employee is prohibited and may result in disciplinary measures.
- 7.3 When you contact a Company employee about your file, you may be asked for some Personal Data. This type of safeguard is designed to ensure that only you, or someone authorised by you, has access to your file.

8. **HOW LONG WE KEEP YOUR PERSONAL DATA**

- 8.1 How long we will hold your Personal Data for will vary and will be determined by the following criteria:
- the purpose for which we are using it - Company will need to keep the data for as long as is necessary for that purpose; and
 - legal obligations - laws or regulation may set a minimum period for which we have to keep your Personal Data.

9. **YOUR RIGHTS**

- 9.1 In all the above cases in which we collect, use or store your Personal Data, you may

have the following rights and, in most cases, you can exercise them free of charge. These rights include:

- the right to obtain information regarding the processing of your Personal Data and access to the Personal Data which we hold about you;
- the right to withdraw your consent to the processing of your Personal Data at any time. Please note, however, that we may still be entitled to process your Personal Data if we have another legitimate reason for doing so. For example, we may need to retain Personal Data to comply with a legal obligation;
- in some circumstances, the right to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible;
- the right to request that we rectify your Personal Data if it is inaccurate or incomplete;
- the right to request that we erase your Personal Data in certain circumstances. Please note that there may be circumstances where you ask us to erase your Personal Data but we are legally entitled to retain it;
- the right to object to, or request that we restrict, our processing of your Personal Data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your Personal Data but we are legally entitled to refuse that request; and
- other rights stipulated by law.

9.2 You can exercise your rights by contacting us using the details listed in paragraph 11 below.

10. **QUESTIONS AND CONCERNS**

10.1 If you have any questions or concerns about Company's handling of your Personal Data, or about this Policy, please contact us using the following contact information:

Address: Bahnhofstrasse 29, 6300 Zug, Switzerland

Email Address: support@wavesplatform.com