

LUMEON Limited (Lumeon)  
PRIVACY POLICY

The Capitalised terms used in this Privacy Policy shall have the meanings attributed to them in the Standard Terms and Conditions, if not defined otherwise in this Privacy Policy.

LUMEON is committed to protecting and respecting your privacy.

This policy (together with our standard terms and conditions and any other documents referred to in it) sets out the basis on which any Client Data or other Information ("Information") we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practises regarding your personal data and how we will treat it. By visiting our website (<https://www.lumeon.com>) and/or purchasing one of our Products and/or Services you are accepting and consenting to the practices described in this Privacy Policy.

For the purpose of the Data Protection Act 1998 (the **Act**), the data processor is Lumeon Ltd of 10 Leake St, London, SE1 7NN, United Kingdom.

Our nominated representative for the purpose of the Act is our Information Security and Governance Lead Employee.

**1. INFORMATION COLLECTED**

1.1 Information you give us. You may choose to give us Information directly in a variety of situations. The Information you give us may include your name, company name, contact details, billing name and address, credit card number when communicating with us, when you register on our website or purchase our Products and/or Services or for financial qualifications and billing information. Information, accessible through Lumeon's Product(s) and Services offering (such as a Software-as-a-Service environment, test, development and production environment), is additionally provided to us. You may also give us, your name, professional qualifications and summaries of your research when publishing Content.

1.2 Information we collect about you. We may collect Information relating to your use of our website and Product and Service offerings through the use of commonly-use Information gathering tools, such as cookies or similar technologies. When you visit our website or access our Products or Services, we may log certain Information that your browser sends us, such as your IP address, browser type and language, access time, and referring website addresses, and we also collect additional Information when you are logged into the website or using our Products and/or Services. Such Information may be anonymous or it may be associated with you or your company. We may also use such technologies to determine whether you've opened an e-mail or clicked on a link contained in an e-mail. Collecting Information in this manner allows us to collect statistics about the usage and effectiveness of our website, our Products and/or Services, personalise your experience and tailor our interactions with you. More information about the use of cookies and similar technologies is provided below.

**2. USE OF INFORMATION**

We use Information held about you in the following ways:

Information may be used and accessed by technical staff to fulfill the requirements specified in the standard terms and conditions and any other documents referred to in it such as monitoring the system performance, testing the systems and developing and implementing upgrades to systems. Any temporary copies of Information created as a necessary part of this process are only maintained and stored for time periods relevant to those purposes. Information is used to provide and maintain the Products and/or Services, including but not limited to provide account access, service notifications, facilitate payments and for other purposes related to use of the Products and/ or Services. Lumeon may also be required to provide Client Data to comply with legally mandated reportings, disclosure or other legal process requirements. Lumeon reserves a limited right to disclose any Client Data we receive if required by law or valid order of a court or other governmental authority, or if needed to protect the health and safety of Lumeon's employees, a client's employees, or the general public. We may also use, copy, distribute internally and extract, compile, synthesize, analyse and otherwise make derivative works of the Information for the following purposes, including but not limited to: marketing, operating and improving our Services, creating new offerings, support, troubleshooting issues, and debugging. Information about your website use may be used to provide personalized Information about available Services and other offerings from Lumeon and our partners. Notwithstanding the foregoing, sensitive personal data will not be used, copied, distributed, extracted, analysed or otherwise made derivative works of for marketing and operating purposes.

Information we receive from other sources. We will combine this Information with Information you give to us and Information we collect about you. We will use this Information and the combined Information for the purposes set out above (depending on the types of Information we receive).

### **3. DISCLOSURE OF YOUR INFORMATION**

You agree that we have the right to share your Information with:

- 3.1 Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- 3.2 Service Providers, Consultants and Marketing Providers. Lumeon works with other companies that help us run our business. These companies, or service providers, provide services such as processing credit card payments, and sending e-mails on our behalf. Some service providers will have access to your Information, with the exception of sensitive personal data, in order to provide services to you on our behalf, but we do not permit them to use your Information for their own purposes. In addition, we may partner with other companies to jointly offer Products and/or Services. If you purchase or express interest in such a jointly-offered Product and/or Service, we may share Information collected in connection with your purchase or expression of interest with those partners. We do not control our business partners' use of Information, and their use of such Information will be in accordance with their own privacy policies. If you do not wish for your Information to be shared in this manner, you should not purchase or inquire about such jointly-offered Products and/or Services. Service providers who manage credit card processing will store, retain, and use billing information for the purpose of credit card processing on our behalf.

3.3 Analytics and search engine providers that assist us in the improvement and optimisation of our website, Product(s) and/or Services. These providers may use cookies, web beacons, SDKs, and other technologies to identify your device when you visit our website and use our Product(s) and/or Services. More information about the use of cookies and similar technologies is provided below.

3.4 Links to Non-Lumeon website and Third Party Applications

Lumeon may provide links or embed third-party applications that allow you to interact with other websites on which you may have accounts (such as LinkedIn and other social media sites) or join communities on such sites. The links and third-party applications allow you to login, post content or join communities from our websites.

Your use of these links and applications is subject to the third parties' privacy policies, and you should become familiar with the third party sites' privacy policies before using the links or applications.

Lumeon is not responsible for the privacy practices or the content of those other websites.

3.5 Required by Law. Lumeon may use or disclose Information if required by law or if Lumeon in good faith believes that use or disclosure is necessary to protect Lumeon's rights, or to comply with a judicial proceeding, court order, or other legal process.

3.6 Merger, Sale or Acquisition. In connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing or acquisition of Lumeon or substantially all of its assets, Information held by us about our customers will be one of the discussed and transferred assets. Notwithstanding the foregoing, sensitive personal data will not be shared for merger, sale or acquisition.

3.7 In an aggregated and/or anonymised form which cannot reasonably be used to identify you.

3.8 No other Uses. Except as provided for in this Privacy Policy, we do not share, sell, rent, or trade any Information provided with third parties for promotional purposes.

**4. DATA STORAGE AND TRANSFER**

To facilitate our global operations, Lumeon may share Information about you within Lumeon and transfer, process and store the Information described in this Statement outside EEA such as the United States and other countries (such countries to include but not limited to countries where the Client and the Authorised Users are located). In the event that one of these countries may have less protective data protection laws, we will take appropriate measures to protect your Information in accordance with this Statement.

In some cases, Lumeon uses suppliers located in various countries to collect, use, analyze, and otherwise process Information on its behalf. It is Lumeon's practice to require such suppliers to handle Information in a manner consistent with Lumeon's policies.

In circumstances where payment transactions are required, the Information will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access

certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of Information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your Information, we will use strict procedures and security features to try to prevent unauthorised access.

Circumstances may arise where, whether for strategic or other business reasons, Lumeon decides to sell, buy, merge or otherwise reorganize businesses in some countries. Such a transaction may involve the disclosure of Information to prospective or actual purchasers, or the receipt of such Information from sellers. It is Lumeon's practice to seek appropriate protection for Information in these types of transactions.

Please be aware that in certain circumstances, Information may be subject to disclosure to government agencies pursuant to judicial proceeding, court order, or legal process. We may also share your Information to protect the rights or property of Lumeon, our business partners, suppliers or Clients, and others when we have reasonable grounds to believe that such rights or property have been or could be affected.

## **5. YOUR RIGHTS**

5.1 Account Information. You may correct your account Information at any time by logging into your online or in-app account. If you wish to cancel your account Information, please email Lumeon at [support@lumeon.com](mailto:support@lumeon.com). Please note that in some cases we may retain certain Information about you as required by law or for legitimate business purposes to the extent permitted by law.

5.2 Marketing. You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your Information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise this right at any time by contacting us at [marketing@lumeon.com](mailto:marketing@lumeon.com).

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

5.3 Contact Information. We may also seek permission for our app's collection and syncing of contact Information from your device per the permission system used by your mobile operating system.

## **6. COOKIES AND SIMILAR TECHNOLOGIES**

As mentioned above, we collect Information from your visits to our Web sites and your use of our Product(s) and/or Services. We do so through the use of various technologies, including

session-based and persistent-based cookies, application performance management tools, log files, audit tables, scripts, tags and local storage (HTML5) beacons.

Session based cookies exist only during one session and disappear from your computer when you close your browser software or turn off your computer. Session cookies are required to use the Product(s) and/or Services. Session cookies allow Lumeon to continually verify your identity once you are logged into the Product(s) and/or Services and to process your online transactions and requests. Persistent cookies remain on your computer after you close your browser or turn off your computer. All cookies are secured using standard encryption. The persistent cookies are used to identify browsers, store user preferences, current and successive visits. Lumeon is careful about the security and confidentiality of the information stored in persistent cookies. Lumeon does not store account numbers or passwords in persistent cookies. Lumeon may use information from session and persistent cookies in combination with Client Data to provide you with information about Lumeon and Lumeon's and our partners offerings. Lumeon may also use persistent cookies and internet record your choice of language and country location. You can set your browser in most instances to notify you before you receive a cookie, giving you the chance to decide whether to accept it or not. You can also generally set your browser to turn off cookies. Lumeon recommends to leave the cookies in our Product(s) and/or Service turned on, in order to use the Product(s) and Services.

Lumeon uses web beacons alone or in connection with cookies to compile information about your usage of the Product(s) and/or Services and interaction with e-mails from Lumeon. Web beacons are electronic transmissions that can recognize certain types of information on your computer, such as cookies, or when you viewed a particular web page. We use the information from web beacons to operate and improve the Product(s), Services and our email communications, and to provide you with information about Lumeon and our Product(s) and Services or our partner's services.

We may also include Web beacons in marketing e-mail messages or our newsletters in order to determine whether messages have been opened and links contained within clicked on.

For more information about the technologies employed by our Product(s) and/or Services, including how to turn them off, please consult the user guide for the particular Product or Service offering you are using.

Lumeon does not control third party tracking technologies, such as cookies and web beacons which may be used on our websites, Products or Services to analyse and log certain information to assist us in the improvement and optimisation of our website, Product(s) and/or Services.

## **7. SECURITY**

Lumeon's access to Client Data is based on job role/responsibility. Client Data residing in Lumeon's Products are controlled via an access control list (ACL) mechanism, as well as the use of an account management framework. Lumeon uses commercially reasonable administrative, technical and physical security measures to protect Client Data including but not limited to the encryption of certain sensitive personal information. Please refer to the security section in your contract for more information. As Lumeon's Clients control access to Client Data by its end-users, end-users should direct any requests related to their personal information to Lumeon's Clients.

## 8. **EU-US PRIVACY SHIELD**

Lumeon complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Lumeon has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

Lumeon is responsible for the processing of personal data it receives, under the Privacy Shield Frameworks, and subsequently transfers to a third party acting as an agent on its behalf. Lumeon complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, Lumeon is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Lumeon may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

In compliance with the Privacy Shield Principles, Lumeon commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Lumeon at:

Legal Department - [Privacy@lumeon.com](mailto:Privacy@lumeon.com)

Lumeon has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning data transferred from the EU.

## 9. **FINALLY, AS A LAST RESORT AND UNDER LIMITED CIRCUMSTANCES, EU INDIVIDUALS WITH RESIDUAL PRIVACY COMPLAINTS MAY INVOKE A BINDING ARBITRATION OPTION BEFORE THE PRIVACY SHIELD PANEL.****CHANGES TO OUR PRIVACY POLICY**

Any changes we make to our privacy policy in the future will be posted on our website and, where material changes have been made, notify you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## 10. **CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [privacy@lumeon.com](mailto:privacy@lumeon.com).