

SCHRÉDER PRIVACY NOTICE
FOR THE SCHRÉDER EXEDRA IOT PLATFORM

1. PURPOSE AND SCOPE

At Schröder ("**Schröder**" or "**we**" or "**us**"), we are committed to protecting your privacy and we value the relationship with our business partners, customers and any party interested in our business.

This Privacy Notice (the "**Notice**") applies to the Users ("**you**") accessing the User Interface of the Schröder EXEDRA IoT Platform (hereafter the "**UI**"), and outlines the types of Personal Data ("**Information**") we collect and process with our UI, how Information are used and otherwise Processed and safeguarded, to whom we may disclose them as well as your rights in relation to your Information.

For ease of reference, all capitalized terms that are not defined in the body of this Notice are defined in Section 11 below.

2. WHO IS RESPONSIBLE FOR YOUR INFORMATION?

Your organization (Customer) has signed an agreement with an Affiliate of Schröder SA with regards to subscription and access to the Schröder EXEDRA IoT Platform. Schröder SA is a global company, operating through its Affiliates, with headquarters in Belgium, at Rue de Lusambo 67, 1190 Brussels. The Schröder EXEDRA IoT Platform and your Information is operated by the Schröder Affiliate with whom the Customer has signed an agreement, by Schröder SA and by its Affiliates (notably the business unit Schröder Hyperion who manages the UI - customersuccesssteam@schreder.com).

Consequently, Schröder SA, acting as a controlling undertaking, and its Affiliates will be jointly responsible for your Information and will collaborate, to the extent necessary, to comply with all obligations under Applicable Laws.

3. WHAT INFORMATION?

Schröder will process Information from you in relation to your access to the UI and the provision of the Services. Please note that if you choose not to provide us with your Information, we may be unable to give you access to the UI, to register you and provide you with the requested Services.

a) Categories of Information we will collect directly from you on the UI in order to provide you with the Services:

- Name and surname
- Login information:
 - E-mail address (that will act as the User name)
 - Password
- Telephone number (to enable specific features of the UI, such as the alert and messaging system)
- Language preferences (which will be by default the language preference of your Tenant)

b) Schröder will collect following Information by automated means:

- User session information.

Schröder also collects data, directly from you, about your use of our Services automatically according to our Cookie Notice.

For more information on the cookies used on the UI, please read our Cookies Notice.

4. LEGAL BASIS AND PURPOSE OF PROCESSING

a) We use Information listed above for the following purposes:

- To provide you access to and enable you to use the UI;
- To administrate the UI;
- To communicate with you and to respond to questions that you have asked;
- To provide you support;
- To communicate changes to this Notice;
- To provide, maintain, operate and improve continuously our Services;
- To activate, manage and provide access to the online account for which you have registered;

- To maintain the UI secure and investigate fraudulent activities, if any;
- To communicate/notify security notifications, (technical) alerts (eg. via SMS) and Updates to you.

- b) We process your Information on various legal basis such as:
- Fulfilling our contractual obligations to provide you with the Services; and/or
 - Complying with our legal or statutory obligation; and/or
 - Your consent, as the case may be; and/or
 - Our legitimate interest as outlined above.

Should you provide us with Information **related to another data subject**, for example by inviting a new User in your Tenant, you confirm that you have a legal basis to do so (consent or another lawful basis, as the case may be) to share such Information with us and that you have made the information in this Notice available to this other data subject.

5. HOW WE MAY SHARE THE INFORMATION WE COLLECT?

We will not share, sell, license, trade or rent your Information to or with any Third Party (except as stated below) without your consent.

We will only share Information as follows:

- a) **Affiliates:** We share Information within the Affiliates of Schröder SA.
- b) **Law enforcement purposes:** We disclose Information if requested or required by government authorities (such as law enforcement authorities, courts, and/or regulators) or otherwise to comply with a legal obligation. In addition, we also disclose Information collected in order to exercise or protect legal rights or defense against legal claims.
- c) **Our Third-Party service providers, agents and distributors ("Service Providers"):** We share Information with our Services Providers who provide services to us or on our behalf. These Service Providers are contractually prohibited from using your Information for any purpose other than to provide their assistance, from sharing Information we disclosed to them and are required to protect your Information.
- d) **Transfer of Information outside of the European Economic Area ("EEA") -** If the GDPR applies to you: We may transfer Information to certain Affiliates located outside the EEA. Such transfer will take place based on our Intra-Group Data Transfer Agreement. Transfer to other Third Parties outside the EEA will take place using a data transfer mechanism in accordance with GDPR standards.
- e) **Fraud prevention:** We disclose Information when disclosure is necessary to investigate, prevent, or respond to suspected illegal or fraudulent activity or to protect the safety, rights, or property of our Customers, Users, others and/or us.

6. HOW LONG WE RETAIN YOUR INFORMATION

We will retain your Information for as long as necessary to perform the purpose(s) outlined above or to comply with a legal obligation, or for the establishment, exercise or defense of a legal claim in accordance with Applicable Laws.

7. YOUR RIGHTS

The GDPR and other Applicable Laws provide certain rights to you. Those rights may vary depending on your location and are subject to various conditions under Applicable Laws. In certain cases, the exercise of your rights may make it impossible for us to achieve the purposes identified at section 4.

Should you want to assert your rights, please see **section 9** below.

We will do our best to provide you with the requested information within the legal deadline. However, if access cannot be provided within a reasonable time frame, we will provide you with an explanation and a date when the information will be provided. If for some reason access is denied, we will provide you with an explanation as to why access has been denied.

Where Applicable Laws so provide, the following rights apply to you:

- a) **Access:** You have the right to obtain confirmation whether we Process your Information and to obtain a copy of your Personal Data;

- b) **Rectification:** You have the right to request the rectification of any inaccurate Personal Data and to have incomplete Personal Data completed;
- c) **Objection:** You have the right to object to the Processing of your Personal Data; At any time, you have the right to object to the Processing of your Personal Data for direct marketing purposes;
- d) **Portability:** You may receive your Personal Data provided to us, in a structured, commonly used and machine-readable format; In addition, you have the right to have your Personal Data transmitted, where technically feasible, to other Data Controllers without hindrance; This right only exists if the Processing is based on your consent or a contract and the processing is carried out by automated means;
- e) **Restriction:** You may request the restriction of the Processing of your Personal Data in accordance with Article 18 paragraph 1, a) to d) of GDPR or with any provision of another Applicable Laws providing you with such right;
- f) **Erasure:** You may request the erasure of your Personal Data if it is no longer necessary for the purposes for which it was collected or when you have withdrawn your consent and no other legal ground for the Processing exists or when you objected and no overriding legitimate grounds for the Processing exists or when the Processing is unlawful or erasure is required to comply with a legal obligation;
- g) **Right to lodge a complaint:** You also have the right to lodge a complaint with the competent Supervisory Authority and before the competent courts;
- h) **Right to refuse or withdraw consent:** In case the processing of Information is based on your consent, you are free to refuse to give such consent and you can withdraw your consent at any time without any adverse negative consequences; The lawfulness of any Processing of your Personal Data that occurred prior to the withdrawal of your consent will not be affected;
- i) **Opt-out:** You can always 'opt-out' of any communications should you prefer not to receive them in the future by using the "unsubscribe" facility provided in the communication itself;
- j) **Right against discrimination:** You will have the right to not be discriminated against for exercising your rights under the Applicable Law.

8. CHILDREN INFORMATION

The UI is not intended for Users under the age of 16. We do not knowingly collect or Process any Information from children under the age of 16. If we become aware that a person submitting Information is under 16, we will attempt to delete the Information as soon as possible.

Users hereby represent that they are at least 16 or at an age to provide valid consent in their country.

9. CONTACT

For any right you would like to exercise or for any question you might have about the way we process your Information, please contact us at customersuccess@schreder.com. In case of complaint about this Notice or legal request about your rights, please contact win@schreder.com.

10. AMENDMENTS TO THIS NOTICE

We may update this Notice from time to time in accordance with legal requirements and/or any changes to our Information management practices. When required, we will notify you about such change. A copy of the latest version of this Notice will always be available on this page.

11. DEFINITIONS

Affiliates: refers to Schröder S.A.' affiliates, which are entities under common ownership or control of Schröder S.A.

Applicable Laws: means any applicable national data protection and privacy laws and, to the extent applicable, the GDPR.

Controller: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and the means of the processing of Personal Data.

Customer: means the customer (legal entity) to whom we provide the Services.

GDPR: means the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation).

Personal Data: means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Notice: means this Privacy Notice.

Processing, Process or Processed: means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Processor: means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller.

Services: means the services related to Schröder EXEDRA IoT Platform provided by or on behalf of Schröder, as ordered by the Customer.

Supervisory Authority: refers to the national public supervisory authority that is competent for supervising and enforcing compliance with any national data protection laws within its jurisdiction.

Third Party or Third Parties: means a natural or legal person, public authority, agency or body other than the data subject (User), Controller, Processor and persons (including our Service Provider) who, under the direct authority of the Controller or Processor, are authorised to process Personal Data.

User: means an individual accessing the UI. Users are deemed part of the organization of Customer and authorized by it to access the UI.