

# Privacy Policy

## 1. Introduction

The privacy and confidentiality of your information is AMgrade's top priority. The Privacy Policy (Policy) will advise you about how we protect your information. Please read this policy carefully. This Policy applies to your use of AMgrade website at <https://amgrade.com/> and <https://amgrade.nl/> and all other web resources, developed by AMgrade and published on the Internet. This Policy does not apply to any other websites, used by AMgrade, but not controlled by AMgrade. By using our Website and reading this Policy, you confirm your acceptance for our using of your personal data, and you are deemed notified of such processing. If you do not agree to the processing of your data, please do not use the Website. We may need to change this Policy from time to time, so you should refer back to this Policy regularly. Your use of the Website after changes have been made shall be deemed to be your acceptance of any changes.

## 2. Information we may collect and how we may use it

We only collect information about you that is necessary for us to allow you to use the Website, and only to the extent specifically provided in this Policy. By using the Website, you consent to the collection, use, disclosure and other forms of processing of your information in the manner, provided in this Policy.

### 2.1. Information we obtain from you

Examples of personal data that we may collect from you are the following: full name, record of communication, language skills, e-mail, phone number, location, interests.

When you contact us via the request form, we keep a record of your communication to help us solve issues you might be facing. We may use your e-mail or phone address to inform you about our services, such as letting you know about upcoming changes or improvements.

### 2.2. Information we may obtain from your use of our Website

We may collect the following information about you:

- information about your device(s), in particular, hardware model, version of the operating system, mobile network information;

- login information, such as details regarding how you use our Website, frequency and duration of your visits, search information, internet protocol address, cookies. The “cookies” may be used by us to help us manage the Website and provide functionality and customized messages to you, but we do not provide this information to third parties, except as required by law. AMgrade also uses session cookies. These are not permanent cookies, and are removed when your browser closes or your computer is powered off. For more information on the cookies being used on the Website and how you can opt out, please visit the Cookies info page [https://docs.google.com/document/d/178zF6QZx56A2xbdIFGaxqLX9SDmpdZ2T\\_ozk0fFAax8](https://docs.google.com/document/d/178zF6QZx56A2xbdIFGaxqLX9SDmpdZ2T_ozk0fFAax8)

### 2.3. Processing personal data of children

This site is not meant for children under 16 and does not knowingly collect any personal data from children under 16.

## 3. Purposes of processing

We use all your personal data only for the following purposes:

- operate, provide, improve, and maintain our Website and services;
- prevent abusive and fraudulent use of our Website and services;
- respond to your inquiries and for other customer service purposes;
- monitor aggregate Website usage metrics such as total number of visitors and pages viewed;
- remember your information so that you will not have to re-enter it the next time you visit the Website;
- for other administrative and internal business purposes.

In case the purpose of processing will be changed to a contradictory purpose, we will obtain additional consent from you for the processing.

## 4. Security of your personal data

AMgrade uses a variety of security measures to keep your personal data protected from unauthorised access and disclosure. For more details, please contact our team via email or any other contact information.

## 5. Principles of processing your personal data

We process your personal data based on the following principles of fairness and lawfulness:

### 5.1. Fairness and lawfulness

We process your personal data only after obtaining your consent for the processing, and for a determined specific purpose, unless otherwise expressly specified by law. AMgrade has developed clear procedures regarding the processing of personal data based on lawfulness.

### 5.2. Transparency

We process your personal data in a fair and transparent manner, and only with your knowledge and in respect of your given rights.

### 5.3. Purpose limitation

We ensure that your personal data is only processed within the purposes as outlined in the consent form and only by those AMgrade employees needed to be involved in the processing operations to fulfil these purposes. Subsequent changes to the purpose are only possible to a limited extent, and require substantiation and your additional consent.

We will ask for your consent before using information for a purpose other than is set out in this Policy.

### 5.4. Data minimization

We collect and process only your personal data if actually needed in order to achieve its processing purposes. AMgrade also does not retain your personal data longer than is required to achieve the relevant purposes.

### 5.5. Accuracy

Personal data must be accurate and, where necessary, kept up-to-date. We take every reasonable step to ensure that your data, when inaccurate or incomplete, is either erased or corrected. We ensure that inaccurate or misleading data will be corrected as soon as possible.

### 5.6. Storage limitation

AMgrade is limiting the storage scope and time to a level appropriate and necessary to fulfill the purposes of the processing of your data in line with your consent. Therefore, we have specified limited periods for personal data storage.

## 5.7. Integrity and confidentiality

We acknowledge personal data to be subject to data secrecy. Our priority is to secure the confidentiality and integrity of your processed personal data. AMgrade secures your personal data with suitable organisational and technical measures to prevent unauthorised access, illegal processing or distribution, as well as accidental loss, modification or destruction.

## 5.8. Accountability

We will be responsible for and be able to demonstrate compliance with the aforesaid six data protection principles.

# 6. How we process your personal data

We may process your data by way of collecting, recording, organising, storing, using, structuring, adapting or altering, retrieving, consulting, disclosing by transmission, disseminating or otherwise making available, aligning or combining, restricting, and erasing or destructing. We may transfer your personal data to our subsidiaries, in which case they are obliged to provide you with an adequate level of personal data protection. We will not transfer personal data of the European Economic Area residents out of the European Economic Area without reasonably ensuring that your rights and freedoms as a data subject are protected and that you are informed of such transfer. We do not sell or pass your personal data to a third party for the purposes of direct marketing.

# 7. Where we store your personal data

All your personal data, collected by us, is stored within the information technology systems, owned and operated by AMgrade, and in the cloud systems. Once we receive your information, we will use all reasonable procedures and security measures to avoid unauthorised access, loss, disclosure or amendment of the received data.

# 8. Disclosure of your information

We are using our best efforts not to intentionally disclose any information about you to any third party without having received your written consent. However, we will have to release specific information about you, if necessary, in relation to the services, provided to you, or to comply with any valid legal process such as a search warrant, subpoena, statute or court order. We will also have to release specific information in special cases, such as if there is an attempted breach of the security of the Website, or to report to the legal enforcement officials any activities that we

reasonably believe to be unlawful. While AMgrade maintains the secure Website, you should know that computer use may be monitored by third parties, such as network administrators, employers, internet providers, operation system and Internet browser vendors, and thus we cannot guarantee the security of information you post online. You disclose all information online at your own risk. Please remember that the Website may be hosted outside your home country, and your email communications to us may be directed to a server outside your home country. Communications over the Internet may not be secure.

## 9. Third-party content/links

Users will find content and products of other companies or organisations on our Website and/or links to the websites and services of our suppliers, licensors or other third parties. While we make reasonable efforts to monitor the websites or services, we do not control them. Each such third party is solely responsible for complying with the laws, rules and regulations applicable to its business and operation of its website. We are not responsible for the privacy practices, the content, or the legal and regulatory compliance of such websites or their owners and operators. These websites and services may have their own privacy policies and customer service policies, or no policies at all. We encourage you to review the privacy policies of any third party websites before providing your information to them.

## 10. Your privacy rights

We provide you with data protection rights, prescribed by the European Union laws, in particular the General Data Protection Regulation, and the relevant national laws. You have, for example, the following rights.

- the right to obtain any information about the processed personal data within one month;
- the right to access your personal data;
- the right to correct or erase your personal data;
- the right to be aware of any correction or erasure of your personal data, restriction of processing, and recipients of personal data;
- the right to object to the processing of your personal data;
- the right of data portability;
- the right not to be subject to a decision, based solely on the automated processing; and
- the right to lodge a complaint with a data protection authority.

You may exercise these rights by sending a request to [data.privacy@amgrade.com](mailto:data.privacy@amgrade.com)