

Metapace Privacy Policy

Our privacy policy ("**Privacy Policy**") details the procedures involved in collecting, processing, using, and disclosing the data that is collected through our website, <https://metapace.io/>, or any other digital property of **Metapace** exhibiting this Privacy Policy (collectively, the "Sites"), as well as our content-discovery platforms, analytics tools, feeds, widgets, and other software system tools that may be provided through our Sites or via third-party websites (collectively, the "**Services**").

Read this information carefully so that you understand how we process personal data and what your rights are.

We may collect data from or about you or your device, including personal information ("**Information**"), when you visit the Sites or use or interact with any of our Services. This Information will be processed as explained in this Privacy Policy.

Categories of data subjects

Our Privacy Policy applies to and addresses the following categories of data subjects:

a. Customers

Included in this category are project parties, users or other content providers who are in a contractual agreement with Metapace.

b. Users

Included in this category are visitors of Metapace Customers' websites and digital properties associated with Metapace's services.

c. Site Visitors

Included in this category are visitors of **Metapace**.

d. Customer Representatives

Included in this category are individuals who act as legal or, as the case may be, conventional representatives of Metapace Customers.

Consequently, the relevant information for each of these main categories has been segregated into three different sections that are featured below. The Information which concerns and applies to all three of the aforementioned categories is included in our Privacy Policy in Section 4.

Table of contents

[1. Customers Section](#)

2. Users Section
3. Site Visitors
4. General Provisions That Apply to Customers, Users, and Site Visitors
5. Our Contact Information
6. Modifications to This Privacy Policy

7. 1. Customers

1.1 Information Collected from Customers ("Customer Information")

Customer Information represents data that we directly collect from our Customers. In order to provide the Services, we may process, directly or through our providers, your personal data, such as:

- **General data:** first name, last name, country of residency, residence address, e-mail;
- **Identity data** (processed on our behalf through collaborations with third-party vendors): ID Type (Passport/Identity Card/Residence permit), identity document photograph(s), document number, date of issue, date of expiry, personal code, birth date, nationality, gender, scan ID, identification date and method, face photograph(s);
- **Financial data** (processed on our behalf through collaborations with third-party vendors): bank account, payment card details, and billing address;
- **Transaction data:** details about payments to and from you and other information about the Services you have purchased from us;
- **Profile data:** username, account number (client ID), and password;
- **Technical and usage data** (any Personal Data we collect as part of your cookies setting, namely online identifiers): cookie identifier, IP address, browser type and version, time zone settings and location, your login history, operating system and platform, time zone setting, information about your visit (the webpages accessed while browsing our Sites, the links that redirected the visitor to our Sites, the accessing dates and times, language settings, Java script objects, mouse movement, and other diagnostic data)
- **Marketing and communications data:** your preferences in receiving marketing from our third parties and us, your communication responses, messages, and other types of data collected as a result of e-mail tracking (frequency, reporting of how often, for how long, and what actions are taken on an e-mail sent by us).

Also, following the provision of the identity document, we have access to a series of personal data present on the identity card, but not necessary for the purpose of data processing, such as religion, signature, and fingerprint. This data will not be collected, used, or processed in any way.

We may also collect information from potential Customers through publicly available sources.

From your personal data, we may collect and use aggregate data, such as statistical or demographic data, based on our legitimate interests to understand and improve the interaction of our services with our customers. Legally, aggregated data may be derived from your personal data but is not considered personal data as this data does not directly or indirectly reveal your identity.

How we collect your data

If you are a **Customer**, we may collect your personal data from the following sources:

- Through <https://metapace.io/> , when you register as a Customer or use our Services;
- Through e-mail when you communicate with us;
- Through information that you provide to us and from third-party sources such as Companies House or other public registers/institutions from where we can collect data about companies, for due diligence and onboarding purposes;
- When you visit our Sites; and/or
- When you provide us with your marketing preferences.

We use Google reCAPTCHA, a service provided by Google Inc. ("Google"). reCAPTCHA is used to check whether the data entered on our website has been entered by a human or by an automated program. To do this, reCAPTCHA analyzes the behavior of the website visitor based on various characteristics. This analysis starts automatically as soon as the website visitor enters the website. For the analysis, reCAPTCHA evaluates various information (e.g., IP address, how long the visitor has been on the website, or mouse movements made by the user). The data collected during the analysis will be forwarded to Google.

We process the data based on our legitimate interest in protecting our Site from abusive automated crawling and spam (in accordance with Article 6 (1) (f) of the GDPR).

For more information about Google reCAPTCHA, please read our Cookie Policy.

1.2 How Customer Information Is Used

The Customer Information we collect might be used for several purposes:

- **Service Provision.** To provide our Customers with the Services of our Sites or for other customer service purposes. The lawful basis we rely on to use your personal data is the performance of a contract and our legitimate interest to ensure the quality of our services, know our Customers, and ensure adequate performance of the contract, as well as documentation of such performance. Moreover, our specific legal obligations may also apply with respect to the use of specific payment methods and evidence of such payments.

- **Billing for the product or services and adequately documenting accountancy operations:** To issue relevant invoices and charge the amounts due by our Customers. The lawful bases we rely on are: our legitimate interest to manage the accountability in our business, audit compliance with regulatory requirements, and our legal obligations to adequately document accounting operations;
- **Security and protection:** To ensure the adequate security of the website and the confidentiality of our Customers' data. The lawful basis we rely on to use your personal data is our legitimate interest to comply with specific security standards and obligations, including data protection-related ones.
- **Client Communication.** To reach and communicate with our Customers regarding Customers' accounts via e-mail or other means of communication. The lawful basis we rely on to use your personal data is our legitimate interest in managing our relationships with Customers;
- **Customer care.** To answer general Customer queries, requests, or complaints. The lawful basis we rely on to use your personal data is our legitimate interest to manage our customer requests/complaints and keep adequate proof of such to defend our rights and interests;
- **Keep our Customers' updated.** To provide Customers with news, pieces of advice, or other information that is useful or of interest based on their communications preferences. The lawful basis we rely on to use your personal data is our legitimate interest to keep our Customers informed and connected with our services;
- **Reporting:** to know our Customers' features, our services' development and evolution, our business particularities and movement from one period to another. The lawful basis we rely on to use your personal data is our legitimate interest to monitor our business evolution and to ensure its compliance with relevant internal/regulatory requirements and, as the case may be, to comply with legal obligations imposing reporting of specific data;
- **Fraud prevention:** to adequately identify our Customers upon onboarding and to assist our payment services providers in complying with their AML obligations. The lawful basis we rely on to use your personal data is our legitimate interest to ensure we enter into a contractual relationship with real and serious Customers and that we can collaborate with our payment services providers and relevant banks to provide our services. Through our personal identification service provider, we use an automated system that detects users from third countries presenting risk from an anti-money laundering perspective. Such users are automatically blocked based on IP and cannot use our services. The lawful basis we rely on to use your personal data is our legitimate interest to ensure compliance with AML requirements set by our financial services providers.

- **Campaign success and customers' interest measurement:** we use tracking technologies in our e-mails so that we can monitor when the e-mails are opened and also evaluate the performance of our campaigns. The lawful basis we rely on to use your personal data is your consent. For additional information on our cookies, please visit our Cookie Policy.
- **Marketing and Advertising Purposes.** To offer newsletters, exclusive deals, and promotions to our Customers either via e-mail or other methods, and to contact them regarding products or services that we think are in accordance with their interests; for general updates regarding Metapace's activity and services; also, for other marketing and advertising purposes. All of the Information sent to us will comply with the communications preferences of our Customers. The lawful bases we rely on to use your personal data are: our legitimate interest to promote our activity to you via e-mail/post/live calls; our legitimate interest to develop and improve our services and to better know our Customers; your consent for the marketing communications sent to you via e-mail, SMS, social media, MMS, and other similar communication channels.

1.3 How Customer Information Is Disclosed

Our collected Customer Information may be disclosed to the following parties:

- **Metapace's Affiliates.** Current or future affiliates of Metapace, as well as parent companies or subsidiaries, may receive some of our Customers' Information for the purposes expressed in this Privacy Policy.
- **Metapace's Service Providers.** Customer Information may also be disclosed to our third-party vendors, service providers, agents, contractors, or other services that perform various tasks on our platform in our interest, respectively maintenance, data analysis, surveys, e-mail marketing, data hosting, fraud detection, and payment processing.
- **Customers.** Customer Information may be disclosed to other Customers if this is relevant to the Service we provide. For instance, our publishers may receive Information regarding possible advertisers on their network, or we may offer our advertisers Information about which publishers' sites their ads have appeared on.

1.4 Customer Options and Actions

Customers may have the possibility of performing certain actions with regard to the Information provided to us, such as accessing, updating, or modifying their data. These actions can be accomplished either by changing their account data, sending an e-mail to their dedicated account manager, or directly sending us an e-mail at contact@metapace.io.

E-mails with promotional or informational content may be sent from time to time to our Customers based on the communications preferences they've opted for. Customers may choose not to receive such communications by completing the instructions provided in their e-mail. Please take into consideration that opt-out requests may have a processing time of up to ten (10) business days.

You may still receive e-mails concerning your account or any requested or received Services from us, even if you have opted out from receiving promotional or informational e-mails.

1.5. How Long We Keep Customer information

We will not keep your Personal Data for any longer than necessary. When deciding how long to keep your Personal Data, we consider factors including:

- our contractual obligations and rights in relation to the Personal Data involved (including the Terms of Service);
- legal obligation(s) under applicable law to retain data for a certain period of time;
- whether we relied on your consent to use the Personal Data, but you have since withdrawn your consent;
- statute of limitations under applicable law(s);
- our legitimate interests where we have carried out balancing tests;
- fraud and risk management;
- (potential) disputes; and
- guidelines issued by relevant data protection authorities.

The personal data will be deleted at the customer's written request or if Metapace considers that such a measure is required (according to the Terms and Conditions). The deletion process will be complete in seven (7) calendar days, at the end of which the data subject will receive written confirmation regarding the deletion of the data.

Upon approval of the request to delete data, Metapace will take all the necessary measures to ensure the deletion of data from all databases, including providers and affiliates. Deleting data from these databases can sometimes last up to two (2) or three (3) months for technical and data security reasons.

In some cases, personal data must be kept to fulfill a legal obligation or a legitimate interest. In these cases, we will inform you that we will not be able to comply with the data deletion request. These concern the data collected from the identity document mentioned above, the data regarding the transactions carried out in the platform, as well as other financial data. Our records will keep these personal data for up to ten (10) years.

Also, personal data related to your request will be kept in our records for four (4) years based on our legitimate interest to prove the facilitation of the rights of the data subjects and to defend our rights in the event of a subsequent dispute.

To make your request, please contact us at contact@metapace.io.

8. 2. Users

2.1 Information Collected from Users ("User Information")

What data do we collect

- data regarding the device and operating system of the User;
- IP address;
- the web pages visited within our Customers' websites;
- the link that brought the User to a Customer's website;
- the accessing dates and times on a Customer's website;
- event information (e.g., system crashes);
- the geographic location of the User's internet service provider (i.e., country, city);
- other diagnostic data.

How we collect your data

If you are a User, we may collect your personal data from the following sources:

- Automatically, when Users come into contact with the Services featured on the websites of our Customers and other digital properties. This User Information is collected through the use of cookies and other technologies employed by most web-based services.
- User data may also be obtained from our data partners (accredited or authorized institutions are able to request such documents).

Please note that Metapace collects data only in a pseudonymized form, meaning your identity is concealed from us as **we do not know or process your name, e-mail address, or other relevant personal data**.

To find out additional information regarding our use of cookies and other technologies, please consult our **Cookie Policy**.

2.2 How Our User Information Is Used

Our collected User Information may be used for the purposes featured down below:

- **Service Provision.** For the purpose of providing our services to our Users and Customers. Our Customers are asked to acquire consent on our behalf to allow us to collect this User Information (whenever it's required by applicable data protection laws).
- **Content Customization.** For the purpose of customizing and personalizing the content and information that we may deliver or feature to Users; retargeting content to Users via our Services; personalizing our Services' user experience. The lawful basis we rely on to use your personal data is your consent, in accordance with Article 6 (1) (a) of the GDPR. For additional information regarding the personalization of our content, please access the Interest-Based Advertising section of this Privacy Policy.

- **Content Personalization for Multiple Devices.** For the purpose of offering an improved user experience for an all-encompassing variety of browsers and devices (e.g., smartphones, tablets, PCs) with better-targeted ad campaigns. We aim to provide the same quality, user experience, and personalized content, whether you are using a web browser or a mobile app. To achieve this, we may sync cookies and identifiers with our service providers or Customers that already have this implementation so that our Users can benefit from improved data and data segments and gain insight into other customers from the market. The lawful basis we rely on to use your personal data is your consent, in accordance with Article 6 (1) (a) of the GDPR.
- **Providing Data Segments for Targeting Content and Advertisements for Services of Possible Interest.** We may provide our Customers with several data segments (groups of Users with common attributes) either from us or from our data partners (accredited or authorized institutions are able to request such documents) to help them gain exposure to Users that have a higher chance of showing interest in their content and ads. When forming segments, we do not base our creation process on sensitive information (e.g., race, ethnicity, religious affiliations, health status, genetic or biometric data, sex life, or sexual preferences). Our Customers may use, via our Services, several standard health-related segments which focus on non-sensitive issues that mostly concern general health and well-being or over-the-counter treatments. We may also provide standard finance-related segments that are about Users who have an interest in financial services. The lawful basis we rely on to use your personal data is your consent, in accordance with Article 6 (1) (a) of the GDPR.

2.3 How Our User Information Is Disclosed

Our User Information may be disclosed to the following parties:

- **Metapace's Affiliates.** Any of the existing or future Affiliates, parent companies, or subsidiaries of Metapace may receive User Information for data processing according to this Privacy Policy's designated purposes.
- **Metapace's Service Providers.** Our vendors, service providers, agents, contractors, or other parties that provide our platform with services (e.g., maintenance, data analysis, surveys, payment and credit card processing, data hosting, etc.) may receive User Information on our part.
- **Third Parties with No Affiliation.** User Information may be disclosed to other third-parties that hold no affiliation with Metapace, such as (i) our data partners (accredited or authorized institutions are able to request such documents) so that we can enable our advertisers to offer targeted content to specific audience segments, and (ii) our programmatic demand and supply partners (accredited or authorized institutions are able to request such documents) so that we can offer personalized advertisements.

- **Customers.** User Information may be disclosed to the Customers that have a Service we think might benefit from such information. For instance, publishers may receive from us data regarding the viewing and click-through patterns of their content, and advertisers may receive conversion rates data that they can use for analytics.

2.4 How to Access Your Metapace User Information

You are able to submit a request to access the personal information Metapace may hold about you, as well as to correct, delete, erase your personal data, and restrict how this Information is processed. To make your request, please contact us at contact@metapace.io.

2.5 Interest-Based Advertising

We may provide advertisements to you via our Services and the Services provided to our Customers in accordance with your recent browsing behavior across various Customer platforms, browsers, or devices.

For example, if you first visit a certain website, then the next websites you will be visiting will feature personalized content related to the content of the first website you have accessed.

We may employ the use of cookies, JavaScript, web beacons (including clear GIFs), HTML5 local storage, and other technologies in order to provide you with relevant advertisements about products and services that are of possible interest to you. Please read our Cookie Policy to find out more information regarding the technologies we use.

Third parties, such as ad networks, may also be used to display advertisements derived from your online browsing behavior. This will enable advertisers to present advertisements that target items and services in relation to your interests.

In order to measure the effectiveness of ads and personalized content for you, our third-party ad networks, advertiser Customers (and their affiliate content providers and agents), and/or traffic tracking services may also employ the use of technologies, including, but not limited to, cookies, JavaScript, web beacons (as well as clear GIFs), and Flash LSOs. The privacy policy which these third-party cookies and other technologies follow are those of a third-party entity that manages them, not this one.

We will require your consent for such processing in accordance with Article 6 (1) (a) of the GDPR.

For queries regarding our collection and use of data for interest-based advertising purposes, please contact us at contact@metapace.io.

2.6 How We Keep User information

For ad-related purposes, User Information may be held for twelve (12) months since the User last interacted with our Services, after which we will de-identify the information by removing unique identifiers or aggregating the data.

The resulting de-identified or aggregated data may also be held by us to be used for reporting and analysis during the entire period it is of commercial necessity. This type of data cannot be

used for the identification of an individual or device. Opt-out data may be retained for longer than twelve (12) months in order to track and keep active the opt-outs that have been requested, but no longer than necessary.

2.7 Children

Our data collecting and advertising is not knowingly targeted toward websites that have, as their audience, children under the age of eighteen (18).

3. Site Visitors

3.1 Site Visitor Data Collection

What data do we collect

- We will collect the information submitted to us when you send us an e-mail with an inquiry or a form on our Sites that confirms you want to receive marketing materials or e-mail newsletters.
- Any Personal Data we collect as part of your cookies setting, namely operating system, IP address, system configuration, device information, mobile data information, your visited web pages within our Sites, the link that redirected you to our Sites, what site you visited when you left our Sites, the accessing dates and times, event information (e.g., system crashes) and weblog data.
- Other Visitor Information that you have sent to us may be collected, including the contents of a message sent via our Sites.

How we collect your data

If you are a **Site Visitor**, we may collect your personal data from the following sources:

- **Directly from You.** Site Visitor Information may be collected by Metapace directly from you when you send us an e-mail with an inquiry or a form on our Sites that confirms you want to receive marketing materials or e-mail newsletters. The data inputted into these fields before submitting the forms may be recorded by third-party analytics.
- **From Third Parties:** Site Visitor Information may also be collected by Metapace through third-parties that automatically do so on our behalf when you access our Site.

To find out additional information regarding the use of cookies and other technologies, please read our Cookie Policy.

3.2 How Site Visitor Information Is Used

Your Site Visitor Information may be used by us for the following purposes:

- **Service Provision.** For the purpose of providing the Services of our Sites, as well as for management motives. The lawful basis we rely on to use your personal data is the performance of a contract and our legitimate interest to ensure the quality of our services, know our Visitors, and ensure adequate performance of the contract, as well as documentation of such performance.
- **Content Personalization.** For the purpose of offering personalized content and data to you when you visit our Sites and to give you a tailored browsing experience. The lawful basis we rely on to use your personal data is your consent.
- **Communication Purposes.** In order to communicate with you and to respond to your questions or complaints regarding our Services through e-mail or to offer you news, pieces of advice, or other updates we deem are of interest to you. The lawful basis we rely on to use your personal data is your consent and our legitimate interest to manage our relationship with visitors.
- **Marketing and Advertising.** To send and contact you about services and materials that we believe might be of interest to you, such as newsletters, exclusive offers, and promotional services, as well as for other purposes that involve marketing and advertising. All of the information we will send will be compliant with the communications preferences set by you. The lawful bases we rely on to use your personal data are: our legitimate interest to promote our activity to you via post/live calls; our legitimate interest to develop and improve our services and to better know our Visitors; your consent for the marketing communications sent to you via e-mail, SMS, social media, MMS, and other similar communication channels.
- **Analytical Purposes.** To have an ampler insight on how our Sites are accessed and used at an aggregated and individualized level; to offer our response to any demands and preferences; and to analyze and research how our site is used. The lawful basis we rely on to use your personal data is your consent.

3.3 How Site Visitor Information Is Disclosed

Site Visitor Information may be disclosed by Metapace to the following parties:

- **Metapace's Affiliates.** Any of the existing or future Affiliates, parent companies, or sub-branches of Metapace may receive Site Visitor Information for the processing purposes detailed in this Privacy Policy.
- **Metapace's Service Providers.** Third-party service providers, such as vendors, agents, contractors, or other entities that perform services for our platform (e.g., maintenance, data analysis, surveys, payment and credit card processing, data hosting, etc.) may receive Site Visitor Information from us.

3.4 Third-Party Online Advertising

We may collaborate with third-parties that employ their proprietary cookies, web beacons, and other technologies which record Site Visitors' online activities, either on our Sites and/or other

sites, so that we can provide personalized advertisements that are suited to your interests.

Advertisers and ad networks are some of the included third-parties that may gather data upon your view or interaction with their advertisements and may also collect Information on your web browsing activities either on our Sites or other different sites.

The ad placement of Metapace is based on the principle that they should be featured in places that are of interest and have the most relevance to visitors. By enabling ad networks to place their own cookies when our Sites receive a visitor, we are able to place our ads organically.

Ad networks are able to identify past visitors of Metapace's Sites through the use of these cookies. The ad network will be able to deliver a Metapace advertisement on any of its new ad spaces on a third-party website to the same individual that visited the Metapace Sites, as its cookies recorded his activity and noted his interest in Metapace.

To find out more details regarding the collection of Site Visitor Information through third parties, please read our Cookie Policy.

3.5 How Long We Keep Site Visitor information

We will not keep your Personal Data for any longer than necessary, after which we will de-identify the information by removing unique identifiers or aggregating the data.

The resulting de-identified or aggregated data may also be held by us to be used for reporting and analysis during the entire period it is of commercial necessity. This type of data cannot be used for the identification of an individual or device. When deciding how long to keep your Personal Data, we consider factors including:

- our contractual obligations and rights in relation to the Personal Data involved (including the Terms of Service);
- legal obligation(s) under applicable law to retain data for a certain period of time;
- whether we relied on your consent to use the Personal Data, but you have since withdrawn your consent;
- statute of limitations under applicable law(s);
- our legitimate interests where we have carried out balancing tests;
- fraud and risk management;
- (potential) disputes; and
- guidelines issued by relevant data protection authorities.

4. General Provisions That Apply to Customers, Users and Site Visitors

4.1 How Your Information Is Used

In addition to the purposes aforementioned in Sections 1-3, we may use data collected from Customers, Users, and Site Visitors for several other purposes:

- **Service Analysis.** To improve our comprehension of how our Sites and Services are accessed and used at an aggregated and individualized level; to offer our response to Customers', Users', and Site Visitors' demands and preferences; and to perform other analysis and research involving our Sites usage. The lawful bases we rely on to use your personal data are your consent and our legitimate interest to improve our Services.
- **Legal Compliance.** To achieve full compliance with the laws set forth by legal authorities or other governmental regulatory bodies. The lawful bases we rely on to use your personal data are our legal obligations and our legitimate interests to ensure compliance with legal requirements applicable to us.
- **Protection of Rights and Interests.** With the purpose of protecting our rights and interests, and, by extension, the rights and interests of our Customers, Users, Site Visitors, and the general public, in addition to the enforcement of our Privacy Policy and our Terms of Service. The lawful bases we rely on to use your personal data are: our legitimate interest to exercise and defend our rights in the context of particular disputes/complaints; our Users' /Visitors' /Customers' legitimate interest to exercise/defend their rights.

4.2 Information Disclosure

Third parties that receive Information collected from us, as mentioned above, are required to agree and comply with this Privacy Policy and our contractual specifications in order to use the Information provided by us and are not allowed to use said information in other contexts or for other purposes than those underlined in this Privacy Policy.

Additional Information disclosures may be made for the following purposes:

- **Business Acquisitions or Transfers.** In case of our company' s acquisition or merger by/with another company, or if our business unit or assets are sold or transferred to another company, in the context of bankruptcy events or other business transmissions, we reserve the right to disclose and/or transfer Information to the company in question.
- **Compliance with Legal Matters.** Information may be disclosed if it is required by law via legal procedures, such as subpoenas, court orders, or other laws, regulations, or judicial proceedings.
- **Protection of Rights and Interests.** If we believe that an investigation, prevention, or action against illegal activities is required, we may disclose Information in order to combat cases such as suspected fraud attempts, potential threats to personal safety, breaches of our Terms of Service or this Privacy Policy, or to provide them as evidence in court cases in which we are involved.
- **De-identified and Aggregated Data.** Our Customers and other third-parties may receive aggregated or de-identified user Information to be processed for purposes such as marketing, advertising, or research.

4.3 Tracking Technologies: Cookies and Others

We use cookies and similar technologies on our websites and applications for analysis purposes and to personalize the audience. Certain cookies or similar technologies are necessary for the proper functioning of our sites (so-called "necessary cookies") or to ensure their performance (so-called "performance cookies").

We also use cookies for online advertising tailored to your interests (so-called "interest-based advertising") to provide you with relevant advertising. This can be done on Metapace sites, as well as through other online media channels, such as social networking sites.

We may also combine and correlate the data collected through cookies or other similar technologies with other data collected by us.

If you do not want such processing through cookies and similar technologies, see the Cookie Use Policy available. That policy explains how to control cookies and how you can object to the collection and processing of data through these technologies.

Depending on the categories of cookies, we rely on (i) Metapace' s legitimate interest in ensuring that our services function properly (for "necessary cookies") or (ii) Users' permission (for "performance cookies" and "interest-based advertising").

Furthermore, links to third-party websites may be embedded in our Sites and Services. The use and access of these websites are not in compliance with this Privacy Policy but with the privacy policies set forth by the third-party websites. We absolve ourselves from any responsibility regarding the information security and privacy practices employed by these third-party websites.

Our Sites, for instance, incorporate features from third-party social networking platforms, such as the "Like" button from Facebook. When using such features, they may collect certain Information, including, but not limited to, the IP address or the pages visited within our Sites, and may also deploy a cookie to enable the feature to have proper functionality. Features and widgets from social media networks either have third-party hosting or direct hosting on our Sites.

The interaction with these features falls under the privacy policy of the providing company of said features. Links to Customers' websites are not governed by this Privacy Policy but by the Customers' privacy policy.

4.4 Storage of personal data

Metapace has implemented policies and rules regarding the retention of personal data in compliance with the principles set out in the legislation on the protection of personal data. Retention periods are reviewed periodically to ensure that we do not store or otherwise process your data unless necessary.

In general, we will retain your personal data (1) for the duration of your account, plus a certain period which may vary from case to case according to our retention policy) or (2) for the duration provided by law or established by a public authority, in accordance with the law, or (3)

in case of disputes/complaints/investigations, until their termination, plus a reasonable period (depending on the circumstances) After the expiry of this period, personal data will be destroyed, deleted, or irreversibly anonymized (as appropriate).

4.5 Security

The Information collected through our Sites or Services is secured through the application of proper technical and organizational procedures in order to prevent the data from being lost, altered, misused, accessed, or disclosed by unauthorized entities, destroyed, removed, or any other type of unofficial activities.

Please keep in mind that no security implementations can provide complete security.

4.6 Notice to European Economic Area ("EEA") Residents

4.6.1 Data Controller

The personal Information of EEA residents which has been provided, collected by or for, or processed by Metapace in relation to our Services, will be controlled by Sevio.

4.6.2 Legal Basis for Data Collection and Processing

The legal basis for collecting and using the personal Information of European Economic Area Customers, Site Visitors, or Users (denoted in this Section 4.6 as "EEA Data") will vary according to the type of personal Information collected and the specific circumstance in which the collection took place.

We will only collect Information from you for the following purposes: (i) when we have your consent; (ii) to establish a contractual agreement with you; (iii) when processing is in our legitimate interest, and this does not come into conflict with your data rights, interests, and liberties. We may be legally required to collect personal Information from you in certain cases or may need the personal data to ensure the protection of your own or another individual's personal interests.

In case of a legal requirement or establishing a contract with you, we will clearly state, at the right time, when and if it is compulsory for you to provide us with your personal Information (you will also be informed of the possible consequences of refusing to supply the required personal Information). The same applies should we require to collect and use your personal Information for our own legitimate interests (or any of our third parties), as we will explain to you, in due time, what these specific interests are.

Should you have additional questions or require further information regarding the legal basis on which your Personal Information is processed and used, and to have a better understanding of how our legitimate data processing interest affects your data protection rights and freedoms, please reach out to us by filling out our contact form.

4.6.3 Personal Rights on Information

In accordance with applicable data protection laws, regulations, guidelines, and policies, you may exercise the following rights in connection with your personal data. Sevio makes every effort to keep your personal data safe.

Your Rights

Right of access: You can obtain confirmation from us that we process your personal data, as well as information on the specifics of the processing such as: purpose, categories of personal data processed, recipients of the data, the period for which the data is kept, the existence of the right of rectification, deletion, or restriction of the processing.

You have the right to request a copy of the personal data that Metapace holds about you.

To make this request as an authorized individual or third-party, please send it by e-mail to the address mentioned below. Alternatively, you can contact our Customer Service team. In order to exercise this right, please note that we may ask you for additional information in order to identify you so as not to mislead essential information by mistake to third parties.

The right to rectify personal data: You have the right to rectify the data held about you if they are incorrect. If the data we hold about you needs to be updated or if you think it may be incorrect, you can contact our Customer Service.

The right to data portability: You have the right, where we process your data via automated means, based on your consent or for contract performance, to ask us to provide you with your own data that you have provided to us in a commonly used electronic format. For example, Metapace ensures that you can access your own data via your Account.

The right to revoke your permissions for marketing messages (commercial communications): If you no longer wish to receive marketing messages (commercial communications) from Metapace, you may opt-out of all marketing communications or only the selected methods (e.g., e-mail notifications).

There are various ways to opt out of receiving marketing messages (to oppose the processing of personal data for marketing purposes, including profiling):

- Log in to the My Account section to manage your permissions;
- Contact our Customer Care team;
- Click the link at the end of an e-mail or marketing text to unsubscribe.

If you opt out of marketing messages, this does not mean that you will no longer receive functional messages. These messages do not fall into the category of commercial communications, and as such, you will continue to receive them.

Do you want to disable a cookie or understand more about it? Consult the Cookie Policy on our website for complete details in this regard.

For any other processing carried out under your agreement, you may withdraw your permission at any time by contacting us at any of our contact details listed in Section 5.

The right to object to the use of personal data: In certain circumstances, you have the right to object to Metapace's processing of your personal data. Depending on the specific situation, if we have legitimate interests in processing that prevail over your interests, rights, and freedoms, or if we need data for the establishment, exercise, or defense in formal proceedings, we may further process your data for correlative purposes.

In the case of the processing of your data for marketing purposes/correlative purposes based on legitimate interest, you can object at any time. In these cases, we will immediately stop processing your data.

The right to make a complaint to a supervisory authority: You have the right to file a complaint to a data protection authority regarding our collection, use, and processing of your personal data. If you are interested in finding out more, please communicate with your local data protection authority by contacting them through the methods described here.

Should you have queries regarding our collection and use of your personal Information, please contact us first at contact@metapace.io.

Users that want to find out more about the personal Information and behavioral Information Metapace may hold about them, and the enforcement of their personal Information rights can request such Information by sending us an e-mail at contact@metapace.io so that we may provide them with the answers they are seeking or direct this request to/cooperate with their employer, if needed.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is manifestly unfounded or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

The statutory period under GDPR for us to reply to a legitimate request is one month. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

4.6.4 EEA Data and Global Data Transfers

As mentioned above, in order to provide our services, we may disclose your personal data to our contractors (Metapace's Affiliates, parent companies, and/or subsidiaries), who may be located both in the EU and outside of the European Economic Area ("EEA"). Therefore, in order to prevent such discrepancies from affecting your Personal Information, we seek to comply with the guarantees listed below:

- the country to which we transfer your personal data has been deemed to provide an adequate level of protection for personal data by the European Commission;
- a specific contract approved by the European Commission which gives safeguards to the processing of personal data, the so-called Standard Contractual Clauses.

Customer, User, and Visitor Information is currently stored in Metapace's data centers located in the United States, Germany, France, India, Singapore, and Japan.

Under the General Data Protection Regulation, all the member states of the European Union have uniform protection of personal data and personal privacy. This also applies in the EEA countries. Personal data can thus be transmitted freely within this area without any restrictions (e.g., Germany, France).

Your data is transferred to USA, India, and Singapore based on standard contractual clauses. Copies of the implemented standard contractual clauses can be provided upon request.

Japan is recognized as providing an adequate level of protection.

5. Our Contact Information

Should you have inquiries regarding the privacy aspects of our Sites or Services, please feel free to reach us

E-mail: contact@metapace.io

6. Modifications to This Privacy Policy

This Privacy Policy is updated starting with the Effective Date stipulated above.

This Privacy Policy may be subjected to occasional updates or changes, so please read this policy periodically to keep abreast with the new modifications. Any changes related to this Privacy Policy on our Sites will be immediately published by us.

If any revisions to our Privacy Policy have a significant impact on our practices concerning the personal data we may have about you, we will try our best to alert you of such updates in advance by emphasizing the changes on our Sites.

By continuing to use the Sites and our Services, you express your agreement regarding this Privacy Policy and any updates.