

Certus Platform Privacy Policy provided by OAIS.Cloud

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Objective

At OAIS.Cloud, privacy is a priority.

This document is intended to present how OAIS.Cloud and its affiliates ("we", "our", or "us/us") collect and use personal information from customers and others (collectively, "you") who access or use our website, mobile applications or web client, products or services linked to this Privacy Notice ("Services").

By using our Services, you acknowledge that we will collect and use your personal information as described in this Privacy Notice.

In some cases, we may process your personal information pursuant to an agreement with a third party company. In such cases, the terms of that agreement may govern how we process your personal information. If you believe that a third party company has asked us to process your personal information on their behalf, please consult them first as they will be responsible for how we process your information. This Privacy Notice ("Notice") does not apply to third-party applications and websites that you may use, including those linked to our Services.

The essential Certus Platform's products and Services help users create, complete and display the validity of electronic or digital transactions, such as electronically signing a document, contract or applying a digital signature to a financial transaction. As part of our Services, users want us to collect and record information that helps parties prove the validity of transactions, such as the names of people involved in transactions and the devices those people use.

We encourage you to read this Notice in its entirety to ensure that you are fully informed about your privacy rights and the way in which we collect, use, store or process your personal information.

1. Collection of Personal Information

You may choose to visit our website, install our applications or provide us with personal information. However, if you do not provide us with certain personal information, you may not be able to use some parts of our Services. For example, if you do not adopt an electronic signature, you will not be able to sign certain electronic documents on our Service.

Personal information we collect from you. You provide us with personal information about yourself when:

- Register for an account or access your account;
- Initiates, signs or reviews an electronic document;
- Create or edit your user's profile;
- Contact customer service;
- Makes comments on our community forums; or
- Participation in surveys, sponsored events, sweepstakes or when signing up for newsletters.

You also provide us with personal information about others when using parts of our Services, such as when:

- Initiates or participates in an electronic operation, such as a document being transferred within the Certus Platform;
- Adds other users as members of an existing account; or
- Leave comments;

Examples of the categories of personal information you provide:

- **Identifiers and contact information.** This includes your name, email address, postal address, telephone number or electronic signature.
- **Business information.** This includes billing and payment information (eg, credit card number, expiration date and CVV), products or services purchased.
- **Geographic location.** This includes the physical location.

Personal information that we collect automatically. We automatically collect personal information from you and your devices when you use our Services, even when you visit our website or apps without logging in.

The categories of personal information we automatically collect include:

- **Device, Usage Information and Operational Data.** We collect personal information about how you use our Services and the devices (eg, computers, mobile phones, tablets) you use to access our Services. This may include, among others:

- IP address.
- Accurate geolocation information that you allow our apps to access (usually from your mobile device).
- Unique device attributes and identifiers, such as operating system and browser type.
- Usage data such as: web log data, referring and exit pages and URLs, platform type, number of clicks, domain names, home pages, pages and content viewed and the order of these pages, time spent on specific pages, the date and time you used our Services, the frequency of your use of our Services, error logs and other related information.
- Operational data such as: names and emails of the parties to an operation, subject, history of actions that people take in an operation (e.g. analyzing, subscribing and activating features) and personal information about those people or their respective devices such as name, email address, IP address and authentication methods.

- **Cookies and related technologies.** We may use cookies, which are text files with small amounts of information that are downloaded to your device, or related technologies such as web beacons, local shared objects and tracking pixels, to store or collect information.

Information we collect from other sources. Subject to applicable law, we may collect personal information about you from others, for example from:

- **Third-party sources.** Examples of third-party sources include marketers, partners, researchers, affiliates (such as companies jointly owned or controlled by OAS.Cloud), service providers, and third parties who are legally authorized to share your personal information with us.

- **Other customers.** Other customers may give us their personal information. For example, if a customer wants you to sign an electronic document on our Services, the customer will give us your email address and name.

- **Combining personal information from different sources.** We may combine the personal information we receive from other sources with the personal information we collect from you (or your device) and use it as described in this Notice.

Personal information that we collect and process on behalf of customers. When our business customers use certain Services, we generally process and store limited personal information on their behalf as a data processor. For example, on the Certus Platform, when a customer uploads contracts or other documents for review or signature, we act as a data processor and process the documents on behalf of the customer and in accordance with the customer's instructions. In such cases, the customer is the data controller and is responsible for most aspects of the processing of personal information. If you have any questions or concerns about how personal information is processed in these cases, including how to exercise your rights as a data subject, you should contact the customer (your employer or the individual or legal entity requesting your signature). If we receive requests for rights in cases where we act as a data processor, we will forward your inquiry to the relevant customer.

2. Use of personal information

Generally, and in accordance with applicable law, including consent (as required), we may use your personal information to provide, repair, improve and develop new Services and to market our companies and their respective products and Services. Examples of how we use the personal information we process include, but are not limited to, the following:

- Provide the Services and products you request and collect payments.
- Create your account and manage your relationship with us (eg, communicating with you, providing requested information).

- Send you records of our relationship, including purchases or other events.
- Market features, products or special events via email or telephone, or send you marketing communications about third-party products and services that we believe may be of interest to you.
- Record data about transactions involving electronic documents (eg who initiated, viewed or signed the documents; signatory IP addresses; time stamps - if entered into the transaction).
- Conduct sweepstakes, contests and friend referral programs.
- Choose and deliver personalized content and advertising, and support the marketing and advertising of our Services.
- Create and analyze data about our users and how they use our Services.
- Test changes to our Services and develop new features and products.
- Correct problems you may have with our Services, including answering customer service, learning and training questions, and resolving disputes.
- Manage the Services platform, including support and security systems.
- Prevent, investigate and respond to fraud, unauthorized access or use of our Services, violations of terms and policies, or other illegal behavior.
- Comply with legal obligations.
- Meet legal retention periods.
- Establish, exercise or defend our rights in lawsuits.

Other Uses. We may combine the personal information we collect or remove portions of personal information to limit or prevent identification of a particular user or device to help with purposes such as research and marketing. Once this information has been aggregated and the anonymity is no longer considered personal

information under applicable data protection law, this Policy does not apply.

If you have any questions or need more information regarding the legal basis on which we collect and use your personal information, please contact us using the contact information provided in Section 10 of this Notice.

3. Sharing Personal Information

Subject to applicable law, including consent (as required), we may share personal information as follows:

- **Public or governmental authorities.** We may share your personal information to comply with our legal obligations or our regulations or contracts, or to respond to court orders, administrative or judicial proceedings, such as subpoenas, government audits or search warrants when we are legally required to do so. We may also share your personal information when there are threats to the physical security of any person, violations of policies or other agreements of OAS, Cloud, regarding the use of the Certus Platform Services, or to protect the legal rights of third parties, including of our employees or users, or the public.
- **Corporate operations.** Your personal information may be disclosed or transferred to the relevant third parties in the event of or as part of due diligence for any reorganization, sale, merger, consolidation, joint venture, assignment, transfer or other disposition or proposed disposition of all or part of the our business, assets or actions (including in connection with bankruptcy or similar proceedings). If a corporate transaction takes place, we will notify you of the change regarding the control of your information, as well as the options you may have.
- **Consent.** We may share your personal information in other ways as requested by you or with your consent. For example, with your consent, we publish user testimonials that can identify you.

Your personal information may also be shared as described below:

- **Other users of the Certus Platform Services.** Whenever you allow others to access, use or edit content on your account, we will share the content with those people. For example, if you send a document to

others for review or signature, we will make the content of the document available to those people.

- **Third Parties.** When you make a payment to another user within our Services, we share your payment method details with the third party payment processor selected by you or the other user.

- **Public information:**

- **Users' generated content.** When you comment on our community forums, that information may also be read, collected and used by others.

- **Your employer or your company.** When you create an account or user role with an electronic mail (email) designated to you as an employee, contractor or member of a company, the company (if you are an OAS.Cloud customer for the Certus Platform services) may find your account and take certain actions that may affect your account.

4. Retention of Personal Information

We keep your personal information for longer than necessary for the purposes for which it is processed. The period for which we retain personal information depends on the purposes for which it was collected and used and/or as required by law. In general, this means that we retain your personal information to comply with legal or retention limitations or to perform a contract with you. If there are technical limitations that prevent deletion or anonymization, we protect personal information and limit active use of that information.

5. Your options

This section describes many of the actions you can take to change or limit the collection, use, storage or processing of your personal information.

- **Profile.** After completing, you will be able to access and review this personal information. If any personal information is inaccurate or incomplete, you can make changes to your account settings.

- **Cookies and other related technologies.** You can refuse cookies through your browser settings.

- **Device and usage information.** It is the guarantee that an act is being performed by you.

- **Claims.** We are committed to resolving valid complaints about your privacy and our collection, use or storage, or other processing by us of your personal information. If you have any questions or complaints about our data usage practices or about this Notice, please contact us at privacy.certus@oais.cloud.

6. Privacy of minors

Our Services are not designed and are not marketed to persons under the age of 18 under applicable law ("minors"). We do not knowingly collect or solicit personal information from minors. We do not intentionally allow minors to use our Services. If you are a minor, do not use the our Services or send us your personal information. We delete personal information that we know is collected from minors without verified parental consent.

7. Your Privacy Rights

You may have certain rights related to your personal information, subject to local data protection legislation, as detailed below.

- You may also **request** the following information: how we collect and use your personal information and why; the categories of personal information involved; the categories of recipients of your personal information; how we received your personal information and its source; our business purpose for using your personal information; and how long we use or store your personal information or the manner in which we determine its retention periods.

- You have the right to have inaccurate personal information about you **corrected**, and you must notify us immediately if you believe that the personal information we hold about you is inaccurate, incomplete or out of date.

- In certain situations, you may request that we **delete** or stop using your personal information, **restrict** or **oppose** the use of your personal information, or **export** your personal information to another controller.

- we always rely on your consent to process your personal information, you have the right to refuse consent and/or, if provided, withdraw consent at any time. This will not affect the lawfulness of the processing prior to the **withdrawal of your consent**. At any time, you can request that we stop using your personal information for direct marketing purposes.
- If you are dissatisfied with our response to your **complaint**, you have the right to raise questions or complaints with your local data protection authority at any time.

If you make a request to exercise the rights mentioned above, we will require you to provide certain information for identity verification purposes. If you have an account with us, we can confirm your identity by logging in to your account. If you do not have an account with us, we may require you to provide additional information on the basis of which we can verify your identity. You may authorize an agent to make a request on your behalf and we will confirm the identity of your agent or authorized legal representative by requesting confirmation from you or through documents establishing the agent's authorization to act on your behalf.

Certain personal information may be exempt from these requests under applicable law. We need certain types of personal information in order to provide the product and Services to you. If you request that this information be deleted, you may not be able to access or use our product and Services at a later date.

8. How we protect your personal information

We implement appropriate technical, physical and organizational measures to protect your personal information from accidental, illegal or unauthorized misuse or destruction, loss, alteration, disclosure, acquisition or access, and all other forms of unlawful processing. To this end, we have developed and implemented an Information Security Management System and other sub-policies and guidelines related to the protection of your personal information. For example, our team is permitted to access customer personal information only to the extent necessary to fulfill the applicable business purpose(s) and to perform its work, subject to confidentiality obligations.

9. Changes to this Privacy Notice

We may amend this Notice to reflect changes in legislation, our services, our data collection practices, or advances in technology. Our use of the personal information we collect is subject to the Privacy Notice in effect at the time the personal information is used. Depending on the type of change, we may notify you of the change by posting it on this page or by emailing it.

10. Contact

For questions or complaints about our use of your personal information or about this Notice, please contact us at privacy.certus@oais.cloud.