

Dataset (PORTALX, INC.)

PRIVACY NOTICE

Last modified: February 27th, 2022

This Privacy Notice describes how we use, disclose, and protect the data we collect when you use our products and services.

Overview

PortalX, Inc. ("PortalX") obtains Personal Data from various sources to provide our services and products:

1. PortalX's Website (namely www.dataset.at) provides information to website-visitors interested in PortalX. With respect to our Website:
 - We collect Personal Data directly from visitors when they provide it, such as when they fill out a form.
2. PortalX Platform: A technology solution allowing businesses to simplify their data operations through data discovery, contextualization, transformation and more.

Personal Data Collection

- We collect and process a Client's Personal Data to provide them with an account, communicate with them, and to enhance our services.
- With respect to the data of the Customers of our Clients, we act as a data-processor. Consumers who wish to exercise their GDPR rights, such as the right to access, erasure or correction, are advised to submit these requests to the Client with whom they have a relationship, who acts as the Controller of their personal data. Please refer to the chapter "PortalX as a processor: Consumers of Clients using PortalX" for more information.
- We only collect and process a Consumer's Personal Data to perform services for the Client, such as data discovery, preparation or the application of Privacy Enhancing Techniques.

Key definitions.

- "Anonymous Data" means information that does not, and cannot be used to identify a single individual.
- "Consumer" refers to consumers of businesses using PortalX ("Clients"). PortalX acts as a processor of this Consumer data, the Client is the data-controller.
- "Client" refers to the businesses using PortalX.

- “Client personal data” means information that can be used to identify any (users) of the Clients, using the PortalX platform or any of our services, whether alone or in combination with other information (PortalX as Data Controller)
- “Personal data of consumers of clients” means the personal data that our Clients share with us for processing purposes (PortalX as Data Processor)
- “PortalX”, “we” and “us” refer to PortalX, Inc., which is located 276 5th Avenue, Suite 704 #797, New York, NY 10001. You can contact us via email at business@theportalx.com.
- “PortalX” or “PortalX Platform” refers to the software that PortalX makes available to businesses (“Clients”) to help them integrate, discover, contextualize and transform their data, for example to break open data silos whilst guaranteeing data privacy.
- “Personal Data” means information that can be used to identify any individual, whether alone or in combination with other information.
- “Transformation of Data” means preparing data for usage or ingestion, such as structuring, cleansing or applying PETs.
- “Website” means the websites that we offer, namely www.theportalx.com and its pages.

What kinds of Personal Data do we collect from where?

PortalX as a Controller: Client personal data

Directly from you, or from your employer or co-workers, we may collect your Personal Data in order to provide you access to your PortalX Account as well as to provide general support for the product or service you are using.

We may collect:

- Your full name (First, Last, Middle)
- Your email address(es)
- Your phone number(s)
- Your company name
- Your job title
- Your PortalX account password

PortalX as a Processor: Consumers of Clients using PortalX.

Businesses (“Clients”) can use PortalX to enable everyone in their organization to find and access their organization’s data immediately. PortalX intelligently transforms data so that Clients can break open data silos and share data to collaborate inside and across teams whilst reducing concern about data privacy, data governance, or data security.

We act as a service provider to our Clients, and handle the data of their Consumers as a data

Processor. Our Clients can upload any data containing both non-personal and personal data. We don't directly collect Consumer data but rely on manual or automated Data Uploads by our Client, and can therefore not provide an exhaustive list of Consumer Personal Data Categories processed by us. The transfer of data from our clients (data controllers or exporters) to us (processor or importer) is governed by our [Data Processing Agreement](#) (DPA). Any international data transfer between a Client and PortalX is governed by the Standard Contractual Clauses (Exhibit B to the [PortalX DPA](#)).

To exercise any of the data rights granted under any applicable privacy laws, Consumers should direct their requests to the Client. At PortalX, we are unable to respond to such data requests.

Visitors who use our Website

Directly from you, we collect your Personal Data in order to provide you with marketing materials and sales support.

We may collect:

- Your full name (First, Last)
- Your email address(es)
- Your phone number(s)
- Your Company's name
- Your Job Title
- Any Personal Data you include in your custom message to us

How do we use Personal Data?

We do not sell anyone's Personal Data.

We do not and will not sell Personal Data. We will only use Personal Data for our own business purposes. The exact ways in which we use your data is explained in more detail below.

Clients

We may use your Personal Data to:

- Provide you access to your PortalX account(s).
- Provide support for the PortalX platform
- Contact you, provide materials or otherwise act in fulfilment of our contract with you

Our legal basis for processing your data is to perform our obligations under a contract with you, our Client (for example, to comply with any terms you or your employer has agreed to as a part of the PortalX Terms of Service or to offer Customer Service).

We may also use your Personal data if necessary to defend our legal rights or comply with a legal obligation.

When signing up to use PortalX, we ask the user to read and consent to the most current version of the Privacy Notice. Therefore, we may use your Personal Data with your consent, as required by and in accordance with applicable law.

Consumers of Clients

Clients can use PortalX to detect, access, understand, and transform their data, including the personal data of their consumers, for example to prepare it for data usage or ingestion. Raw data can be transformed through a combination of techniques, such as cleansing or structuring techniques or the application of Privacy Enhancing Techniques (pseudonymization, anonymization and encryption). PortalX's PII Classification machine learning algorithms are aimed at the automatic detection and categorization of sensitive business data, such as personal data.

Website-visitors

We use the other Personal Data we collect directly from you to

- Communicate with you. We use the information you provide us to send you educational, marketing, sales, and support communications. We also use your information to respond to you when you contact us. The legal basis for this data-usage is to operate in our legitimate interests or the legitimate interests of others, for instance to offer customer service, perform direct marketing activities or to improve your experience.

How do we share Personal Data?

We do not and will not sell Personal Data.

In addition to the purposes described in the section *How do we use Personal Data?*, we may share Personal Data of our Clients with others in the following ways:

- With our service providers. We may share Client Personal Data with service providers or sub-processors who help support our business, products, and services. We use the following types of service providers: cloud server and storage services; data store connection services; messaging services. A list of our sub-processors can be found [here](#).
- To comply with law. We may share Client Personal Data when we believe it is necessary to comply with laws applicable to us, including court orders, legal processes, and responding to government or regulatory requests.
- To enforce our rights and the rights of others. We may share Client Personal Data with third parties: (i) to enforce or apply our Terms of Service, terms of sale, or other agreements with you; or (ii) when we believe disclosure is necessary or appropriate to protect the rights, property, or safety of PortalX, our customers, or others.
- In the event of a corporate transaction. We may share Client Personal Data with a successor in interest if we are involved in a merger, divestiture, restructuring,

reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding.

Your data rights

We believe everyone deserves to be in control of their Personal Data, and we have taken steps to make it possible for all users of our products and services, to exercise the following rights with regard to the Personal Data we control about them:

- The right to be informed about how their information is used. We inform individuals of the fact that we are collecting data when they access our products and services by referring to this Privacy Notice. This Notice describes our data handling processes.
- The right to access the information we hold about individuals.
- The right to request the correction of inaccurate information we hold.
- The right to request that we delete information, or stop processing it or collecting it.
- The right to withdraw consent for other processing activities for which you have given us your consent.
- The right to request that we transfer information either to yourself or a third party.

You can exercise your data rights by sending an email to privacy@theportalx.com. In the case that we act as a data processor, we will refer you to the data controller to exercise your rights.

If you'd like to delete your PortalX account, please send your request to privacy@theportalx.com. When you place an account deletion request, it can take us up to 30 days to honor that request.

If you decide you do not want to receive educational or marketing communications from us, you can click the unsubscribe link at the bottom of any educational or marketing email. Please note that even if you opt out of marketing communications, you may still receive administrative, legal, and other important communications from us.

How do we secure your Personal Data?

We have implemented technical, administrative, and physical security measures that are designed to protect your Personal Data from unauthorized access, disclosure, use, and modification. We regularly review our security procedures to consider appropriate new technology and methods. Please be aware that, despite our best efforts, no security measures are perfect or impenetrable.

How long do we keep your Personal Data?

It is our policy to not keep your Personal Data for longer than we need it. In certain circumstances, Personal Data is kept for the period of time during which claims against PortalX

may be enforced. Personal data is also saved to the extent that and for so long as we are legally obliged to do so.

Do Not Track Signals

Some web browsers incorporate a "Do Not Track" ("DNT") or similar feature that signals to websites that a user does not want to have his or her online activity and behavior tracked. If a website that responds to a particular DNT signal receives the DNT signal, the browser can block that website from collecting certain information about the browser's user. At this time, we do not honor the DNT signals we receive from your browsers.

International Data Transfers

We are committed to complying with this Privacy Notice and the data protection laws that apply to us. PortalX is headquartered in the United States and collaborates with our partner-organization Pnyks GmbH in the European Union. We recognize that the laws in the United States may be different and, in some cases, not as protective as the laws of other countries. By providing us with your Personal Data and using our Platform, you understand that your Personal Data, referred to as "client personal data", can be transferred and processed in both the EU and the United States.

The transfer of data from our clients, referred to as "personal data of consumers of clients" (data controllers or exporters) to us (processor or importer) is governed by our Data Processing Agreement. This DPA is accessible [here](#). Any international data transfer between a Client and PortalX is governed by the Standard Contractual Clauses (exhibit B to the [PortalX DPA](#)).

The Platform is not meant for children

We are committed to protecting the privacy of children. The PortalX Platform is intended for adult users over the age of 16, and it is not designed to attract child users. We do not knowingly collect Personal Data from any person we actually know is a child under the age of 16. If we learn that any of our users are under the age of 16, we delete their account and their associated Personal Data.

Special Notice to California Residents

California Civil Code Section 1798.83 permits individual California residents to request certain information regarding our disclosure of certain categories of Personal Data to third parties for those third parties' direct marketing purposes, which we only do if you have explicitly consented to allow such disclosures. You may submit these requests to privacy@theportalx.com.

Third Party Websites

Our Platform may contain links to other websites on the Internet, and other websites may contain links to the Platform. These third party websites are not under our control, and this Notice does not cover the privacy and security practices of those third party operators. We are not responsible for the privacy or security practices or the content of such websites, and we recommend that you review the privacy practices of any third party website to which you use or submit your information.

How will we notify you of changes to this Privacy Notice?

We will notify you before we make material changes to this Notice and give you the opportunity to review (for example, via email or a notification within the PortalX Platform) the revised Privacy Notice before you choose to continue using our Platform.

Contacting PortalX

If you have any questions about this Privacy Notice, please contact us at:

PortalX, Inc.,
276 5th Avenue, Suite 704 #797,
New York, NY 10001

Email: privacy@theportalx.com

If you are located in the European Union, you have the right to lodge a complaint with your national data protection authority. Contact information for your data protection authority can be found on the European Data Protection Board website.