

PRIVACY POLICY

This privacy policy explains how Werenode SAS (“Werenode,” “we” and “us”) obtains, utilizes, shares and safeguards information collected from Customers and visitors to its websites, including without limitation werenode.com (each, a “Website,” collectively, the “Websites”).

By visiting our Websites or by becoming a Werenode Customer, you consent to the collection, use and transfer of your personal data pursuant to the terms of this privacy policy.

The Personal Data We Collect From You

Werenode collects personal data that you choose to provide to us on the Websites (including information referenced in the [“The Use of Cookies”](#) section of this Privacy Policy), through email, over the phone and otherwise, including your name, contact information, work address, email address, phone number, and if you are a potential Customer, we additionally collect home address, employment and biographical information, social security numbers, banking information, payment preferences, information obtained from third-party background check providers and feedback concerning your experience as an Customer. We may also obtain information from third parties about you. In addition, Werenode’s Websites may automatically record information when you visit. This information can include your Internet Protocol address and data concerning webpage requests.

Werenode may place small files called “cookies” on your computer when you visit the Websites. Cookies facilitate your utilization of the Websites and enable us to track activity and customize your website experience. If you do not wish to receive a cookie from Werenode Global, you may set your Internet browser settings to decline or disable the cookie.

How Your Personal Data is Used

We utilize personal data collected to market our services to you and develop, support and improve our business and, in the case of Customers, to match you with consulting opportunities, notify you of Werenode Global developments, process your invoices and administer honoraria.

We do not sell or share your personal data with third parties for their marketing or solicitation purposes. We do not use IP addresses or web page request information to try and identify you (nor do we disclose that information to third parties for them to use for their own purposes—although we do use third parties for our internal analytics purposes and retargeting for marketing). Werenode and trusted third parties utilize personal data only for the purposes for which it was obtained.

How Your Personal Data is Disclosed

Personal data provided to Werenode will be processed and stored by us inside the United States and will be accessed by our staff and third parties working for us for the purposes set forth in this policy or for other purposes subject to your consent. Your personal data also may be held, processed and accessed inside the European Economic Area and/or Asia.

Werenode may share your personal data with our Clients, typically in connection with consulting opportunities (as this is one of the core and necessary functions provided by our platform). Werenode may disclose the fact that you are an Customer and personal data collected about you in response to a valid order or request by a court or other governmental body, to enforce an agreement between you and Werenode or one of Werenode's Clients, to protect Werenode's rights, or as otherwise required by law, legal process or for the prevention or detection of a crime.

Third parties, including your current employer, may request that limitations be placed on your participation in the Network of Customers arising from duties you may owe to them. Werenode will comply with limitations requested by an employer, through an authorized representative, for its current employees. Werenode does this to comply with law and best practices. Werenode also reserves the right to abide by any limitations requested by a third party for the same reason, on a case-by-case basis. Werenode may discuss with third parties your participation or proposed participation in any project through Werenode Global for the purpose of verifying any factual information you provide to us or any consents or approvals that may be needed.

Updating Your Information

As one of the Terms & Conditions of your participation in the Network of Customers, you are required to update the biographical and employment information you provide to Werenode regularly. You are entitled to review the personal information Werenode Global holds about you and may ask that we revise your personal information to ensure that it is current and correct. We may also revise your information using data obtained from third parties or public sources.

Information Security

We use physical and technological security measures to protect your information both online and offline from unauthorized access and against illegal manipulation and processing, accidental loss and damage. We will preserve your information for a reasonable period of time or as required by law.

Opting Out

You may elect to opt-out of membership in the Network at any time by providing Werenode with written or electronic notice. Upon receipt of such notice, we will cease contacting you and cease presenting information concerning you to Clients for potential consulting opportunities.

Updates to the Policy

Werenode may update this policy from time to time. To the extent permitted by law, any changes to our privacy policy will be posted to the Websites and will become effective upon posting. Your continued use of the Websites and failure to opt out of membership in the Network will indicate your agreement to such changes.

Contact Werenode

We welcome all requests, suggestions and questions concerning our use of your personal data. All such communication should be directed to privacy@Werenode.com, or call us at (212) 375-2980.

SPECIFIC DISCLOSURES FOR THE EUROPEAN ECONOMIC AREA

(This section is effective on May 25, 2018)

This section applies to data processing activities of data subjects residing in the European Economic Area as well as, regardless of residence, the processing of any Personal Data in the European Economic Area. In the event there is a conflict between this section and other parts of the Privacy Policy, this section shall control with respect to residents of the European Economic Area.

“Personal Data,” for purposes of this section, 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.

“Services” means any of our products, services, or deliverables.

“Site” means any website operated and controlled by us.

Pursuant to the European Union General Data Protection Regulation (GDPR), we function in the capacity of a “processor” both for the Services we offer to our Clients as well as for the services Customers and other persons offer to our Clients through our platform. The scope of applicable data protections and processing for those Services are set forth in contractual agreements covering the relevant data processing.

Controller versus Processor. We may process certain Personal Data in order to maintain and provide the Services to our Clients, such as names, addresses, email addresses, and other contact information for designated Client representatives or personnel (“Client Relationship Data”). In addition, we may send marketing materials or communications to potential or existing

Clients (“Marketing Activities”). For purposes of Client Relationship Data and Marketing Activities, we function as a “data processor” under GDPR. Our disclosures with respect to our processing of data as a data processor are set forth in this Privacy Policy.

1. HOW WE COLLECT AND USE PERSONAL DATA

We describe how we collect and use Personal Data in the [“The Personal Data We Collect from You”](#) section of this Privacy Policy.

2. HOW WE DISCLOSE PERSONAL DATA

Our disclosure is limited to circumstances where we are permitted to do so under applicable European and national data protection laws and regulations. We share data with certain types of companies, for purposes of providing Services to Clients and marketing our Services to potential and existing Clients, such as cloud computing companies, cloud communications platform as a service (PaaS), web analytics services, employment-related social networking services, and mailing and emailing services.

3. LEGAL BASIS FOR PROCESSING

We collect and process your Personal Data for a variety of different purposes which are set out in further detail in this section.

In some cases, we will ask for your consent so that we may process your Personal Data. However, in certain circumstances, applicable data protection laws allow us to process your Personal Data without needing to obtain your consent.

3.1. PROCESSING PERSONAL DATA WHERE CONSENT NOT REQUIRED

In certain cases, separate consent is not required, including:

- - For the performance of a contract.

To perform our contractual obligations to you, including our fulfilling orders or requests you have made, contacting you in relation to any issues with your order or use of our Services, or where we need to provide your Personal Data to our service providers related to the provision of the Services.

- - To comply with legal obligations.

To comply with laws, regulators, court orders, or other legal obligations, or pursuant to legal process.

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- Legitimate Interests.

To operate our business and provide our Services (other than in performing our contractual obligations to you) for our “legitimate interests” and for the purposes of applicable law, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Legitimate interests may include:

- - - To communicate with you regarding the Services, including to provide you important notices regarding changes to our operations and to address and respond to your requests, inquiries, and complaints.
 - For our direct marketing purposes.
 - To send you surveys in connection with our Services.
 - To assist in the investigation of suspected illegal or wrongful activity, and to protect and defend our rights and property, or the rights or safety of third parties.
 - To develop, provide, and improve our Services.
 - To enforce our Terms of Use, License Agreements, or this Privacy Notice, or agreements with third parties.

3.2. CONSENT FOR PROCESSING

In cases where we are not already authorized to process the Personal Data under applicable law, we may ask for your consent to process your Personal Data, including:

- - Marketing

We may ask for your consent for Werenode or our partners or vendors to contact you by telephone, SMS, post and/or email about other offers, products, promotions, developments or Services which we think may be of interest to you and for other marketing purposes.

- - Use of Cookies

Our Site uses cookies and similar technologies to improve user experience and for analytics. We also use cookies and similar technologies for purposes of including social network sharing capabilities on our main site, analytics, marketing, and session control.

A “cookie” is a small text file that a web server stores in browser software. A browser sends cookies to a server when the browser makes a connection to the server (for example, when requesting a web page from the same domain that created the cookie). The purpose of cookies is to remember the browser over time and distinguish one browser instance (or user) from all others. Some cookies and other technologies may serve to track Personal Data previously

entered by a web user on our site. Most browsers allow visitors to the website to control cookies, including whether or not to accept them, and how to remove them. Cookies can remember login information, preferences, and similar information.

Cookies, as well as other tracking technologies such as HTML5 local storage, and Local Shared Objects (such as “Flash” cookies), and similar mechanisms, may record information such as a unique identifier, information visitors to the website enter in a form, IP address, and other categories of data.

We also use web beacons or “pixels,” and in certain circumstances may collect IP address, screen resolution and browser software and operating system types; clickstream patterns; dates and times that our site is accessed, and other categories of data.

If visitors to the Site want to block the use and saving of cookies from the Site on to their computers hard drive, he or she should take the necessary steps within your web browser’s settings to block all cookies from the Site and its external serving vendors, or use the cookie control system, if available upon first visit. Please note that if visitors to the website choose to erase or block your cookies, certain parts of our Site may not function correctly. For information on how to disable cookies, refer to your browser’s documentation.

4. INTEREST-BASED ADVERTISING

Interest-based advertising is advertising that is targeted to you based on your web browsing and app usage over time and across websites or apps. You have the option to restrict the use of information for interest-based advertising and to opt-out of receiving interest-based ads.

Depending on from where you access our Site, you may also be asked to consent to our use of cookies, including advertising cookies.

The opt-outs for interest-based advertising require that strictly necessary cookies are not blocked by the settings in your web browser. We support the Self-Regulatory Principles for Online Behavioral Advertising of the [Digital Advertising Alliance](#) in the U.S., the [Canadian Digital Advertising Alliance](#) in Canada, and the [European Digital Advertising Alliance](#) in the EU. If you live in the United States, Canada, or the European Union, you can visit [Ad Choices](#) (US), [Your Ad Choices](#) (Canada), or [Your Online Choices](#) (EU) to find a convenient place to opt-out of interest-based advertising with participating entities for each region. These websites also provide detailed information about how interest-based advertising works. Opting out does not mean that you will no longer receive advertising from us, or when you use the Internet. It just means that the data collected from our website will not be used for interest-based advertising and that the advertising you see displayed on websites will not be customized to your interests.

5. WITHDRAWING YOUR CONSENT

You may at any time withdraw the consent you provide for the processing of your Personal Data for the purposes set forth in this Privacy Notice by contacting us at privacy@Werenode.com, provided that we are not required by applicable law or professional standards to retain such information.

If you want to stop receiving future marketing messages and materials, you can do so by clicking the “unsubscribe” link included in our email marketing messages or by contacting us at privacy@Werenode.com.

6. DATA SUBJECT RIGHTS

You have the right in certain circumstances to request confirmation from us as to whether or not we are processing your Personal Data in our capacity as a Controller. Where we are processing your Personal Data as a Controller, you also have the right to request access to, modification of, or deletion of such Personal Data.

You also have the right in certain circumstances to receive the Personal Data concerning you that you provided to us, to restrict processing of your Personal Data, or to transmit such data to another controller.

To exercise your rights with respect to your Personal Data, please contact us at privacy@Werenode.com.

7. DE-IDENTIFIED OR ANONYMIZED DATA

We may create de-identified or anonymous data from Personal Data by removing data components (such as your name, email address, or linkable tracking ID) that makes the data personally identifiable to you or through obfuscation or through other means. Our use of anonymized data is not subject to this Privacy Notice.

8. DATA RETENTION

We will retain your Personal Data for as long as you remain a Client or an employee of a Client, an Customer in our Network or maintain an account or agreement or as otherwise necessary. We will also retain your Personal Data as necessary to comply with our legal obligations, resolve disputes, enforce our agreements, comply with applicable industry standards, and in accordance with disaster recovery procedures.

9. RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

You may have a right to lodge a complaint with a supervisory authority.

10. CONTACT US

For questions regarding this Privacy Notice, please contact us at: privacy@Werenode.com.