



## SUPERTAB GLOBAL PRIVACY POLICY

**Effective Date September 26, 2024**

Supertab, Inc., is a wholly-owned subsidiary of Supertab AG, which provides through its website at [www.supertab.co](http://www.supertab.co) (the "Platform"), the Supertab service (the "Service"). We (Supertab, Inc.) are based at 450 Lexington Ave, 4<sup>th</sup> Floor, New York, NY, 10017. Supertab, Inc. is affiliated with Supertab GmbH, based in Neuturmstraße 5, 80331 Munich, Germany.

This Privacy Policy applies to all visitors, end users, and others who access our Platform and Service either through our websites or via a third party who utilizes our Service.

[Part I of this Privacy Policy](#) informs you about the data processing if you are a consumer located within the U.S. or other parts of the world except the EU/EEA, UK and Japan.

If you are a data subject located within the European Union (EU), the European Economic Area (EEA) or the United Kingdom (UK), please see [part II of this Privacy Policy](#) here.

If you are a consumer located in Japan, please see [part III of this privacy policy](#).

### **PART I – PRIVACY POLICY FOR CONSUMERS IN THE US AND OTHER PARTS OF THE WORLD EXCEPT THE EU/EEA/UK**

#### **1. OVERVIEW**

This Privacy Policy explains how we, and some of the companies we work with, collect, use, share and protect information in relation to our Platform and Service and your choices about the collection and use of your information. Please read this Privacy Policy carefully. By using the Platform and/or Service, you agree to the collection and use of information in accordance with this Privacy Policy and our Terms of Service.

- By using the Supertab Platform and Service, you understand and agree that we are providing a platform that offers the ability for individuals or organizations to offer access management functions to individuals wishing to access digital content, products, or services on websites or applications. Furthermore, you understand and agree that in cases where access is granted in exchange for a payment, you may have the ability to "pay now" or to make a commitment to "pay later" by bundling multiple small transactions on to a single electronic ledger linked to you and/or your user device(s).
- Your agreement to the Terms of Service and this Privacy Policy is, of course, voluntary. Please understand, however, that you may not utilize our Service in any manner without agreeing to our Terms of Service and this Privacy Policy.

#### **2. INFORMATION WE COLLECT**

We collect the following types of information:

##### **1. Information you may provide to us directly**

- Your first and last name, password, e-mail, phone number and mailing address, a reference number that can be associated with your payment details, your payment history (if any) and login data, which you provide when you register for an account on the Service. When you sign up for our newsletter, we collect your name, e-mail, industry, and company. In addition to the information set forth above, we may collect information required by law, for instance in compliance with "know your customer" (KYC) procedures required to facilitate payments.
- Communications between you and the Service. For example, we may send you emails (e.g. account verification, changes/updates to features, technical and security notices). You may send us comments, questions, or requests.



- Additional details related to your use of the Service, including a record of your agreement to our Terms of Service, term of subscription and renewal periods, preferred billing method, user account details or credit card details or other terms of payment.

## 2. Information you provide to us indirectly

### **Analytics information:**

- The Service uses third party software analytics tools including, for example, but not limited to, tools provided by Google Analytics (a service provided by Google, Inc.) to help us measure traffic and usage trends on our website. The Service also uses Zendesk for customer support. These tools collect information sent by your device or by our Service to you, including the web pages you visit through our Service, add-ons, your anonymized IP address, and other information that assists us in gathering feedback to improve our products and our business model. We collect and use this analytics information together with analytics information from other users so that it cannot reasonably be used (and is not used) to identify any individual user.

### **Cookies and similar technologies:**

- When you visit the Service, we may use cookies and similar technologies like pixels, web beacons, and local storage to collect information about how you use the Service and provide features to you. Cookies are small files that make it easier for you to use content from the providers that use our Service. Your Internet browser automatically receives these files from our servers and then saves the cookies on your computer. The Service use what are known as session cookies and persistent cookies. We send several persistent cookies to your computer. Among other things, cookies allow you to access Internet content across different websites. You can change the settings on your browser so that it informs you when it accepts a cookie, or so that it does not accept any cookies at all. We recommend that your browser be set to accept cookies from the Service, as only then will you be able to use the Service. We may ask advertisers or other partners to serve ads or services to your devices, which may use cookies or similar technologies placed by us or the third party.

### **Log file information:**

- Log file information is automatically reported by your browser each time you make a request to access (i.e., visit) a web page or app. It can also be provided when the content of the webpage or app is downloaded to your browser or device.
- When you use the Service, our servers automatically record certain log file information, including your web request, IP address, browser type, referring / exit pages and URLs, number of clicks and how you interact with links on the Service, domain names, landing pages, pages viewed, and other such information. We may also collect similar information from emails sent to our users, which then help us track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Service.

## 3. HOW WE USE YOUR INFORMATION

In addition to uses of information we describe elsewhere in this Privacy Policy, we use your data to do the following:

### **Enable the Service:**

- We process your data, including your name, e-mail and mailing address, and payment information to process payments that you initiate when you use the Service. We further review a range of user data, including log files, IP addresses, mailing and e-mail addresses, and payment information in order to improve the Service, trouble-shoot and track issues with the Service, and identify areas for improvement.
- We use your personal data to communicate with you about the services we provide. For instance, for subscription service users, we use your contact information to notify you that your subscription will automatically be renewed soon or has expired. We also use user and payment data to handle support requests from users.
- In order to make sure our users of the Service receive payments, we engage in a payment settlement process. During this process, our payment service provider consults user data, including name, amounts owed and currency information and makes net payments to our users.



### **Perform credit, identity, and address checks:**

- The success of our business depends on our preventing illegal or fraudulent transactions. To minimize our risks, among other processes, we compare usernames and country information against crime prevention watch lists upon registration.
- Analyze user behavior: We perform statistical and other analysis of your activities related to the Service, including your payments. We do this to gain a better understanding of how our Service is used so that we can provide you with a better, more intuitive and personalized experience and offer new products and services that may interest you.

### **Marketing:**

- With your consent, we will use your data for marketing purposes, including to communicate with you about products, services, and other organizations and activities that may interest you. In order to tailor these communications, we evaluate your activities on the Service, often by using automated processing. In the course of using your data for marketing purposes, we will not forward it to third parties without your consent as explained in Section 6 below.

## **4. HOW WE SHARE YOUR INFORMATION**

We will not share your information with third parties outside of the Service or its Affiliates (defined below) except as noted in this Privacy Policy or with your explicit consent.

### **Parties with whom we may share your information:**

- The Service may share limited information with Merchants and Distribution Partners (as defined in our Terms of Service) including your name, email address, phone number (if collected) and preferred language, as well as payment or payment commitment details, including the payment amount, the payment date, and similar, only after you have made a payment or a commitment to pay to that particular Merchant or Distribution Partner. Merchants or Distribution Partners may use this data to inform you by mail, email or digital advertising of their products and/or services that might be of interest, i.e. for marketing purposes. Merchants or Distribution Partners are not permitted to share your data with any third parties. Additionally, the Service may share the results of analysis of user behavior described above with other affiliates of the Service.
- We transmit certain user data to our payment service providers, e.g. credit card billing companies, banks, risk management provider and other financial institutions. We typically transmit the payment amount and a reference number that the payment service provider associates with your payment details. We also monitor whether payments from users are received on time and provide that information to Merchants and Distribution Partners. We share name, address, and country data with our payment service providers to help us perform some of the credit and fraud risk assessments described in Section 3.
- We may share certain information regarding Service content and/or your information (including but not limited to, information from cookies, log files, device identifiers, location data, and usage data) with businesses that are legally part of Supertab AG ("Affiliates"). Affiliates may use this information to help provide, understand, and improve the Service (including by providing analytics) and Affiliates' own services (including by providing you with better and more relevant experiences).
- We also may share your information, including information from tools like cookies, log files, payment service providers, hosting providers, Google Analytics and other third-party organizations that help us connect you with the Service ("Third Party Service Providers"). Our Third Party Service Providers will be given access to your information as is reasonably necessary to provide Supertab with their services, under data processing agreements that require them, among other things, only to act on Supertab and instruction and to take sufficient technical and organizational measures to safeguard your data.
- We may also share certain information such as cookie data with third-party advertising partners. This information would allow third-party ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you.

### **What happens in the event of a change of control:**



- If we sell or otherwise transfer part or all of Supertab AG, its subsidiaries or affiliates, or its assets, to another organization (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, or liquidation), your information may be among the items sold or transferred. The buyer or transferee would be obligated to honor the commitments we have made in this Privacy Policy.

#### **Responding to legal requests and preventing harm:**

- We may access, preserve and share your personal data in response to a legal request (like a search warrant, court order or subpoena) if we have a good faith belief that a law, regulation, or governmental request requires us to do so. This may include responding to legal requests from jurisdictions outside of the United States where we have a good faith belief that the response is required by law in that jurisdiction, affects users in that jurisdiction, and is consistent with internationally recognized standards. We may also access, preserve, and share information when we have a good faith belief it is necessary to: detect, prevent, and address fraud and other illegal activity; to protect ourselves, you, and others, including as part of investigations; and to prevent death or imminent bodily harm. Information we receive about you may be accessed, processed, and retained for an extended period of time when it is the subject of a legal request or obligation, governmental investigation, or investigations concerning possible violations of our terms or policies, or otherwise to prevent harm.

## **5. HOW WE STORE YOUR INFORMATION**

### **Storage and Processing:**

- Your information collected through the Service may be stored and processed in the European Union and the United States, or any other country in which Supertab AG, its Affiliates or Service Providers maintain facilities.
- Supertab AG, its Affiliates, and/or Service Providers may transfer information that we collect about you, including personal information, across borders and from your country or jurisdiction to other countries or jurisdictions around the world.
- We use commercially reasonable safeguards to help keep the information collected through the Service secure and take reasonable steps (such as requesting a unique password) to verify your identity before granting you access to your account. However, Supertab AG cannot ensure the security of any information you transmit to the Service or guarantee that information on the Service may not be accessed, disclosed, altered, or destroyed.
- You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to emails between you and the Service, at all times. We are not responsible for the functionality, privacy, or security measures of any other organization.

## **6. YOUR CHOICES ABOUT YOUR INFORMATION**

You are entitled to make choices about our handling of your data, from deleting or correcting data you include in your profile to opting out of advertising and other communication controls.

For personal data that we have about you:

- **Delete Data:** You can ask us to delete all or some of your personal data (e.g., if it is no longer necessary to provide the Service to you).
- **Change or Correct Data:** You can edit some of your personal data through your account. You can ask us to update your data in certain cases, particularly if it's inaccurate.



- **Object to, or Limit or Restrict, Use of Data:** You can ask us to stop using all or some of your personal data (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., if your personal data is inaccurate or unlawfully held).
- **Right to Access Your Data:** You can request a copy of your personal data. If you have any questions, you may contact us using the contact information below. We will only collect and process personal data about you where we have a lawful basis for doing so. Examples of lawful bases include consent (where you have given us consent for the processing, whether by agreeing to this Privacy Policy, ticking a box in a dialogue window, both, or by another explicit method), contract (where processing is necessary for us to perform our contract with you, for instance, to deliver the Service) and "legitimate interests." Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time. In those instances where we rely on legitimate interests, you have the right to object. If you have any questions about the lawful bases on which we collect and use your personal data, please contact us as set forth below.

#### **How long we keep your data:**

- **Retention.** We will retain your information as long as your account is active, as necessary to provide you with our services or as otherwise set forth in this Privacy Policy. We will also retain and use this information as necessary for the purposes set out in this Policy and to the extent necessary to comply with our legal obligations, resolve disputes, enforce our agreements and protect our legal rights. We also collect and maintain aggregated, anonymized or pseudonymized information which we may retain indefinitely to protect the safety and security of our site, improve our services or comply with legal obligations.
- Your consent to the uses of your data outlined in this privacy policy are valid unless revoked.
- If you do not use our Service for a period of eighteen (18) months, we may delete your data for the Service. We may inform you, at our option, three (3) months before the expiration of this deadline and give you the opportunity to oppose this deletion.

### **7. CHILDREN'S PRIVACY**

- The Service does not knowingly collect or solicit any information from anyone under the age of 18 or knowingly allow minors to register for the Service. The Service and its content are not directed at anyone under the age of 18. In the event that we learn that we have collected personal information from a child under age 18, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under age 18, please contact us at [privacy@supertab.co](mailto:privacy@supertab.co).

### **8. OTHER WEB SITES AND SERVICES**

- Please remember that when you use a link to go from our Service to another website or service, our Privacy Policy or other terms do not apply to those third-party websites or services. Your browsing and interaction on any third-party website or service, including those that have a link on our website, are subject to that third party's own rules and policies.

### **ADDITIONAL NOTICE TO CALIFORNIA RESIDENTS**

- This Section applies only to users who are California residents, and to the Personal Information of such users that we collect. For California residents, Personal Information is defined by the CCPA (California Consumer Protection Act) as any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer or household.

This California Notice does not address or apply to:

- Our handling of Personal Information that is exempt under Section 1798.45 of the CCPA;
- Personal Information we collect about individuals who are not California residents, or;
- Personal Information we collect about individuals acting in their capacity as representatives ("B2B contacts") of users, to the extent we use their Personal Information only in the context of conducting our business relationship with the respective business.

The CCPA requires certain disclosures about the categories of Personal Information that we collect and how we use it, the categories of sources from whom we collect Personal Information, and the third parties with whom we share it.

We do not sell your Personal Information.



California residents have the right to request: (1) that we disclose what Personal Information about them we collect, use, and disclose, including the specific pieces of the Personal Information about them collected by us in the preceding 12 months (known as a “request to know”); and (2) that we delete the Personal Information about them collected or maintained by us (known as a “request to delete”).

If you are a California resident and would like to submit a request to know or a request to delete, you may submit your request by e-mailing [privacy@supertab.co](mailto:privacy@supertab.co).

Requests will be responded to, free of charge, within 45 days of receiving the request. Consistent with California law, you may only make two such requests in a 12-month period, and the information provided will only cover the information collected in the preceding 12 months.

In order to process a request, we will need to verify your identity. We may request two or more data points of Personal Information and other proof of identification depending on the nature of the request and the Personal Information requested to verify your identity.

As a California resident, you also have the right to designate an agent to exercise these rights on your behalf. We may require proof that you have designated the authorized agent to act on your behalf and to verify your identity directly with us.

## 10. HOW TO CONTACT US

If you have any thoughts or questions about this Privacy Policy, please contact us at [privacy@supertab.co](mailto:privacy@supertab.co). If you live in the United States, the data controller responsible for your personal data is Supertab Inc.:

Supertab Inc.  
Attn: Privacy Policy Inquiry 4th Floor  
450 Lexington Ave  
New York, NY, 10017

**If you live outside the United States, please see [part II of this Privacy Policy](#)**

Our EU representative is Supertab GmbH:  
Supertab GmbH  
Attn: Data Protection Officer  
Neuturmstrasse 5  
80331 München GERMANY

## 11. CHANGES TO OUR PRIVACY POLICY

Supertab Inc. may modify or update this Privacy Policy from time to time, so please review it periodically. We may provide you additional forms of notice of modifications or updates as appropriate under the circumstances. Your continued use of the Service after any modification to this Privacy Policy will constitute your acceptance of such modification.

## PART II – PRIVACY POLICY FOR DATA SUBJECTS IN THE EU/EEA AND UK

This part of the Privacy Policy informs you as a data subject **located in the EU/EEA or UK** about the handling of your personal data by Supertab, Inc. and about your rights under the European General Data Protection Regulation (GDPR) and any national data protection laws, including the right to object to certain types of processing. See below for more information on your rights as a data subject. References to the European GDPR always implicitly include a reference to the corresponding regulation in the law of the United Kingdom, in which the European GDPR has been implemented into national law (UK GDPR).

### I. GENERAL INFORMATION

#### 1. Contact of the controller

Supertab, Inc., based at 450 Lexington Ave, 4th Floor, New York, NY, 10017 (hereinafter referred to as "we" or "us") is the controller of your data and is responsible for the data processing of individuals located in the EU/EEA and UK.

If you are located within the EU/EEA and have any questions or suggestions regarding this information, or if you would like to contact us about asserting your rights, please send your request to our EU representative:



Supertab GmbH  
Neuturmstrasse 5  
80331 Munich  
Email [help@supertab.co](mailto:help@supertab.co)

If you are located within the UK and have questions regarding this Privacy Policy, or if you would like to contact us about asserting your rights, please send your request to: [help@supertab.co](mailto:help@supertab.co)

**If you are not located in the EU/EEA or UK or Japan, only [part I of this Privacy Policy](#) applies.  
If you are located in Japan, only [part III of this Privacy Policy](#) applies.**

## 2. Legal bases

The term "personal data" under data protection law refers to all information relating to an identified or identifiable individual. We process personal data in compliance with the relevant data protection regulations, in particular the GDPR. Data processing by us only takes place on the basis of a legal permission. We process personal data only with your consent (Art. 6 (1) (a) GDPR), for the performance of a contract to which you are a party or at your request for the performance of pre-contractual measures (Art. 6 (1) (b) GDPR), for the performance of a legal obligation (Art. 6 (1) (c) GDPR) or if the processing is necessary to protect our legitimate interests or the legitimate interests of a third party, unless your interests or fundamental rights and freedoms which require the protection of personal data override (Art. 6 (1) (f) GDPR).

## 3. Duration of storage

Unless otherwise stated in this Privacy Policy, we store the data only for as long as is necessary to achieve the processing purpose or to fulfill our contractual or legal obligations. Such statutory retention obligations may arise in particular from commercial or tax law regulations. From the end of the calendar year in which the data was collected, we will retain such personal data contained in our accounting records for ten years and retain personal data contained in commercial letters and contracts for five to seven years (depending on the country you are located in). In addition, we will retain data in connection with consents requiring proof as well as with complaints and claims for the duration of the statutory limitation periods. We will delete data stored for advertising purposes if you object to processing for this purpose.

## 4. Categories of data recipients

We use processors as part of the processing of your data. Processing operations carried out by such processors include, for example, hosting, sending e-mails, maintenance and support of IT systems, customer and order management, accounting and billing or marketing activities. A processor is a natural or legal person, public authority, agency or other body that processes personal data on behalf of the data controller. Processors do not use the data for their own purposes but carry out data processing exclusively for the controller and are contractually obligated to ensure appropriate technical and organizational measures for data protection. In addition, we may transfer your personal data to bodies such as postal and delivery services, house bank, tax consultancy/auditing company or the financial administration. Further recipients are also set out below.

We are a globally active company with cross-border and cross-company teams. Data transfer to other companies in our group of companies can therefore not be ruled out.

## 5. Data transfer to third countries

Our data processing operations may involve the transfer of certain personal data to third countries, i.e. countries that may not provide the same level of protection for your personal data (especially where the GDPR is not applicable law). Such a transfer takes place in a permissible manner if the European Commission or the UK government (as applicable) has determined that an adequate level of data protection is required in such a third country. Please find a list of the European Commission's adequacy decisions [here](#). Information regarding UK adequacy decisions can be found [here](#).

If such an adequacy decision by the European Commission or the UK government (as applicable) does not exist, a transfer of personal data to a third country will only take place if appropriate safeguards exist pursuant to Art. 46 GDPR or if one of the conditions of Art. 49 GDPR is met.

Unless an adequacy decision is in place and otherwise specified below, we use:

(a) the EU standard data protection clauses as appropriate safeguards for transfers of personal data to third countries outside of the EU; and

(b) the standard data protection clauses approved by the UK's supervisory authority (the Information Commissioner's Office) as appropriate safeguards for transfers of personal data to third countries outside of the UK.

You have the possibility to obtain a copy of these EU or UK standard data protection clauses or to inspect them. To do so, please contact us at the address given under Contact.

In exceptional circumstances, if there is no adequacy decision for a third country or appropriate safeguards in place with a recipient, if you consent to the transfer of personal data to third countries, the transfer will take place on the legal basis of Article 49 (1) (a) GDPR.

## 6. Processing when exercising your rights

If you exercise your rights outlined in Your Rights below, we will process the personal data provided for the purpose of implementing these rights by us and to be able to provide evidence thereof. We will only process data stored for the purpose of providing information and preparing it for this purpose and for data protection control purposes and otherwise restrict processing in accordance with the GDPR.

These processing operations are based on the legal basis of Art. 6 (1) (c) GDPR (compliance with a legal obligation) in conjunction with your rights under the GDPR (Art. 15 to 22 GDPR).

## 7. Your rights

As a data subject, you have the right to assert your data subject rights against us. In particular, you have the following rights:

- In accordance with Art. 15 GDPR, you have the right to request information about whether and, if so, to what extent we are processing personal data relating to you or not and the right to access your personal data.
- You have the right to demand that we correct your data in accordance with Art. 16 GDPR.
- You have the right to demand that we delete your personal data in accordance with Art. 17 GDPR.
- You have the right to have the processing of your personal data restricted in accordance with Art. 18 GDPR.
- You have the right, in accordance with Art. 20 GDPR, to receive the personal data concerning you that you have provided to us in a structured, common and machine-readable format and to transfer this data to another controller.
- If you have given us separate consent to data processing, you may revoke this consent at any time in accordance with Article 7 (3) GDPR. Such a revocation will not affect the lawfulness of the processing that was carried out on the basis of the consent until the revocation.
- If you believe that a processing of personal data concerning you violates the provisions of the GDPR, you have the right to lodge a complaint with the relevant supervisory authority in accordance with Art. 77 GDPR. This means that you have the right to raise a complaint with the supervisory authority in the country where you live, work or where the infringement took place.

## 8. Right of withdrawal

In accordance with Art. 21 GDPR, you have the right to object to processing in the following circumstances:

- on grounds relating to your particular situation when the applicable legal basis is legitimate interests; In some cases, we may demonstrate that we have compelling legitimate grounds to process your personal data, which override your rights and freedoms. If this is the case, we will let you know; and
- at any time when your personal data is processed for direct marketing purposes.

Where you receive marketing emails from us, you can unsubscribe by clicking on the unsubscribe link contained in each mailing or by sending an email to [help@supertab.co](mailto:help@supertab.co).

## II. DATA PROCESSING WHEN VISITING OUR WEBSITE

The following table describes what personal data is processed when you visit our Supertab website (<https://supertab.co/>).

When you visit our Supertab website, we collect information that you provide yourself. In addition, during your interaction with the website, we automatically collect certain information about your use of the website.

| Purpose                        | Legal basis                                | Personal data processed  |
|--------------------------------|--|--|
| Processing of server log files | Art. 6 (1) (f) GDPR: Legitimate interests. | Browser type/version, operating system used, page accessed, previously |



|   |   |  |
|---|---|--|
| <p>During the purely informative use of our website, general information that your browser transmits to our server is initially stored automatically (i.e. not via registration).</p> <p>The stored data is deleted after a maximum of two years, unless there is a justified suspicion of unlawful use based on concrete indications and further examination and processing of the information is necessary for this reason. If this is the case, we will delete the information as soon as the investigation/examination is concluded.</p> <p>Please note: We may not be able to identify you as a data subject based on the stored information without further information. Articles 15 to 22 of the GDPR therefore do not apply pursuant to Article 11 (2) of the GDPR, unless you provide additional information that enables us to identify you to exercise your rights set out in these articles.</p>  | <p>This processing serves the technical administration and security of our website. In addition, the log files are used to identify and resolve possible cases of fraud.</p>  | <p>visited page (referrer URL), IP address, date and time of the server request, HTTP status code.</p> |
| <p><b>Contact options and inquiries</b></p> <p>Our website contains contact forms through which you can send us messages. The transfer of your data is encrypted (recognizable by the "https" in the address line of the browser). All data fields marked as mandatory are required to process your request. Failure to provide this data will result in us not being able to process your request. The provision of further data is voluntary. Alternatively, you can send us a message via the contact email. We process the data for the purpose of answering your inquiry.</p>  | <p>Art. 6 (1) (b) GDPR: Contractual necessity if your request is directed towards the conclusion or performance of a contract with us.</p> <p>Art. 6 (1) (f) GDPR: Legitimate interests if the request is not directed towards the conclusion or performance of a contract with us. In this case, our legitimate interest is to answer inquiries and get in touch with inquiring persons.</p> | <p>Contact data (name, email address, telephone number), other data you provide via your inquiry</p>   |
| <p><b>Job applications</b></p> <p>You have the option of applying via our website. For this purpose, we collect personal data from you. For the selection of our applications, we use the service provider Personio, Personio SE &amp; Co. KG (Germany/EU), who is solely bound by instructions to act for us in accordance with the legal requirements for order processing.</p> <p>Your personal application data will be processed exclusively for purposes related to your interest in current or future employment with us and the processing of your application. Your application will only be processed and noted by the relevant contacts at our company. It is possible that your application will also be passed on to a company in our group in order to decide whether to hire you.</p> <p>All employees entrusted with data processing are obliged to maintain the confidentiality of your data. If we are unable to offer you employment, we will retain the data you have provided for up to six months after completion of the application process for the purpose of answering questions relating to your application and rejection. This does not apply if legal provisions prevent deletion, if further storage is necessary for the purpose of providing evidence, or if you have expressly consented to longer storage.</p> <p>If we store your applicant data for longer than six months and you have expressly consented to this, we would like to point out that this consent can be freely revoked at any time in accordance with Art. 7 (3) GDPR. Such revocation shall not affect the lawfulness of the processing that was carried out on the basis of the consent until the revocation.</p> | <p>Art. 6 (1) (b) GDPR: Contractual necessity.</p> <p>Art. 6 (1) (a) GDPR: Consent if we store your applicant data for longer than six months and you have expressly consented to this.</p>   | <p>Name, resume, salary requirements and other information provided by you.</p>                        |

When visiting our website, we also use cookies and similar technologies as well as tracking tools. The following table informs you about this data processing.

| Purpose  | Legal basis   | Personal data processed   |
|--|---|---|
| <p><b>Cookies</b></p> <p>We use cookies and similar technologies ("cookies") on our website. Cookies are small data sets that are stored by your browser when you visit a website. This identifies the browser used and can be recognized by web servers. You have full control over the use of cookies through your browser, or through your cookie settings on our website (which are accessible in the footer of our website). You can delete the cookies in the security settings of your browser at any time. You can object to the use of cookies through your browser settings in principle or for specific cases, or through your cookie settings on our website (which are accessible in the footer of our website).</p> <p>We use cookies that are necessary for the operation of our website and thus permissible without the consent of the user.</p> <p>In addition, we may use cookies to offer special features and content and for analysis and marketing purposes. These may also include cookies from third-party providers (so-called third party cookies). In this case, we only use such cookies if you consent to us doing so.</p> <p>Information on the purposes, providers, technologies used, data stored and the storage period of individual cookies can be found in the cookie settings of our Consent Management Tool, which you can access in the footer of our website ("Cookie Settings").</p> <p>We also explain our use of cookies below where it involves the collection of your personal data.</p> | <p>Necessary cookies:<br/>Art. 6 (1) (f) GDPR: Legitimate interest</p> <p>Our legitimate interest is to provide a user-friendly and secure webpage.</p> <p>Non-necessary cookies:<br/>Art. 6 (1) (a) GDPR: Consent</p>  | <p>Information on the data that is processed through cookies can be found in our Consent Management Tool, which you can access in the footer of our website ("Cookie settings").</p>                                  |
| <p><b>Consent management tool</b></p> <p>This website uses the CookieYes consent management tool from CookieYes Limited (United Kingdom) to control cookies and the processing of personal data.</p> <p>The consent banner allows visitors of our website to give their consent to certain data processing or to revoke their consent. By confirming the "I accept" button or by saving individual cookie settings, you consent to the use of the associated cookies.</p> <p>In addition, the banner supports us in being able to provide evidence of the declaration of consent. For this purpose, we process information about the declaration of consent and further log data about this declaration. Cookies are also used to collect this data. The processing of this data is necessary in order to be able to prove that consent has been given.</p> <p>You can revoke or change your consent at any time in the cookie settings, which are accessible in the footer of our website.</p>  | <p>Art. 6 (1) (a) GDPR: Consent, where the placement of cookies involves the processing of personal data</p> <p>Art. 6 (1) (c), Art. 7 (1) GDPR: Legal obligation. The banner supports us in being able to provide evidence of the declaration of consent</p> | <p>Information on the data that is processed through cookies can be found in our Consent Management Tool, which you can access in the footer of our website ("Cookie settings").</p>                                  |
| <p><b>Tracking and retargeting via Google Analytics</b></p> <p>We use the Google Analytics service of the provider Google Ireland Limited (Ireland, EU) on our website. Google Analytics is a web analytics service that allows us to collect and analyze data about the behavior of our website visitors. Google Analytics allows us to measure interaction data from different</p>   | <p>Art. 6 (1) (a) GDPR: Consent</p> <p>The setting of cookies and the further processing of personal data takes place with your consent. You can revoke this consent via our Consent Management Tool at any time.</p>   | <p>IP addresses, device identifiers, information about interaction with our service (stored in the terminal device you are using or stored on your device via cookies). For more information also see our Consent</p> |

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| <p>devices and from different sessions. This allows us to put individual user actions in context and analyze long-term relationships.</p> <p>Google Analytics uses cookies for this purpose, which enable an analysis of the use of our service.</p> <p>Google Ireland will process the data collected in this way on our behalf in order to evaluate the use of our website by visitors, to compile reports on the activities within our website and to provide us with other services related to the use of our website and the use of the Internet. In doing so, pseudonymous usage profiles of users can be created from the processed data.</p> <p>We use Google Analytics only with IP anonymization enabled.</p> <p>The data on user actions are stored for a period of 14 months and then automatically deleted. The deletion of data whose storage period has expired takes place automatically once a month.</p> <p>Further information on how data from websites or apps is used by Google for advertising purposes can be found in Google's notices at: <a href="http://www.google.com/policies/technologies/ads/">www.google.com/policies/technologies/ads/</a>.</p> |  | <p>Management Tool, which you can access in the footer of our website ("Cookie settings").</p> |
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### III. DATA PROCESSING WHEN USING THE SUPERTAB SERVICE

Our Supertab service consists of

- your user account (<https://my.supertab.co/>), where you can view and manage all purchases and payments, and
- the user interface, which is integrated with our partners and through which you can directly purchase the content of our partners.

The following table describes what personal data is processed when you use our Supertab service. When you use our Supertab service, we collect information that you provide yourself. In addition, during your interaction with the service, we automatically collect certain information about your use of the service.

| Purpose   | Legal basis  | Personal data processed   |
|---|--|---|
| <p><b>Processing of server log files</b></p> <p>When using our service, general information that your browser transmits to our server is initially stored automatically (i.e. not via registration).</p> <p>The stored data is deleted after a maximum of two years, unless there is a justified suspicion of unlawful use based on concrete indications and further examination and processing of the information is necessary for this reason. If this is the case, we will delete the information as soon as the investigation/examination is concluded.</p> <p>Please note: We may not be able to identify you as a data subject based on the stored information without further information. Articles 15 to 22 of the GDPR therefore do not apply pursuant to Article 11 (2) of the GDPR, unless you provide additional information that enables us to identify you to exercise your rights set out in these articles.</p> | <p>Art. 6 (1) (f) GDPR: Legitimate interests.</p> <p>This processing serves the technical administration and security of our service. In addition, the log files are used to identify and resolve possible cases of fraud.</p> | <p>browser type/version, operating system used, page accessed, previously visited page (referrer URL), IP address, date and time of the server request, HTTP status code.</p> |
| <p><b>Registration/user account</b></p> <p>In order to use our service, registration is required. There are several ways to create the account and log in.</p>  | <p>Art. 6 (1) (b) GDPR: Contractual necessity</p>  | <p>email address, password<br/>if SSO: first and last name</p>  |

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|--|---|---|
| <p><b>1. <u>Registration and Login by email and password</u></b></p> <p>You can register and log in with your e-mail address and a password. To confirm the registration, you will first receive a registration email, which you must confirm via a link (double opt-in). After registration, you can log in to your user account by providing your email address and the password used. The provision of the information is mandatory for the registration to be completed via this method and for you to be able to use the service.</p> <p><b>2. <u>Registration / Login via single-sign-on</u></b></p> <p>You also have the option to register with us using your Google or Apple account. In this case, we receive from Google or Apple (hereinafter "SSO provider") the information necessary for registration (your email address and, if applicable, your first and last name). Your password is not transmitted to us in the process.</p> <p>By integrating the single sign-on functionality, your web browser automatically establishes a direct connection with the server of the respective SSO provider. To log in, you will be redirected to the page of the SSO provider. There you can log in with your user data. This links your user account with the respective SSO provider to our service. We have no influence on the scope and further use of data collected by the SSO providers through the use of single sign-on. It is also possible that the respective SSO provider links the information about your login to our service to your other account information.</p> <p>When using the SSO services, your personal data may be transferred to the US and other third countries. Please see the "data transfer to third countries" section for further information.</p> <p>You can find more information about Google Log-In here:<br/> <a href="https://support.google.com/accounts/answer/112802?hl=en&amp;co=GENIE.Platform=Desktop">https://support.google.com/accounts/answer/112802?hl=en&amp;co=GENIE.Platform=Desktop</a></p> <p>General information on data protection at Google can be found at: <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a></p> <p>You can find more information about the Apple Log-In here: <a href="https://www.apple.com/de/privacy/features/">https://www.apple.com/de/privacy/features/</a>.</p> <p>More information on data processing by Apple can be found here: <a href="https://www.apple.com/de/privacy/">https://www.apple.com/de/privacy/</a>.</p> |   |   |
| <p><b>Purchase of Partner Content via Supertab</b></p> <p>As soon as you purchase content from one of our partners and decide to use Supertab for payment, you will be redirected to our service. In this case, we process the personal data required to process the contract and to provide the desired content. Each purchase of content via the tab is documented in your user account. There you have the possibility to view all purchases as well as the status of your tab.</p>   | <p>Art. 6 (1) (b) GDPR: Contractual necessity</p> | <p>e-mail address, IP address, purchased content, price of the content, date of purchase</p>                          |
| <p><b>Payment service provider</b></p> <p>To be able to pay for the content via your tab, you must store payment information.</p> <p>We use the payment provider Stripe of Stripe Inc. (US) to manage and process payments. Stripe processes the respective payment information under its own responsibility and directly collects all payment details from you (e.g. credit card information, country</p>   | <p>Contractual necessity</p>                      | <p>Last four digits of the credit card, date of purchase, amount/price, taxes, issuing bank, country, postal code</p> |

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| <p>and postal code, IP address, content purchases, price). We can only access limited personal data in order to control the payments. You can find more information about data protection at Stripe here: <a href="https://stripe.com/de/privacy#translation">https://stripe.com/de/privacy#translation</a>. When using Stripe, data may be transmitted to the US or other third countries. Please note the information in the section "Data transfer to third countries".</p> <p>The information provided and/or collected by you during the payment process will be transmitted by us to the payment service provider, insofar as this transmission is necessary for the execution of the payment transaction.</p>   |  |   |
| <p><b>Data transfer to our partners</b></p> <p>If you purchase content from one of our partners, Supertab transfers personal data to those partners in specific cases, as described below. The further processing of personal data by the partner as a separate data controller is subject to the partner's data privacy policy.</p> <p><b>a) Disclosure of pseudonymous data for usage analysis</b></p> <p>If you purchase content from one of our partners, for example a publisher, via Supertab, we may transmit pseudonymized usage information to this partner in specific circumstances. With this information, our partner can track that a person has consumed the specific content and has paid or will pay via Supertab. However, our partner is not allowed to link this pseudonymous usage data with other personal data (e.g., your email address). We transmit this data to inform our partner about the number and type of purchases of your content via Supertab. Further data processing is determined by the partner on its own responsibility.</p> <p><b>b) Disclosure of usage and contact data for other purposes</b></p> <p>We may ask you for permission to transmit an extended data set to our partners or other organizations. The purpose of this permission is to transmit personal data such as your name, your e-mail address, or your IP address instead of the pseudonymized usage information in order to give our partners or other organizations the opportunity to contact you directly or to take over your tab. Such transmission for the aforementioned purposes will only take place if you have consented to this. The specific purposes as well as the exact data transmitted and the exact recipients of the data can be found in the respective declaration of consent.</p> <p><b>c) Disclosure of purchase data for providing customer support</b></p> <p>If you purchase content from one of our partners, we will automatically share the necessary purchase data with our partners. This enables our partners to provide customer support services and to help you directly and efficiently if you have problems with the purchased content. Our partners are</p> | <p>Art. 6 (1) (f) GDPR: Legitimate interests.</p> <p>Legitimate interests arise from our partners. They have the legitimate interest to obtain basic information about the users that access content via Supertab services (e.g. readers of a publisher's content) in order to optimize their own offers and services.</p> <p>Art. 6 (1) (a) GDPR: Consent</p> <p>Art. 6 (1) (f) GDPR: Legitimate interests.</p> <p>The legitimate interest from our partners and from us is to provide you with the possibility to directly contact the partner's customer support in order to solve any content-related problems directly.</p> | <p>Pseudonymous user information: User ID, information about purchased content (e.g. name of a specific article or 1-hour-access to all articles)</p> <p>e-mail address, first and last name, IP address, other data specified in the consent form</p> <p>Email address, purchase information (purchased content, date, number, name webpage where content was purchased)</p> |

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| not allowed to use those purchase data for purposes other than customer support.  |   |   |
| <p><b>Support Requests</b></p> <p>You have the possibility to contact us directly and send us a support request via the help section in your Supertab account. To answer your request and help you, we need your email address and a description of the problem. Without this information, we will not be able to help you. You also have the option to provide us with documents (e.g. screenshots of error messages). This information can help us to solve your problem as quickly as possible. The provision of these documents is voluntary.</p> | <p>Art. 6 (1) (f) GDPR: Legitimate interests.</p> <p>Our legitimate interest is to respond to your request and to provide you with a hassle-free user experience.</p> | <p>email address, description of the problem/question, screenshots/documents provided</p> |

When providing our service, we also use cookies and similar technologies as well as tracking tools. The following table informs you about this data processing when using our service via your user account (<https://my.supertab.co/>).

| Purpose  | Legal basis   | Personal data processed  |
|--|---|--|
| <p><b>Cookies</b></p> <p>We use cookies and similar technologies ("cookies") in our service. Cookies are small data sets that are stored by your browser when you visit a website. This identifies the browser used and can be recognized by web servers. You have full control over the use of cookies through your browser, or through your cookie settings on our website (which are accessible in the footer of our website). You can delete the cookies in the security settings of your browser at any time. You can object to the use of cookies through your browser settings in principle or for specific cases, or through your cookie settings on our website (which are accessible in the footer of our website).</p> <p>We use cookies that are necessary for the operation of our service and thus permissible without the consent of the user.</p> <p>In addition, we may use cookies to offer special features and content and for analysis and marketing purposes. These may also include cookies from third-party providers (so-called third party cookies). In this case, we only use such cookies if you consent to us doing so.</p> <p>Information on the purposes, providers, technologies used, data stored and the storage period of individual cookies can be found in the cookie settings of our Consent Management Tool, which you can access in the footer of our website ("Cookie Settings").</p> <p>We also explain our use of cookies below where it involves the collection of your personal data.</p> | <p>Necessary cookies:<br/>Art. 6 (1) (f) GDPR: Legitimate interest</p> <p>Our legitimate interest is to provide a user-friendly and secure webpage.</p> <p>Non-necessary cookies:<br/>Art. 6 (1) (a) GDPR: Consent</p>                      | <p>Information on the data that is processed through cookies can be found in our Consent Management Tool, which you can access in the footer of our website ("Cookie settings").</p> |
| <p><b>Consent management tool</b></p> <p>Our service implements the CookieYes consent management tool from CookieYes Limited (United Kingdom) to control cookies and the processing of personal data.</p> <p>The consent banner allows users of our service to give their consent to certain data processing or to revoke their consent. By confirming the "I accept" button or by saving individual cookie settings, you consent to the use of the associated cookies.</p> <p>Where the placement of cookies involves the processing of your personal data, the legal basis under data protection law to place these cookies on</p>   | <p>Art. 6 (1) (a) GDPR: Consent, where the placement of cookies involves the processing of personal data</p> <p>Art. 6 (1) (c), Art. 7 (1) GDPR: the banner supports us in being able to provide evidence of the declaration of consent</p> | <p>Information on the data that is processed through cookies can be found in our Consent Management Tool, which you can access in the footer of our website ("Cookie settings").</p> |

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| <p>your device is your consent within the meaning of Art. 6 (1) (a) GDPR.</p> <p>In addition, the banner supports us in being able to provide evidence of the declaration of consent. For this purpose, we process information about the declaration of consent and further log data about this declaration. Cookies are also used to collect this data. The processing of this data is necessary in order to be able to prove that consent has been given. The legal basis arises from our legal obligation to document your consent (Art. 6 (1) (c) in conjunction with Art. 7 (1) GDPR).</p> <p>You can revoke or change your consent at any time in the cookie settings, which are accessible in the footer of our website.</p>  |   |  |
| <p><b>Analysis of our service via New Relic</b></p> <p>We use the New Relic service of New Relic, Inc. (US) on our Supertab service. New Relic is a web analytics tool that collects the usage data of a website in order to analyze and monitor the website's performance and, for example, to improve the loading times of individual parts of the website.</p> <p>When using the service, a transfer of your data to the US or other third countries cannot be excluded. Please note the information in the section "Data transfer to third countries".</p>   | <p>Art. 6 (1) (f) GDPR: Legitimate interest</p> <p>Our legitimate interest is to monitor and optimize our service.</p>  | <p>IP address</p>  |
| <p><b>Analysis of our service via DataSet</b></p> <p>We use the "DataSet" service of SentinelOne, Inc. (US) to evaluate our log files. DataSet helps us to clearly process the log files and to check for certain events (fraud attempts, technical errors, etc.). For this purpose, the collected log files including your IP address are transmitted to DataSet.</p> <p>When using the service, a transfer of your data to the US cannot be excluded. Please note the information in the section "Data transfer to third countries".</p>   | <p>Art. 6 (1) (f) GDPR: Legitimate interest</p> <p>We have a legitimate interest in ensuring the technical administration and security of our service in a clear and efficient manner</p>                             | <p>IP address</p>  |
| <p><b>Tracking and retargeting via Google Analytics</b></p> <p>We use the Google Analytics service of the provider Google Ireland Limited (Ireland, EU) in our service.</p> <p>Google Analytics is a web analytics service that allows us to collect and analyze data about the behavior of users on our service. Google Analytics allows us to measure interaction data from different devices and from different sessions. This allows us to put individual user actions in context and analyze long-term relationships.</p> <p>Google Analytics uses cookies for this purpose, which enable an analysis of the use of our service.</p> <p>Google Ireland will process the data collected in this way on our behalf in order to evaluate the use of our service by users, to compile reports on the activities within our service and to provide us with other services related to the use of our service and the use of the Internet. In doing so, pseudonymous usage profiles of users can be created from the processed data.</p> <p>We use Google Analytics only with IP anonymization enabled.</p> <p>The data on user actions are stored for a period of 14 months and then automatically deleted. The deletion of data whose storage period has expired takes place automatically once a month.</p> | <p>Art. 6 (1) (a) GDPR: Consent</p> <p>The setting of cookies and the further processing of personal data takes place with your consent. You can revoke this consent via our Consent Management Tool at any time.</p> | <p>IP addresses, device identifiers, information about interaction with our service (stored in the terminal device you are using or stored on your device via cookies).</p> <p>For more information also see our Consent Management Tool, which you can access in the footer of our website ("Cookie settings").</p> |

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| <p>Further information on how data from websites or apps is used by Google for advertising purposes can be found in Google's notices at:<br/> <a href="http://www.google.com/policies/technologies/ads/">www.google.com/policies/technologies/ads/</a>.</p>  |  |  |
| <p><b>Amazon Cloudfront</b></p> <p>For our Supertab service, we use the Amazon Cloudfront service of the provider Amazon Web Services EMEA SARL (Luxembourg, EU) to display content. For such an integration, processing of your IP address is necessary so that the content can be sent to your browser. Your IP address is therefore transmitted to Amazon Web Services.</p> <p>You can object to this data processing via the settings of the browser used or certain browser extensions. Please note that this may result in functional restrictions within the Supertab service.</p> <p>When using Amazon Cloudfront, a transfer of your data to the US cannot be ruled out. Please note the information in the section "Data transfer to third countries".</p> <p>For more information on data protection at Amazon Web Services, please refer to the Amazon Web Services privacy notices at<br/> <a href="https://aws.amazon.com/de/privacy/?nc1=f_pr">https://aws.amazon.com/de/privacy/?nc1=f_pr</a>.</p>   | <p>Art. 6 (1) (f) GDPR: Legitimate interest.</p> <p>Our legitimate interest is the optimization and economic operation of our service.</p> | <p>IP address</p>                                      |
| <p><b>Fastly</b></p> <p>We use the Fastly service of the provider Fastly Inc. (US) in our Supertab service to display content. For such an integration, a processing of your IP address is necessary so that the content can be sent to your browser. Your IP address is therefore transmitted to Fastly Inc.</p> <p>You can object to this data processing via the settings of the browser used or certain browser extensions. Please note that this may result in functional restrictions within the Supertab service.</p> <p>When using Fastly, a transfer of your data to the US cannot be ruled out. Please refer to the information in the section "Data transfer to third countries".</p> <p>For more information about Fastly's privacy policy, please refer to Fastly's privacy policy at<br/> <a href="https://www.fastly.com/de/privacy/">https://www.fastly.com/de/privacy/</a>.</p>   | <p>Art. 6 (1) (f) GDPR: Legitimate interest.</p> <p>Our legitimate interest is the optimization and economic operation of our service.</p> | <p>IP address</p>                                      |
| <p><b>Google reCAPTCHA</b></p> <p>We use the service reCAPTCHA of Google Ireland Limited (Ireland, EU) for registration. For this integration, processing of your IP address is necessary so that we can verify you as an individual. Your IP address is therefore transmitted to Google Ireland. In addition, Google Ireland collects further data, e.g. about your browser and your click behavior.</p> <p>We use the service for security reasons to check whether the information is provided by a natural person. In this way, automated access attempts and attacks can be detected and warded off. We are required by law to take technically and commercially reasonable measures to ensure the security of the portal.</p> <p>When using the service, a transfer of your data to the US cannot be excluded. Please note the information in the section "Data transfer to third countries".</p> <p>For more information on data protection at Google, please refer to Google's privacy policy at<br/> <a href="https://www.google.com/policies/privacy">https://www.google.com/policies/privacy</a>.</p> | <p>Art 6 (1) (c) GDPR: Compliance with a legal obligation in conjunction with Art 32 GDPR.</p>   | <p>IP address<br/>         browser, click behavior</p> |



Our partner may use further cookies and similar technologies as well as tracking tools at its own website which may also affect you as a data subject when using our user interface on our partners website. Our partner has a sole responsibility for such operations and data processing. Please see the Privacy Policy and/or consent management tool at our partner's website for more information.

## IV. FURTHER DATA PROCESSING

| Purpose   | Legal basis  | Personal data processed  |
|---|--|--|
| <p><b>Contact by email</b><br/>If you send us a message via the contact email provided, we will process the transmitted data for the purpose of responding to your inquiry.</p>   | <p>Art. 6 (1) (f) GDPR: Legitimate interests.<br/>Our legitimate interest is to get in touch with inquiring persons.</p>   | <p>Email address, content, attached documents (if applicable), technical data</p>  |
| <p><b>Customer and interested party data</b><br/>If you contact our company as a commercial customer or interested party, we process your data to the extent necessary to establish or implement the contractual relationship.<br/>We also process customer and interested party data for evaluation and marketing purposes.<br/><br/>Further data processing may take place if you have consented (Art. 6 (1) a GDPR) or if this is necessary for the fulfillment of a legal obligation (Art. 6 (1) c GDPR).</p> | <p>Art. 6 (1) (f) GDPR: Legitimate interests.<br/>Our legitimate interest is to get in touch with our contact persons for commercial customers and business partners.<br/><br/>For marketing purposes:<br/>Art. 6 (1) (f) GDPR: Legitimate interests.<br/>Our legitimate interest is to further develop our offer and informing our contact persons specifically about our offers.</p> | <p>personal master data (name, address, company), contract data and payment data, contact and communication data (email address, telephone number)</p> |
| <p><b>Use of email address for marketing purposes</b><br/>We may use the email address you provided during registration to inform you about our own similar products and services offered by us.<br/><b>You can object</b> to this at any time without incurring any transmission costs other than those according to the basic rates. To do so, you can unsubscribe by clicking on the unsubscribe link contained in each mailing or by sending an email to help@supertab.co.</p>                                | <p>Art. 6 (1) (f) GDPR: Legitimate interests.<br/>Our legitimate interest is to inform you about our own similar products and services offered by us.</p>  |  |



## **PART III – PRIVACY POLICY FOR PERSONS IN JAPAN**

### **1. OVERVIEW**

This Privacy Policy explains to you as a person in Japan how we, and some of the companies we work with, collect, use, share and protect information in relation to our Platform and Service and your choices about the collection and use of your information. Please read this Privacy Policy carefully. By using the Platform and/or Service, you agree to the collection and use of information in accordance with this Privacy Policy and our Terms of Service.

- By using the Supertab Platform and Service, you understand and agree that we are providing a platform that offers the ability for individuals or organizations to offer access management functions to individuals wishing to access digital content, products, or services on websites or applications. Furthermore, you understand and agree that in cases where access is granted in exchange for a payment, you may have the ability to “pay now” or to make a commitment to “pay later” by bundling multiple small transactions on to a single electronic ledger linked to you and/or your user device(s).
- Your agreement to the Terms of Service and this Privacy Policy is, of course, voluntary. Please understand, however, that you may not utilize our Service in any manner without agreeing to our Terms of Service and this Privacy Policy.

### **2. INFORMATION WE COLLECT**

We collect the following types of information:

#### **1. Information you may provide to us directly**

- Your first and last name, password, e-mail, phone number and mailing address, a reference number that can be associated with your payment details, your payment history (if any) and login data, which you provide when you register for an account on the Service. When you sign up for our newsletter, we collect your name, e-mail, industry, and company. In addition to the information set forth above, we may collect information required by law, for instance in compliance with “know your customer” (KYC) procedures required to facilitate payments.
- Communications between you and the Service. For example, we may send you emails (e.g. account verification, changes/updates to features, technical and security notices). You may send us comments, questions, or requests.
- Additional details related to your use of the Service, including a record of your agreement to our Terms of Service, term of subscription and renewal periods, preferred billing method, user account details or credit card details or other terms of payment.

#### **2. Information you provide to us indirectly**

##### **Analytics information:**

- The Service uses third party software analytics tools including, for example, but not limited to, tools provided by Google Analytics (a service provided by Google, Inc., <https://marketingplatform.google.com/about/analytics/>) to help us measure traffic and usage trends on our website. The Service also uses Zendesk (<https://www.zendesk.com/about/>) for customer support. These tools collect information sent by your device or by our Service to you, including the web pages you visit through our Service, add-ons, location data, your anonymized IP address, and other information that assists us in gathering feedback to improve our products and our business model. We collect and use this analytics information together with analytics information from other users so that it cannot reasonably be used (and is not used) to identify any individual user.

##### **Cookies and similar technologies:**

- When you visit the Service, we may use cookies and similar technologies like pixels, web beacons, and local storage to collect information about how you use the Service and provide features to you. Cookies are small files that make it easier for you to use content from the providers that use our Service. Your Internet browser automatically receives these files from our servers and then saves the cookies on your computer. The Service uses what are known as session cookies and persistent cookies. We send several persistent cookies to your computer. Among other things, cookies allow you to access Internet content



across different websites. You can change the settings on your browser so that it informs you when it accepts a cookie, or so that it does not accept any cookies at all. We recommend that your browser be set to accept cookies from the Service, as only then will you be able to use the Service. We may ask advertisers or other partners to serve ads or services to your devices, which may use cookies or similar technologies placed by us or the third party.

#### **Log file information:**

- Log file information is automatically reported by your browser each time you make a request to access (i.e., visit) a web page or app. It can also be provided when the content of the webpage or app is downloaded to your browser or device.
- When you use the Service, our servers automatically record certain log file information, including your web request, IP address, browser type, referring / exit pages and URLs, number of clicks and how you interact with links on the Service, domain names, landing pages, pages viewed, and other such information. We may also collect similar information from emails sent to our users, which then help us track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Service.

### **3. HOW WE USE YOUR INFORMATION (PURPOSE)**

In addition to uses of information we describe elsewhere in this Privacy Policy, we use your data to do the following:

#### **Enable the Service:**

- We process your data, including your name, e-mail and mailing address, and payment information to process payments that you initiate when you use the Service. We further review a range of user data, including log files, IP addresses, mailing and e-mail addresses, and payment information in order to improve the Service, trouble-shoot and track issues with the Service, and identify areas for improvement.
- We use your personal data to communicate with you about the services we provide. For instance, for subscription service users, we use your contact information to notify you that your subscription will automatically be renewed soon or has expired. We also use user and payment data to handle support requests from users.
- In order to make sure our users of the Service receive payments, we engage in a payment settlement process. During this process, our payment service provider consults user data, including name, amounts owed and currency information and makes net payments to our users.

#### **Perform credit, identity, and address checks:**

- The success of our business depends on our preventing illegal or fraudulent transactions. To minimize our risks, among other processes, we compare usernames and country information against crime prevention watch lists upon registration.
- Analyze user behavior: We perform statistical and other analysis of your activities related to the Service, including your payments. We do this to gain a better understanding of how our Service is used so that we can provide you with a better, more intuitive and personalized experience and offer new products and services that may interest you.

#### **Marketing:**

- With your consent, we will use your data for marketing purposes, including to communicate with you about products, services, and other organizations and activities that may interest you. In order to tailor these communications, we evaluate your activities on the Service, often by using automated processing. In the course of using your data for marketing purposes, we will not forward it to third parties without your consent as explained in Section 6 below.

### **4. HOW WE SHARE YOUR INFORMATION**

We will not share your information with third parties outside of Supertab or its Affiliates (defined below) except as noted in this Privacy Policy or with your explicit prior consent.

#### **Parties with whom we may share your information:**

- We may share limited information with Merchants and Distribution Partners (as defined in our Terms of Service) including your name, email address, phone number (if collected) and preferred language, as well as payment or payment commitment details, including the payment amount, the payment date, and similar, only after you have made a payment or a commitment to pay to that particular Merchant or Distribution Partner. Merchants or Distribution Partners may use this data to inform you by mail, email or digital advertising of their products and/or services that might be of interest, i.e. for marketing purposes. Merchants or Distribution Partners are not permitted to share your data with any third parties. Additionally, we may share the results of analysis of user behavior described above with other affiliates of the Service.
- We transmit certain user data to our payment service providers, e.g. credit card billing companies, banks, risk management provider and other financial institutions. We typically transmit the payment amount and a reference number that the payment service provider associates with your payment details. We also monitor whether payments from users are received on time and provide that information to Merchants and Distribution Partners. We share name, address, and country data with our payment service providers to help us perform some of the credit and fraud risk assessments described in Section 3.
- We may share certain information regarding Service content and/or your information (including but not limited to, information from cookies, log files, device identifiers, location data, and usage data) with businesses that are legally part of Supertab AG ("Affiliates"). Affiliates may use this information to help provide, understand, and improve the Service (including by providing analytics) and Affiliates' own services (including by providing you with better and more relevant experiences).
- We also may share your information, including information from tools like cookies, log files, payment service providers, hosting providers, Google Analytics and other third-party organizations that help us connect you with the Service ("Third Party Service Providers"). Our Third Party Service Providers will be given access to your information as is reasonably necessary to provide Supertab with their services, under data processing agreements that require them, among other things, only to act on Supertab and instruction and to take sufficient technical and organizational measures to safeguard your data.
- We may also share certain information such as cookie data with third-party advertising partners. This information would allow third-party ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you.
- Other cases permitted by the Act on the Protection of Personal Information (Act No. 57 of 2003) or by other laws or regulations
- The recipients include third parties in countries or regions outside of Japan. The countries or regions where these entities are located are as follows (please refer to "PART II – PRIVACY POLICY FOR DATA SUBJECTS IN THE EU/EEA AND UK" above for details of the information to be provided):

(1) Third Parties located in the United States of America

Please refer to the following link for more information on the protection of personal information in the United States of America: [https://www.ppc.go.jp/enforcement/infoprovision/laws/offshore\\_report\\_america/](https://www.ppc.go.jp/enforcement/infoprovision/laws/offshore_report_america/)

Personal information protection measures to be taken by the third parties:

| Name of third party | Does this party take measures according to the same standard required of businesses handling personal information in Japan? |
|---------------------|---|
| Google, Inc.        | Yes   |
| Zendesk, Inc.       | Yes   |
| Stripe, Inc.        | Yes   |
| New Relic, Inc.     | Yes   |
| SentinelOne, Inc.   | Yes   |
| Sisense, Ltd        | Yes   |
| Metabase, Inc.      | Yes   |
| Fastly, Inc.        | Yes   |

(2) Third Parties located in the United Kingdom or in Member States of the European Union

Supertab AG (Germany)  
 Supertab GmbH (Germany)  
 Google Ireland Limited (Ireland)  
 Amazon Web Services EMEA SARL (Luxembourg)



Personio, Personio SE & Co. KG (Germany)  
CookieYes Limited (United Kingdom)  
Salesforce.com Germany GmbH (Germany)

#### **What happens in the event of a change of control:**

- If we sell or otherwise transfer part or all of Supertab AG, its subsidiaries or affiliates, or its assets, to another organization (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, or liquidation), your information may be among the items sold or transferred. The buyer or transferee would be obligated to honor the commitments we have made in this Privacy Policy.

#### **Responding to legal requests and preventing harm:**

- We may access, preserve and share your personal data in response to a legal request (like a search warrant, court order or subpoena) if we have a good faith belief that a law, regulation, or governmental request requires us to do so. This may include responding to legal requests from jurisdictions outside of the United States where we have a good faith belief that the response is required by law in that jurisdiction, affects users in that jurisdiction, and is consistent with internationally recognized standards. We may also access, preserve, and share information when we have a good faith belief it is necessary to: detect, prevent, and address fraud and other illegal activity; to protect ourselves, you, and others, including as part of investigations; and to prevent death or imminent bodily harm. Information we receive about you may be accessed, processed, and retained for an extended period of time when it is the subject of a legal request or obligation, governmental investigation, or investigations concerning possible violations of our terms or policies, or otherwise to prevent harm.

#### **How we record the provision of information to or by third parties:**

- When we provide personal information to a third party, we will create a record of such provision and store these records. When we receive personal information from a third party, we perform the necessary confirmation, and we create a record of such confirmation and store these records.

## **5. HOW WE STORE YOUR INFORMATION**

#### **Storage and Processing:**

- Your information collected through the Service may be stored and processed in the European Union and the United States, or any other country in which Supertab AG, its Affiliates or Service Providers maintain facilities.
- Supertab AG, its Affiliates, and/or Service Providers may transfer information that we collect about you, including personal information, across borders and from your country or jurisdiction to other countries or jurisdictions around the world.
- We take necessary and appropriate measures to safely manage and to prevent leakage, loss, or damage of user information. If we outsource the handling of personal information to a third party, we will confirm the handling of personal information by the third party by measures such as concluding an outsourcing contract and receiving periodic reports, etc.. For specific details of our security control measures, please contact us as described in Chapter 10 of this Part III of the Privacy Policy.
- We use commercially reasonable safeguards to help keep the information collected through the Service secure and take reasonable steps (such as requesting a unique password) to verify your identity before granting you access to your account. However, Supertab AG cannot ensure the security of any information you transmit to the Service or guarantee that information on the Service may not be accessed, disclosed, altered, or destroyed.
- You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to emails between you and the Service, at all times. We are not responsible for the functionality, privacy, or security measures of any other organization.

## **6. YOUR CHOICES ABOUT YOUR INFORMATION**

You are entitled to make choices about our handling of your data, from deleting or correcting data you include in your profile to opting out of advertising and other communication controls.

When we receive a request from a user according to the Act on the Protection of Personal Information on any personal data retained, such as a request for disclosure, correction and utilization cease, etc. we will appropriately and without delay meet such request pursuant to applicable laws and regulations. For



specific information on how to make such request, please contact us as described in Chapter 10 of this Part III of the Privacy Policy.

#### **How long we keep your data:**

- Retention. We will retain your information as long as your account is active, as necessary to provide you with our services or as otherwise set forth in this Privacy Policy. We will also retain and use this information as necessary for the purposes set out in this Policy and to the extent necessary to comply with our legal obligations, resolve disputes, enforce our agreements and protect our legal rights. We also collect and maintain aggregated, anonymized or pseudonymized information which we may retain indefinitely to protect the safety and security of our site, improve our services or comply with legal obligations.
- Your consent to the uses of your data outlined in this privacy policy are valid unless revoked.
- If you do not use our Service for a period of eighteen (18) months, we may delete your data for the Service. We may inform you, at our option, three (3) months before the expiration of this deadline and give you the opportunity to oppose this deletion.

### **7. CHILDREN'S PRIVACY**

- The Service does not knowingly collect or solicit any information from anyone under the age of 18 or knowingly allow minors to register for the Service. The Service and its content are not directed at anyone under the age of 18. In the event that we learn that we have collected personal information from a child under age 18, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under age 18, please contact us at [privacy@supertab.co](mailto:privacy@supertab.co).

### **8. OTHER WEB SITES AND SERVICES**

- Please remember that when you use a link to go from our Service to another website or service, our Privacy Policy or other terms do not apply to those third-party websites or services. Your browsing and interaction on any third-party website or service, including those that have a link on our website, are subject to that third party's own rules and policies.

### **10. HOW TO CONTACT US**

Please direct any comments, questions, complaints, or other inquiries regarding the handling of your information to the following contact point:

Supertab, Inc.  
Privacy Policy Inquiry 4th Floor  
Data protection officer: Eric Larsen  
450 Lexington Ave  
New York, NY, 10017  
E-mail [privacy@supertab.co](mailto:privacy@supertab.co)

### **11. CHANGES TO OUR PRIVACY POLICY**

Supertab Inc. may modify or update this Privacy Policy from time to time, so please review it periodically. We may provide you additional forms of notice of modifications or updates as appropriate under the circumstances. Your continued use of the Service after any modification to this Privacy Policy will constitute your acceptance of such modification.