

## PRIVACY POLICY

### Introduction

This Privacy Policy is intended to describe how Veniam collects, uses and shares your personal information through our websites and services (Website, Service, NOC). Please read carefully this notice in order to understand what, why and how we do it. If you do not understand any aspects of our Privacy Policy, please feel free to contact us at [privacy@veniam.com](mailto:privacy@veniam.com). Also, make sure you read and understand our Terms of Use and our Cookie Policy.

### What information may we collect

Personal information could be provided to us directly or via third parties when you register for an account, update or change information for your account, complete a survey, sign-up for a newsletter, send us an email message or submit your CV. Under this circumstances, you are giving us your consent for data collection and use according to this Privacy Policy.

#### *Information related to your use of Veniam's Website*

When you use our Website ([veniam.com](http://veniam.com)), we may track, collect and aggregate information indicating, among other things, which pages of our Website were visited, the order in which they were visited, when they were visited, and which hyperlinks were selected. Collecting such information may involve information about your device, including information about your web browser, language, operative system, IP address, date and time and time zone. We may also use cookies and web beacons when you visit our Website. For more information on our use of cookies and web beacons, please refer to our Cookie Policy. Additionally, as you browse the website, we may collect information about the individual web pages and information about how you interact with the Website. We refer to this automatically-collected information as "Website Device Information".

While using our Website, subscribing to Veniam's Newsletter, we may collect your personal information, such as your name and email address. If you're applying for a job opportunity on our Website, we may also collect the information present in your Curriculum Vitae. We refer to this collected information as "Website Personal Information".

#### *Information related to your use of Wi-Fi Services*

When you use our Services, we may track, collect and aggregate information about your device, including your device IP address, web browser, language, date and time, time zone. We may also collect information, such as, universally unique ID ("UUID"), MAC address, operating system and version (e.g., iOS, Android or Windows), carrier and country location, hardware and processor information (storage, chip speed, camera resolution, NFC enabled, and network type (WiFi, 2G, 3G, 4G)). Certain features and functionalities of the Wi-Fi Services are

based on your location. In order to provide these features and functionalities after you sign in to the Services at a venue, we may automatically collect geolocation information. Collection of such geolocation information occurs only when the Wi-Fi Services are active on your device. We refer to this automatically-collected information as "Service Device Information".

In addition, personal information may be also collected during the use of Service, such your name, email address. Additional personal information could be also collected if voluntarily provided, such as hobbies, personal interests, household income range, number of children, gender, product and service preferences. Information that we collect or receive from Facebook, Twitter, and/or other third-party sites, are in accordance with their terms of use and privacy policies. When you use the Services with your Google, Facebook or other Social Login credentials, you will be authorizing us to access, and we will collect, your basic profile information, your birthday, your "likes," and user location. We refer to this collected information as "Service Personal Information".

#### *Information related to your use of NOC*

When you use our NOC (noc.veniam.com), we may we may track, collect and aggregate information indicating, among other things, which pages of our NOC were visited, the order in which they were visited, when they were visited, and which hyperlinks were selected. Collecting such information may involve information about your device, including information about your web browser, language, operative system, IP address, date and time and time zone. We may also use cookies and web beacons when you visit our NOC. For more information on our use of cookies and web beacons, please refer to our Cookie Policy. Additionally, as you browse the website, we may collect information about the individual web pages and information about how you interact with the NOC. We refer to this automatically-collected information as "NOC Device Information".

While using our NOC, we may collect your personal information, such as your name and email address. Information that we collect or receive from Facebook, Twitter, and/or other third-party sites, are in accordance with their terms of use and privacy policies. When you use the NOC with your Google, Facebook or other Social Login credentials, you will be authorizing us to access, and we will collect, your basic profile information, your birthday, your "likes," and user location. We refer to this collected information as "NOC Personal Information".

#### **How we might use your personal information**

All personal information collected by us, relating to your use of the Website, Services or NOC is done to deliver the higher quality service possible. We may use this information in order to deliver our products and services, perform statistical analysis and ensure the security of our websites and services.

#### **How we might share your personal information**

Your personal information may be shared with third parties for marketing communications and statistical analysis purpose. We may also share your personal information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.

### **How you may access and control your personal information**

You may access your personal information, by contacting us through email at [privacy@veniam.com](mailto:privacy@veniam.com). Also, at any time, you may use your right to access, correct, request deletion or request restriction of our usage of your personal information. We will take all the steps to ensure that your personal information is accurate and up to date.

### **How long we keep your personal information**

We retain your personal information for as long as necessary to provide the services you have requested, or for other essential purposes such as complying with our legal obligations, resolving disputes, and enforcing our policies.

### **How we protect your personal information**

At Veniam, we follow the industry standards and best practices on information security management to safeguard your information. Our information security systems apply to people, processes and information technology systems on a risk management basis. We perform regular audits to ensure our security measures align with industry guidelines.

### **How we handle children personal information**

We do not knowingly collect or maintain personal information from persons under 13 years of age. If you are under 13 years of age, then please do not use or access our website or services at any time or in any manner. We will take appropriate steps to delete any personal information belonging to persons with less than 13 years of age that has been collected without verified parental consent upon learning of the existence of such personal information.

### **How we manage privacy changes and notifications**

Please note that we review our privacy practices frequently, and that these practices are subject to change. Any change, update, or modification will be effective immediately upon posting. Be sure to return to this page periodically to ensure familiarity with the most current version of this Privacy Policy.

### **Contacts**

If you have any privacy-related questions, suggestions, unresolved problems, or complaints you may contact us via [privacy@veniam.com](mailto:privacy@veniam.com). Will be glad to answer with any questions or comments about this Privacy Policy, our privacy practices, or your consent choices.