

AGM@Convene Privacy Policy

Posted: May 2, 2020

Effective: May 2, 2020

1. Introduction

Azeus and/or Convene, and its affiliated companies (“**Azeus**”, “**Convene**”, “**we**”, “**us**”, “**our**” or “**ours**”) respect the privacy rights of our customers, users, website visitors and business partners and we recognize the importance of protecting and handling information collected about you in accordance with both the law and best practice. This document (“Privacy Policy”) tells you how we use and disclose the personal information we collect via our services or when you otherwise interact with us.

2. Our Processing Activities

To find out more please go to the sections of this policy that are relevant to you (at Exhibit A):

- I. Visitors to our website**
- II. AGM@Convene customers or users**
- III. Business partners**
- IV. Job applicants**

3. Security

We are committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use or disclosure.

While we take reasonable efforts to guard personal information we knowingly collect directly from you, no security system is impenetrable and due to the inherent nature of the Internet as an open global communications vehicle, we cannot guarantee that information, during transmission through the Internet or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others, such as hackers. In addition, we cannot guarantee that any passively collected personal information you choose to include in or store on our systems are maintained at levels of protection to meet specific needs or obligations you may have relating to that information.

You may access your account information and our services only through the use of an individual username and password. To protect the confidentiality of personal information, you must keep your password confidential and not disclose it to any other person. Please advise us immediately if you believe your password has been misused. In addition, always logout and close your browser when you finish your session.

Our information security policy is supported by a number of security standards, processes and procedures and we store information in access-controlled premises or in electronic databases requiring logins and passwords. We require our third-party data storage providers to comply with appropriate information security industry standards. All partners and staff and third-party providers with access to confidential information are subject to confidentiality obligations.

4. Location of Processing

We may store and process personal information and content in the United States and other countries or cities which include but are not limited to the United Kingdom, Australia, Hong Kong, Singapore and the Philippines.

As part of a global group of companies, we have affiliates and third-party service providers within as well as outside of the European Economic Area (the “EEA”) and the United Kingdom (UK). We may transfer and disclose your personal information to our affiliates and third-party service providers for any of the purposes set out in this privacy policy.

As a result, your personal information may be transferred outside the country where you are located. This includes countries outside the European Economic Area (EEA), the UK and countries that do not have laws that provide specific protection for personal information. Where we collect your personal information within the EEA or the UK, transfer outside these locations will be only:

- to a recipient in a jurisdiction approved by the European Commission (for personal information collected within the EEA) or approved by the UK-ICO (for personal information collected within the UK post-Brexit) as offering an adequate level of protection for personal data (including the U.S. for personal information transferred to organisations in the U.S under the EU-U.S. Privacy Shield) or
- under an agreement which covers the EU requirements (for personal information collected within the EEA) or the UK requirements (for personal information collected within the UK post-Brexit) as the case may be, for the transfer of personal data to data processors or data controllers outside these locations.

We use resources and servers located in various countries around the world to process your personal information. Your personal information may also be transferred to third party service providers who process information on our behalf, including providers of IT and IT services such as website hosting and management, data back-up, security and storage services. Our third-party service providers may also use their own third parties (sub-processors). Our third-party service providers and their sub-processors are bound to maintain appropriate levels of security and confidentiality and to process personal information as instructed by us.

If you have any questions in relation to the transfer of your personal information outside the jurisdiction of origin please send an email to dataprocessing@conveneagm.com.

5. Sharing Information with Third Parties

We will share your personal information with third parties only in the ways that are described in this Privacy Policy. We do not sell your personal information to third parties.

We may also disclose your personal information to third parties where:

- you have consented to us sharing your personal information in this way;
- we are under a legal, regulatory or professional obligation to do so (for example, in order to comply with anti-money laundering requirements) or in order to enforce or to protect our rights and interests, property, or safety, and that of our clients' or others;
- if we are involved in a merger, acquisition, or sale of all or a portion of our assets, or a bankruptcy proceeding, we may transfer your information to the acquiring company, you will be notified via email and/or a prominent notice on our website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.
- we may share aggregated or anonymized information with third parties that does not directly identify you.
- we may share your information to our partners, sub-processors or vendors working on our behalf, who provide us with IT and support services to help us manage and store information, and who may require such information for the performance of any contract we enter into with them to conduct our business.
- We may share your information to our group companies and/or affiliates, who may provide related or ancillary services.

6. Data Retention

We may retain your personal data for a period of time consistent with the original purpose of collection. We also may retain your personal data during the period of time needed for us to pursue our legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes, enforce our agreements, if deemed necessary.

7. Your Rights

As a data subject whose personal information is collected or processed by us, you have certain rights, as hereinafter described. If you wish to exercise any of these rights, then you may reach us through the contact details supplied below. In order to process your requests, we may ask you to provide valid form(s) of identification for verification purposes.

Depending on the reasons we are holding or processing the data, we may have to refer you to our customer which you represent or with whom you are affiliated or connected, and have provided consent to (i.e. as the data processor, we will have to refer you to the data controller to make such requests).

You have a right of access to personal data held by us as a data controller. We may charge for a request for access in accordance with applicable law. We will aim to respond to any requests for information promptly, and in any event within the legally required time limits.

You have a right to have any inaccurate personal information corrected. When practically possible, once we are informed that any personal data processed by us is no longer accurate, we will make corrections (where appropriate) based on your updated information.

Where we process personal data based on consent, individuals have a right to withdraw consent at any time.

You also have a right to erasure/deletion, to restrict or object to our processing of personal data and the right to data portability.

If you wish to exercise any of these rights, please send an email to dataprocessing@conveneagm.com. In case you want to complain about our use of personal data, please send an email with the details of your complaint to dataprocessing@conveneagm.com. We will look into and respond to any complaints we receive.

8. Changes to This Privacy Policy

We will update this Privacy Policy when necessary to reflect customer feedback and changes in our services. When we post changes to this Privacy Policy, we will revise the "Posted" and "Effective" dates at the top of the Privacy Policy. If there are material changes to the statement or in how we will use your personal information, we will notify you either by prominently posting a notice of such changes before they take effect or by directly sending you a notification. We encourage you to periodically review this Privacy Policy to learn how we protect your information.

9. Contacting Us

Any questions, comments and requests regarding this Privacy Policy or the information that we hold about you should be addressed to dataprocessing@conveneagm.com.

For EU/EEA, Switzerland, and UK organizations and residents, you may also contact our EU/EEA and UK Representatives at the below addresses:

Convene Sociedad Limitada
Address: Calle Balmes, nú-mero 173, 4º 2ª, 08006, Barcelona
Email: dataprocessing@conveneagm.com

Azeus UK Limited
Address: Azeus Convene, 2.014, 3 Waterhouse Square, 138-142 Holborn, London, EC1N 2SW
Email: dataprocessing@conveneagm.com

Exhibit A: Specific Provisions

I. Visitors to our website

1. Information Collection

There are two types of information we collect from our website:

“Personal Data”: There are pages on our website where your personal information is collected, such as the forms to supply your details to make contact with us. Such personal data identifies you or can be used to identify or contact you, and include for example your name, telephone number and email address.

“Non-Personal Data”: Non-personal data is collected through traffic data and site statistics. We keep a record of traffic data which is logged automatically by our server. Such non-personal data collected include for example the URLs visited before ours, and other anonymous statistical data involving the use of our website. We are not readily able to identify any individual from traffic data or site statistics.

We ask that you do not provide sensitive information (such as race or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; physical or mental health; genetic data; biometric data; sexual life or sexual orientation; and, criminal records) to us when using our website.

2. Use of Your Information

For “Personal Data”, we use this information solely to respond to you appropriately, for example, by providing you by e-mail with the information you may have requested, or an update of information about our services and products. The legal basis for processing this information is that it is in our legitimate interest to ensure that you are provided with the best client services and visitor services we can offer.

We may ask whether you wish to receive marketing from us and this will be presented to you as an option on the relevant page on our website where necessary. We will not send you marketing if you ask us not to. If you have agreed to receive marketing but then later change your mind and no longer wish to receive marketing, please let us know so we can remove you from our distribution lists. You can contact us at dataprocessing@conveneagm.com.

We may disclose your personal information to law enforcement, regulatory, or other government agencies or to other third parties as required by, and in accordance with, applicable law or regulation. We may also review and use your personal information to determine whether this disclosure is required or permitted. We may also disclose log files for security-related purposes.

For “Non-Personal Data”, we use non-personally identifiable information to analyze site usage (such as aggregated information on the pages visited by our users), which allows us to improve the design and content of our site.

3. Cookies

Cookies are small text files that websites send to your computer’s browser when you access the website. Our website uses cookies and upon visiting our site you will be invited to give consent that our system can place cookies on your computer. You can also set your web browser to reject cookies. Please refer to [here](http://www.allaboutcookies.org/manage-cookies/) (at <http://www.allaboutcookies.org/manage-cookies/>) for details on how you can control and/or delete cookies.



Cookies enable our system to recognize your computer every time you visit our website, enabling us to have an idea of your preferences – for example, what services or offerings you viewed – in order to enhance your user experience, and help us consider how we can improve our services to you.

None of this information that we collect in this way will be sold or disclosed to any other party unless required by law.

You can find out more details regarding our use of cookies from the Cookies Policy of our website.

II. AGM@Convene Customers and Users

1. Introduction

This Privacy Policy, together with our AGM@Convene Terms of Service (at <https://www.azeusconvene.com/convene-eagm/terms>) and AGM@Convene End User Terms of Service (at <https://www.azeusconvene.com/convene-eagm/end-user-terms>) and any other documents referred to below tells you how we use and disclose the personal information we collect via our Services or received from our customers for provision of the Services, or when you otherwise interact with us, as a customer or end user of our Services.

For the purposes of this Policy, unless otherwise defined here, the terms shall have the same meaning as defined in the AGM@Convene Terms of Service or AGM@Convene End User Terms of Service.

Please read the following carefully to understand how we will collect, use and protect your personal information.

2 What We Collect

We collect a variety of information to enable us to provide the Services, and to improve and enhance our users' experience of the Services. For more information about the purposes for which we use your information please see the Use of Information section below.

We collect the following information (which may include personal information):

a. Information You Provide To Us

When you create a AGM@Convene account, register for and use the Services, request a quotation or a demo, we collect information you provide directly to us. This can include:

- Your name, username, your company name, job title, email address, phone number, passport or identity number
- The password and/or unique code that we generate for you when you register for our Services
- Information you submit (such as proxy forms and votes) and documents you upload to our Services
- Contact made with our customer support or helpdesk via means such as emails, phone conversations or chat sessions
- Messages you send to us, such as feedback and product reviews you write

If you are providing information (including personal information) about someone else, you confirm that they have appointed you to act for them and consent to the processing of their personal information and that you have informed them of our identity and the purposes (as set out in this Privacy Policy) for which their personal information will be processed.

b. Information Provided by our Customers

Because our Services revolve around supporting our customers to better deliver their business and obligations (such as conducting Events like annual general meetings (AGMs)), we may also receive your personal data from those customers (which can include your name, address, passport or identity number, etc.), who may have collated or analysed the information they already have about you or you have provided directly.

When a company (such as a listed company) contracts our Services for the purpose of conducting an Event (i.e. "Customer Account Holder" as defined in the AGM@Convene Terms of Service), such as an AGM, they may provide your personal information to us in order allow you to participate in said Events, either as a company representative, individual shareholder, representative of a corporate shareholder, observer, or as authorized third-party participant or guest, etc. In such cases, our agreement with our customers and/or the AGM@Convene Terms of Service, ensure that they are authorized to share your information to us.

c. Information We Collect as You use our Services

When you use our Services, we collect data to make the Services work better for you. This can include, for example, usage of the features and modules, and data about the performance of the Services.

We may also collect data including IP address(es), browser types, log information and the devices you use to access the Services, to optimize your use of the Services and remedy your technical concern related to the use of the Services.

3. Data Processor

While we act as the Data Controller for the personal information required by us to create and maintain the Personal End User Accounts, we act as Data Processor for all other personal information submitted or uploaded to the Services or provided to us for provision of the Services.

In relation to the Events, the Customer Account Holder is the data controller under the data protection laws for any personal data, meaning that such party controls the manner such personal data is collected and used as well as the determination of the purposes and means of the processing of such personal data. We are not responsible for the content of the personal data contained in the Content or other information stored on our servers (or our subcontractors' servers) at the discretion of the customer or user nor are we responsible for the manner in which the customer or user collects, handles disclosure, distributes or otherwise processes such information.

We however share your personal information with the Customer Account Holder whom you are affiliated with, who control your information and may have directly provided it to us and/or asked us to collect information and process it by using our technology and services. Where you have provided your personal data directly to us by registering for an Event in AGM@Convene, your information will likewise be processed in accordance with the Customer Account Holder's instructions. They have their own privacy policies that apply to your information and must be able to provide you with a copy.

4. Use of Information

We may use the information (which may include personal information) we collect about you for a variety of purposes, including, for example, to:

- Provide, operate, maintain and improve the Services including the creation and maintenance of AGM@Convene accounts;
- Fulfill a contract that we have entered into with you or with an entity that you represent;
- Deliver services to our customers who are using our Services and to whom you have consented;
- Enable you to access and use the Services, including registering for and joining Events, browsing Event information, submitting proxy forms and online voting;
- Allow you to opt-in to participate in any interactive feature of our Services;
- Notify you about changes to our Services;
- Send you technical notices, updates, security alerts and support and administrative notices;
- Provide and deliver services and features upon your request;
- Process and complete transactions;
- Respond to your comments, questions, and provide customer service and support;
- Communicate with you, where you have agreed or where the law permits, for marketing purposes, including to periodically inform you about services, features, surveys, newsletters, offers, promotions, and events, and provide other news or information about us. If you have agreed to receive marketing but then later change your mind and no longer wish to receive marketing, please let us know so we can remove you from our distribution lists. You can contact us at marketing@conveneagm.com ;
- Monitor and analyze trends, usage, and activities in connection with the Services;
- Investigate and prevent fraudulent transactions, unauthorized access to the Services, and other illegal activities; and
- Personalize and improve the Services.

We may collect anonymous and aggregated data which does not contain personal information for the purposes of improving our Services.

5. Cookies

We use cookies to analyze trends, administer and track users' movements during your use of our services, and gather information about you, where you access or use our Services, how you use our services. The AGM@Convene Cookies Policy (at <http://www.azeusconvene.com/convene-eagm/legal/cookiespolicy/>) explains the cookies that we use for AGM@Convene Services and why.

Certain features of the Services depend on cookies. Please be aware that if you choose to block cookies, you may not be able to sign in or use those features, and preferences that are dependent on cookies may be lost.

6. Sharing Information with Third Parties

We do not sell your personal information to third parties.

We may provide your personal information to companies that provide services to help us with our business activities such as offering customer service. These companies are authorized to use your personal information only as necessary to provide these services to us.

We may also disclose your personal information to our customers (that is, Customer Account Holders with whom you are connected), who have asked us to collect, process or analyse it on their behalf.

7. Where We Store Your Information

We may store and process personal information and content in the United States and other countries or cities which include but are not limited to the United Kingdom (UK), Australia, Hong Kong, Singapore and Philippines.

For US customers, the Content uploaded by users to the Services shall reside within the United States. No content will be transferred outside of the United States without the prior consent of the customer.

For customers in Europe (other than in the UK), the Content uploaded by users to the Services shall reside within the EEA. For customers in the UK, the Content uploaded by users to the Services shall reside within the UK. No Content will be transferred outside of the aforementioned locations without the prior consent of the customer.

If you have any questions in relation to the transfer of your personal information outside the jurisdiction of origin please send an email to dataprocessing@conveneagm.com.

8. Your Consent

When you use our Services, you will be asked to indicate that you have read and agreed to the AGM@Convene Terms of Service and/or AGM@Convene End User Terms of Service as well as this Privacy Policy. Your use of our website(s) is also subject to this Privacy Policy. In giving your consent, you agree to:

- The collection and use of personal information by us and the third parties described in this Privacy Policy.
- The disclosure of your personal information to the third parties described in this Privacy Policy.
- The transfer of your personal information to outside your country of residence, in strict compliance with this Privacy Policy

9. Data Retention

We store data until it is no longer necessary to provide our Services, or until your account is deleted – whichever comes first. This is a case-by-case determination that depends on things such as the nature of the data, why it is collected and processed, and relevant legal or operational retention needs. For example, the Contents will be deleted after expiry of our contract with the Customer Account Holder; Customer contracts and billing information are kept to comply with our financial and audit policies, as well as tax requirements.

III. Business partners

1. Introduction

Protecting the security and privacy of personal data of contact persons (each a “Business Partner Contact”) of our customers, suppliers, vendors and partners (each a “Business Partner”) is important to us and our affiliated companies (together “Azeus”, “Convene”, “we”, “us”, “our” or “ours”). Therefore, we process personal data in compliance with applicable laws on data protection and data security.

2. Categories of Personal Data Processed, Purpose of the Processing and Legal Basis

In the context of the business relationship with us, we may process personal data for the following purposes:

- Communicating with Business Partners about our products, services and projects or Business Partners, e.g. by responding to inquiries or requests;
- Planning, performing and managing the (contractual) relationship with Business Partners, e.g. by performing transactions and orders of products or services, processing payments, performing accounting, auditing, billing and collection activities, arranging shipments and deliveries, facilitating repairs and providing support services;
- Administrating and performing customer surveys, marketing campaigns, market analysis, sweepstakes, contests, or other promotional activities or events;
- Maintaining and protecting the security of our products, services and websites, preventing and detecting security threats, fraud or other criminal or malicious activities;
- Ensuring compliance with legal obligations (such as record keeping obligations), Business Partner compliance screening obligations (to prevent white-collar or money laundering crimes), and our own policies or industry standards; and
- Solving disputes, enforce our contractual agreements and to establish, exercise or defend legal claims.

For the aforementioned purposes, we may process the following categories of personal data:

- Contact information, such as full name, work address, work telephone number, work mobile phone number, work fax number and work email address;
- Payment data, such as data necessary for processing payments and fraud prevention, including credit/debit card numbers, security code numbers and other related billing information;
- Further information necessarily processed in a project or contractual relationship with us or voluntarily provided by the Business Partner Contact, such as orders placed, payments made, requests, and project milestones;
- Information collected from publicly available resources, integrity databases and credit agencies; and
- If legally required for Business Partner compliance screenings: information about relevant and significant litigation or other legal proceedings against Business Partners.

The processing of personal data is necessary to meet the aforementioned purposes including the performance of the respective (contractual) relationship with Business Partners. Unless indicated otherwise, the legal basis for the processing of personal data is that (i) the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6 (1) (b) of the EU General Data Protection Regulation (GDPR)); (ii) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (Article 6 (1) (f) of the EU GDPR); or (iii) if explicitly provided by Business Partner Contacts, the consent (Article 6 (1) (a) of the EU GDPR).

If we do not collect the respective personal data, the purposes described above may not be met by us.

IV. Job applicants

1. What Information we Collect?

As part of any recruitment process, we collect and process personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

We collect a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements; and
- information about your entitlement to work in the country.

We may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

We may also collect personal data about you from third parties, such as references supplied by former employers. Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

2. Why do we Process Personal Data?

We need to process data to take steps at your request prior to entering into a contract with you. We may also need to process your data to enter into a contract with you.

In some cases, we need to process data to ensure that we are complying with its legal obligations. For example, it is mandatory to check a successful applicant's eligibility to work in the country before employment starts.

We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.