

KLEVER's Privacy Policy (Updated for GDPR June 2021)

KLEVER Company BV., its affiliates ("KLEVER") is committed to safeguarding your privacy.

This Privacy Policy outlines the types of information we collect from website visitors, clients, and other third parties through our website, located at <https://klevercompany.com/> ("Site").

In this Policy we set out how we collect and use personal information gathered through the Site, with whom we might share it, the means by which we keep it secure, and the choices you ("You") have about the information You choose to share with us.

If You have any questions about the privacy practices of KLEVER or our Privacy Policy, please send an email to admin@klevercompany.com in the first instance.

Personal information we collect and what we use it for

The types of personal information we collect depend on the purpose for which You provide it to us. We only collect what is necessary for the purposes set out below and we do not sell or rent Your personal information to any third parties.

a) Clients/authorized users

In Your capacity as an authorized user or contact for our products and services, we collect limited personal information about You, such as Your name, email and in some cases phone number and physical address and other personal information You choose to enter in the profile section of the Site. We also collect Your IP Address and track Your information about Your

use of our Site and its features. Additionally, in those instances where You are paying for a subscription service, we will collect credit card or payment details.

What we use it for

We use the personal information to administer and support the contracts/relationships we have with You and the authorised users of the products and services. We use this information to provide updates about these products and services, to deliver product support, to manage billing and other client inquiries and send You information about other products and services that may be of interest to You.

b) Website visitors

If You are accessing the Site to learn more about KLEVER and our products and services, to inquire about employment with KLEVER, etc., the information we collect may include name, IP, physical and email addresses, and phone number(s) via an online registration/request form, as well as usage information about your use of the Site as well as Your use of any newsletters or other communication you agree to receive following your visit to the Site.

If You are an EU data subject, our Site provides you the opportunity to consent to our use of your Personal Information prior to submitting any personal information; KLEVER will only use your Personal Information if you consent to such use.

What we use it for

We use the personal information (and any preferences indicated by You, where appropriate) to send You the investment data, tools and other information You have requested and, in some cases, to provide You on our

Site with targeted third-party advertisements which may be of interest to You based on any preferences You have indicated in Your registration/request form.

KLEVER's suppliers

We collect limited personal information, such as name, email and in some cases Your IP address, phone number and postal business address from You as the contact for the supplier of the business products and services being provided to KLEVER.

What we use it for

We use the personal information to administer and support the contracts we have with You or Your employer. We also use this information to contact You for purposes of dealing with support, billing and inquiries about Your products and services.

Candidates

If You are accessing the Site to inquire about tech solution with KLEVER, the information we gather may include, but is not limited to: Your name, physical and email addresses, pictures and phone number(s) and if you are submitting an application and related information through the Site, Your user name/password and any additional employment-related information that You choose to provide.

What we use it for

We use this information to process and manage Your application for evaluation with KLEVER.

Links to other websites

KLEVER may provide links to one or more other websites from the Sites. We encourage You to read those websites' individual privacy policies before providing any of Your personal information to them. KLEVER is not responsible for those websites, their policies or practices.

Personal information: How long do we keep it

KLEVER retains personal information only for as long as necessary for the uses we have set out above. Individual jurisdictions have different tax, accounting, regulatory and legal retention requirements and KLEVER is bound to keep certain personal data in accordance with these local requirements.

Personal information: How we store and process it

All personal information we gather from You may be processed and stored in any one of our group company locations and may subsequently be transferred to other countries for further processing, storage, and/or use by either KLEVER or third parties, on KLEVER's behalf. Our staff who need to access personal information to perform their roles will have access to it and have agreed to comply with KLEVER's policies on data protection.

KLEVER uses a small number of third parties to provide services on its behalf. These services may include, but are not limited to, handling, processing and delivery of mailings, providing customer support, hosting websites, processing transactions, performing statistical analysis of our services, and providing systems and software for its administrative functions, such as sales processing, accounting/finance management and procurement. In such cases, KLEVER remains controller of the personal data, the third parties only process the data in accordance with our instructions and we are responsible

for ensuring such third parties are compliant with all applicable data protection regulations in relation to their processing activities.

KLEVER also utilizes servers from Amazon Web Services (AWS) to host our platform and to store our data. According to their respective privacy policy, AWS follows US-Swiss Safe Harbor, Privacy Shield, and ISO27001 certifications and policies, as well as additional security measures. You understand and agree that Your personal information may be stored on any or all AWS servers. More information about AWS's compliance can be found on its [Compliance page](#)..

Protection of Your personal information

We have technical, security and organisational measures in place, (and require our service providers do so as well), reasonably designed to protect against unauthorized access to, or unauthorized alteration, disclosure, or destruction of personal information. The measures we use are appropriate to the nature, scope and purpose for which we use the personal data we collect. These measures include internal reviews of our data collection, storage, and processing practices and security measures, as well as physical security measures to guard against unauthorized access to systems where we store personal data. We have recently updated our processes to ensure we can comply with data subject requests as required under applicable law, to address complaints and to comply with breach reporting procedures and incident management plans.

KLEVER operates secure data networks protected by industry-standard firewall and password protection systems. Our security and privacy policies

are periodically reviewed and enhanced as necessary and only authorized individuals have access to the information provided.

Further information on our security and incident management is available from admin@klevercompany.com.

Use of cookies on the Site and in our products and services

We use Cookies to set user preferences such as email and, if applicable password. This information allows us to personalize the user experience and improve the quality of Site navigation and the products and services we offer through it. Cookies do not reveal the identity of the individual user; they only identify the computer utilized by that user. Specific information about the cookies we use is available on the Site.

How to update Your personal information or make a data subject request

Clients /Suppliers

If You need to update Your personal information or make a Data Subject Request (as described below), please email us at admin@klevercompany.com and Your email will be directed to the correct KLEVER team to take action with respect to Your request.

Website visitors

If You need to update Your preferences or personal information or make a Data Subject Request, You need only email us at admin@klevercompany.com or follow the instructions contained in any email we have sent to You to unsubscribe or change Your preferences.

Candidates Data Subject Requests or Questions related to Your personal information submitted as an application inquiries You've made or job applications You've submitted should be sent to: admin@klevercompany.com and Your email will be directed to the correct KLEVER team to take action with respect to Your request.

What about children's privacy?

KLEVER does not separately identify, or collect, any information that is specific to children.

What is a Data Subject Request?

Some local regulations grant individuals in those localities certain rights in respect of the personal data held by companies, including but not limited to the right of an EU Data Subject to inquire about their personal information. Data Subject Requests include these types of inquiries.

Your consent

If You are submitting personal information from a US IP address, You consent to the collection and use of any personal information and any related information in the manner described in this Privacy Policy. If You are an EU data subject, and we don't already have the right to use your personal information – for example, to perform under a contract with You, our Site provides You the opportunity to consent to our use prior to submitting it. KLEVER will only use Your personal information if it is authorized to do so and that use will be consistent with this Privacy Policy.

Changes to the Privacy Policy

KLEVER reserves the right to change this Privacy Policy at any time by distributing and/or posting a new Privacy Policy without notice. We encourage You to review our Privacy Policy on a regular basis so that You will be aware of any changes to it. Persons subject to EU General Data Protection Regulations 2016/ 679 ("GDPR") KLEVER has updated its Privacy Policy to take account of GDPR and much of the information set out above is relevant to You as an EU data subject, but we are obliged to also provide You with local contact details of our Data Protection Officer.

If You are an EU data subject and have any questions or comments about the information contained in this Privacy Policy or any other privacy inquiries, including if You want to make a data subject request or complain about Morningstar's collection and use of Your personal data, please contact admin@klevercomopany.com.

If You are not satisfied with our handling of Your complaint You can complain to Your local Data Protection Authority via the links below.

Country	Authority	Website
Denmark	Danish Data Protection Agency (Datatilsynet)	www.datatilsynet.dk
France	Commission Nationale de l'Informatique et des Libertés (CNIL)	www.cnil.fr
Germany	Der Bundesbeauftragte für den Datenschutz und die Informationsfreiheit	http://www.bfdi.bund.de/

Italy	Garante per la Protezione dei Dati Personali	www.garanteprivacy.it
Luxembourg	Commission Nationale pour la Protection des Données	www.cnpd.lu
Netherlands	College Bescherming Persoonsgegevens (CBP)	www.autoriteitpersoonsgegevens.nl
Norway	Datatilsynet	www.datatilsynet.no
Spain	Agencia de Protección de Datos	https://www.agpd.es/
Sweden	Datainspektionen	http://www.datainspektionen.se/
Switzerland	Eidgenössischer Datenschutz- und Öffentlichkeitsbeauftragter (EDÖB)	http://www.edoeb.admin.ch
UK	The Office of the Information Commissioner (ICO)	www.ico.org.uk https://ico.org.uk/concerns/ ICO's helpline on 0303 123 1113

Updated: 21/6/2022