



**SUPPLY CHAIN CUBE**

# Privacy Policy

## 1 Introduction

Thank you for choosing SUPPLY CHAIN CUBE (SCC). In this Privacy Policy

- "SCC", "we" or "us" means Supply Chain Cube AG (registered at Pfäffikerstrasse 16, 8834 Schindellegi, Switzerland) and its affiliates.
- "SCC Services" or "Service" means any software or service that SCC provides to our customers and their business partners, including our website, our cloud platform, desktop software, mobile applications, social media pages, consultancy, in-person meetings, SCC events and our sales and marketing activities.
- "Personal Data" includes data which either by itself or with other data available to us can be used to identify you or any natural person. We define Personal Data collected or controlled by us in section 2.1.
- "Customer Personal Data" is a subset of all data that our customers upload for storage or processing, that can be used to identify you or any natural person. We define Customer Personal Data, which is collected or controlled by our customer in section 3.1.

This Privacy Policy, effective as of 1. August 2023, contains a policy statement how we collect, use and process personal data, with whom we may share such data and your rights in relation to personal data. This Privacy Policy applies to all SCC Services.

By using our Services, you are agreeing to the terms of this Privacy Policy.

## 2 Personal data

### 2.1 Information SCC collects and controls

We may process the following personal data in connection with the SCC Services:

- 2.1.1 Account signup: When you sign up for an account to access one or more of our Services, we ask for information like your name, contact number, email address, company name and address, registration and VAT number to complete the account signup process. You'll also be required to choose a unique username and a password for accessing the created account.
- 2.1.2 Event registrations and other form submissions. We record information that you submit when you:
  - 2.1.2.1 register for any event, including webinars or seminars
  - 2.1.2.2 subscribe to our newsletter or any other mailing list
  - 2.1.2.3 submit a form to download any product, whitepaper, or other materials
  - 2.1.2.4 participate in contests or respond to surveys OR
  - 2.1.2.5 submit a form to request customer support or to contact SCC for any other purpose.

- 2.1.3 Payment processing: When you buy something from us, we ask you to provide your name, contact information, and payment account information.
- 2.1.4 Testimonials: When you authorize us to post testimonials about our products and Services on websites, we may include your name and other personal information in the testimonial. You will be given an opportunity to review and approve the testimonial before we post it. If you wish to update or delete your testimonial, you can contact us at [support@supplychaincube.com](mailto:support@supplychaincube.com)
- 2.1.5 Interactions with SCC: We may record, analyze and use your interactions with us, including email, telephone, and chat conversations with our sales and customer support professionals, for improving our interactions with you and other customers.
- 2.1.6 Information from browsers, devices and servers: When you visit our websites, we collect information that web browsers, mobile devices and servers make available, such as the internet protocol address, browser type, language preference, time zone, referring URL, date and time of access, operating system, mobile device manufacturer and mobile network information. We include these in our log files to understand more about visitors to our websites.
- 2.1.7 Information from first party cookies and tracking technologies: We use temporary and permanent cookies to identify users of our SCC Services and to enhance user experience. We only use first-party cookies and do not use third-party cookies or other third-party tracking technologies on our websites.
- 2.1.8 Information from application logs and mobile analytics: We collect information about your use of our products, Services and mobile applications from application logs and in-house usage analytics tools, and use it to understand how your business use and needs can improve our products. This information includes clicks, scrolls, features accessed, access time and frequency, errors generated, performance data, storage utilized, user settings and configurations, and devices used to access and their locations.
- 2.1.9 Information that we collect from third parties:
  - 2.1.9.1 Referrals: If someone has referred any of our products or Services to you through any of our referral programs, that person may have provided us your name, email address and other personal information. You may contact us at [support@supplychaincube.com](mailto:support@supplychaincube.com) to request that we remove your information from our database. If you provide us information about another person, or if another person gives us your information, we will only use that information for the specific reason for which it was provided to us.
  - 2.1.9.2 Information from our reselling partners and service providers: If you contact any of our reselling partners, or otherwise express interest in any of our products or Services to them, the reselling partner may pass your name, email address, company name and other information to SCC. If you register for or attend an event that is sponsored by SCC, the event organizer may share your information with us. SCC may also receive information about you from review sites if you comment on any review of our products and Services, and from other third-party service providers that we engage for marketing our products and Services.
  - 2.1.9.3 Information from social media sites and other publicly available sources: When you interact or engage with us on social media sites such as Facebook, Twitter, LinkedIn and Instagram through posts, comments, questions and other interactions, we may collect such publicly available information, including profile information, to allow us to connect with you, improve our products, or better understand user reactions and issues. We must tell you that once collected, this information may remain with us even if you delete it from the social media sites. SCC may also add and update information about you, from other publicly available sources.

## 2.2 How we use the personal data we collect

We will process the personal data set out above for the following purposes:

- 2.2.1 To administrate your account, to enable and provide SCC Services including, as applicable, integration with third party services, and to provide, personalize and improve your experience with the Services and any advertising made available on or outside the Services. This processing is necessary for the fulfilment of the contract we have with you.
- 2.2.2 To ensure technical functionality of SCC Services, develop new products and Services, and analyze your use of the Service including your interaction with advertising made available on the Service, as applicable. This processing is based on our legitimate interest to ensure that our Service is of continuously high quality and to better understand how our Service is used to improve it even further.
- 2.2.3 To communicate with you for Service-related or research purposes including via emails, notifications, text messages, or other messages. This processing is lawful on grounds of our legitimate interest to interact with you, to inform you about Service-related changes or to invite you to participate in research about the Service.
- 2.2.4 To communicate with you, either directly or through one of our partners, for marketing and promotional purposes via emails, notifications, or other messages, consistent with any permissions you may have communicated to us. This processing is based on our legitimate interest to send you promotional material. You have the absolute right to opt-out of the use of your personal data for this purpose.
- 2.2.5 To enable and promote SCC Services and other services or products, either within or outside SCC Services.
- 2.2.6 To process your payment, to detect or prevent fraud. This processing is based on our legitimate interest to receive payment for the Services provided to you and to protect you and us from fraudulent payments.
- 2.2.7 To enforce this Privacy Policy, the Terms of Use, and any other agreement between you and SCC, including to protect the rights, property, or safety of SCC, its users, or any other person, or the copyright-protected content of the Service. This processing is based on our legitimate interest to ensure that the terms under which you make use of our Services are enforced.
- 2.2.8 Where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose our information as evidence in litigation in which we are involved.
- 2.2.9 As otherwise stated in this Privacy Policy.

## 2.3 Who we share your information with:

- 2.3.1 Employees and independent contractors: Employees and independent contractors of all SCC group entities have access to the information covered in Part I on a need-to-know basis. We require all employees and independent contractors of SCC group entities to follow this Privacy Policy for personal information that we share with them.
- 2.3.2 Third-party service providers: We may need to share your personal information and aggregated or de-identified information with third-party service providers that we engage, such as marketing and advertising partners, event organizers, web analytics providers and payment processors. These service providers are authorized to use your personal information only as necessary to provide these services to us.

- 2.3.3 Reselling partners: We may share your personal information with our authorized reselling partners in your region, solely for the purpose of contacting you about products that you have downloaded or Services that you have signed up for. We will give you an option to opt out of continuing to work with that partner.
- 2.3.4 Business transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

## 2.4 Your rights with respect to information we hold about you as a controller

If you are in the European Economic Area (EEA), you have the following rights with respect to information that SCC holds about you. SCC undertakes to provide you the same rights no matter where you choose to live.

- 2.4.1 Right to access: You have the right to access (and obtain a copy of, if required) the categories of personal information that we hold about you, including the information's source, purpose and period of processing, and the persons to whom the information is shared.
- 2.4.2 Right to rectification: You have the right to update the information we hold about you or to rectify any inaccuracies. Based on the purpose for which we use your information, you can instruct us to add supplemental information about you in our database.
- 2.4.3 Right to erasure: You have the right to request that we delete your personal information in certain circumstances, such as when it is no longer necessary for the purpose for which it was originally collected.
- 2.4.4 Right to restriction of processing: You may also have the right to request to restrict the use of your information in certain circumstances, such as when you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 2.4.5 Right to data portability: You have the right to transfer your information to a third party in a structured, commonly used and machine-readable format, in circumstances where the information is processed with your consent and by automated means.
- 2.4.6 Right to object: You have the right to object to the use of your information in certain circumstances, such as the use of your personal information for direct marketing.
- 2.4.7 Right to complain: You have the right to complain to the appropriate supervisory authority if you have any grievance against the way we collect, use or share your information. This right may not be available to you if there is no supervisory authority dealing with data protection in your country. User may exercise their rights by sending us an email at [support@supplychaincube.com](mailto:support@supplychaincube.com).

## 2.5 Retention of information

We retain your personal information for as long as it is required for the purposes stated in this Privacy Policy. When we no longer have a legitimate need to process your information, we will delete or anonymize your information from our active databases. We will also securely store backup data and isolate it from further processing until deletion is possible.

## 2.6 Children's personal information:

Our products and Services are not directed to individuals under 18. SCC does not knowingly collect personal information from children who are under 18 years of age. If we become aware that a child under 18 has provided us with personal information, we will take steps to delete such information. If you believe that a child under 18 years has provided personal information to us, please write to

support@supplychaincube.com with the details, and we will take the necessary steps to delete the information we hold about that child.

## 2.7 Transfer to other countries:

SCC can transfer, process and store personal data about our users on servers located in a number of countries. Accordingly, SCC will share or subcontract processing to, or share your personal data with, third parties located in countries other than your home country in order to carry out the activities specified in this Privacy Policy. Your personal data can therefore be subject to privacy laws that are different from those in your country of residence. Personal data collected within the European Economic Area (“EEA”) may, for example, be transferred to and processed by third parties identified above, located in a country outside of the EEA. However, if we do transfer personal data collected within the EEA to third parties outside the EEA, such transfer will be based on the safeguards either of the standard contractual clauses issued by the EU Commission, or the EU-U.S. Privacy Shield mechanism.

## 3 Customer Personal Data

### 3.1 Information you upload and control

You may entrust information that you or your organization (“you”) control, to SCC in connection with use of our Services or for requesting technical support for our products (collectively referred to as “Customer Data”). This may include personal information regarding your customers and your employees (if you are a controller) or data that you hold and use on behalf of another person for a specific purpose, such as a customer to whom you provide services (if you are a processor). This subset of Customer Data is referred to as “Customer Personal Data”. The data may either be stored on our servers when you use our Services, or transferred or shared to us as part of a request for technical support or other services.

### 3.2 Ownership and control of your Customer Personal Data

We recognize that you own your Customer Data, which includes your Customer Personal Data. We provide you complete control of your Customer Data by providing you the ability to

- 3.2.1 access your Customer Data,
- 3.2.2 share your Customer Data through supported third-party integrations,
- 3.2.3 request export or deletion of your Customer Data.
- 3.2.4 We hold the data in your account as long as you choose to use SCC Services. Once you terminate your SCC user account, your data will eventually get deleted from active database during the next clean-up that occurs once in 6 months. The data deleted from active database will be deleted from backups after 3 months.

### 3.3 How we use Customer Personal Data:

We process your Customer Personal Data when you provide us instructions through the various modules of our services.

### 3.4 Who we share Customer Personal Data with:

- 3.4.1 SCC and third party sub-processors: In order to provide Services and technical support for our products, the contracting entity within SCC engages other group entities and third parties.

- 3.4.2 Employees and independent contractors: We may provide access to your Customer Personal Data to our employees and individuals who are independent contractors of the SCC group entities involved in providing the Services (collectively our “employees”) so that they can identify, analyze and resolve errors. We ensure that access by our employees to your Customer Personal Data is restricted to specific individuals, and is logged and audited. Our employees will also have access to data that you knowingly share with us for technical support or to import data into our products or Services. We communicate our privacy and security guidelines to our employees and strictly enforce privacy safeguards within SCC.
- 3.4.3 Collaborators and other users: Some of our products or Services allow you to collaborate with other users or third parties. Initiating collaboration may enable other collaborators to view some or all of your profile information. For example, when you edit a document that you have shared with other persons for collaboration, your name and profile picture will be displayed next to your edits to allow your collaborators to know that you made those edits.
- 3.4.4 Third-party integrations you have enabled: Most of our products and Services support integrations with third-party products and services. If you choose to enable any third-party integration, you may be allowing the third party to access your Customer Personal Data and Personal Data about you. We encourage you to review the privacy practices of the third-party services and products before you enable integration with them.
- 3.4.5 Data subject requests: If believe that we store, use or process your information on behalf of one of our customers, please contact the customer if you would like to access, rectify, erase, restrict or object to processing, or export your personal data. We will extend our support to our customer in responding to your request within a reasonable timeframe. It is our customer’s responsibility, if they are processing any personal data utilizing our services.

## 4 Updates to Privacy Policy

We may update the privacy policy. The updated version will be indicated by an updated “Version” date and will be effective as soon as it is accessible. If we make material changes to the privacy policy, we may notify you by prominently posting a notice of change or by directly sending you a notification.