

DATA MANAGEMENT NOTICE

OF PAPER DOG Ltd.

1. Purpose, Scope, and Definition of Data Controllers

The purpose of this notice is to record the data management principles of Paper Dog Ltd., including its data controller activities, as well as the data management principles and data protection measures applied in connection with the website at <https://www.paperdog.com>, in accordance with applicable legislation. The information on the processing and protection of personal data required by Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: "GDPR") must be concise, transparent, comprehensible, and easily accessible.

This data management notice contains the rules governing the processing of personal data in relation to services provided through this website, as well as information on data processing. By using the services provided through the website, users accept the terms of this notice.

For the purposes of this notice, Data Controllers are those who perform data processing tasks on behalf of the members of Paper Dog Ltd., and who are therefore authorised to transfer the relevant personal data to the regionally competent Data Controller to which the data subject has expressly consented.

The material scope of this notice extends to all data processing activities carried out by the data controllers involving the processing of personal data, regardless of the nature of the personal data or the category of data subjects. A data subject is any person whose personal data is processed by the Data Controller. This term is used in this sense throughout.

The personal scope of this notice extends to all employees of the data controllers and, where provided in data processing agreements, to data processors in a contractual relationship with the Data Controller.

2. General Provisions

The competent Data Controllers process numerous personal data in connection with their activities. With regard to the personal data processed, we always ensure the lawfulness and purpose-limitation of data processing, and we promptly inform the data subject about the processing of their personal data and its conditions. The purpose of this notice is to ensure that persons registering on our website can receive appropriate information before providing their personal data, under what conditions and guarantees and for how long the regionally competent Data Controllers will process their data.

The competent Data Controllers comply with the provisions of this notice in all cases involving personal data processing. We reserve the right to amend this unilateral declaration, but will always do so with appropriate notice to the data subjects.

If you have any questions or comments regarding the contents of this notice, please contact the Data Controller by email or by post to the Data Controller's registered address.

Our data processing activities have been established in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation, hereinafter: "GDPR") and Act CXII of 2011 on Informational Self-Determination and Freedom of Information ("Info Act").

Our details and contact information:

Name: Paper Dog Ltd.

Registered address: Unit B, 11 Bell Yard Mews, Bermondsey Street, London, England, SE1 3TN

Company registration number: 05297245

Email: info@paperdog.com

3. Processing of Data of Visitors Who Register on the Website

Persons interested in our services may register online on our website.

Data controller: Competent Data Controller

Purpose of processing: To make contact following an enquiry about the software.

Legal basis for processing: Prior consent of the data subject (Article 6(1)(a) GDPR).

Data subjects: Persons registering on the paperdog.com website.

Categories of personal data processed:

- Data required to complete registration: surname, first name, email address, phone number.

Duration of data processing:

- The duration of personal data processing extends until the explicit withdrawal of the data subject's consent. Once the data subject notifies the Data Controller that they no longer wish to be registered as a user after a given date, the Data Controller will delete the data subject's personal data within 30 working days. The data subject acknowledges that the Data Controller is nonetheless obliged to continue processing personal data if required to do so by law or — based on authorisation by law, within the scope defined therein — by local government decree for public interest purposes (hereinafter: mandatory processing), until the deadline set by law. In the case of mandatory processing, the types of data to be processed, the purpose and conditions of processing, the accessibility of the data, the duration of processing, and the identity of the data controller shall be determined by the law or local government decree ordering such processing.

Recipients: The processed personal data may only be accessed within the competent Data Controller's organisation by authorised employees whose job function requires it, and by designated staff of data processors.

Rights of the data subject in brief: The data subject (the person whose personal data is processed by the Data Controller) may:

- a. request access to the personal data relating to them,
- b. request rectification of such data,
- c. request erasure of such data: a request for erasure, and the resulting deletion, does not affect the lawfulness of processing carried out on the basis of consent prior to its withdrawal;
- d. request restriction of processing under the conditions set out in Article 18 GDPR (i.e., that the Data Controller not delete or destroy the data pending a

- court or authority request, but for no longer than thirty days, and not process the data for any other purpose beyond that),
- e. object to the processing of personal data,
 - f. exercise the right to data portability. Under this right, the data subject is entitled to receive the personal data relating to them in Word or Excel format, and to request that our company transfer such data to another data controller.
 - g. lodge a complaint with the supervisory authority as set out in the section of this notice entitled “Rights of Data Subjects and Remedies”.

Other information regarding data processing:

- The Data Controller takes all necessary technical and organisational measures to prevent a potential data protection incident (e.g., loss, disappearance, or unauthorised access to files containing personal data). Our data is protected by state-of-the-art physical and IT security measures. The general terms and conditions, privacy statements, and contracts concluded with data processors provide high-level guarantees for lawful and secure data processing.

5. Processing of Personal Data for Marketing Newsletter Purposes

The email addresses of registered persons are processed by the competent Data Controller in accordance with Sections 2 and 3. However, Paper Dog Ltd. may also send marketing notifications to email addresses — based on the explicit consent of the data subject — and this activity therefore constitutes an independent processing purpose.

Data controller: Data Controller

Purpose of processing: To inform data subjects about new services, news, events, and other marketing communications of the Data Controller.

Legal basis for processing: Prior consent of the data subject (Article 6(1)(a) GDPR).

Data subjects: Persons who subscribe to the newsletter.

Categories of personal data processed: Email address.

Duration of data processing:

- The duration of personal data processing extends until the explicit withdrawal of the data subject’s consent. Once the data subject notifies the Data Controller that they no longer wish to appear in the newsletter database after a given date, the Data Controller will cease data processing under this provision.
- The Data Controller also informs data subjects that it plans to clean its database every year, during which data subjects who have been registered in the newsletter database for at least 2 years will be asked whether they still wish to receive the newsletter. If no response is received from the data subject, or if they state that they no longer wish to receive the newsletter, the Data Controller will not send further marketing newsletters to the data subject.

Recipients: The processed personal data may only be accessed within the Data Controller’s organisation by authorised employees whose job function requires it, and outside the organisation by authorised employees of data processors.

Use of data processor: The Data Controller uniformly engages a data processor for maintaining the newsletter database and communicating with subscribers.

Possible consequences of not providing data: Provision of data is voluntary and based on the data subject's consent. If data is not provided, the Data Controller will not send marketing newsletters to the data subject.

Rights of the data subject in brief: The data subject may:

- h. request access to the personal data relating to them,
- i. request rectification of such data,
- j. withdraw consent to data processing,
- k. request erasure of such data: a request for erasure, and the resulting deletion, does not affect the lawfulness of processing carried out on the basis of consent prior to its withdrawal;
- l. request restriction of processing under the conditions set out in Article 18 GDPR,
- m. object to the processing of personal data,
- n. exercise the right to data portability — to receive personal data in Word or Excel format and to have it transferred to another data controller,
- o. lodge a complaint with the supervisory authority as described in the section "Rights of Data Subjects and Remedies".

Other information:

- The Data Controller takes all necessary technical and organisational measures to prevent data protection incidents. Our data is protected by state-of-the-art physical and IT security measures.
- The data subject may withdraw consent to data processing at any time by clicking the "unsubscribe" link in the newsletter, or by logging into www.paperdog.com and navigating to the "My Settings" menu. The Data Controller will cease processing immediately upon unsubscription.

6. Web Analytics, Cookies, and Local Storage on the Website

To measure website traffic, monitor visitor behaviour, compile statistics, and assess the effectiveness of advertisements, the website uses Google Analytics and AdWords.

These programmes place so-called cookies on the user's computer, which collect user data. Visitors to the site consent to the monitoring and tracking of their behaviour and to the use of all services provided by these programmes on behalf of the Data Controller. Users may at any time disable future cookie recording and storage as described below. We inform our users that the settings and use of Google Analytics and AdWords Conversion Tracking fully comply with the requirements of the data protection authority.

According to Google, Google Analytics primarily uses first-party cookies to report visitor interactions on the website. These cookies only record non-personally identifiable information. Browsers do not share first-party cookies across domains.

Google Analytics

www.paperdog.com uses Google Analytics primarily for generating statistics, including measuring the effectiveness of its campaigns. Through this programme, the Data Controller obtains information mainly about how many visitors accessed its website and how long they spent on it. The programme recognises the visitor's IP address, enabling it to track whether the visitor is returning or new, and to follow the path the visitor took on the website and where they entered from.

Google AdWords Conversion Tracking

The purpose of Google AdWords conversion tracking is to enable the Data Controller to measure the effectiveness of AdWords advertisements. This is done through cookies placed on the user's computer, which exist for 30 days and do not collect personal data.

Disabling Cookies

If you wish to manage or disable cookie settings, you can do so on your own computer through your browser. This option is typically found under Tools > Settings > Privacy Settings, where you can enable or disable tracking features.

Users who do not want Google Analytics to report on their visit can install the Google Analytics opt-out browser add-on. This add-on instructs Google Analytics JavaScript scripts (ga.js, analytics.js, and dc.js) not to send visit information to Google. Visitors who have installed the opt-out browser add-on will also not participate in content experiments.

To disable Analytics web activity, visit the Google Analytics opt-out page and install the add-on for your browser.

8. Other Data Processing

Information about data processing not listed in this notice will be provided at the time the data is collected. We inform our clients that certain authorities, public bodies, and courts may contact the Data Controller for the purpose of disclosing personal data. The Data Controller will only disclose personal data to such bodies — where the requesting body has specified the exact purpose and scope of the data — to the extent strictly necessary to fulfil the purpose of the request, and only where required by law.

10. Method of Storing Personal Data and Data Processing Security

Our IT systems and other data storage locations are located at the premises of the regionally competent Data Controllers and on leased servers. The regionally competent Data Controllers select and operate the IT tools used in the provision of services for personal data processing such that the processed data:

- p. is accessible to those authorised (availability);
- q. its authenticity and authentication is ensured (authenticity of processing);
- r. its integrity can be verified (data integrity);
- s. is protected against unauthorised access (data confidentiality).

We pay special attention to data security and take all necessary technical and organisational measures and establish procedural rules required to enforce the guarantees under the GDPR. Data is protected by appropriate measures, in particular against unauthorised access, alteration, transmission, disclosure, deletion, destruction, accidental destruction or damage, and inaccessibility resulting from changes in the technology used.

Our and our partners' IT systems and networks are equally protected against computer-assisted fraud, computer viruses, computer intrusions, and denial-of-service attacks. The operator ensures security through server-level and application-level protection procedures. Daily data backup is in place. To prevent data protection incidents, the Data Controller takes all possible measures; in the event of such an

incident, we act immediately to minimise risks and remedy damage in accordance with our incident management policy.

11. Rights of Data Subjects and Remedies

The data subject may request information about the processing of their personal data, and may request rectification, erasure, or withdrawal of their personal data — except in the case of mandatory processing — and may exercise the right to data portability and the right to object, as indicated at the time of data collection or by contacting the Data Controller at the address provided above.

Upon the data subject's request, information will be provided in electronic form without delay and at the latest within 30 days, in accordance with our relevant policy. Requests from data subjects for the exercise of the rights below are fulfilled free of charge.

Right to Information

The Data Controller takes appropriate measures to ensure that all information referred to in Articles 13 and 14 GDPR and all notifications under Articles 15–22 and 34 GDPR are provided to data subjects in a concise, transparent, comprehensible, and easily accessible form, written in clear and plain language, yet precisely.

The right to information can be exercised in writing through the contact details provided in Section 1. Upon request — after verification of identity — information may also be provided verbally. If the Data Controller's staff have doubts about the data subject's identity, we may request information necessary to confirm the data subject's identity.

Right of Access

The data subject is entitled to obtain confirmation from the Data Controller as to whether personal data concerning them is being processed. If processing is taking place, they are entitled to access their personal data and the following information: the purposes of processing; the categories of personal data; the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations; the intended storage period; the right to rectification, erasure, restriction, and the right to object; the right to lodge a complaint with a supervisory authority; information about the data sources; the existence of automated decision-making, including profiling, and meaningful information about the logic involved and its significance and expected consequences. Where personal data are transferred to a third country or international organisation, the data subject has the right to be informed about the appropriate safeguards.

Right to Rectification

Anyone may request the rectification of inaccurate personal data relating to them processed by the Data Controller, and the completion of incomplete data.

Right to Erasure

The data subject is entitled to request that we erase their personal data without undue delay in any of the following circumstances:

- t. the personal data is no longer necessary for the purpose for which it was collected or otherwise processed;
- u. the data subject withdraws the consent on which processing is based and there is no other legal basis for processing;
- v. the data subject objects to processing and there are no overriding legitimate grounds;
- w. the personal data has been unlawfully processed;
- x. the personal data must be erased to comply with a legal obligation under EU or Member State law;
- y. the personal data was collected in relation to the offer of information society services.

Erasure may not be requested where processing is necessary for: exercising the right to freedom of expression and information; compliance with a legal obligation; the performance of a task carried out in the public interest; public health purposes; archiving, scientific, historical research, or statistical purposes in the public interest; or the establishment, exercise, or defence of legal claims.

Erasure from the personal data database is only possible upon written request and will be completed within 30 days of receipt. Such requests should be submitted to the customer service office where the data was registered, or by email to the territorially competent Data Controller (info@paperdog.com).

Right to Restriction of Processing

At the data subject's request, we will restrict processing if the conditions under Article 18 GDPR are met, i.e., if:

- z. the data subject contests the accuracy of the personal data, in which case restriction applies for the period needed to verify accuracy;
- aa. the processing is unlawful but the data subject opposes erasure and requests restriction instead;
- bb. the Data Controller no longer needs the data but the data subject requires it for establishing, exercising, or defending legal claims;
- cc. the data subject has objected to processing; in this case restriction applies for the period until it is determined whether the Data Controller's legitimate grounds override those of the data subject.

Where processing is restricted, personal data may, with the exception of storage, only be processed with the data subject's consent, for the establishment, exercise, or defence of legal claims, for the protection of the rights of another person, or for important public interests of the EU or a Member State. The data subject must be informed before the restriction is lifted.

Right to Data Portability

The data subject is entitled to receive the personal data concerning them, which they have provided to the Data Controller, in a structured, commonly used, machine-readable format, and to transmit those data to another data controller. The Data Controller can fulfil this request in Word or Excel format.

Right to Withdraw Consent

The data subject is entitled to withdraw their consent at any time. Withdrawal does not affect the lawfulness of processing carried out on the basis of consent prior to its withdrawal.

Procedural Rules

The Data Controller shall inform the data subject about measures taken in response to a request under Articles 15–22 GDPR without undue delay and in any event within one month of receipt of the request. Where necessary, taking into account the complexity and number of requests, this period may be extended by a further two months. The Data Controller shall inform the data subject of any extension within one month of receipt of the request, stating the reasons for the delay.

If the data subject submitted the request electronically, the information shall be provided electronically, unless the data subject requests otherwise.

If the Data Controller does not take action following the data subject's request, the Data Controller shall inform the data subject without delay, and at the latest within one month of receipt of the request, of the reasons for not taking action and of the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

The Data Controller shall inform each recipient to whom personal data has been disclosed of any rectification, erasure, or restriction of processing, unless this proves impossible or involves disproportionate effort. The Data Controller shall inform the data subject about those recipients upon request.

Damages and Compensation for Non-Material Harm

Any person who has suffered material or non-material damage as a result of a breach of data protection regulations is entitled to compensation from the Data Controller or data processor for the damage suffered. A data processor shall only be liable for damage caused by processing where it has not complied with its obligations under applicable law specifically imposed on data processors, or where it has disregarded or acted contrary to lawful instructions from the Data Controller. Where multiple data controllers or processors are involved in the same processing and are liable for damage, each shall be jointly and severally liable for the full amount of the damage.

The Data Controller or data processor shall be exempt from liability if they prove that they are not responsible in any way for the event causing the damage.

Right to Judicial Remedy and Data Protection Authority Proceedings

In the event of a violation of their rights, the data subject may take legal action against the Data Controller. The court shall handle the case on a priority basis.

London, 18 June 2019

Paper Dog Ltd.

Competent Data Controllers