



BIND TECHNOLOGIES d.o.o.

PRIVACY NOTICE

1. DEFINITIONS

- The term “**BIND**” or “**us**” or “**we**” or “**our**” refers to the company **BIND TECHNOLOGIES d.o.o.**
- The term “**you**” refers to a natural person (an individual) whose personal data BIND collects and processes.
- The term “**Services**” means BIND’s Communications Platform-as-a-Service and other products and services.
- The term “**personal data**” means any information about you from which you can be identified, directly or indirectly.
- The term “**controller**” means the organisation which determines the purposes and means of the data processing and is responsible for processing such data in a manner consistent with the applicable privacy law.
- The term “**processor**” means an organisation who processes personal data on behalf of the controller.
- The term “**applicable privacy law**” means all laws and regulations applicable to the processing of given personal data (e.g. the General Data Protection Regulation (EU) 2016/679, the UK GDPR, or the UK Data Protection Act 2018).

2. OUR SERVICES

BIND provides Services via its Communications Platform-as-a-Service (CPaaS), and may act as the controller or the processor when providing these Services.

BIND as processor

Our customers are mainly companies that use our Services to send or exchange communications with their end-users using different communication channels (SMS, email, voice etc.).

We do not have a direct relationship with our customers’ end-users. We distribute these communications through telecom operators and other communications providers, whereby we act as the processor on behalf of our customers. We therefore process the relevant data for the sole purpose of providing our Services to the customers, per the customers’ instructions and accordance with the Services’ terms and conditions, agreement for Services, data processing or similar agreement concluded with the customer.

In an instance where you, as an end-user of our customer, are the recipient of communication that our customer sent to you via our platform (such as an SMS message), we send that customer’s communications acting on behalf of our customer. As such, the customer is the controller, and BIND is the processor. Any request we receive from customers’ end-users regarding their rights related to our activities will be forwarded to customers, or instruct the end-users to contact them directly.

BIND as controller

BIND is a controller when we process personal data for our own purposes and this Privacy Notice explains our controller activities.



3. ENTITY RESPONSIBLE FOR YOUR PERSONAL DATA

The entity responsible for processing of personal data as described in this Privacy Notice – the controller – is BIND TECHNOLOGIES d.o.o., OIB (PIN): 51119819722, Ulica Velog Jože - Via Veli Jože 14, Pula, Republic of Croatia.

BIND's EU-based Data Protection Officer ('DPO') may be contacted at: dpa@bind.hr.

4. OBTAINING YOUR PERSONAL DATA

Personal data we process is provided to us by you, when you use our Services, visit our website, register for an event, participate in our research initiatives, submit an application form, or otherwise communicate with us.

Other sources of personal data, are (for example):

- If you are employed with or represent our customer or supplier, they may provide us with certain information so that you can use our Services
- If you are an end-user of our customer, they may provide us with certain information in order to use our Services
- If you participate in our market research, we may receive information from our third-party provider related to that research
- If you visit our website or use our Services, we automatically collect certain information, such as your Internet protocol (IP) address, user settings, cookie identifiers, and other unique identifiers, browser or device information, and location information (including approximate location derived from IP address). For more information about how we collect data through cookies please review our **Cookie Policy**
- If you apply for a job, we may receive information from providers of background check services, or collect information from LinkedIn or other publicly available sources or other data providers (to the extent permitted by law)

5. THE PURPOSE, BASIS AND TIME PERIOD FOR KEEPING OF PERSONAL DATA

When providing Services to our customers, we are processing your data if you are:

- our customer (as an individual/natural person)
- working for or on behalf of our customer, in which case you are either: an **"account user"** (individual authorized by the customer to log into their account and utilize BIND Services) or **"business contact"** (a customer's representative or any other individual acting as a contact point between the customer and BIND)
- our customer's **"end-user"** (an individual that receives communications from or sends it to our customer)

When concluding an agreement, creating customer's account, and providing the necessary support to the customer to use our Services:

- **What:** BIND may collect **"account data"**, which is all data essential for maintaining a business relationship with a customer (information needed to create customer's account,



to allow customer to use BIND Services, or to bill the customer accordingly), including: Registration details of a customer and account users (e.g. name and surname, (business) address, phone number, email address, company's name and industry, business role, as well as login details); Billing and financial details of a customer (e.g. billing address, prepaid or postpaid customer, bank account details, VAT number, information about creditworthiness and payment behaviour, and other additional information as required under applicable laws); Business contacts' details (e.g. name and surname, (business) address, phone number and email address, company's name and industry, and business role); "Customer support data" (i.e. customer support communication including the content of customer support tickets).

- **How:** Directly from you or from our due diligence provider, if you are an individual. Directly from you or via your organisation, if your organisation is our customer.
- **Why:** To sign and administer agreements with our customers; Create customers' accounts and enable their account users to use our Services; Keep customers' accounts secure and provide customer care and support; Share relevant information about our products and services, maintain and improve our business relationships with customers, and exercise our rights and fulfill our obligations arising from these business relationships; Assess, by conducting a due diligence process, whether we can enter into a contractual agreement with a prospective customer. We might use your identification data as part of the process. Whenever due diligence is conducted, we will separately inform you of precise details about the processing.
- **On what basis:** on our legitimate interest of providing our Services to your organisation or, if you personally are our contractual counterpart, we process your data because it is necessary for the performance of an agreement for Services or to provide assistance at your request prior to entering into the agreement.
- **How long is it kept:** Personal data of account users and business contacts are retained for twelve (12) months after the end of our business relationship with the customer. Personal data of individuals who are our customers are retained for seven (7) years after the end of our business relationship. Customer support data is retained for seven (7) years after the resolving of the support request. We might be required to retain this data for a different time period in certain circumstances if prescribed by specific local laws, when requested by authorities, or if needed to defend our legal rights.

When enabling customers to exchange their communications through our Services, ensuring the security of our network and Services, and handling billing and payments:

- **What:** BIND may collect "**communications-related data**" that includes: "**Communications content**": message text, voice, video or audio media, documents, or images exchanged between the customer and their end-users via BIND Services, "**Traffic data**": data that is processed for the transmission of a communication exchanged by using our Services or for billing related to that communication. It includes information on the communication itself (e.g. routing, type, duration and time of communication) and on the source and destination of the communication (including the customer's end-users' phone number or e-mail address depending on the Services provided), and "**usage data**", which



is information created during your use of our Services. This includes information communicated by the application to BIND (e.g. IP addresses, information on your usage, routing information), as well as logs of your activities on our platform.

- **How:** Communications content is received from our customers or their end-users. Customers' end-users' phone numbers or email addresses are received from our customers. Other traffic data is automatically generated or unveiled during the process of transmission of a communication. Usage data is received directly from you or generated automatically when you use our Services
- **Why: Communications content** is collected and processed solely on behalf of a given customer. We act as a processor and in line with the customer's instructions. **Traffic data** is generally kept in the form of communication detail records, and we collect it and use it to: Manage traffic with the purpose of transmitting customer's communications toward or from telecom operators and other communications providers and handling customer's enquiries. If you, as our customer, are an individual, the processing of your personal data is necessary for the performance of our agreement for Services. If our customer is a legal person, we rely on our legitimate interest to provide Services to our customers. To troubleshoot and detect problems with the network, prevent fraud and other illicit activities, and keep our Services secure. When conducting these activities, we might also leverage **account** and **usage data**. The latter is especially relevant for investigating fraudulent activities as it allows us to construct the timeframe of account user's activities in the case of security-related incidents and be able to take adequate steps for mitigation. The security of our Services is crucial, so for these activities we rely on our legitimate interest to maintain and improve the security of our network and Services. To calculate charges and settle interconnection payments with telecom operators and other communications providers or resolve a billing dispute with our customer or our communications provider. In some cases we might also utilize **account data** as part of this activity. The carrying out of these activities is our legitimate interest in handling payments and resolving financial disputes. Please note that in order to comply with our legal obligations, we may be obliged to retain records containing **communications-related data** as stipulated in the relevant national data retention provisions regulating law enforcement matters, and to share them upon government request.
- **How long is it kept:** Communications content is retained on behalf of the customer and according to the customer's instructions. Traffic data containing end-users' personal data (such as phone number or email address) is deleted from communication detail records twelve (12) months after the end of the month in which the communication took place. Other traffic data (such as time, type, duration of communication, routing details) which do not contain end-users' personal information is retained in communication detail records for up to ten (10) years following the year of communication. Usage data may be retained for up to three (3) years. We might be required to retain this data for a different time period in certain circumstances if prescribed by specific local laws, when requested by authorities, or if needed to defend our legal rights.

When improving our Services and products:



- **What:** BIND may collect “**behaviour analytics data**”, which is data you generate as our customer’s account user during your activity on our website and our platform (e.g. your behaviour records inside our web interface, such as time spent, pages visited, history of your visits and features used as well as your IP address and information about your browser).
- **How:** Behaviour analytics data is received directly from you or generated automatically when you use our Services by placing cookies and trusted tracking technologies on your browser. For more information on how we collect your data through cookies on our website, please visit our **Cookie Policy**.
- **Why:** To gain insight into how our current customers are using our platform and Services. We take partially automated measurements that include human intervention in order to analyse the way you use the features and tools available on our platform to give you recommendations to improve your performance (e.g. how to better access some feature) and to better satisfy the business needs of our customers. To create statistics on the use of our tools to understand which tools have a user-friendly design and which should be enhanced. The goal of such activities is to enhance your and your organisation’s messaging execution when communicating with your end-users, and we rely on our legitimate interest when conducting them.
- **How long is it kept:** **Behaviour analytics data** is retained for up to twenty-five (25) months after it was generated.

When you provide your products or services to us:

- **What:** BIND may collect (if you, as our supplier, are an individual) your name and surname, (business) address, phone number, email address, company’s name and industry, business role, as well as your billing information (e.g. billing address, your VAT number, bank account details, and further information if we are legally required to and in accordance with applicable national legislation). We may also collect: personal data related to “**business contacts**” (supplier’s representatives and other individuals acting as a contact point between the supplier and BIND) such as name and surname, (business) address, phone number, email, company name and industry, and business role.
- **How:** Directly from you, if you as an individual are our supplier. Directly from you or via your organisation, if your organisation is our supplier.
- **Why:** To Sign and administer an agreement with you or your organisation; Get relevant information about your product or services or share relevant information about our business and services with you; Maintain and improve our business relationship with you or your organisation as well as exercise our rights and fulfill our obligations arising from the business relationship. Conducting these activities is our legitimate interest in purchasing products or services from or collaborating with a supplier that is a legal person. However, if you personally are our contractual counterpart, we process your personal data because it is necessary for the performance of an agreement or for entering into an agreement.



- **How long is it kept:** Personal data about business contacts will be deleted twelve (12) months after the end of our business relationship with the supplier. Personal data of individuals who are our suppliers will be deleted seven (7) years after the end of our business relationship. If prescribed by specific local laws, when requested by authorities, or if needed to defend our legal rights, we might be required to retain this data for a different time period than listed above.

When communicating our products and services or business opportunities:

- **What:** BIND may collect your name and surname, contact details (e.g. email address, phone number, country), and business details (e.g. company's name and industry and your business role). We will also collect any other information you choose to provide to us, depending on the nature of our communication.
- **How:** Directly from you when you register on our website to learn about our business and services, start chatting with us via our chat channel, take steps to enter a business relationship with us, and when you provide us with your contact details. Indirectly through business and professional networks and databases (such as LinkedIn) or third parties we might employ that supply us with information collected from publicly available sources and data enrichment providers. We only retain the information that will help us reach potential customers or suppliers that could benefit from our services and products, or if we are interested in their products and services.
- **Why:** To communicate with you, answer your questions, and find out if you or your organisation are interested in further cooperation with us, either by using our products and services or by providing your products or services to us; to ensure adequate support within the presales and purchasing process if there is a mutual interest in entering into an agreement. Such activities represent our legitimate interest to conduct our business. If you personally are our contractual counterpart, we process your data because it is necessary for the performance of a contract or for entering into a contract.
- **How long is it kept:** Personal data collected for this purpose will be deleted six (6) months after our last communication unless we enter into a business agreement with you or your organisation.

When we send you email or other marketing communications:

- **What:** BIND may collect your name and surname, and contact details (e.g. email address or phone number). We also gather simple statistics around email openings and clicks.
- **How:** Directly from you if you subscribe to receive our newsletters, blogs or our other marketing communications through the webforms available on our website. Directly from you or via your organisation as part of business-to-business (B2B) marketing if we have an existing business relationship with your organisation. Simple statistics around email openings and clicks are generated automatically via industry standard technologies such as clear gifs when you engage with our emails.



- **Why:** To inform you about our Services, company news, webinars and upcoming events; to gather statistics (email opening and clicks) to help us improve our direct marketing initiatives. If you subscribe to our email marketing communications, we rely on your consent provided to us when submitting such webforms. For B2B (business-to-business) marketing, we rely on our legitimate interest to maintain and improve our business relationships by informing our existing business partners (e.g. customers and suppliers) about our Services, company news, webinars, and upcoming events via email or other forms of communications. In any case, you may proactively manage your preferences or opt-out of communications (**unsubscribe**) with BIND at any time using the unsubscribe link provided in all marketing communications. When you unsubscribe from our marketing communications (i.e. withdraw your consent or object to the processing), we will stop sending you any marketing materials. However, we maintain a so-called “suppression list” that contains only your email address or phone number just to be sure that we do not contact you with unwanted content in the future. We retain this information relying on our legitimate interest to respect the choices of our newsletter recipients.
- **How long is it kept:** Your personal data (name and surname, contact details) are kept for our marketing activities during your or your organisation’s business relationship with us unless you object (B2B). If you have subscribed directly, then your personal data will be kept for our marketing activities until you unsubscribe. If you unsubscribe or object, we will only keep a suppression list that includes your contact details (e.g. email address or phone number) to ensure you do not receive any further marketing communication.

When you register for, attend, or speak at our events:

- **What:** BIND may collect your name and surname, contact details (e.g. email, phone number, country), as well as your business details (e.g. company’s name and industry and your business role). If you are participating as a speaker, you might also be asked to provide your brief CV and an official photo of you. For live events, we may also ask you information about the time and place of your arrival as well as accommodation details and dietary requirements you may have. If you require us to provide you with an invitation letter, or you need to get a letter of guarantee to be able to get a visa, we will collect the necessary information required by applicable law (such as your name and surname, address, date of birth, or passport details). We may collect photos, audio, and video material from our events.
- **How:** Directly from you when you register to attend or check in at our event. Sometimes your organisation will send us your contact details to attend our event on their behalf, and we will send you an invitation with the link for registration.
- **Why:** to provide you with the webinar details in advance, to remind you of the webinar and email you the recording of the webinar subsequently; to ensure your place at the event, to communicate to you all the relevant information before your arrival and during the event, and to facilitate the event, e.g., help you with information about the location of our event, accommodation, travel or other logistic details related to the event (the legal basis we rely on is your consent, provided when you submit your details through our registration forms. When we collect any information about dietary requirements, we also rely on your consent); to support you with getting a visa for an event that you wish to attend, including to send an invitation, support letter or letter of guarantee (we collect this information only to respond



to your request and we rely on your consent provided when you submit your personal data for this purpose. However, we may be obligated to share such document with government authorities and to retain it for a certain period of time. We do this to comply with our legal obligation); to invite you to future events and inform you about our products and services that we think you might be interested in. For that purpose, we maintain former events' participants lists containing only your name and surname, contact details, and business details (we rely on our legitimate interest to conduct our business for this purpose. You may object to these communications at any time by using the unsubscribe link provided in all BIND's communications and we will stop sending you event invitations); to conduct promotion activities of the events we held, which include the publishing of photos, videos, audio, and texts in online and offline media (these activities represent our legitimate interest to conduct our business)

- **How long is it kept:** Personal data collected when registering for a webinar or a live event (e.g. name and surname, contact details, business details) will be deleted two (2) years after the event. All other personal data collected for the organisation of an event (accommodation, and other logistic data) will be erased within sixty (60) days after the event day. Any invitation, support letter or letter of guarantee will be kept for a period of time determined by the applicable legislation.

When we perform user experience research:

- **What:** BIND may collect name and surname, email, company name, and business role. We might record and transcribe interviews that we conduct.
- **How:** We collect your name and surname and contact details (email address) from our databases if you or your organisation are our customer to invite you to be part of our research hub. If you have registered to participate in research activities at a third-party provider, we may collect the same types of data from them to invite you. If you apply to be part of our research hub and participate in our research, we will collect the personal data directly from you through a third-party provider who will process it on our behalf. We collect any further information (e.g. your feedback on our products) directly from you as part of the research.
- **Why:** to invite you to be part of our research hub (when inviting you to be part of our research hub, we send you an email with a link to apply. For this activity we rely on our legitimate interest to improve our products and Services. We will contact you only about research related to the product or Services you already use or have used. When you apply to a third-party provider to participate in research activities, we may contact you to be part of our research hub and participate in our user experience research via a third-party provider's platform. We will rely on your consent or the contract for personal data collected and processed, depending on the circumstances); to conduct user experience research activities and obtain your feedback to improve our products and Services (your participation is completely voluntary and if you decide to be a part of our research hub or to participate in our research, we will rely on your consent or the contract for personal data collected and processed, depending on the circumstances). The research may be recorded, and we will take notes on your comments and actions. The research results, recordings, and notes are used only for improving our products and Services and will be shared internally with our product design and development teams



- **How long is it kept:** Recordings of interviews and associated personal data (e.g. contact details and personal data within the interview transcripts) will be deleted one (1) year after the interview date.

When you visit our website:

- **What:** BIND may, by placing cookies, collect your IP address, your browser type and associated information, the pages you have visited and the order you visited them, as well as whether you are a new or returning visitor.
- **How:** Directly from you when you browse our website by placing cookies on your browser. The cookies are either placed automatically (necessary cookies) or only once you have consented to them (functional, analytical, and advertising cookies). Please review our Cookie Policy for more information
- **Why:** To maintain and improve our website and overall business. When doing so, we rely either on our legitimate interest to ensure the functioning of the website (for necessary cookies) or on your consent (for functional, analytical, and advertising cookies). Please review our Cookie Policy for more information on how you can manage (including to withdraw) your cookie consent.
- **How long is it kept:** This depends on the specific types of cookies that were either placed automatically (necessary cookies) or that you have consented to be placed (other categories). Please review our Cookie Policy for more details on the retention periods for specific types of cookies.

When you visit our offices or premises:

- **What:** BIND may collect your name and surname, email, signature, business role, and name of the organisation you work for or represent. We might also collect your phone number. We may also collect CCTV recordings as some entrances and common areas might be under CCTV surveillance.
- **How:** Directly from you when you visit one of our offices or our other company's premises.
- **Why:** to manage access control to our offices and premises and provide you with additional services while you are visiting us; to ensure the safety and security of our employees, visitors, and property (CCTV surveillance at the entrances and common areas of some of our offices and premises). Most of these activities are conducted based on your consent. The processing of CCTV surveillance data as well as the processing regarding access control are done based on our legitimate interest to protect our premises and staff.
- **How long is it kept:** Personal data collected for the purpose of managing the access to our premises is erased as soon as it is no longer needed for that purpose. When we provide you with additional services during your visit, we will retain your personal data for as long as needed to fulfill your specific request or until you withdraw your consent. CCTV surveillance recordings are generally deleted ninety (90) days after the recording date,



unless prescribed otherwise by the local laws. However, we might be required to retain this data for a different time period in certain circumstances if prescribed by specific local laws, when requested by authorities, or if needed to defend our legal rights.

6. SHARING OF YOUR PERSONAL DATA

We may engage suppliers to help us in the processing of your personal data for the activities that we conduct as a controller and that we describe in this Privacy Notice. We may also share your personal data with our affiliates as part of our daily operations. Any such sharing is regulated by agreements on personal data processing and transfer.

If a supplier acts as our processor we ensure that the processing of personal data is governed by a written data processing agreement.

As a rule, we do not share personal data with third parties except if strictly necessary and on a need-to-know basis, such as with:

- Telecom operators and other communications service providers for the set-up of proper routing and connectivity.
- Service and technology providers to the extent strictly necessary for them to perform specific actions on our behalf. These might be related both to our Services and to our other processes.
- Third parties when required to comply with our legal obligations, such as legal authorities due to relevant legislation, court order, or legal process served on us or because of threats to public security, regulatory requirement, or in the context of investigations or bankruptcy. As a communications provider, we are required to retain certain communications-related data for law enforcement purposes and will be required to share that data with authorized law enforcement authorities upon their request. Also, if we are under an obligation to demonstrate compliance with relevant accounting, financial and tax legislation, your data can be shared with auditors and tax authorities for those purposes.
- Advertising partners that we might use as part of our marketing activities. More information is listed in our Cookie Policy along with an explanation of how to adjust your cookie settings.
- Merger and acquisition stakeholders as part of disclosure in the event of a merger, sale, or other asset transfer. Your information may be transferred as part of such a transaction, as permitted by law or contract.

7. SECURING YOUR PERSONAL DATA

We have invested in the development, implementation, and constant improvement of a wide range of technical and organisational security measures, incl. appropriate ISO standards.

8. INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA

All international transfers are carried out while ensuring the confidentiality and security of your personal data and in line with the applicable privacy law. This might include specific technical, organisational, and contractual measures. In relation to transfers of personal data outside the



European Economic Area, we will complete and execute standard contractual clauses for data transfers where required.

9. YOUR RIGHTS IN RESPECT OF YOUR PERSONAL DATA

Where granted by the applicable privacy law, you have the right to:

- Withdraw your consent to our processing of your personal data (to the extent such processing is based on your consent and consent is the only permissible basis for processing), without affecting the lawfulness of processing based on consent before its withdrawal
- Request from us to access your personal data, which means requesting a copy of the personal data we hold about you
- Ask us to rectify (correct) your personal data that you think is inaccurate and to complete your personal data that you think is incomplete
- Ask us to erase your personal data in certain circumstances
- Ask us to restrict the processing of your personal data in certain circumstances
- If we process your personal data by automated means based on your consent or upon a contractual relation with you, you can exercise the right of data portability
- If we process your personal data upon our legitimate interest, you have the right to object to the processing
- If you want to object to the processing of your data for marketing purposes, you can do it at any time by using the unsubscribe link provided in our marketing communications
- You may also have specific rights in exceptional cases when we may carry out automated decision-making operations, including profiling.

If you have any questions or you wish to exercise a certain right or resolve a complaint regarding the processing of your personal data, you can contact our Data Protection Officer by sending an email to the following email address: dpa@bind.hr.

If applicable to you, you can lodge a complaint with the supervisory authority of the EU member state of your habitual residence, place of work, or place of the alleged infringement.

10. HOW LONG IS YOUR PERSONAL DATA KEPT

Personal data that has been collected based on your consent will be kept for a period specified in the consent. If you wish to withdraw your consent for the processing of your personal data for any purpose and to delete your data, you can do that at any time by sending an email to dpa@bind.hr.

Personal data that is not subject to your consent is kept for as long as necessary to fulfill the purposes for which it was collected before making it non-identifiable (anonymous) or deleting it, as required by law.

The retention periods listed in previous provisions are standard default periods. In some cases, exceptions apply due to local laws related to law enforcement, tax, or other purposes. Additionally, if legal matters such as litigation, law enforcement requests, or government investigations require



us to preserve records, including those containing personal information, for longer periods than listed above, we will delete the records in question when we are no longer obligated to retain them.