

Privacy Statement

Alfaleads respects your right to privacy. This Privacy Statement explains who we are, how we collect, share and use Personal Data about you when you use our website, and how you can exercise your privacy rights. This Privacy Statement applies to all business processes in Alfaleads and to all websites, domains, mobile solutions, cloud services and communities as well as Alfaleads branded websites (“Alfaleads Sites”).

If you have any questions or concerns about our use of your Personal Data, then please contact us using the contact details provided at the bottom of this Privacy Statement.

Please do not use Alfaleads Sites or our services if you do not agree with how we process personal data according to this Privacy Statement.

What types of information does Alfaleads collect?

Personal Information. “Personal Data” is information that, directly or indirectly, identifies you or another individual and which may include: name, title, company name, job function, expertise, postal address, telephone number, email address, browser and device information (including IP Address), and information collected through cookies and other similar technologies. If you submit any Personal Data relating to other people to us or to our service providers in connection with the Sites, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Statement.

Other Information. “Other Information” is any information that does not and cannot be used to reveal your identity or that of another individual, such as information which has been fully and permanently anonymized and aggregated. We use this information to facilitate our operation of the Sites and for other purposes described below.

2. How does Alfaleads collect information?

- when you contact us through Alfaleads Sites, by telephone, post, e-mail or through any other means;
- when you register with us and set up an account to receive our services;
- when you complete surveys that we use for research purposes (although you are not obliged to respond to them);
- when you make payments to us, through Alfaleads Sites or otherwise;
- when you set your preferences for receiving marketing and other communications from us;
- when you use our services;
- when we receive your Personal Data from third parties, for example our Partners that register you with us; and
- when we collect publicly available information about you.

In general, we will use the Personal Data we collect from you only for the purposes described in this Privacy Statement or for purposes that we explain to you at the time we collect your Personal Data. However, we may also use your Personal Data for other purposes that are not incompatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws.

Alfaleads can act as the data controller of your Personal Data, as well as the data processor – depending on how we collect your Personal Data. For details on how Alfaleads acts as data processor, please refer to Clause 10 below.

3. Who does Alfaleads share my Personal Data with?

We may disclose your Personal Data to the following categories of recipients:

- to third-party agents, services providers and partners. We contract with other companies and people to perform tasks on our behalf and share your Personal Data with some of them to provide products or services to you, or to otherwise communicate with you, such as to provide marketing or offers on our behalf. Examples include removing repetitive information from customer lists, analyzing data, providing marketing assistance, conducting billing, processing credit card payments, engaging technical support for our services, providing customer service, and performing analysis related to our products or services. We also provide your Personal Data to agents and service providers to verify or compile aggregate usage data that we provide to our partners. When we share this information in this way, we require the agent or service provider to maintain the privacy, confidentiality and security of the Personal Data.
- to any competent law enforcement body, regulatory, government agency, court or other third party in case it should occur that we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to a potential acquirer of Alfaleads and its agents/advisers in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your Personal Data only for the purposes disclosed in this Privacy Statement;
- to any other person with your consent to the disclosure.

4. Legal basis for processing Personal Data

Our legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it.

However, we will normally collect Personal Data from you only (i) where we need the Personal Data to fulfill our contractual obligations with you, (ii) where the processing is in our legitimate interest and not overridden by your rights, or (iii) where we have your consent to do so. In some cases, we may also have a legal obligation to collect Personal Data from you or may otherwise need the Personal Data to protect your vital interests or those of another person.

If we ask you to provide Personal Data to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your Personal Data is mandatory or not (as well as of the possible consequences if you do not provide your Personal Data).

If we collect and use your Personal Data in relation to our legitimate interests (or those of any third party), this interest will normally be to operate our platform and communicate with you as necessary to provide our services to you and for our legitimate commercial interest, for instance, when responding to your queries, improving our platform, undertaking marketing, or for the purposes of detecting or preventing illegal activities. We

may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Data, please contact us by sending an email to dpo@alfaleads.net.

5. Cookies and similar tracking technology

We use cookies and similar tracking technology (collectively, "Cookies") to collect and use Personal Data about you, including to serve interest-based advertising. We use cookies for:

- Recording the number of visitors to Alfaleads Sites;
- Setting the order in which a visitor visits the various pages to Alfaleads Sites;
- Assessing which parts of Alfaleads Sites or services need adaptation;
- Optimizing Alfaleads Sites;
- Targeting and tailoring advertising towards previous visitors and users; and
- Segmenting users according to relevant categories for our advertising.

For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice.

6. How does Alfaleads keep my Personal Data secure?

We have implemented appropriate organizational, technical, and administrative measures to protect Personal Data within our organization, including security controls to prevent unauthorized access to our systems. While we take reasonable steps to secure your Personal Data from loss, misuse, interference and unauthorized access, modification and disclosure, you should be aware no security procedures or protocols are ever guaranteed to be 100 percent secure from intrusion or hacking, and there is therefore always some risk assumed by sharing Personal Data online. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us by sending an email to dpo@alfaleads.net.

7. International data transfers

Your Personal Data may be transferred to, and processed in, countries other than the country in which you reside. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Whenever we transfer Personal Data to other jurisdictions, we will ensure that the information is transferred in accordance with this Privacy Statement. Further details of these can be provided upon request.

8. Data retention

We will retain your Personal Data for a period of time consistent with the original purpose of collection, including to pursue our legitimate business interests, comply with our legal obligations, resolve disputes and enforce applicable agreements.

9. Your data protection rights

You have the following data protection rights:

- If you wish to access, correct, update or request deletion of your Personal Data, you can do so at any time by sending an email to dpo@alfaleads.net
- In addition, you can object to the processing of your Personal Data, ask us to restrict processing of your Personal Data or request portability of your Personal Data. Again, you can exercise these rights by sending an email to dpo@alfaleads.net
- If you chose to receive marketing communications from us, you have the right to opt-out at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you.
- Similarly, if we have collected and processed your Personal Data with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Data conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority. A list of the relevant data protection agencies can be found here: (http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

For your protection, we only implement requests with respect to the Personal Data associated with the particular email address that you use to send us your request, and we need to verify your identity before implementing your request. We will respond to your request within 30 days.

Please note that we need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting such access, change or deletion.

10. How does Alfaleads protect and store personal data as data processor?

We provide Alfaleads services to our Partners. Most of our services involves processing of the Partner’ data, hereunder their personal data. The purposes of processing is determined by our Partners not by Alfaleads, making the Partner the data controller. Alfaleads do in such cases act as data processor and process the data on behalf of and according to instructions given by the Partner. The relation between the Partner as data controller and Alfaleads as data processor shall be regulated by a data processing agreement.

When the Partner act as data controller the Partner shall, according to applicable privacy legislation, ensure the legal grounds for processing the personal data. Further, the Partner shall assess and establish ownership to the risks posed to data subjects by processing their personal data. Another important aspect of the Partner’s duty as data controller is to comply with the information duty towards data subjects.

Alfaleads is a natural part of the Partner duties as data controller, in the sense that Alfaleads’s services constitutes parts of the processing of personal data that the Partner must ensure are compliant with applicable privacy legislation. Thus, when Alfaleads processes personal data on behalf of their Partner, we must do so in accordance with privacy legislation applicable for data processors.

In short, the Partner and Alfaleads are obligated to cooperate to ensure privacy for data subjects. Alfaleads shall provide the information necessary for the Partner to be compliant with applicable privacy legislation.

11. How to contact us

If you have any questions or believe your Personal Data has been used in a way that is not consistent with this notice or applicable legislation, or you have any other data protection related issues or queries, please, contact our Data Protection Officer by e-mail sent to dpo@alfaleads.net

Written inquiries may be addressed to:

Data Protection Officer

Harju maakond, Tallinn, Kesklinna linnaosa, Narva mnt 7-634, 10117

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