

Plek Privacy Policy

At Plek, we are committed to handling all information related to you with the utmost care and discretion. In this privacy policy, we explain how we handle your personal data and what rights you have in this regard.

Plek is the data controller of your personal data (except for Customer Data, as defined below). Personal data is information that can identify you, such as your name or email address, or information that can reasonably be traced back to you.

We manage the Plek desktop and mobile applications ("Plek") that are intended for use by our customers according to their instructions. If one of our customers (e.g., your employer or another organization that has authorized your access to and use of Plek) provides you with an instance of Plek, they are responsible for collecting and using data (such as messages, files, or other content) that you submit or provide through that instance of Plek or that we otherwise process according to their instructions ("Customer Data") (and they are subject to the terms we have agreed upon with them). You should read the privacy policy of such an organization for information on how they use Customer Data. We are not the data controller of Customer Data that we process according to the instructions of our customers.

What data do we collect?

We collect the following data that you provide to us or that is automatically collected:

Personal data that you provide to us

By filling out the contact form on the website or sending an email:

- First and last name
- Email address
- Optional: your phone number
- Communication preferences

Limited personal data when you visit our website

- Cookies (read the cookie policy for more information)
- IP address

Personal data when the organization you work for or are affiliated with becomes a customer of Plek

- First and last name
- Email address
- Other customer-dependent information, such as department, job title, year of employment. This information is usually retrieved via a link from our customer's primary administration.
- Feedback Information you provide via survey forms or Smart Conversations

Recruitment information when you apply for a job with us

- Name, address, and place of residence (NAW) details
- Email address
- Phone number
- Curriculum Vitae
- Any other information you provide with your application

We use personal data for the following purposes

- For (technical) maintenance and improvement of our website
- To contact you by phone or email in response to a question or request via our contact form
- To contact you by phone or email in response to a demo request

If you are a customer of our platform, we use your personal data

- To grant you access to Plek
- To enable your use of Plek
- To manage our customer database
- To share updates about Plek
- To send invoices or for other regular business activities

We do not use:

- Special categories of personal data
- Automated decision-making or profiling
- Additionally, we store as few personal data as possible and only the data necessary for our purposes. Moreover, we process the data exclusively within the European Union.

On what basis do we collect personal data?

We collect personal data because it is necessary for one of the aforementioned purposes and is based on a legal basis required by the GDPR. Thus, we may collect data:

- Based on our own legitimate interest
- To execute the agreement we have with you
- Based on your consent

When do we share personal data with third parties?

We only share your data with third parties when permitted by current legislation. It may occur that we provide your personal data to third parties because:

- We have engaged them to process certain data
- It is necessary to execute the agreement with you
- You have given your consent
- We have a legitimate interest in it
- We are legally required to do so

The parties that process personal data on our or your behalf are:

- Cookie providers (see our cookie policy for more information)
- IT suppliers and service providers
- Payment service providers

Plek also works with contractors or services to measure, research, or improve our services. These contractors may collect information about visitors to Plek websites on our behalf using cookies, log file data, and code embedded on our websites. Third parties are prohibited from sharing this information with other third parties or using it for their own purposes or other objectives.

To provide our services, we may share your personal data with parties located within the European Economic Area (EEA). We do this only if there is an adequate level of protection for the processing of personal data. This means, for example, that we use a model contract of the European Commission or make agreements about the handling of personal data through data processing agreements.

How do we secure your personal data?

Protecting the privacy and security of your information is a fundamental aspect of everything we do and is part of our business processes, our Software Development Life Cycle, and our employee training program.

We take appropriate technical and organizational security measures to limit unauthorized access to your personal data and thus protect your data.

Furthermore, we do not have access to information on your Plek-based platform unless we gain access as a user, such as an editor, admin, or tester. We will always agree with you on what kind of access we will have to your platform, if applicable. If you want certain information on your Plek platform, such as a confidential document or information within a hidden group, to be accessible only to specific users or members of a group, neither other persons in your organization nor we will have access to the relevant information. When you participate in an anonymous survey or an anonymous Smart Conversation, your answers are not traceable to you by our customer's employees or our employees. Segmentation of responses into groups smaller than five is technically impossible because, in that case, answers could be traceable to individuals.

How long will you retain my data?

We will only retain your personal data for as long as necessary for the purposes outlined in this privacy policy. To determine the appropriate retention period for personal data, we consider various criteria, including:

- the amount, nature, and sensitivity of the personal data,
- the potential risk of harm from unauthorized use or disclosure of your personal data,
- the purposes for which we process your personal data and whether we
- the applicable legal, regulatory, tax, accounting, or other requirements.

If it is necessary to retain personal data to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, enforce our legal agreements and policies, or otherwise establish, defend, or exercise legal claims, we will do so.

Once specific retention periods have elapsed and we no longer have any specific reason to retain the personal data, the relevant personal data will be deleted or altered so that it no longer constitutes personal data.

In some circumstances, you may request that we delete your data. Please see *Your Rights* below for information about your data protection rights. You also have the right to object to our processing of personal data for direct marketing purposes (but if you do so, we will retain enough information to ensure that we do not send you direct marketing messages in the future).

If you have applied for a job with us, we will delete your data 4 weeks after the end of the recruitment process unless you give us permission to retain the data longer. In that case, we will keep your data for up to one year after the end of the recruitment process.

What rights do I have?

You have the following rights:

- **Right of access:** You have the right to access the personal data we process about you.
- **Right to rectification:** You have the right to correct or supplement the personal data we process about you if it is incorrect or incomplete.
- **Right to withdraw consent:** You can easily withdraw your consent at any time.
- **Right to object:** You can object to the processing of your personal data.
- **Right to erasure:** You can request that we delete your personal data.
- **Right to data portability:** If technically possible, you have the right to have the personal data we process about you transferred to a third party.
- **Right to restrict processing:** In certain cases, you can request to restrict the processing of your personal data (either temporarily or permanently), meaning that we will process less of your data.

If you wish to exercise any of these rights, we may ask you to identify yourself. We request this information to ensure that you are the correct person to whom the personal data belongs.

We will generally comply with your request within one month. However, this period may be extended by two months due to specific privacy rights or the complexity of the request. If we extend this period, we will notify you within the first month.

If you wish to exercise any of your rights, you can do so by contacting us via the contact details provided at the end of this privacy policy.

Where can I file a complaint?

If you have any questions or wish to file a complaint about the use of your personal data, you can contact us via the contact details provided at the end of this privacy policy. We will address any questions or complaints internally and communicate further with you. However, if you feel that we are not assisting you appropriately, you can contact the Data Protection Authority to file a complaint.

Changes to this Privacy Policy

Our privacy and cookie policy may be subject to changes in the future. Therefore, we advise you to regularly check this page for any changes. If we make significant changes, we will ensure that this is clearly communicated.

If you have any questions or comments about our privacy policy, please contact our Information Security Officer via privacy@plek.co.

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