



# PRIVACY NOTICE

Last updated January 30, 2021

Thank you for choosing to be a part of our community at XevoTech Limited, doing business as XevoTech (“XevoTech”, “we”, “us”, “our”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or our practices with grades to your personal information, please contact us at [mail@xevotech.com](mailto:mail@xevotech.com).

When you visit our website <https://xevotech.com> (the “Website”), and generally, use any of our services (the “Services”, which includes the Website), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it, and what rights you have in relation to it. We hope you take some time to read through it, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

This privacy notice applies to all information collected through our Services (which, as described above, includes our Website), as well as any related services, sales, marketing, or events.

**Please read this privacy notice carefully as it will help you understand what we do with the information that we collect.**

## WHAT INFORMATION DO WE COLLECT?

### Personal information you disclose to us

***In Short:** We collect personal information you provide to us.*

We collect personal information that you voluntarily provide to us when you register on the Website. Express an interest in obtaining information about us or our products and Services, when you participate in activities on the Website or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the Website, the choices you make and the products and features you use. The personal we collect may include the following:



**Personal Information Provided by You.** We collect names; phone numbers; email addresses; usernames; passwords; contact preferences; billing address; debit/credit card numbers; and other similar information.

**Payment Data.** We may collect data necessary to process payment if you make purchases such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data is stored by PayPal and Stripe. You may find their privacy notice link(s) here:

<https://www.paypal.com/uk/webapps/mpp/ua/privacy-full> and

<https://stripe.com/en-dk/privacy>.

**Social Media Login Data.** We may provide you with the option to register with us using your existing social media account details, like your Facebook and Twitter. If you choose to register in this way, we will collect the Information described in the section called “HOW DO WE HANDLE YOUR SOCIAL LOGINS” below.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

## Information automatically collected

***In Short:** Some information - such as your Internet Protocol (IP) address and/or browser and device characteristics - is collected automatically when you visit our Website.*

We automatically collect certain information when you visit, use or navigate the Website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Website and other technical information. This information is primarily needed to maintain security and operation of our Website, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic, usage and performance information our servers automatically collect when you access or use our Website and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity in the Website (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called ‘crash dumps’) and hardware settings).



- **Device Data.** We collect device data such as information about your computer, phone, tablet or other device you use to access the Website. Depending on the device used, this device data may include information such as your IP address (or proxy server) device and application identification numbers, location, browser type, hardware model, Internet service provider (sometimes called “ISP”, collectively “ISPs”) and/or mobile carrier, operation system and system configuration information.
- **Location Data.** We collect location data such as information about your device’s location which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Website. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. Note however, if you choose opt out, you may not be able to use certain aspects of the Services.

## Information collected from other sources

***In Short:** We may collect limited data from public databases, marketing partners, social media platforms, and other outside sources.*

In order to enhance our ability to provide relevant marketing, offers and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, social media platforms, as well as from other third parties. This information includes mailing addresses, email addresses, phone numbers, intent data (or user behavior data), Internet Protocol (IP) addresses, social media profiles, social media URLs and custom profiles, for purposes of targeted advertising and event promotion. If you interact with us on a social media platform using your social media account (e.g. Facebook or Twitter), we receive personal information about you such as your name, email address, and gender. Any personal information that we collect from your social media account depends on your social media account’s privacy settings.

## HOW DO WE USE YOUR INFORMATION?

***In Short:** We process your information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our Website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interest, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligation. We indicate the specific processing ground we rely on next to each purpose listed below.



In legal terms, we are generally the “data controller” under European data protection laws since we determine the means and/or purposes of the data processing we perform. However, if you are a business customer with whom we have entered into a data processing agreement for the provision of corporate services to you, then you would be the “data controller” and we would be the “data processor” under European data protection laws since we would be processing data on your behalf in accordance with your instructions.

We use the information we collect or receive:

- **To facilitate account creation and logon process.** If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract. See the section below headed “HOW DO WE HANDLE YOUR SOCIAL LOGIN” for further information.
- **Request feedback.** We may use your information to request feedback and to contact you about your use of our Website.
- **To manage user accounts.** We may use your information for the purposes of managing our account and keeping it in working order.
- **To send you marketing and promotional communications.** We and/or our third-party marketing partners may use the personal information you send us for our marketing purposes, if this is in accordance with your marketing preferences. For example when expressing an interest in obtaining information about us or our Website, subscribing to marketing or otherwise contacting us, we will collect personal information from you. You can opt-out of our marketing emails at any time (see the “WHAT ARE YOUR PRIVACY RIGHTS” below).

## WILL YOUR INFORMATION BE SHARED WITH ANYONE?

***In short:** We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.*

We may process or share your data that we hold based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to archive our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a

subpoena (including in response to public authorities to meet nation security or law enforcement requirements)

- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiation of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and subsidiaries, joint ventures partners or other companies that we control or that are under common control with us.
- **Business Partners.** We may share your information with our business partners to offer you certain products, services or promotions.

## DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

***In Short:** We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

## HOW DO WE HANDLE YOUR SOCIAL LOGINS?

***In Short:** If you choose to register or login to our services using a social media account, we may have access to certain information about you.*

Our Website offers you the ability to register and login using your third-party social media account details (like your Facebook or Twitter logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, profile picture as well as other information you choose to make public on such social media platform.



We will use the information we receive only for the purposes that are described in this privacy notice or that are otherwise made clear to you on the relevant Website. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use, and share your personal information, and how you can set your privacy preferences on their sites and apps.

## HOW LONG DO WE KEEP YOUR INFORMATION?

***In Short:** We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice, unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us to keep your personal information for longer than six (6) months past the start of idle period of the user's account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your information has been stored in backup archives), then we will securely store your information and isolate it from any further processing until deletion is possible.

## HOW DO WE KEEP YOUR INFORMATION SAFE?

***In Short:** We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.

## WHAT ARE YOUR PRIVACY RIGHTS?

In Short: In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances you may also have the right to object to the processing of your personal information. To make such, please use the contact details provided below. We will consider and act upon any request in accordance with the applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you are a resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here:

[http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm)

If you are a resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admim.ch/edoeb/en/home.html>

If you have questions or comments about your privacy rights you may email us at [mail@xevotech.com](mailto:mail@xevotech.com).

## Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account setting and update your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with applicable legal requirements.

**Cookies and similar technologies:** Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to





reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Website.

**Opting out of email marketing:** You can unsubscribe from our marketing email list at any time by clicking the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list - however, we may still communicate with you, for example to send your service related emails that are necessary for the administration and use of your account to respond to service requests, or for other non-marketing purposes. To otherwise opt-out, you may:

- Access your account and update your preferences.

## CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online track is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under the age of 18 year of age, reside in California, and have registered an account with the Website, you have the right to request removal of unwanted data that you publicly posted on the Website. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure that data is not





publicly displayed on the website, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, ect.).

## CCPA Privacy Notice

The California Code of Regulations defines a “resident” as

- (1) Every individual who is in the State of California for other than a temporary or transitory purpose and
- (2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as “non-residents.”

If the definition of “resident” applies to you we must adhere to certain rights and obligations regarding your personal information.

### What categories of personal information do we collect?

We have collect the following categories of personal information in the past twelve (12) months:

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifiers, online identifiers, Internet Protocol address, email address and account name	YES
B. Personal information categories listed in the California Customer Records statute	Name, contact information, education, employment, employment history and financial information	YES
C. Protected classification characteristics under California or federal law	Gender and date of birth	NO
D. Commercial information	Transaction information, purchase history, financial details and payment information	NO

E. Biometric information	Fingerprints and voiceprints	NO
F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, system and advertisements	YES
G. Geolocation data	Device location	YES
H. Audio, electronic, visual, thermal, olfactory, or similar information	Images and audio, video or call recordings created in connection with our business activities	NO
I. Professional or employment-related information	Business contact details in order to provide you our services at a business level ,job title, as well as your work history and professional qualifications if you apply for a job with us	NO
J. Education Information	Student records and directory information	NO
K. Inferences drawn from other personal information	Inference drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	NO

We may also collect other personal information outside of these categories instances where you interact with us in-person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys or contents; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

## How do we use and share your personal information?

More information about our data collection and sharing practices can be found in this privacy notice.

You may contact us by email at [mail@xevotech.com](mailto:mail@xevotech.com), or by referring to the contact details at the bottom of this document.



If you are using an authorized agent to exercise your right to opt-out we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

## Will your information be shared with anyone else?

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Each service provider is a for-profit entity that processes the information on our behalf.

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be “selling” of your personal data.

XevoTech Limited has not disclosed or sold any personal information to third parties for a business or commercial purpose in the preceding 12 months. XevoTech Limited will not sell personal information in the future belonging to website visitors, users, and other consumers.

## Your rights with respect to your personal data

### Right to request deletion of the data - Request to delete

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation or any processing that may be required to protect against illegal activities.

### Right to be informed - Request to know

Depending on the circumstances, you have a right to know:

- Whether we collect and use your personal information;
- The categories of personal information that we collect;
- The purposes for which the collected personal information is used;
- Whether we sell your personal information to third parties;
- The categories of personal information that we sold or disclosed for a business purpose;
- The categories of third parties to whom the personal information was sold or disclosed for a business purpose; and
- The business or commercial purpose for collecting or selling personal information.

In accordance with applicable law, we are not obligated to provide or delete consumer



information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

### Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you exercise your privacy rights.

### Verification process

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g. phone or email) that you have previously provided to use. We may also use other verification methods as the circumstances dictate.

We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible we will avoid requesting additional information from you for the purposes of verification. If, however, we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity, and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

### Other privacy rights

- You may object to the processing of your personal data
- You may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the data.
- You can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA
- You may request to opt-out from future selling of your personal information to third parties. Upon receiving a request to opt-out, we will act upon the request as soon as feasibly possible but no later than 15 from the request submission.

To exercise these rights, you can contact us by email at [mail@xevotech.com](mailto:mail@xevotech.com), or by referring to the contact details at the bottom of this document. If you have a complaint about how we handle your data, we would like to hear from you.

## DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such change or by directly sending you a notification. We encourage you to review this privacy notice frequently to be information of how we are protecting your information.

## HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have any questions or comments about this notice, you may contact our Data Protection Officer, Jimmi Hansen, by email at [jimmi@xevotech.com](mailto:jimmi@xevotech.com), or by post to:

Jimmi Hansen  
Gyvelvej 55 st th  
Roskilde. 4000  
Denmark

If you are a resident in the European Economic Area, the “data controller” of your personal information is XevoTech Limited. XevoTech Limited has appointed Jimmi Hansen to be its representative in the EEA. You can contact them directly regarding the processing of your information by XevoTech Limited, by email at [jimmi@xevotech.com](mailto:jimmi@xevotech.com), or by post to:

Gyvelvej 55 st th  
Roskilde. 4000  
Denmark

If you have any further question or comments, you may also contact us by post at the following corporate address:

**XevoTech Limited**  
130 Old Street  
London EC1V 9BD  
United Kingdom  
Company No. 13159508

[mail@xevotech.com](mailto:mail@xevotech.com)  
**+442045423440**



## HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information please visit: <https://xevotech.com/login>. We will respond to your request within 30 days.