

INRISK

Privacy Notice

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1. Why Do You Need this Privacy Notice?

We encourage you to carefully read this Privacy Notice as it provides you with information about your personal data being processed in connection with:

- (a) your access to and use of our website available at <https://inrisk.com>, including any of its subdomains (the “**Website**”);
- (b) discussions for evaluating or pursuing certain business relationships and transactions with us (the “**Business Relationship**”) when either, we (including our representatives) contact you, or you reach us (including our representatives) for these purposes;
- (c) Buying Inrisk products and services; and
- (d) Receiving information about Inrisk products and services;

We at Inrisk respect your privacy and are committed to protecting your personal data. In this Privacy Notice personal data and personal information are used as synonyms and mean any information that directly or indirectly identifies you as an individual. In this Privacy Notice we explain which types of personal data we hold on you, how we collect and process such data, how long we keep it, and so on.

2. Who Are We and How to Reach Us?

When we say “**we**”, “**us**”, or “**our**”, we mean **Inrisk**. “**You**” or “**your**” refers to you as (i) a visitor of the Website, (ii) a person who we contact or who reaches us regarding the Business Relationship, (iii) a person who accesses and uses our Social Media Channels, or (iv) any other person if we process your personal data in accordance with this Privacy Notice, as may be informed by us.

With respect to personal data collected as outlined in Section 1 above, we act as a data controller or joint data controller, depending on applicable circumstances as described below in this Privacy Notice.

We respect your privacy and are committed to protecting your personal data. Therefore, we process your personal data in accordance with this Privacy Notice and we endeavour to comply with the applicable data protection legislation, which includes the General Data Protection Regulation, also known as the GDPR (the “**Applicable Legislation**”).

3. What Are Our Principles?

Lawfulness. We endeavour to process personal data in accordance with the Applicable Legislation and only on the basis of the appropriate legal grounds.

Fairness. We do our best to handle personal data in ways that you would reasonably expect and we do not use any personal information in ways that have unjustified adverse effects on you.

Transparency. We endeavour to make the processing activities transparent and understandable for you, including by providing you with all reasonably necessary information regarding the processing.

Data Minimisation. We endeavour to process only necessary personal data, taking into consideration the requirements of the Applicable Legislation.

Purpose Limitation. We process your data only for the purposes it was collected. If we establish any other purpose, we will inform you reasonably in advance.

Accuracy. We endeavour to ensure the accuracy of your personal data, including by providing you with the opportunity to rectify or complete it.

Confidentiality, Integrity, and Availability. We try to comply with the best practices applicable to the development and maintenance of the security systems.

Storage Limitation. We keep the personal data as long as prescribed in this Privacy Notice, based on the purposes the data was collected.

Accountability. We endeavour to comply with the Applicable Legislation, and, furthermore, if we disclose personal data to any person, we will do our best to ensure that such person will comply with the terms of the Applicable Legislation and this Privacy Notice.

4. What Personal Data Do We Process?

In the context of managing our contractual relationship with you the following personal data can be processed: first name and last name, business e-mail address or other email address you provided us, the company, which you represent (if any), the business address, your phone number, your computer's information (IP address, browser type, device) and information about how you use our site (which pages you've visited, the time you spend on the site and the activities on the website).

In addition to the above, we also process personal data transmitted from our affiliated companies, if there is a legal basis for this, personal data for which you give specific consent to be processed for other purposes, and personal data obtained from public sources, if permitted by law

5. For which purposes we use your personal data?

For managing our contractual and pre-contractual relationship with you, which may include:

- Performance of a contract to which you are a party,
- Providing efficient customer support and building a good business relationship with existing and potential customers,
- Improving and developing our solutions and services.

In order to better understand the requirements and needs of the market and our customers, we also process your information for our legitimate interests, which include:

- Operating and managing our business operations,
- Improving quality, updating and customizing our solutions and services,

- Satisfaction assessment with our solutions and services,
- Protecting our business and our business interests,
- Informing about new solutions and products, educations, legal changes and events,
- Marketing our products and services to you,
- Providing a friendly, personalized and effective user experience in the event of data collection through a website,
- Diagnosing technical problems, analyzing trends and for the purposes of technical web site management,
- Complying with legal requirements,
- Marketing activities.

6. How Long Do We Process Your Data?

We will retain your personal data only for as long as it is necessary. The period of retention of personal data varies according to the criteria of each category of personal data. Personal data shall be kept until the expiration of the time limits specified in the legislation.

The personal data we collect on the basis of your consent, we keep the shortest possible period as long as there is a purpose for their collection or until the consent is cancelled. The cancellation of the consent does not affect the lawfulness of the processing that was carried out on the basis of the consent until its cancellation.

Certain information is also kept for the purpose of demonstrating compliance with your requirements (see section on Your rights regarding the processing of personal data)

7. How Do We Share Your Data?

General. We do not sell or rent out your data. However, we may share your personal data in accordance with this Privacy Notice, Applicable Legislation, or with your consent, in each case for the purposes of and if it is reasonably necessary for the purposes outlined in this Privacy Notice or required under the applicable laws and regulations.

Please note that if we share any portion of your personal data with third persons, we will endeavour to secure such transfer using appropriate legal, organisational, and technical measures.

Recipients. Given the purposes outlined above, your personal information is shared with the following categories of recipients:

- (a) our affiliates, meaning any person controlling, controlled by, or under the same control as we;
- (b) our personnel, contractors and consultants, who are required to have such data in connection with the performance of the Business Relationship and on a “need-to-know” basis, such as our legal department for conducting the paperwork or financial department for administering payments, etc.;

- (c) CRM systems and other systems for the data management and storage;
- (d) support and technical teams;
- (e) sales and marketing teams;
- (f) email delivery service providers;
- (g) analytical solution providers, such as [Google Analytics](#);
- (h) government authorities, upon their request or if necessary to comply with our legal obligations; and
- (i) another entity by virtue of succession, including as a result of merger, reorganisation, acquisition, or liquidation.

8. Do We Transfer Your Personal Data to Third Countries?

Sometimes we may transfer your personal data to countries that do not offer the same level of data protection as the laws of the European Union, EEA, Switzerland, the United Kingdom or your country. In case we transfer your personal data to a country that does not maintain the “adequate” level of data protection, as defined by the [European Commission](#), we will put in place suitable safeguards, which give you more protection and control regarding your personal data, and take reasonable steps to ensure that your privacy rights continue to be protected as outlined in this Privacy Notice and provided for in the Applicable Legislation. As a general rule, we will use the [Standard Contractual Clauses](#) (special documents developed by the European Commission) as an appropriate safeguard. You may reach us via the contact details indicated herein to ask whether your personal data is subject to transfer to a third country.

9. Who Controls Your Personal Data?

General. With respect to personal data processed in accordance with this Privacy Notice, we act as a data controller or joint data controller depending on applicable circumstances as described below.

Data Controller. When we act as a data controller, we mean that we solely determine what data collected and the purposes and means of processing of your data. As a general rule, if the personal data is processed in connection with the Business Relationship and/or your access and use the Website, we are considered a data controller. Please note that with respect to Google Data and LinkedIn Cookie Data, we act as a data controller and Google and LinkedIn, accordingly, act as our data processors. However, Google and LinkedIn may use such personal data for any of its own purposes, in which case, they act as independent data controllers. You can learn more about how Google and LinkedIn process personal data in their privacy policies: [Google's privacy policy](#) and [LinkedIn privacy policy](#).

Joint Controller. When we act as a joint controller with others, we mean that we and the respective person or entity process the substantially the same set of personal data and jointly determine the purposes and means of processing such personal information. If and to the extent we are considered to be a joint controller according to the Applicable Legislation, you may exercise your data protection rights with respect to the relevant personal data against both us or the respective person or entity. However, we will be able to assist you only with respect to the processing operations expressly outlined in this Privacy Notice. We have no influence on the processing of personal data in connection with your interaction with others, including, but not limited to third-party service providers, as such. According to the Applicable Legislation, we may be regarded as joint controllers, for example, in the following cases:

- (a) with respect to the Meta Data — we are deemed a joint data controller with respect to the following data processing activities in connection with the Meta Pixel: (i) creation of individualised or suitable ads, as well as for their optimisation; (ii) delivery of commercial and transaction-related messages. The following data processing activities are not covered by the joint controllership: (i) the process that takes place after the collection and transmission is within the sole responsibility of Meta; (ii) the preparation of reports and analyses in aggregated and anonymised form is carried out by Meta as a data processor and we act as a data controller. We have concluded a corresponding [agreement with Meta for joint controllership](#). This agreement defines the respective responsibilities for fulfilling the obligation under the data protection legislation with regard to joint controllership. In particular, we have agreed with Meta that Meta can be used as a contact point for the exercise of your data protection rights regarding the data collected by the Meta Pixel.
- (b) with respect to the Lead Data — we are deemed a data controller with respect to the following data processing activities: (i) collection, structuring, adaptation and storage of the Lead Data; and (ii) making marketing calls as well as delivery of marketing and other commercial messages regarding the Business Relationship. However, if the Lead Data was obtained from a public or other third-party resource, the respective provider of such public or other third-party resource acts as an independent data controller with respect to any other processing of your data, and we will not be responsible for such processing.

10. Are You Subject to Automated Decision-Making?

According to the Applicable Legislation, you have the right not to be subject to a decision based solely on automated processing of data, including profiling, which produces legal effects concerning you or similarly significantly affecting you. Automated decision-making is the process of making a decision by automated means without any human influence on the outcomes. A process might still be considered solely automated if a human inputs the data to be processed, and then the decision-making is carried out by an automated system.

We do not make any automated decisions based on your personal data, including profiling, which produce legal effects concerning you or similarly significantly affect you. If we intend to do so, we will do our best to inform you about the same in advance.

11. What About Securing Your Personal Data?

We strive to do our best to keep your personal data secure. We always review and update appropriate technical and organisational measures to:

- (a) keep your personal data secure in accordance with the Applicable Legislation, our internal policies and procedures regarding the storage of, access to, and disclosure of personal data; and
- (b) protect you against unauthorised or unlawful processing of personal data and accidental loss or destruction of, or damage to them.

We endeavour to implement and maintain reasonably necessary technical and organisational measures to protect the confidentiality, integrity and availability of your personal data. Your personal information may undergo anonymisation, pseudonymisation, and/or encryption to ensure safe transfer and/or processing.

12. What About Interacting with Third-Party Links?

The Website may include links and social media plugins to third-party websites and applications. Clicking on those links or enabling those connections may allow third parties to collect or share certain data about you. We do not control these third-party websites and applications, and are not responsible for their privacy statements. When you leave the Website, we encourage you to read the privacy policy/notice/statement of every website or application you visit.

13. What Data Subject Rights Do You Have?

General. According to the Applicable Legislation, you may have the rights outlined below. In order to exercise your rights as a data subject, we may request certain information from you to verify your identity and confirm that you have the right to exercise such rights.

Data Subject Rights. According to the Applicable Legislation, you may have the following rights:

<i>Rights</i>	<i>Description</i>
Right to access your personal data (commonly known as a “ data subject access request ”)	This enables you to (i) ask us whether we process your personal data, and (ii) request certain information about the processing activity and/or a copy of the personal data we hold about you as well as (iii) check that we are lawfully processing it.
Right to rectification of the personal data	This enables you to have any incomplete or inaccurate data we hold about you completed or rectified, though we may need to verify the accuracy of the new data you provide us with.
Right to erasure of your personal data (commonly known as a “ right to be forgotten ”)	This enables you to ask us to delete or remove personal data where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal or technical reasons which will be notified to you, if applicable, at the time of your request
Right to object to processing of your personal data	This enables you to object to processing of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate

	grounds to process your information which override your rights and freedoms.
Right to restrict the processing of your personal data	This enables you to ask us to suspend the processing of your personal data in the following scenarios: (i) if you want us to establish the data's accuracy, (ii) where our use of the data is unlawful but you do not want us to erase it, (iii) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims, (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
Request the transfer of your personal data (commonly known as a " right to the data portability ")	We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
Right to withdraw consent	You may withdraw your consent at any time where we are relying on consent to process your personal data.
Right not to be subject to automated decision-making	You reserve the right not to be subject to a decision based solely on automated processing of data, including profiling, which produces legal effects concerning you or similarly significantly affecting you. Please note that currently you are not subject to the automated decision-making, which produces legal effects concerning you or similarly significantly affecting you.
Right to file a complaint	You may file a complaint with a relevant supervisory authority in case we violate your rights or obligations imposed on us under the Applicable Legislation. The relevant supervisory authority may depend on the place where you are located.

14. Can We Modify and Update this Privacy Notice?

We keep our Privacy Notice under regular review and we may update it at any time. If we make any changes to this document, we will change the "Last Updated" date above. If we make substantial changes to the way we treat your personal information, we will notify you about the same prior to the change becoming effective.