

**FIRST LAYER**
**PRIVACY POLICY**

—last updated August 2019—

<b>BASIC INFORMATION REGARDING THE PROCESSING OF PERSONAL DATA OF USERS</b>	
<b>JOINT DATA CONTROLLERS AND EU REPRESENTATIVE</b>	Clarity AI Europe S.L. and Clarity AI, Inc. (" <b>Clarity</b> ") EU Representative of Clarity AI, Inc.: Clarity AI Europe S.L. <a href="#">+More information</a>
<b>PERSONAL DATA</b>	<ul style="list-style-type: none"> <li>• Identification data (e.g. name, surname, email address, and telephone number);</li> <li>• Login information (e.g. user name and password);</li> <li>• Internet profiles (e.g. IP address, web browser, use of the website and device information);</li> <li>• Economic and financial data (e.g. users' selected portfolio and preferences);</li> <li>• Employment data (e.g. employer and position); and</li> <li>• Behavioural information (e.g. data collected using cookies and other device identifying technologies).</li> </ul> <a href="#">+More information</a>
<b>PURPOSES</b>	<ul style="list-style-type: none"> <li>• To manage and control your registration and use of the site;</li> <li>• To manage and control the relationship with your employer;</li> <li>• To guarantee the security of the site;</li> <li>• To conduct studies to analyze the relevance and use of the site by you, including by way of anonymized information;</li> <li>• To send commercial communications about Clarity's similar services and products; and</li> <li>• To comply with the applicable legislation.</li> </ul> <a href="#">+More information</a>
<b>LEGAL BASIS</b>	<ul style="list-style-type: none"> <li>• Performance of a contract (<a href="#">Legal Notice</a>) to which the data subject is party;</li> <li>• Legitimate interest for managing and controlling the contractual relationship with the user's employer, guaranteeing the security of the site, conducting studies to analyze the use of the site and for sending commercial and/or promotional communications related to our products and services; and</li> <li>• Legal obligations.</li> </ul> <a href="#">+More information</a>
<b>RECIPIENTS</b>	<ul style="list-style-type: none"> <li>• Service providers.</li> </ul> <a href="#">+More information</a>
<b>INTERNATIONAL TRANSFERS</b>	<ul style="list-style-type: none"> <li>• Note that no transfers of personal data to countries located outside the EU are expected. However, please bear in mind that one of the joint controllers (i.e. Clarity AI, Inc.) is located in the USA and applies appropriate security safeguards.</li> </ul> <a href="#">+More information</a>
<b>RIGHTS</b>	<ul style="list-style-type: none"> <li>• Among others, you have the right to access, rectify and erase the personal data, and to withdraw consent. Additionally, you have the right to address to the Spanish Data Protection Agency any claim or query on data protection matters.</li> <li>• You may exercise your rights at any time by sending an email to <a href="mailto:privacy@clarity.ai">privacy@clarity.ai</a>.</li> </ul> <a href="#">+More information</a>
<b>RIGHT TO OBJECT</b>	<b>You have the right to object, at any time, to our processing of your personal data based on legitimate interest, including for purposes such as the reception of commercial communications.</b> <a href="#">+More information</a>
<b>EXTENDED INFORMATION</b>	Available at the following URL: ( <a href="#">Privacy Policy</a> ) <b>WE RECOMMEND THAT YOU READ IT CAREFULLY</b>

## SECOND LAYER

### PRIVACY POLICY

—last updated August 2019—

#### 1. GENERAL INFORMATION

This Privacy Policy covers the processing of your personal data when using the site <https://go.clarity.ai> (hereinafter, the “**Site**”) by Clarity AI Europe S.L. and Clarity AI, Inc. (hereinafter, “**Clarity**”, “**us**” or “**we**”), as well as the services offered therein (the “**Services**”). “**Personal Data**” means any information relating to an identified or identifiable natural person.

Please read carefully this Privacy Policy before using or proceeding to access to the Site.

#### 2. JOINT DATA CONTROLLERS AND EU REPRESENTATIVE

<b>NAME</b>	Clarity AI Europe S.L.	Clarity AI, Inc. <u>EU Representative</u> : Clarity AI Europe S.L., with the contact details described in this chart.
<b>ADDRESS</b>	Calle Meléndez Valdés 16 7 <sup>o</sup> 5 28015 Madrid	160 Greentree Drive, Suite 101, City of Dover, County of Kent, Delaware 19904
<b>EMAIL</b>	<a href="mailto:privacy@clarity.ai">privacy@clarity.ai</a>	

If you would like to obtain information about how the joint controllership operates and its essential arrangements, please contact us at the details above.

#### 3. PERSONAL DATA WE COLLECT

We will collect personal data about you from a variety of sources, including information we collect from you directly (e.g. when you register and use the Site); from third parties (e.g. from your employer) or automatically (e.g. through cookies):

- **Personal data we may collect directly from you:** Identification data (e.g. name, surname, email address, and telephone number); Login information (e.g. user name and password); Internet profiles (e.g. IP address, web browser, use of the Site and device information); Economic and financial data (e.g. users' selected portfolio and preferences); Employment data (e.g. employer and position); Behavioural information (data collected using cookies and other device identifying technologies); and other information provided at your discretion from time to time.
- **Personal data we may collect from third parties:** we may obtain from your employer certain information, such as your professional contact details (e.g. name, surname, email address, and telephone number).
- **Personal data we may collect automatically from you:** when using the Site we collect automatically from you certain information which may include personal data. Further information about our use of cookies and tracking technologies is available in our [Cookie Policy](#).

#### 4. HOW WE USE YOUR PERSONAL DATA AND ON WHAT LEGAL BASIS

We use and subsequently process personal data we collect about you on the following legal basis and for the purposes identified below:

- We will process your personal data for managing and controlling your registration and use of the Site on the basis of the **execution of the Legal Notice**.
- We will process your personal data **on the basis of our legitimate interest**, for the following purposes:
  - To manage the contractual relationship entered into with your employer, by which you have access to the Site;
  - To manage the Site, including the protection of the security and/or integrity of the Site and our IT infrastructure;
  - To deal with your enquiries and requests;
  - To understand how you use our Services and to enable us to improve and further develop the features, performance and support available on the Site, which may entail the provision of anonymous statistical information about our visitors (however, without it being used to identify any individual user);

- To contact you with promotional e-mails relating to products and services offered by Clarity, unless you have expressly manifested your desire to opt out of such communications, or we are otherwise legally prevented from doing so; and
- For internal administrative purposes with regard to Clarity's group companies.

Where Clarity processes personal data in fulfillment of its own legitimate interests, it shall always balance such interests against the data subjects' fundamental rights and freedoms, and implement robust safeguards in view of ensuring that their privacy is protected accordingly. You may obtain information on such balancing test upon request.

- (c) We will process your personal data **in order to comply with EU laws**, which may include the disclosure of your personal data and other complementary information to comply with requests received from EU authorities and/or bodies with compelling power.

## 5. HOW DO WE SHARE YOUR PERSONAL DATA AND WITH WHOM

Clarity will be able to share your personal data with service providers. Our service providers that support the IT infrastructure of Clarity and provide other services that may be required to have access to and process your data, on our behalf and to the extent necessary in order to provide the service.

Should some of the recipients of your personal data mentioned in this section are located outside the EU, in countries not regarded as ensuring an adequate level of protection for personal data under EU law, we will put in place appropriate safeguards in accordance with applicable legal requirements to ensure that when transferred to such recipients, your data is adequately protected. In particular, we will enter into agreements with the recipients on the basis of the relevant sets of standard contractual clauses approved by the European Commission available for consultation at [the site of the European Commission](#). For more information on the appropriate safeguards in place, please contact us at the details above.

## 6. FOR HOW LONG DO WE STORE YOUR PERSONAL DATA

We will keep your personal data for as long as we have a relationship with you and insofar the agreement with your employer is in force. Afterwards, we will retain your personal data for a period of time that enables us to defend ourselves against potential legal and contractual actions (during their expiration period). Finally, once these actions expire, we will proceed to delete your information.

Notwithstanding the above, logs will be retained for one (1) year for security purposes.

## 7. WHAT RIGHTS DO YOU HAVE OVER YOUR PERSONAL DATA

You have certain rights regarding your personal data. These include the following rights:

- (a) To know how we are processing your personal data and to **access** to your personal data held by Clarity;
- (b) To request the **rectification** of inaccurate or incomplete personal data;
- (c) To request the **erasure** of your personal data when, among others, such data is no longer necessary for the initial purposes for which it was initially collected, in accordance with applicable law;
- (d) To **restrict our processing** of your personal data, under certain circumstances (in which case we will only retain the personal data for the exercise and/or defense of Clarity's rights);
- (e) To **object** to our processing of your personal data, having regard to the given circumstances and for reasons related to your particular situation (in which case we will only retain the personal data for imperative legitimate reasons or the exercise and/or defense of Clarity's rights);
- (f) To request the **portability** of your personal data, which will allow you to obtain and reuse the personal data in a usable electronic format for your own purposes and across different services without hindrance to usability, including its transmission to another third party;
- (g) To **withdraw the consent** you may have granted to a specific processing, at any time; and
- (h) To **make a complaint** to the Spanish Data Protection Agency.

In order to exercise any of these rights, please send a letter or an e-mail using any of the postal addresses or e-mail included in Section 2.