### **General Business Privacy Statement for LEXIFY**

This Privacy Statement provides general information on the processing of certain below specified personal data by Lexify Oy and its employees, partners and affiliates ("LEXIFY") in connection with LEXIFY's general business conduct.

#### 1. Data controller contact information

Data controller name: Lexify Oy

e-mail: support@lexify.online

### 2. Personal data

The following personal data may be collected and processed in connection with LEXIFY's potential customers and ecosystem members (the "Prospects"), LEXIFY's business partners (customers, ecosystem members) (the "Customers") and LEXIFY's suppliers (the "Suppliers"):

- Name, telephone number, e-mail address
- Social media accounts (link)
- Company affiliation and role
- Communication preferences and feedback: such as opt-in/opt-out status for marketing communications, survey responses, and other feedback mechanisms.
- Interaction history (e.g., responses to outreach, meeting notes, e-mail correspondence)

Also the following personal data may be processed in connection with Customers:

- Transactional and service data: such as service requests, maintenance logs, purchase & invoicing history, and support interactions
- Technical identifiers: such as IP addresses, device identifiers, and browser types
- Compliance and Due Diligence Data: including records required for anti-bribery, anticorruption, and trade compliance purposes

Also the following personal data may be processed in connection with Suppliers:

- Contractual and transactional data: such as signed agreements, purchase orders, invoices, delivery records, and payment details
- Compliance and Due Diligence Data: including certifications, audit results, export control information, and records required for anti-bribery, anti-corruption, and trade compliance purposes.

# 3. The purposes of the processing

Purposes of use for Prospect personal data are:

- Lead generation and qualification: to identify and evaluate potential business opportunities, including capturing contact details, company affiliation, and expressed interests
- Marketing and outreach: to send relevant product or service information, event invitations, and promotional content, based on consent or legitimate interest
- Sales funnel management: to track prospect engagement, manage opportunity status, and convert qualified prospects into ecosystem members
- Access provisioning: to enable access to the LEXIFY platform

# Purposes of use for Customer personal data are:

- Contract fulfilment: to manage the business relationship, billing, invoicing, and service requests, including technical support
- Account and relationship management: to maintain accurate customer records, preferences, and communication history, and to support account-based marketing
- Regulatory and tax compliance: to fulfil legal obligations related to e.g. sanctions, invoicing and VAT
- Operational coordination: to facilitate communication between LEXIFY and Customer representatives
- LEXIFY Platform access and usage monitoring: to authenticate users, track usage patterns, and ensure secure access to LEXIFY services
- Analytics and service optimization: to analyse customer behaviour and feedback for improving products, services, and operational efficiency

## Purposes of use for Supplier personal data are:

- Procurement and contract management: to evaluate, onboard, and manage supplier relationships, including contract negotiation and payment processing
- Regulatory and tax compliance: to fulfil legal obligations related to e.g. sanctions, invoicing and VAT
- Operational coordination: to facilitate communication between LEXIFY and Supplier representatives

LEXIFY may further aggregate and anonymize the personal data to use it for business analytics purposes.

Processing is necessary for the purposes of the legitimate interests pursued by LEXIFY. The legitimate interests consist of the abovementioned processing purposes. Moreover, part of the processing may also be based on the contractual relation LEXIFY has with the company you represent or the fulfilment of regulatory obligations of LEXIFY.

Where required by applicable law, LEXIFY will collect your explicit consent for specific data processing activities (such as unsolicited marketing communications, as applicable) and such consent can be withdrawn at any time.

As allowed or required by applicable laws, LEXIFY may use personal data in legal and administrative proceedings or for regulatory compliance, e.g. for fulfilling a request for a resolution or information by authorities, in submissions for court or for the establishment, exercise or defence of legal claims.

If you do not want to provide personal data as listed above or later request the personal data to be deleted, this may result in a situation where you can no longer continue your business relationship with LEXIFY.

### 4. Source(s) from which the personal data originate

Personal data is collected through a variety of sources, depending on the nature of the relationship and the context in which the data is provided or generated. These sources include:

- Direct interactions: such as when individuals submit inquiries, attend events, or engage with our social media accounts or marketing campaigns
- Online forms and digital tools: including newsletter sign-ups, demo requests, and contact forms on our websites or platforms
- Third-party sources: such as business directories, lead generation platforms, or referrals, where permitted by applicable law
- Publicly available information: including professional networking sites and company websites

### 5. Transfers of personal data

The LEXIFY platform as well as LEXIFY's business partner data management system are hosted by external service providers who may have access to the personal data, but only for the purposes of providing hosting or other services. From time to time, LEXIFY may use also other external parties to e.g. provide IT support or development, and for these purposes transfer the personal data to such service providers. LEXIFY shall limit the possibility of such external parties to use personal data only to what is necessary for the performance of the respective services.

Due to the technical and practical requirements, some of the personal data may be processed also outside the country of where you reside (including outside EU/EEA) by LEXIFY's subcontractors. LEXIFY ensures that there is a legal basis for such transfers, and you can get more information about the data transfers by contacting LEXIFY.

The transfer of personal data between LEXIFY and a subcontractor for purposes of performing the services, does not constitute the selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic means the personal data for monetary or other valuable consideration.

LEXIFY requires robust security measures to be implemented by the service providers. These measures may include, as applicable:

- DDoS protection: safeguards against distributed denial-of-service attacks
- Encrypted data transmission: Ensures data is encrypted during transfer
- Secure infrastructure: Regular security assessments and compliance with industry standards

# 6. Retention period of personal data

The personal data will be stored as long as you have active relations with LEXIFY. Where your data has remained unused and there have been no interactions between you and LEXIFY for over 5 years, the personal data records will be deleted. However, your name, role, contact details, and certain transactional data may be stored as part of the bookkeeping records for up to 10 years. Data related to legal proceedings shall be retained for 10 years after the matter has been resolved.

# 7. Data subjects' rights

You have a right to review the personal data collected on you, right to have incorrect personal data corrected and right to request deletion of personal data. You may also have a right to object to processing based on a specific individual circumstance and request data portability and right to object marketing. You may use these rights by contacting LEXIFY via support@lexify.online.

In the event you have concerns or remarks regarding the legality of personal data processing, you may lodge a complaint with a competent local data protection supervisory authority or enforce your legal rights in jurisdictions without such data protection supervisory authority.