

# Privacy Policy

## 1. GOAL

This Privacy Policy together with the Terms and Conditions applies to you if you use the following Loki Services (hereinafter referred to generically as "Services" or "Loki Services"):

- The Loki mobile app, hereinafter referred to as the App, available in the App Store and Google Play, as soon as you have downloaded a copy of it to your mobile phone or on any device that allows this thing;
- Any of the services accessible through the application, hereinafter referred to as "External Services". It falls into this category, but without limiting at: our own pages on social networks (Facebook, Twitter, Googl +, Dribble, Reddit, etc.).

This document sets out the rules according to which you transmit your personal data to us, as well as the situations in which we collect this data with your consent, as well as the way in which all these data are processed or used by us.

## Data Protection Officer

Adonis Software SRL designated a Data Protection Officer (DPO). Within the Adonis Software organization, this role has a number of important responsibilities regarding personal data, among which:

- Monitoring Adonis Software's compliance with the rules set out in the General Data Protection Regulation (GDPR) and with other data protection laws;
- Awareness of issues related to data protection, training of Adonis Software staff and collaborators;
- Carrying out internal audits regarding personal data and their protection;
- Cooperation with supervisory authorities, in the interest and within the limits of the law.

If you have any questions regarding this Privacy Policy, including any request to exercise your legal rights, you may contact us at any time:

- By email at [ancu@adonissoft.com](mailto:ancu@adonissoft.com)

## Complaints

You have the right to submit a claim/ complaint at any time to the National Supervisory Authority for the Processing of Personal Data (<http://www.dataprotection.ro>), the Romanian supervisory authority in charge of personal data protection issues. However, we encourage you to contact us directly so that we can respond to any questions or inquiries regarding your personal data.

## Commitment

As transparency is one of our values and in order to avoid any misunderstanding regarding the way we manage your personal data, we assure you that:

- We will always keep your data confidential and secure;
- We will never sell your data;
- We provide you ways to manage and review your marketing options at any time.

## 2. USED PERSONAL DATA

We record for processing the following types of data:

### a. Information Provided

Represents the data that you provide us directly by filling in the pages/ forms available within the Loki Services. This category also

includes the information that you provide us when you correspond with us, by email or through the Platform.

This information is sent when:

- You register on the Platform;
- Download or register the Loki App;
- You subscribe to any of our services listed on the Platform;
- You participate in a competition, promotion or questionnaire available on the Platform;
- Report a problem regarding the Platform.

The information sent may include your first and last name, address, date of birth, email address, telephone number, username, password and other information required for registration, financial information, your bank account details, IBAN code, the details of your debit and/ or credit card, including card's number, card's expiry dates and the CVC, identification documents and their numbers, copies of your identification documents (identity card, passport, driver's license, study diplomas, accreditations given by the professional bodies and associations where you work, etc.), your personal description, your photo but also other information that you provide to us in order to prove your eligibility to use our services.

## **b. Information Collected**

Represents the data we collect about you and your device.

Every time you visit/ use Loki Services, we will automatically collect the following information:

- Technical information, your login information, information about the type of mobile device you use, a device unique identifier (for example: UDID number of your device, information about the mobile network, the operating system of the mobile device and its version, time zone setting, phone's language;
- Information regarding your visit, browsing within these Services but also accessing external resources from the Loki Services, as well as the date and time when these services addresses were accessed. There are also included here the services you viewed or searched for, the response time of the used pages, the errors you encountered, the duration of visits per page, the way in which you interacted with each page

individually (such as scrolling, taps) but also the interaction and how you navigate between pages, methods used to surf outside the Services and their pages;

- Information on the events that you carry out during the Online Meetings, but also within other services that you purchase or consume through the Loki Platform. This information includes the date and time when you started the meeting, the attempts to pay for the services and their actual payment, the attempts to access and actually access the meetings, attending the meetings, leaving the meetings, disconnecting and reconnecting during the meetings, their completion but also of other similar events in the sense of those listed above.
- Information related to Transactions - date, time, amount of meeting, used currency, data used to pay for the services, name and registration information of the payer, information about the device used to facilitate the payment
- Information stored on your device, which includes, if you explicitly allow, the access of the Loki Application to login information, photos and / or video files but also any other digital content.
- Details regarding your use of Loki Services or of your visits on our platform.

## c. Information that helps us provide you the services.

We work closely with third parties in order to help us deliver our Services to you. These third parties are business partners (such as external companies that promote or sell Loki services to other companies or Companies that buy/ negotiate Loki services in order to offer them to their own employees, etc.), subcontractors in technical and payment services, companies in the advertising field, analytics services providers, search services providers, fraud prevention agencies, governmental agencies and bodies.

The information we collect about you from such third parties may include information that helps us verify:

- Your identity.
- The veracity of the information transmitted;
- Eligibility to list services within the Loki platform;
- Eligibility to use Loki services (for example, the companies that offer Loki services in special conditions to the employees, can provide us, periodically, information through which the existing Employees can be identified, but also those who have left the company).

## d. Information you give us access to

In case you allow us explicit access, we will collect personal data from the Facebook account to which you allow us the access explicitly. The application will periodically collect this information to keep it up to date.

Once allowed the access to that information, you can withdraw your consent at any time by disabling those permissions for the Loki app in your device settings.

## 3. USE OF DATA

### a. Use of information

In the following, we will present the details on how the types of data are used and for what purposes.

Thus, we use the information held about you in the following ways:

#### i. Information Provided

We use this information for:

- fulfilling our obligations arising out from your interactions with the Loki Platform, such as, for example: Online Meetings, Transactions, payments and to offer you all the information, services and products you require us;
- Providing you with information about other goods and services, listed or not on the Loki Platform, that may be similar to those you purchased or requested within the platform;
- Providing you directly, or allow to third parties to provide you information about products and services that we believe are or may be of your interest.
- Verifying your identity in order to protect against fraud, in order to comply with the laws of the state/ country/ territory in which you operate but also to the laws regarding financial crime but also to confirm the eligibility to use our services and products;
- Facilitating interactions between users through our services and to give you the opportunity to distribute/ recommend to your contacts the use of Loki services;
- Notifying and informing you of changes brought to our services;
- Ensuring that the content thus presented on the Loki website, application and/ or platform is presented in the most efficient way possible for you and your device.

## ii. Information collected

We use this information for:

- the Administration of the Loki Application and Platform, including for audit, debugging, data analysis, testing, research, statistics;
- the transparency and history of all your interactions regarding the evaluation, booking, payment and consumption of products and services available on the Loki platform
- Improving Loki site, application and Platform, in order to ensure that the information and content are presented in the most efficient way for you and the device you use;
- Being able to grant you the right to participate in the interactive sections of the Loki Platform, when you choose to do so;

- Keeping the Loki Website, Application and Platform secure and safe;
- Measuring and understanding the effectiveness of advertising that we can provide to both Loki users, platform visitors but also to others so that we can provide you with relevant advertising.
- Making suggestions and recommendations to Loki users, visitors on the platform but also to others about the goods and services that may interest you or them;
- Verifying the identity in order to protect against fraud, in order to comply with the laws of the state/ country/ territory in which you operate but also to the laws on financial crime but also to confirm the eligibility to use our services and products;
- Complying with all policies and terms and conditions

### iii. External/third party information

We will aggregate external/ third party information with the information you provide to us but also with the information collected about you, following to use this information in order to:

- Help us better understand your behavior so we can make decisions about how we manage your Loki account;
- Analyze and process the requests referring to the purchase and use of existing goods and services within the Loki Platform, in order to be able to make decisions regarding the acceptance or rejection of such requests in the future.

### b. Aggregation of personal data

In order to use the data, we can associate/ correlate the various categories of information, the data thus aggregated being considered personal data, following to be treated in accordance to the present Privacy Policy.

For example, we can call on external/ third party companies in what regards:

## i. Registration as a Loki Specialist and conducting this activity on a regular basis

In order to be able to identify if you are eligible to carry out activities within the Platform, external companies can make search regarding:

- Your professional training;
- Accreditations obtained in order to legally exercise your professional activity;
- The financial situation of the legal entity on the basis of which you legally perform the activity;
- Information on fraud, attempt at deception and any other facts related to financial crime;
- Information on the existence of financial credits both of you and of the legal entity concerned

In case you would like more details about the external/ third party companies with the help of which we have obtained or we will be able to obtain information about you, please contact us at [ancu@adonissoft.com](mailto:ancu@adonissoft.com).

You may also withdraw your consent to be sought information about your financial credits at any time by contacting us at [ancu@adonissoft.com](mailto:ancu@adonissoft.com).

## ii. Use and consumption of the services listed in Loki

In order to be able to offer you the most customized services within the Loki Platform, external companies can perform searches regarding:



- The types of products and services you currently use;
- Your online activity and behavior in what regards the goods and services purchase;

If we decide to hire Advertising Agencies to promote Loki products and services, those Agencies but also their partners may request anonymous personal data in order to provide you with customized information and advertising.

We will never disclose information that could lead to the identification of individuals but we may provide them with aggregated and anonymized information about our users.

We may also use such aggregated and anonymized information to help our partners to deliver personalized and specific advertising campaigns relevant to a particular category of our users.

Furthermore, we may, in some cases, provide our partners with such aggregated and depersonalized information for the purpose of displaying their own advertising campaigns to their target audience.

## c. The purpose of using personal data

In the following, you can find a description of all the ways in which we use your personal data, as they have been mentioned above, and which are the legal grounds on which we proceed in this way. Moreover, where applicable, we will specify the following information:

- Legitimate interest

Represents any conduct necessary for the development, exercise and management of the Adonis Software activities in order to achieve the purpose, mission and vision for which the Loki platform was created. Legitimate interest also means any activity that allows us and helps us to offer to our users Loki services in conditions of maximum security.

We assure you that we always analyze, first of all, your rights regarding personal data and we always consider the implications that the use of this personal data may have on you, before processing any type of such personal data in order to achieve our legitimate goal.

Moreover, even when certain activities would help us achieve our legitimate goal, we will never use your personal data in activities that could have an impact on you, as long as we do not have your consent or the legislation in force will require or it will not impose it on us.

- Contractual obligations

The processing of your data is carried out in order to execute the contractual relations in which you are a party or to take measures, at your request, before concluding/ deciding to take part in such a contract.

- Legal obligations

Your personal data are used and processed for the compliance and in the limits of the legislation in force. These legal obligations apply, for example: to mandatory data appearing on the fiscal invoices, the obligation to keep the fiscal invoices for a certain time, etc. The purposes for which we use your personal data are:

## i. Provision of services

Reason:

- Providing all services and products that you request from us or that you have booked, paid for and/ or consumed;
- Fulfilling the obligations arising from your interaction with the Loki Platform, such as, for example: Online Meetings, Transactions, Payments and to provide you with all information, services and products that you request from us.
- Providing information about other goods and services, listed or not on the Loki platform, that may be similar to those you have purchased or requested within the platform;

Type of information:

- Provided information

The scope of processing:

- Contractual obligations
- Our legitimate interest
- Legal obligations

Legitimate interest:

- Efficiency of fulfilling legal and contractual obligations

- Our commercial interest in the delivery of competitive products and services
- Observance of the regulations in force that are opposable to us

## ii. Transparency & Fight against fraud

### Reason:

- Audit of all your interactions regarding the evaluation, payment and consumption of products and services available on the Loki platform;
- Verification of identity in order to protect against fraud, in order to comply with the laws of the state/ country/ territory in which you operate but also the laws on financial crime but also to confirm eligibility to use our services and products;
- To help us better understand your behavior so we can make decisions about how we manage your Loki account.

### Type of information:

- Provided information
- Collected information
- Third party/ external information

### Scope of processing:

- Contractual obligations
- Our legitimate interest
- Legal obligations

### Legitimate interest:

- Ensuring transparency regarding the interaction of users with the products and services listed within the platform;
- Developing and improving the way we manage frauds but also complying with our legal obligations in this regard;
- • Compliance with current legislation.

## iii. Continuous improvement of services and products

### Reason:

- The content presented on the Loki website, application and/ or platform should be presented in the most efficient way for you and your device
- Improving the Loki Platform in order to ensure that the information and content are presented in the most efficient way for you and for the device you use;

Type of information:

- Provided information
- Collected information
- Third party/ external information

Scope of processing:

- Our legitimate interest

Legitimate interest:

- Continuous improvement of products and services listed on the platform;
- Providing services and products customized and tailored to users' needs;
- Defining the types of customers for new products and/ or services;
- Efficiency of fulfilling legal and contractual obligations.

## iv. Promoting and providing new products and services

Reason:

- Providing information about other goods and services, listed or not on the Loki platform, that may be similar to those you have purchased or requested within the platform;
- Providing directly, or through third parties, information about products and services that we believe you are interested in or might be interested in;
- Measuring and understanding the effectiveness of advertising that we can provide to both Loki users, platform visitors and to others in order to provide you with relevant advertising

- Creating and promoting suggestions and recommendations to Loki users, site visitors and to others about goods and services that may interest you or them;
- Analysis and processing of requests regarding the listing, reservation, purchase and use of existing goods and services within the Loki Platform, in order to be able to make decisions regarding the acceptance or rejection of such requests in the future.

Type of information:

- Provided information
- Collected information
- Third party/ external information

Scope of processing:

- Our legitimate interest

Legitimate interest:

- Developing products and services for the existing clients
- Defining the types of clients for new products and/or services
- Efficiency in fulfilling legal and contractual obligations
- Obtaining your explicit consent when it is necessary to contact you

## v. Keeping the operation of Loki platform

Reason:

- Management of Loki Platform and App, including for audit, debugging, data analyzes, testing, research, statistics;
- Granting the right to participate in the interactive sections of the Loki Site, Application or Platform, when you choose to do so;
- Notifying and informing you of changes brought to our services;
- • Keeping the Loki website, Application and Platform secure and safe;

Type of information:

- Provided information;
- Collected information.

Scope of processing:

- Contractual obligations;
- Our legitimate interest;
- Legal obligations.

Legitimate interest:

- Efficiency in fulfilling legal and contractual obligations
- Complying with the legislation in force

## vi. Facilitating interaction between users

Reason:

- Facilitating interactions between users through our services;
- Possibility to distribute/ recommend to personal contacts the use of Loki services.

Type of information:

- Provided information;
- Collected information;
- Information regarding the location.

Scope of processing:

- Our legitimate interest

Legitimate interest:

- Development of new products and services and/ or improvement of existing ones;
- Dissemination of Loki services and products to other categories of users or non-users;
- Efficiency in fulfilling legal and contractual obligations;
- Obtaining your explicit consent when it is necessary to contact you.

## 4. DISCLOSURE OF DATA

We will make available, directly or indirectly, explicitly or anonymously, your personal data both to other users of the Loki

platform but also to certain companies/ third parties, which use these data for the purpose of providing various services to Adonis Software, but only for achieving the legitimate purpose of the Loki platform and within the legal limits.

Personal data are used by third party companies in conditions of full security and confidentiality, under strict contractual conditions and in accordance to the laws of personal data protection.

## a. To other users/ beneficiaries of Loki platform

The Loki platform places great emphasis on maintaining the confidentiality of users' data both in the interaction between them and in the relation with third parties.

Therefore, in the design process of the platform we have taken into account and will always take into account the confidentiality of personal data.

This is the reason why in the interactions between Loki users but also with the Companies that offer to the employees, access to Loki services, in special conditions, only the personal data relevant for that purpose are provided, complying with both the legislation in force and with the principles and values of Adonis Software.

In particular, the data that users can see about other users they interact with on the Loki platform are the "last name" and "first name" set by each of them at registration, and then in the "My Profile" section. Also, when a user purchases a product or service listed on the Loki platform, the data in the My Profile section, legal entity, will appear on the invoices issued automatically by the Loki platform at the time of purchase.

We will detail below, on a case-by-case basis, what data Loki users have access to when interacting with other Loki users.

## i. Customer Data to Specialists

When a Client user interacts with a Specialist user, the Specialist may have access to the following data:

- Client's First and Last Name - can be viewed by the Specialist in the in-call screen, in the Home after the call and on the invoicing data in the mail.
- Invoicing details - represent the information that a Client introduces in the section My Profile> Legal entity if it is a legal entity or name and surname in the case of an natural person and which will be found on invoices issued automatically by the Loki platform with the purchase of any product or service
- Meetings History - after a Meeting, a series of collected data will be accessible to both the Specialist and the Client. These data are: the date and time when the meeting started, when the meeting ended, the duration and cost of the meeting.

If, during the meetings and other interactions with the Specialist, the Client decides to transmit personal information, he assumes full responsibility but also the consequences of his actions. Moreover, if the Client considers that he has shared/ transmitted personal data to the Specialist, he may address directly to the Specialist in connection to his rights regarding his personal data under the legislation in force.

The Loki platform has no responsibility for the transmission of personal data during the interactions in the Online Meetings between the Specialist and the Client.

## ii. Customer data to other users of the platform

The only data that other users of the Loki platform can view, authenticated or not within the platform, in connection with Loki Customers can be:



- Evaluations of the services - At the end of an Online Session, the Client has the possibility to assess the services provided by the Specialist;
- Reviews - At the end of an Online Session, the Client has the possibility, in addition to the assessment of the service provided, to give reviews (comments and written testimonial/ remarks) in relation to those services. Those written comments/ observations will be explicitly displayed in the Specialist's Profile, along with:
  - Client's name and surname
  - Rating - the number of stars provided by the Client during the meeting for which he added the review.

All this information is public and available to any Loki user due to the legitimate interest of the platform.

Adonis Software has the mission to provide to its users, access to the highest quality services, the evaluations and reviews being very effective tools through which Clients can specifically inform other users of the platform about the quality and effectiveness of the service consumed. This is also the reason for which, on the Loki platform, all reviews and evaluations are real being offered by Clients only after they have consumed the service in question.

### iii. Specialist data to other users of the platform

Loki platform users can have access to data of Specialists both authenticated within the Loki platform but also anonymously/ unauthenticated. Below are the data that Loki users have access to regarding Specialists:

- Specialist's Profile - all data that the Specialist enters into the Profile or are available to all Loki users, whether they are logged in or not, these ones being:
  - Specialist's name and surname;
  - Profile description;

- Reviews received from Clients and personal comments provided in response to those reviews;
- Details regarding his specialties;
- Education;
- Member of various professional organizations or associations;
- Certificates;
- Documents - files that the Specialist has uploaded to certify the information in his Profile;
- Specialists' fees, their availability
- Name and Surname of the Specialist - can be viewed by the Client in the sections Home, Consultant Profile
- Meetings History - at the end of a Meeting, a series of collected data will be accessible to both the Client and to the Specialist. These data are: the date and time of the beginning and end of the meeting, its duration and cost;

In case when, during the meetings or other interactions with the Client, the specialist decides to transmit personal data information, this one bears the responsibility but also the consequences of his facts.

Moreover, if the Client considers that he has shared/ transmitted personal data to the Specialist, he may address directly to the Specialist in connection to his rights regarding his personal data under the legislation in force.

The Loki platform has no responsibility for the transmission of personal data during the interactions in the Online Meetings between the Specialist and the Client

## iv. Customer Data to their Employers

In order to increase the addressability of the listed services and products, Adonis Software may enter into contracts and partnerships with Companies that decide to provide employees with access to Loki services, under specific and special conditions. Also, Adonis Software will promote the respective services to the business/ corporate environment, as the Companies can obtain

substantial benefits in terms of reducing attendance, reducing the stress level of the employees, etc.

This is in our legitimate interest and, in such cases, Adonis Software may transmit to the Companies anonymized data regarding the access to Loki services by their employees. These anonymized data are intended to raise awareness of the problems and their intensity that employees face, in order to take internal measures, outside the Loki platform, related to those data.

The data transmitted are anonymized and we will never disclose information and personal data that could determine the identification of individuals who use such services.

## b. To third parties

We will transmit personal data to the following third parties, personal data processors, in order to provide their services to Adonis Software:

### i. Cloud service providers

In order to keep safe and secure your personal data determined by the use of the services of the Loki Platform, of the applications but also of the site, Adonis Software uses the cloud services of its suppliers.

Service providers do not have direct access to your personal data, which are stored in databases installed in closed operating systems (accessed only by Adonis Software), hosted only on the provider's hardware.

### ii. Advertising agencies and data analytics service providers

If we decide to hire Advertising Agencies to promote Loki products and services, those Agencies but also their partners could request anonymous personal data in order to provide you with customized information and advertising.

We will never disclose information that could lead to the identification of individuals but we may provide them with aggregated and anonymized information about our users.

We may use such aggregated and anonymized information in order to help our partners deliver customized and specific advertising campaigns relevant to a particular category of our users.

Furthermore, we may provide to our partners, in some cases, with such aggregated and depersonalized information for the purpose of displaying their own advertising campaigns to their target audience.

We also use the information provided by internet search service providers and by statistical/ analytical data in order to help us improve and optimize the services available within the Loki Platform.

### iii. Online payment service providers

Users of the Loki app and platform can purchase the products and services listed on the platform using online payment as a payment method.

All online payments are processed by specialized providers of such services that Adonis Software has integrated into its application and platform.

Whenever you make a payment for a product or service listed on Loki, the card data you introduce are transmitted directly to the payment processor, without being saved in our platform. Thus, Loki does not save or process information about your card and its details.

However, Loki transmits to payment processors information about the service or product you purchased (the unique identifier of the service or product, the name given by you to the service or product in question, the date and time the service or product follows to be

carried out/ delivered, as appropriate) and receives from them data on the status/ status of the transaction initiated by you for the payment.

## iv. Videoconferencing communications service providers

For the Online Meetings available within Loki, Adonis Software uses an external solution, provided by third parties, as a service. The service provider has access to the following collected data: information about the device with which the conference was accessed, the IP address from which it was accessed, the capabilities of the used internet network (frame rate, packet loss) Also, the audio and video signal do not pass through any server of Adonis Software. Moreover, both the audio and video signals are not saved on any equipment or server, neither of Adonis Software nor of the third-party service provider.

## c. To other entities, under special conditions

Adonis Software may provide your personal information and data in the following situations:

- If Adonis Software or all of its assets are acquired by a third party, in which case the personal data we hold about our users will be one of the transferred assets;
- When we are obliged to disclose personal data in order to comply with legal obligations and/ or legal requirements;
- In order to determine the application and compliance with the Legal Agreements and/ or any other agreement concluded between you and Adonis Software, or to investigate potential breaches of these agreements;
- In order to protect the rights, the property and safety of Adonis Software, of the Loki platform and of the listed services, of our Clients and users and but also of others. This could include the

exchange of information with other companies and/ or organizations in order to protect against fraud or debt recovery.