

## Finaeon, Inc. Privacy Policy

Last Updated: December 1, 2024

### Introduction

Finaeon, Inc. and its affiliates, which you have a contract with or which provide services to you, (collectively or individually, as applicable, referred to as “Finaeon”, “Company”, “we”, “our”, “us”) respect your right to privacy. This Customer Privacy Policy explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. If you do not agree with our policies and practices, your choice is not to use our Website and services. By accessing or using this Website and our services, you agree to this privacy policy. If you have any questions or concerns about our use of your personal information, you may contact us using the contact details provided at the bottom of this Customer Privacy Policy.

### I. Updates To This Customer Privacy Policy

We reserve the right to change this Privacy Policy at any time upon notice. You can determine when this Privacy Policy was last revised by referring to the “last Updated” date at the top of this page. Any changes will become effective upon our posting of the revised Privacy Policy. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

### II. What Personal Information Does Finaeon Collect And Why?

The personal information that we may collect about you broadly falls into the following categories:

#### 1. Information that you provide voluntarily

We ask you to provide certain information voluntarily, such as your contact details, user credentials, and employment information. We ask for this information when you:

- Register to use our products and services;
- When you register to attend an event;
- When you provide us with your business information; or
- When you request to receive information from us.

The types of information we ask you to provide, and the reasons why we ask you to provide it, include:

Types of Personal Information	Why We Collect It
Billing Information	To maintain your account with us
Contact details including name, telephone numbers, email address, and postal address	To respond to correspondence and inquiries you send us. In some cases to gather information needed to provide products and services requested by you or your employer. To obtain your feedback regarding our products and services.
User credentials including name, email address and personal information you provide to us in a profile	To set up and maintain your user account. To monitor and enforce compliance with our contractual terms.
To set up and maintain your user accounts. To monitor and enforce compliance without contractual terms	To manage your individual user account which is covered by a corporate account of one of Finaeon’s corporate customers, for instance, the corporate account of your employer.

## 2. Information that we collect automatically

We may also collect certain information automatically from your computer or device, including information pertaining to your use patterns of our products and services. In some countries, including countries in the European Union, this information may be considered personal information under applicable data protection laws.

The information we collect automatically may include:

- Information like your IP address;
- Device type;
- Unique device identification numbers;
- Browser-type and version;
- Broad geographic location (e.g. country or city-level location); and
- Other technical information.

We also collect information about how your device has interacted with our websites and products, including the pages and products accessed, links clicked, and how you access data provided on our website.

Collecting this type of information enables us to better understand the visitors who come to our website and the users of our products and services, where they come from, and what content on our website and products and services is of interest to them. We use this information:

- For our analytics purposes;
- To monitor compliance with our policies and terms;
- To improve the quality and relevance to users, of our websites and products and services;
- To develop and update our websites and products and services;
- For customer service purposes, for instance, reviewing our customers' training needs regarding the use of our products;
- To satisfy Finaeon's corporate customers' requests regarding the use of our products and services by the individual users licensed by their corporate account;
- To send you tailored information on our products and services that we believe may be of interest or value to you in accordance with applicable law;
- To identify unauthorized use or unauthorized distribution of our products and services related or unrelated to a security issue;
- Where relevant, to review and/or update our pricing model agreed with our corporate customers; and
- For billing purposes, so that we or others (such as content providers) are able to bill for the services provided.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading "Cookies and similar tracking technology".

## **III. Who Does Finaeon Share My Personal Information With?**

We may disclose your personal information to the following categories of recipients:

- Third party service providers, product content providers, and partners;
- Your employer;
- Competent law enforcement bodies, regulatory, government agency, court or other third parties; and
- Any other person with your consent to the disclosure.

### 1. Third Party service providers

We provide personal information to third party service providers who provide data processing services to us. These included:

- Commodity Systems Inc.
- Interactive Data
- S&P Global

2. Your employer

We provide personal information to your employer, in many instances and jurisdictions in an aggregate form, for purposes such as to fulfil our contract with them, to inform them of potential group training needs, to inform them of product/service use by certain categories of user and for pricing purposes.

3. Competent law enforcement bodies, regulatory, government agency, court or other third parties

We provide personal information to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary:

- As a matter of applicable law or regulation;
- To exercise, establish or defend our legal rights; or
- To protect your vital interests or those of any other person.

#### **IV. Data Controller**

Your personal information collected by your use of our website is controlled by Finaeon, Inc.

If you have any questions or concerns about our use of your personal information, please contact us at [legal@finaeon.com](mailto:legal@finaeon.com) or write to us at:

Finaeon, Inc.  
Attn: Privacy Policy  
2 Venture, Ste. 120  
Irvine, CA 92618

#### **V. Legal Basis For Processing Personal Information**

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

As a general rule, we will only collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you (for instance, your subscription to one of our products), or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms (for instance, where we process personal data regarding the usage of our products and services, as described above). In some cases, we may also have a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to provide our products and services and communicating with you as necessary to provide our services to you and for our legitimate commercial interest, for instance, when responding to your queries, improving our products and services, advising you of product features or new releases, informing you of product maintenance, or undertaking marketing activities. We may have other legitimate interests and if appropriate it will be clear to you at the relevant time regarding what those legitimate interests are.

Where we send you communications regarding our products or services from our different divisions and affiliates that may be of interest to you, we do so based on your consent, if and when required by applicable law.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided below.

## **VI. How Does Finaeon Keep My Personal Information Secure?**

We use appropriate technical and organizational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our website. Any transmission of personal data is at your own risk.

We take appropriate safeguards so your personal information remains protected in accordance with this Privacy Policy. These safeguards include implementing the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies, which require all group companies to protect personal information they process from the EEA in accordance with European Union data protection law.

## **VII. Data Retention**

We retain personal information we collect from you where we have an ongoing legitimate business need to do so. Your personal information will be deleted or anonymized approximately seven (7) years after your last activity on our Website.

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

## **VIII. EU Data Protection Rights**

Users in the European Economic Area and the UK have the following data protection rights:

- To access, correct, update or request deletion of your personal information.
- You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information.
- To opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you, by using the contact details below.
- If we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- To complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

To exercise your data protection rights, please submit a request by either:

- Calling us at 949-542-4200; or
- Emailing us at [legal@finaeon.com](mailto:legal@finaeon.com)

We respond to all requests we receive from individual wishing to exercise their data protection rights in accordance with applicable data protection laws. Only you or someone legally authorized to act on your

behalf may submit a request that affects your data. Therefore, we will need to verify your identity or whoever is submitting a request on your behalf.

We will not discriminate against you for exercising any of your data protection rights. We do not charge a fee to process or respond to your data protection request, unless it is excessive, repetitive or manifestly unfounded.

## **IX. Children**

We do not knowingly collect personal information from individual under eighteen (18) years of age. If we learn that we have collected the personal data from an individual under 18, we will take steps to delete the information as soon as possible.