

Last updated in January 2023

Privacy Policy for MyQ Roger Solution

Your privacy is our concern, and we are serious about it. This Privacy Policy for MyQ Roger Solution (the "Privacy Policy") explains what type of information MyQ may collect, hold and process in connection with provision of any products, services, content, applications, or other components that form part of the MyQ Roger Solution (the "Services"), and how that information is used and protected. It also sets out how you can contact us if you have any queries or concerns regarding your personal data.

This Privacy Policy is issued by MyQ, spol. s.r.o., with its registered office at Českomoravská 2420/15, Libeň, 190 00 Praha 9, Czech Republic, company ID No. 615 06 133, registered in the Commercial Register held by the Municipal Court in Prague, section C, insert 29842 ("MyQ" or "us").

We reserve the right to make changes to this Privacy Policy at any time. Please check the Privacy Policy periodically for changes, although, if you are our customer, we may also notify you via email of any changes that, in our sole discretion, materially impact your use of the Services or the way we process your personal data. Your continued use of our Services covered by this Privacy Policy will signify your acceptance of any and all changes to this Privacy Policy made by us from time to time. The updated version of this Privacy Policy is available at <https://www.myq-solution.com/en/myq-legal-documents>

1. Data we collect or receive

We collect personal data from our customers, as the users of the Services, and their end-users (which includes employees of our customers) in order to set up and manage user accounts and provide and administer the Services. We also collect usage data and metrics. We are the data controller in respect of this personal data.

With respect to personal data that may be included in the metadata of the Content, as defined in the Terms of Service <https://www.myq-solution.com/en/myq-legal-documents>, that the users or end-users manage using the Services, or with respect to the personal data that we may have access to while providing remote or local support services (the "Customer Data"), we process such personal data on behalf of our customers as a data processor. When we process the Customer Data to deliver the Services to our customers, we act in accordance with the instructions of our customers as their data processor. We always keep Customer Data that we process on behalf of our customers and pursuant to their instructions separate from our other customers' data and keep them strictly confidential.

1.1 Data of users and end-users of our Services

We collect your personal data when:

- You create an account within our Services;
- You log to our Service, by entering your username (email) and password;
- You use our Services or otherwise interact with MyQ, for example when you submit any queries to us;
- You otherwise voluntarily provide such data to MyQ.

When you create an account with MyQ, we will ask you to complete a registration form indicating your first name, surname, email, company, and job title. You can also choose to add a phone number to your account.

We also collect and process your username (email) and password.

For purposes of analysis and improvement of our Services, our servers may automatically record information when you visit our website or use some of our Services ("usage data"), including:

- Information about third-party services that the user and its end-users connect to the Services for authentication purposes and connection to the user's cloud storage;
- Information about the user's devices, e.g., type and brand of the printers and their serial number;
- Information about the use of our Services, e.g., the amount of printed or scanned documents.

The Services enable you to connect to third-party applications or other services, e.g., One Drive or Google Disk, for the purpose of sharing documents and other Content with the Services. If you choose to connect to third-party services, we will ask for your permission to enable the Services to access such third-party services, however, MyQ will not process any personal data stored there, except for the Customer Data, as defined above.

If our Services are purchased by an entity, it is the individual users within such entity's organization who log into our Services platform and whose personal data are collected, as described above. Where such entity provides us directly with any personal data of its employees or other individual users that it authorized to access the Services, it must have all necessary consents, permissions or registrations to process and to provide to us its employees' or users' personal data.

1.2 Customer Data

To deliver our Services to our users and end-users, we may also process Customer Data, as defined above. The processing of Customer Data is subject to the users's privacy policy, and the users are obliged to ensure that the processing of such data is lawful and compliant with the applicable law. The data processing with respect to Customer Data performed by MyQ is regulated by applicable data processing agreements concluded with the users.

2. How we use the data

We use your personal data for the following purposes:

2.1 To provide the Services

We may process your personal data to identify you when you login to your account and use our Services, to enable us to operate the Services and provide them to you. This may include verification of your payments, purchase orders and billing information.

2.2 To communicate with you

We may process data of our customers or their individual end-users, in particular email or other contact data, to communicate with our users and end-users, for example, when we assist them with setting up or administering their account, when we provide customer care and support, send technical notices, updates of upcoming changes or improvements to the Services, reminders, security alerts and other support and administrative messages.

2.3 To provide a better user experience

We may process your personal data in the scope to learn how you use our Services to be able to continuously enhance user experience as well as provide our customers seamless customer care. We may process such personal data also to improve and enhance our existing Services and develop new offerings. This includes product and market statistics, research and analytics, benchmarks and other analyses to better understand your needs and the needs of users in the aggregate, diagnose problems and analyse trends.

2.4 To protect our Services and defend our or third-party rights

We process your personal data to keep the Service safe, secure and reliable. This includes detecting, preventing, and responding to fraud, abuse, security risks, and technical issues that could harm MyQ, our customers and end-users.

We may process some of the data specified in Section 1.1 when required by law or to establish, exercise or defend our legal claims or, where necessary, protect rights and interests of MyQ.

2.5 For marketing and sales purposes

We may process the contact details of the contact persons designated by you or your end-users in order to provide you with information relating to new features of the Services and new product offerings. For more details, please see Section 7 below.

3. Lawful basis

For the purposes specified in Sections 2.1 and 2.2, we process your personal data based on our contract with you (if you are our direct customer and an individual) or based on our legitimate interest to provide our Services to our customers (where our customer is your company or organisation and you are an authorized end-user designated by your company or organization).

For the purposes specified in Section 2.3, we process your personal data based on our legitimate interest to develop and improve our Services.

For the purposes specified in Section 2.4, we process your personal data based on our legitimate interest to protect and secure our rights or claims or the rights of our customers or users.

For the purpose specified in Section 2.5, we process your personal data based on your voluntary consent where you have given us such consent. In a limited scope permissible under applicable law, we may also use your electronic contact details to inform you about our Services without your explicit consent, based on our legitimate interest, as described in more detail in Section 7 below.

Where we use your personal data for our legitimate interests, we make sure that we take into account any potential impact that such use may have on you. Our legitimate interests don't automatically override yours and we won't use your information if we believe your interests should override ours unless we have other grounds to do so (such as performance of contract, your consent or a legal obligation). If you have any concerns about our processing, please refer to details of "Your rights" in Section 9 below.

4. Retention periods

Where we process personal data as data controller, we retain your personal data for the period necessary to fulfil the purposes outlined in this Privacy Policy and/or any Services agreement, unless a longer retention is required by law (e.g. for tax or accounting purposes or due to other legal requirements) or storing of the data is needed for the establishment, exercise or defence of MyQ's legal claims; in such case, we will store only the data necessary for the enforcement of our claims or our defence for the period necessary in the given case and not exceeding the statutory limitation periods.

Where we process personal data on behalf of our customers as a data processor, we retain such data for the duration of our agreement with such customers and delete them in accordance with our retention and backup processes automatically within 90 days after termination of the agreement, unless the customers ask us to erase them earlier.

5. Sharing your personal data for legal and business purposes

We may use and/or disclose to third parties (including government bodies and law enforcement authorities, our affiliates, professional advisors and our vendors or subcontractors) information about you when:

- Complying with legal process;
- Enforcing or defending the legal rights of MyQ, and in connection with a corporate restructuring such as a merger, business acquisition or insolvency situations;
- Preventing fraud or imminent harm; and
- Ensuring the security and operability of our network and services.

This information will be shared provided that, in all such circumstances, we will only share the limited personal information that is required to be shared in the unique situation.

We share your data with our trusted business partners or individuals who process your data as our data processors on our behalf and pursuant to our instructions, in accordance with this Privacy Policy. We

select our vendors very carefully and always ensure that they provide adequate data protection and security safeguards. To this effect, we have bound our data processors with data processing agreements concluded pursuant to Article 28 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (“GDPR”). If you select your Services tenant in the MyQ administration interface to be located in the EU, then your Customer Data will be processed in the EU, in accordance with Microsoft’s EU Data Boundary contractual commitments. If you select your Services tenant in the MyQ administration interface to be located outside the EU, such transfer will be made based on Standard Contractual Clauses (model clauses) approved by the European Commission (2010/87/EU), unless a different transfer mechanism under Articles 45, 46 et seq. of the GDPR becomes available. Notwithstanding the above, your Customer Data may also be transferred to countries for which the European Commission has issued an adequacy decision.

The list of our current processors who may have access to your personal data:

- salesforce.com EMEA Ltd. (sales-related processed and technical support),
- Microsoft Ireland Operations Limited (collaboration and communication, Microsoft Azure – cloud hosting services),
- TeamViewer GmbH (technical support).

Apart from the processors mentioned above, we may also share your personal data to manage our business processes and comply with our legal obligations, including logistical, invoicing, tax, legal and technical services.

Apart from third-party vendors, MyQ may share data with its affiliates located in the EU and UK for the purpose of certain logistical, invoicing, tax, legal and technical services. The updated list of our EU and UK affiliates is available at <https://www.myq-solution.com/en/the-list-of-myq-data-processors>.

6. Anonymous statistics

We may use aggregated anonymised data derived from the personal data provided by you or collected by the program analytics such as user behaviour and activities for our own statistics, for auditing, for the purposes of product and market research, for analytics (which helps us to optimise and improve our Services and their usability, the range of Services and to develop new technologies, products, and services), and for benchmarks and other analyses.

7. Marketing communications

We may contact the contact persons designated by you or your end-users in order to provide information relating to new features of the Services and new product offerings, provided that we have the requisite permission to do so, either on the basis of your consent (where we have requested it and you have provided it to us), or our legitimate interests to provide you with marketing communications where we may lawfully do so, within the limits provided by law. In the latter case, we will only send you marketing communication if you are using or have recently used any of our Services and have not objected to receiving such information (by any means mentioned below).

Your marketing communication preferences may be changed at any time by following the instructions below:

- If you would like to unsubscribe from an email sent to you, follow the ‘unsubscribe’ link and/or instructions placed at the bottom of the email.
- Alternatively, you can contact us using the details in the “Contact Us” section below to change your marketing communication preferences, including the withdrawal of your consent.

If you have received unwanted, unsolicited emails sent via our system or purporting to be sent via our system, please forward a copy of that email with your comments to info@myq-solution.com for review.

Please note that we may occasionally send you important information (including via email) about our Services that you are using or have used including changes to applicable terms and conditions and/or other communications or notifications as may be required to fulfil our legal and contractual obligations, as described in Section 2.2 above. These important Service communications do not constitute marketing communication are not affected by your preferences.

8. Security and location of your data

We have implemented and will maintain appropriate technical and organizational measures, internal controls, and information security routines in accordance with good industry practice while keeping in mind the state of technological development in order to protect your data against accidental loss, destruction, alteration, unauthorized disclosure or access or unlawful destruction. Such measures may include, without limitation, taking reasonable steps to ensure the reliability of employees having access to your data and providing for limited access rights and access controls; authentication; personnel training; regular back up; data recovery and incident management procedures; restrictions on storing, printing and disposal of personal data; software protection of devices on which personal data are stored; etc.

9. Your rights

This Section describes your rights under the applicable laws, such as the GDPR, and how to apply them. If you exercise any of your rights pursuant to this Section or pursuant to applicable laws, we will communicate any rectification or erasure of your personal data or restriction of processing carried out in accordance with your request to each recipient to whom the personal data have been disclosed pursuant to Section 5 of this Privacy Policy, unless such communication proves impossible or involves disproportionate effort.

If you wish to exercise these rights and/or obtain all relevant information about the processing of your personal data, please contact us at info@myq-solution.com. You will be asked to identify yourself; this is necessary to verify that the request has been sent by you. We will respond within 1 month after receipt of your request, but we retain the right to extend this period up to 2 months in exceptional justified circumstances. We will in any event inform you within 1 month after receipt of your request if we decide to extend the period for our response.

In accordance with applicable laws and as further described below, you have the right to request access to your personal data and information about their processing, the right to rectification, erasure or portability (e.g., transfer of your personal data to another service provider) of your personal data we process, as well as the right to object to the processing of your personal data and/or request restriction of such processing.

Please note that your objection to processing could mean that we are unable to provide you with our Services or otherwise perform the actions necessary to achieve the purposes set out above (see Section 2 'How we use the data').

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us by contacting us via the contact details in Section 10 'Contact Us'.

9.1 Information about, access to and rectification of your personal data

According to applicable laws, you have the right to obtain confirmation as to whether or not personal data concerning you are being processed (pursuant to the process described above), and, where that is the case, the right to access and rectify your personal data you have shared with us. Through your settings of the Services, you can access and update your account information and change your profile settings.

9.2 Accuracy of your personal data

We take reasonable measures to ensure that you are able to keep your personal data accurate and updated. You can always approach us in order to obtain confirmation whether or not we still process your personal data.

If you find out that your personal data processed by us is inaccurate or incomplete and you are unable to update your personal data according to Section 9.1 of this Privacy Policy, you may request us to update such personal data. We will verify your identity and update your personal data on your behalf.

9.3 Erasure of your personal data

You can ask us to erase your personal data at any time. If you approach us with such a request, we will delete all your personal data we have without undue delay, provided that your personal data is no longer necessary for the provision of the Services or other permitted purposes, in particular in connection with exercising and defending our legal rights, or meeting our legal obligations. We will also delete (and ensure deletion by the processors that we engage) all your personal data in case you withdraw your consent or in the circumstances that the law requires us to do so.

9.4 Restriction of processing

If you request us to restrict the processing of your personal data, e.g. in circumstances when you contest the accuracy, lawfulness or our need to process your personal data, we will limit processing of your personal data to the necessary minimum (storage) and, if applicable, will process them only for the establishment, exercise or defence of legal claims or, where necessary, for protection of rights of another natural or legal person, or other limited reasons dictated by the applicable law. In case the restriction is lifted, and we continue processing your personal data, you will be informed accordingly without undue delay.

9.5 Portability of your personal data

You have the right to receive personal data relating to you and which you have provided to us. If you approach us with such request, we will provide your personal data in commonly used and machine-readable format to you without undue delay from receipt of your request. If you request so, we will send your personal data to a third party (another data controller) which you will identify in your request, unless such request would adversely affect rights or freedoms of others and where technically feasible.

9.6 Objection to processing

You have the right to object to our using your personal data on the basis of our legitimate interests. In such case, we will no longer process your personal data unless we demonstrate compelling legitimate grounds for their further processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of our legal claims. If you object to processing of your data for direct marketing purposes, we will cease to process your data for these purposes.

9.7 Withdraw your consent

If you have provided us any consent with the processing of personal data, for example for marketing communication, you can withdraw your given consent at any time without stating any reason. We will block your personal data for any further processing. Please note that the withdrawal of your consent does not affect the lawfulness of any processing based on consent before its withdrawal.

9.8 Complaint to a data protection authority

You have the right to submit a complaint concerning our data processing activities to Úřad pro ochranu osobních údajů, at Pplk. Sochora 2Z, 170 00 Praha 7, Czech Republic.

9.9 Request to opt out of the sale of personal data under the CCPA

MyQ does not sell, as defined in the CCPA, any personal data. Therefore, if a California consumer communicates an opt-out request under this provision, it will have no effect. If you require additional information about your rights under the CCPA to opt out of the sale of your personal data, please contact: info@myq-solution.com.

10. Contact Us

If you have any queries regarding our data collection and protection practices or your rights, please do not hesitate to contact us at info@myq-solution.com.