

Privacy Policy

1. INTRODUCTION

beepnow Inc. ("beepnow", "beepshift", "beepHR", "we", "us", "our", or "The Company") values and respects everything related to personal data that is provided to us, and as a result, our Privacy Policy is aligned with applicable data protection legislation and any other legislation in force which applies to privacy or the handling of personal data (the "Data Protection Legislation"). We commit to protecting the privacy of individuals who visit the Company's Websites ("Visitors") and individuals who register to use the Services as defined below ("Customers"). This Privacy Policy describes beepnow's privacy practices in relation to the use of the Company's applications and services offered by beepnow (collectively, the "Services"), as well as individuals' choices regarding use, access and correction of personal data.

This Privacy Policy aims to clearly outline our policies and procedures for collecting, using, storing and disclosing personal data of individuals. In this Privacy Policy, "Personal Data" refers to information about identifiable individuals and information which can be used to identify an individual.

As data controller and processor, we have implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through this website and application. However, internet-based data transmissions may, in principle, have security gaps occasionally, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g. by telephone.

beepnow may amend this Privacy Policy from time to time. Please visit this page if you want to stay up to date, as we will post any changes here. beepnow will also notify affected individuals of any material changes in the way we process data.

2. WHAT PERSONAL DATA WE COLLECT AND HOW DO WE COLLECT

IT

All Personal Data that is collected through the use of the beepnow Services is stored in the United States of America.

Upon acquisition of our services, we will ask for your full name and a valid e-mail address,

which will be included in our emailing list, for future updates, and eventual marketing promotions. In addition, at the end of the trial period, we will ask you to provide us with the secure payment data, which will be used for processing the order.

- We may process data about your use of our website and services (“usage data”). The usage data may include your IP address, geographical location, browser type and version, device type and operating system (e.g. versions), referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analyzing the use of the website and services.
- We may process your account data (“account data”). The account data may include your name and email address. The account data may be processed for the purposes of providing our services, updates, promotions, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.
- We may process your personal data that are provided in the course of the use of our services (“service data”). The service data may be processed for the purposes of providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.
- We may process information contained in any enquiry you submit to us regarding goods and/or services (“enquiry data”). The enquiry data may be processed for the purposes of providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.
- We may process information relating to our customer relationships, including customer contact information (“customer relationship data”). The customer relationship data may include your name, your employer, your job title or role, your contact details, or other additional information such as company annual revenues, number of employees, or industry, and information contained in communications between us and you or your employer. The customer relationship data may be processed for the purposes of providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.
- We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our services (“transaction data”). The transaction data may include your contact details, and the transaction details such as billing name and address, credit card number, and the number of employees within the organization that will be using the Services. The transaction data may be processed for the purposes of providing our services, ensuring the security of our website and services,

maintaining back-ups of our databases and communicating with you.

- We may process information contained in or relating to any communication that you send to us (“correspondence data”). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.
 - “Automatically Collected” Information: The beepnow website collects a series of general data and information when a data subject or automated system calls up the website or application. This general data and information are stored in the server log files, and it is collected regardless of your quality: Website Visitor, Phone User, Service User or Former Service User. Collected information may be:
 - the ISP,
 - the operating system used by the accessing system
 - the website from which an accessing system reaches our website (so-called referrers)
 - the sub-website
 - the date and time of access to the website
 - an Internet Protocol address (IP address)
 - screen Resolution
 - locale Preferences
 - web page visited before you came to our website
 - information you search for on our website
 - date and time stamps associated with transactions
 - system configuration information and other interactions with the website.
 - call recordings – you will be notified whether the call is being recorded at the start of every call to us.
 - call log – including the phone number, time and date and length of call.
 - social networking information (if we are provided with access to your account on social network connection services);
 - any further personal data contained in any files that you upload, download, or create (“Files”) within the beepnow Services
 - any other similar data and information that may be used in the event of attacks on our information technology systems.
- When using these general data and information, beepnow does not draw any conclusions about the data subject. Rather, this information is needed to:

deliver the content of our website correctly;
optimize the content of our website as well as its advertisement;
ensure the long-term viability of our information technology systems and website technology;
provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack;

In addition to the specific purposes for which we may process your personal data set out in this Section, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Please do not supply any other person's personal data to us, unless we prompt you to do so. Obviously, the access to our website for website visitors is free; however, we inform you that for the use of the website via mobile device the charges and the standard tariffs provided in the service contract that you have stipulated with them will still be applied by the telephone operators

- Former Service Users

If we retain your personal data once you have left your organization and cease to use your beepnow Account for our own purposes, we are a "data controller" for the purposes of the Data Protection Legislation.

Activities that we may carry out on this basis include:

Making announcements to you regarding our products and service offerings;
Providing you with any service offering outside of the beepnow Services directly;
Ensuring compliance with our own obligations under applicable law and regulations; and
Using your personal data to help us to establish, exercise or defend legal claims

3. INFORMATION SHARING & DISCLOSURE

Where appropriate and in accordance with applicable laws and requirements (and where we use your Personal Data as a data processor on behalf of and under the instructions of your organization in accordance with our obligations under our agreement with your organization), we may share your Personal Data in the following ways. We reserve the right to change providers, vendors, and partners when we deem necessary without prior notice. In all cases we have done our due diligence to ensure those services to not violate this Privacy Policy, and those services are in compliance with privacy regulation.

- Your Use: We will display your Personal Data on your profile page, and this may be viewed by other persons to whom you are connected within your organization depending

on their access level. If you use community services on the beepnow Services such as messaging, log book, and notes, you should be aware that any Personal Data you provide in these areas may be read, collected, and used by Users who access them. Your posts may remain even after you close your account.

- **Employees:** The organization with which your Account is connected will have access to the Employment Information. If you switch jobs, no Employment Information will be shared with any other organization.
- **Service Providers, Business Partners and third parties:** We may use certain trusted third-party companies and individuals to help us provide, analyze, and improve the beepnow Services (including but not limited to data storage, maintenance services, chat tools, database management, web analytics, payment processing, and improving the features of the beepnow Service). These third parties may have access to your Personal Data only for purposes of performing these tasks on our behalf and under obligations similar to those in this Privacy Policy.
- **Other Service Providers, Business Partners and third parties:** We may share your Personal Data with our agents or third-party service providers (including professional advisers and telecommunication service providers) which require your Personal Data to provide their services to beepnow. Such agents and third party service providers will not be permitted to use your Personal Data for any other purpose.
- **Third-Party Applications:** We may share your information with a third-party application with your consent, for example when you choose to access beepnow through such an application. We are not responsible for what those parties do with your information, so you should make sure you trust the application and that it has a privacy policy acceptable to you before allowing this feature to be employed.
- **Compliance with Laws and Law Enforcement Requests:** We may disclose to parties outside beepnow, Files stored in your beepnow Services and Personal Data about you that we collect when we have a good faith belief that disclosure is reasonably necessary to (a) comply with a law, regulation or compulsory legal request; or (b) to protect beepnow's intellectual property rights. If we provide your Files to a law enforcement agency as set forth above, we will remove beepnow's encryption from the files before providing them to law enforcement.
- **Business Transfers:** If we are involved in a merger, acquisition, or sale of all or a portion of our assets, your Personal Data may be transferred as part of that transaction, but we will notify you and/or your organization (for example, via email and/or a prominent notice on our website) of any change in control or use of your Personal Data or Files, or if either become subject to a different Privacy Policy.

- Non-private or Non-Personal data: We may disclose your non-private, aggregated, or otherwise non-personal data, such as usage statistics of the beepnow Services.
- Note that organizations may share your Personal Data with third parties and other software services, such as payroll and accounting services.

4. COOKIE POLICY

beepnow uses cookies to make interactions with the Company's Web sites easy and meaningful. When you visit one of the Company's Websites, beepnow's servers send a cookie to your computer. Standing alone, cookies do not personally identify you; they merely recognize your Web browser. Unless you choose to identify yourself to beepnow, either by responding to a promotional offer, opening an account, or filling out a Web form (such as a "Request a Demo"), you remain anonymous to the Company.

beepnow uses cookies that are session-based and persistent-based. Session cookies exist only during one session. They disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer after you close your browser or turn off your computer. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our Websites or Services.

The following sets out how beepnow uses different categories of cookies and your options for managing cookies' settings:

- **Strictly necessary cookies**

These cookies are essential, as they enable you to move around the Site and use its features, such as accessing secure areas. Without these cookies, some services you have asked for such as payment submission can't be provided.

- **Performance cookies**

These cookies collect information about how you use the Site, for example which pages you go to most often and if you get error messages from certain pages. These are used to improve how the Site works.

- **Functionality cookies**

These cookies allow the Site to remember choices you make (such as your user name, language or the region you're in). For instance, the Site uses functionality cookies to remember your language preference. These cookies can also be used to remember changes you've made to text size, font and other parts of pages that you can customize. They may also be used to provide services you've asked for such as watching a video or commenting on a blog.

- **Targeting cookies**

These cookies are used to deliver advertisements that are more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of an advertising campaign. They remember that you have visited a website and this information may be shared with other organizations such as advertisers. This means after you have been to the Site you may see some advertisements about our services elsewhere on the Internet.

The data subject may, at any time, prevent the setting of cookies through our website and application by means of a corresponding setting of the browser or app, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time. If the data subject deactivates the setting of cookies in the browser or app, then not all functions may be entirely usable.

We use automatically collected information and other information collected during the Services through cookies and similar technologies to:

- personalize our Service, such as remembering a Customer's or Visitor's information or login details so that the Customer or Visitor will not have to re-enter it during a visit or on subsequent accessing;
- provide customized content and information;
- monitor and analyze the effectiveness of website and applications and third-party activities;
- monitor site usage metrics such as the number of visitors.

5. DATA PROCESSING, SECURING AND TRANSFERING RULES

- beepnow will only process your personal data in accordance with applicable data protection and privacy laws. We need certain personal data in order to provide you with access to beepnow website and product.

If you created a request for a demo or registered for a webinar, event or requested collateral, you will have been asked to check a tick box indicating your agreement to provide this data in order to access our services, purchase our products, view our content. If you created an account with us, you will have been asked to check a tick box indicating your agreement to provide this data in order to access our services, purchase our products, view our content. This consent provides us with the legal basis we require under applicable law to process your data.

You maintain the right to withdraw such consent at any time. If you do not agree to our use of your personal data in line with this Policy, please do not use our website, application or provide us personal information either over the phone, in email, through

web forms or in any other way.

- We follow generally accepted standards and have taken reasonable steps to keep your personal information secure at all times and in accordance with our Information Security Policies. For example, electronic access is limited to authorized personnel.

We also take steps to reasonably protect your personal information from misuse and loss, unauthorized access, modification or disclosure and maintained in an accurate, complete and up-to-date manner. If you have any questions about the security of your personal information, you can contact us as set forth below in 'How to Contact Us'.

- International Transfer of Information Collected

Your data, including personal data that we collect from you, may be transferred to, stored at and processed by us parties and our affiliates and other third parties outside the country in which you reside, including, but not limited to the United States, where data protection and privacy regulations may not offer the same level of protection as in other parts of the world. By using our product, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy.

6. DATA RETENTION AND DELETION

We will only retain your personal data as long as reasonably required for you to use the Application(s) and/or to provide you with the service, unless a longer retention period is required or permitted by law (for example, for regulatory purposes).

When we are no longer permitted under our agreement with your organization or it is otherwise no longer necessary to retain your Personal Data, we will delete the Personal Data that we hold about you from our systems. While we will endeavour to permanently erase your Personal Data once it reaches the end of its retention period, some of your Personal Data may still exist within our systems, for example if it is waiting to be overwritten. For our purposes, this data has been put beyond use, meaning that, while it still exists in the electronic ether, our employees will not have any access to it or use it again.

7. YOUR RIGHTS TO YOUR PERSONAL DATA

- Right to object: this right enables you to object to us processing your Personal Data
- Right to withdraw consent: Where we have obtained your consent to process your Personal Data for certain activities (for example, sharing your information with a third-party application), you may withdraw this consent at any time. For certain activities this

may require you having to cancel your beepnow account due to the nature of the Service. For example, opting out of our notifications makes the beepnow Services impossible to use.

- Data Subject Access Requests (DSAR): You may ask us to confirm what information we hold about you at any time, and request us to modify, update or delete such information. You may also request a copy of the information we hold about you.
- Right to erasure: You have the right to request that we "erase" your Personal Data in certain circumstances. We will try to delete your Personal Data quickly upon request and if desired make it available to you. While we will endeavour to permanently erase or return your Personal Data upon request, some of your Personal Data may still exist within our systems, for example if it is waiting to be overwritten. For our purposes, this Personal Data has been put beyond use, meaning that, while it still exists in the electronic ether, our employees will not have any access to it or use it again. We may retain and use your Personal Data if we believe that the law or other regulation requires us to preserve it (for example, because of a request by a tax authority or in connection with any anticipated litigation) or if we require it to enforce our agreements. If your Account is connected with an organization, we shall not delete or edit your Personal Data without the approval of your organization.
- Right to restrict processing: You have the right to request that we restrict our processing of your Personal Data in certain circumstances, for example if you dispute the accuracy of the Personal Data that we hold about you or you object to our processing of your Personal Data for our legitimate interests. If we have shared your Personal Data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your Personal Data.
- Right to rectification: You also have the right to request that we rectify any inaccurate or incomplete Personal Data that we hold about you, including by means of providing a supplementary statement. If we have shared this Personal Data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. You may also request details of the third parties that we have disclosed the inaccurate or incomplete Personal Data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.
- Right of data portability: If you wish, you have the right to request that we transfer your Personal Data to another third party. To allow you to do so, we will provide you with your Personal Data in a commonly used machine-readable format so that you can transfer the data. Alternatively, we may directly transfer the Personal Data for you. This right of data

portability only applies to certain types of Personal Data.

- Right to lodge a complaint with a supervisory authority: You also have the right to lodge a complaint with the relevant supervisory authority in your jurisdiction.

8. COMPLAINS RESOLUTION

We are committed to providing our clients with a fair and responsive system for handling and resolving complaints concerning the handling of their personal information. You have a right to complain and to have your complaint handled efficiently if you are concerned about our handling of your personal information. We believe that in receiving your complaint, we are provided with a valuable opportunity to improve the services we deliver to you and maintain your confidence in our services.

If at any time you wish to lodge a complaint in respect of the handling, use or disclosure of your personal information by us, you may do so by contacting us directly. We aim to investigate and advise you of the outcome of the complaint promptly.

9. CONTACT US