Privacy Notice

The protection and confidentiality of personal data is of particular importance to us. With this privacy policy, we inform you how we handle your personal data in accordance with applicable laws and regulations on data protection.

CONTACT

If you have any questions about the processing of your personal data by us, you can contact us by e-mail at the following address:

privacy@figures.hr

OVERVIEW

Our data processing activities and our responsibilities with respect to personal data differ depending on the context in which these data are processed.

In order to allow you to select those areas of data processing that you consider relevant, we have divided our privacy notice into the following parts:

PART I: provides information on our processing activities in connection with our website https://figures.hr, where such website is accessed by internet users only for informational purposes

PART II: provides our cookie policy. Our cookie policy applies both for internet users visiting our website for informational purposes and for users of our application software Figures.hr made available for use by our customers via the internet (the "**Figures Application**")

PART III: provides information on our processing activities in connection with the Figures Application

PART IV: provides information on your rights as data subject pursuant to applicable laws and regulations on data protection. This information applies with respect to all of our data processing activities under the foregoing parts I up to III.

PART I: DATA PROCESSING RELATED TO USE OF OUR WEBSITE

1. **Name and Address of responsible Data Controller**

Figures SAS
5, rue Gallieni,
92100 Boulogne-Billancourt
FRANCE

Contact: contact@figures.hr

2. Nature of Data Processing, Persons affected by Data Processing

When you visit our website for information purposes, we collect access data about your access to our server on which our website is stored for retrieval via the Internet (so-called server log files). This data includes

- the name of the website accessed
- File, date and time of access
- Amount of data transferred
- Message about successful retrieval
- browser type and version
- the user's operating system
- Referrer URL (the previously visited page)
- IP address, and
- the requesting provider.

The persons affected by our processing of the aforementioned categories of data are internet users accessing our website.

3. Purposes and legal Basis of Data Processing

The legal basis for our processing of access data is our legitimate interest in presenting our range of services on the Internet (legitimate interest pursuant to Art. 6(1)(f) GDPR).

4. Use of Sub-Processors

We engage the following sub-processor for hosting our website:

Digital Ocean ____ 101 Avenue of the Americas (Grand St.)
New York, NY 10013
United States of America

All personal data hosted by Digital Ocean will be stored on servers located in the European Union and in accordance with the following privacy policies:

Privacy policies of Digital Ocean: https://www.digitalocean.com/legal/privacy-policy/

We may engage other third parties to process personal data in connection with our website. Any such sub-processors will be selected with due care and we will provide that such will be bound by adequate contractual arrangements in such a way as to ensure that they comply with the requirements for the protection of personal data pursuant to Article 28 of GDPR.

5. International Transfers

We do not transfer any personal data outside the EU/EEA, or engage sub-processor to process personal data outside of the EU/EEA.

6. Data Retention

The access data is stored for security reasons (e.g. to clarify acts of abuse or fraud) for a maximum period of seven days and then deleted. Data that must be retained for evidentiary purposes are excluded from deletion until the final clarification of the respective incident.

PART II: OUR COOKIE POLICY

1. **Name and Address of responsible Data Controller**

Figures SAS
5, rue Gallieni,
92100 Boulogne-Billancourt
FRANCE

Contact: contact@figures.hr

2. Nature of Cookies, Processing Purposes and Persons affected by Data Processing

Cookies are small files or other types of stored information that are transmitted from our web server or third party web servers to the web browser you are using and stored there for later retrieval.

Cookies serve different purposes depending on their type. We use the following types of cookies:

- Necessary cookies are used to make our website usable by enabling basic functions such as page navigation and access to protected areas of the website. Without these cookies, the website cannot function properly.
- Session cookies are only stored for the duration of your current visit to our website, e.g. to allow your login status to be saved. A randomly generated unique identification number is stored in a session cookie (so-called session ID). In addition, a session cookie contains information about its origin and the duration of storage, but does not store any other data. Session cookies are deleted when you stop using our website and log out or close the browser.

- Functionality cookies store your preferences for our website, such as the language setting or your user name.
- Performance cookies collect website and app usage data at an abstract level and are used to provide analytics and metrics such as number of visitors and most viewed pages. These cookies include Google Analytics (see also below).
- Statistics cookies help us understand how visitors interact with our website by collecting and reporting information anonymously.
- Marketing or advertising cookies are used by us to collect information about browsing habits and may be used to tailor advertising and marketing. These cookies are in most cases third party cookies.

The individual types of cookies used on our website are listed in the chart below:

Cookie Name	Type of Cookie
_dd_s	Performance
amp_def8b0	Statistics
crisp-client%2Fsession%2F384293ac-9e67-4ebb-90c4-1d9436bb7f82	Statistics
_gid	Performance
_ga	Performance
figures.hr	Session
fs_uid	Statistics

The persons affected by our processing of the aforementioned cookies are internet users accessing our website.

3. Legal Basis of Data Processing and Management of Cookie-Settings

By law, we may store cookies on your device only if they are absolutely necessary for the operation of this site. The legal basis for the processing of essential cookies is our legitimate interest in presenting our range of services on the internet (legitimate interest pursuant to Art. 6(1)(f) GDPR). For all other types of cookies, we need your permission.

When you visit our website, we display a “cookie banner” in which you can declare your consent to the use of cookies on our website by clicking on a button.

We also store your consent in the form of a cookie (“opt-in cookie”) on your end device in order to determine whether you have granted your consent when you visit the website again.

Strictly necessary cookies cannot be deactivated using the cookie management function of this website. However, you can deactivate these cookies in general at any time in your browser.

You can also manage cookies using your browser's settings. Different browsers have different ways to configure cookie settings. You can find more extensive information on this by accessing the following link: https://www.allaboutcookies.org/manage-cookies.

Please note that some functions of our website may not work properly or at all if you deactivate cookies in general in your browser.

4. Cookie Data Retention

The cookies used by us on our website remain active for different periods depending on whether they are transient or persistent cookies. Transient cookies, also called "session cookies" - are automatically deleted when you close your browser. Persistent cookies remain stored on your end device for a certain period of time after the browser is closed.

The cookies used on our website fall into the categories listed in the chart below:

Cookie Name	Category of Cookie	Storage Time/Expiry
figures.hr	Session	15 days

5. Specific Third Party Cookies

Cookie Name	Category of Cookie	Storage Time/Expiry
_dd_s	Performance	15 minutes
amp_def8b0	Statistics	Transient
crisp-client%2Fsession%2F384293ac-9e67-4ebb-90c4-1d9436bb7f82	Statistics	6 months
_gid	Performance	24 hours
_ga	Performance	Transient
fs_uid	Statistics	1 year

PART III: DATA PROCESSING RELATED TO USE OF OUR FIGURES APPLICATION

1. Introduction

Our Figures Application is made available to our customers – essentially start-up and scale-up companies – on a subscription basis by means of customer contracts for software application services. A key feature of our service offering related to the Figures Application is that our customers are granted the opportunity to enter specific data regarding their employees and their business on dedicated dashboards displayed exclusively to the respective customer via the Figures Application. Further, our customers are provided the opportunity to compare their

employee data with statistical market benchmarking data generated by us in connection with the Figures Application. The specific employee and business data provided by our customers are used by us as basis for creating further statistical and market benchmarking data, always on a pseudonymized basis – without identifying any of our customers or their employees.

2. Names and Addresses of responsible Data Controllers

Figures SAS ("**Figures**")
5, rue Gallieni
92100 Boulogne-Billancourt
FRANCE

Contact: contact@figures.hr

and customers of Figures that have signed a customer contract for use of the Figures Application

3. Terms and Conditions of Joint Controllership

Under the contract we conclude with our customers, we provide for specific terms and conditions regarding the processing of personal data under the joint responsibility of us and our respective customers. The key provisions relating to such joint responsibility are summarised below.

(i) We only process personal data of employees of our customers that has been collected and submitted to us by the respective customer under the customer contract. Our customers take the responsibility for ensuring that all such personal data is collected and transferred to us on a legal basis in accordance with applicable laws and regulations on data protection.

(ii) We only process personal data of customer employees for the specific purposes agreed with the customer in the customer contract. These purposes are described in more detail under item 5 below.

(iii) We agree with all of our customers that we and the respective customer will ensure that all relevant provisions of applicable laws and regulations of data protection law are complied with, and that the rights of data subjects under applicable data protection law are safeguarded.

4. Nature of Data Processing, Persons affected by Data Processing

The categories of personal data processed by us in connection with the Figures Application are the following:

(i) Personal data of contact persons of our customers (hereinafter: "**Customer Contact Data**"):
- Name, surname and email address of contact persons for contract administration
- Name, surname and email address of contact persons for invoicing

(ii) Personal data of employees of our customers (hereinafter: "**Customer Employee Data**"):
- Name, surname or combination of characters or numbers chosen by our customers to identify the employee
- Gender
- Job title
- Type of job (chosen by our customers from types provided by us)
- Seniority
- Annual base salary
- Annual bonus
    - Annual collective bonus
    - Equity hire grant
    - Equity hire grant type
    - Employee's potential status as a founder
    - Work Location

The data subjects affected by the data processing activities in connection with the Figures Application are the following:

(i) Customer Data:
- Employees of our customers designated for administration of the Customer Contract
- Employees of our customer designated invoicing related to the Customer Contract

(ii) Customer Employee Data:
- Employees of our customer reported by our customer to us for purposes of using the Figures Application.

5. Purposes and legal Basis of Data Processing

We process the aforementioned categories of personal data exclusively for the following purposes:

(i) Customer Contact Data:
- for the purpose of administration and execution of the respective customer contract, including receipt of the remuneration owed by our customers under such contracts;

(ii) Customer Employee Data:
- for the purpose of generating overviews and reports made available exclusively to our respective customer by means of dashboards displayed as part of the Figures Application and
- only in pseudonymized form - without identification of our customers or any of their employees - for the purpose of generating aggregated statistical benchmarking data; such data are stored by us on separate databases which are accessed by the Figures Application for display of aggregated market benchmarks to our customers.

6. Use of Sub-Processors

We engage the following sub-processors for hosting the Figures Application:

(i) Google ____GOOGLE IRELAND LIMITED : BARROW STREET, 99132 DUBLIN, IRELAND
(ii) Digital Ocean ____ 101 Avenue of the Americas (Grand St.) New York, NY 10013 United States of America

All personal data hosted by Google and Digital Ocean will be stored on servers located in the European Union and in accordance with the following privacy policies:

- Privacy policy of Google Business Solution: https://cloud.google.com/terms/data-processing-terms

- Privacy policies of Digital Ocean: https://www.digitalocean.com/legal/privacy-policy/

We may engage other third parties to process personal data in connection with the Figures Application. Any such sub-processors will be selected with due care and we will provide that such will be bound by adequate contractual arrangements in such a way as to ensure that they comply with the requirements for the protection of personal data pursuant to Article 28 of GDPR.

7. International Transfers

We do not transfer any personal data outside the EU/EEA, or engage sub-processor to process personal data outside of the EU/EEA.

8. Data Security and Data Retention

We use appropriate technical and organisational security measures in order to protect your data processed by us against manipulation, loss, destruction and against access by unauthorised persons.

We do not process and or store personal data for no longer than is necessary for the purposes set forth above.

(i) Customer Contact Data related to contract administration and execution is retained for the mandatory preservation period prescribed by the laws applicable to our commercial activities, which is five (5) years from termination or expiry of the Customer Contract. Customer Contact Data related to accounting and billing is retained for a period of ten (10) years in accordance with applicable tax legislation.
(i) Customer Employee Data and Customer Business Data are retained by us for the duration of the Customer Contract and erased after termination or expiry of the Customer Contract, unless erasure at an earlier point of time should be required upon request of a data subject. will erase such Processed Data from its operational systems no later than 30 days after the effective date of termination or expiry of the Customer Contract. The right of Figures to retain Processed Data for archiving and statistical benchmarking purposes set forth in Section 8.1 (i) and 8.2 above.

We reserve the right to retain aggregated statistical benchmarking data generated on the basis Customer Employee Data submitted to us by our customers for longer periods as the retention periods set forth in the foregoing Section 6.1(ii), it being understood that none of such statistical benchmarking data will identify any Customer employee or other data subject.

PART IV: YOUR RIGHTS IN CONNECTION WITH OUR PROCESSING OF PERSONAL DATA

In accordance with the provisions of the GDPR, you as a data subject may assert the following data protection rights against us:

1. You may revoke the consent you have given to us at any time (Art. 7 (3) GDPR). This has the consequence that we will no longer carry out the data processing covered by this consent in the future.

2. You have the right to obtain information about your personal data processed by us (Art. 15 GDPR).

3. You have the right to request that the data we hold about you be corrected if it is inaccurate or incomplete (Art. 16 GDPR).

4. You have the right to request the deletion of the data we hold about you, unless other statutory provisions (e.g. statutory retention obligations) prevent this or there is an overriding interest on our part (e.g. to defend our rights and claims) (Art. 17 GDPR).

5. You may request us to restrict the processing of your data in accordance with Art. 18 GDPR.

6. You have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format or to transfer this data to another party (Art. 20 GDPR).

7. You may object to the processing of your data in accordance with Art. 21 GDPR. If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

8. In addition, you have the right to complain to a data protection supervisory authority (Art. 77 GDPR).

CHANGES TO OUR PRIVACY NOTICE

We reserve the right to amend or update this privacy statement from time to time in order to adapt it to changes in the law or changes in the framework conditions for our data processing activities. We will obtain your consent for any changes or adjustments to this privacy statement that can only be implemented with your consent as a data subject.