

Privacy Statement

Effective date: 25 May 2018

Codejig Limited is committed to protecting the privacy of individuals who use our Website and/or register to use the Services as defined in the Terms of Service Agreement. This Privacy Statement describes what personal data Codejig Limited collects from you, through our interactions with you, and how we use, share and secure that data.

This Privacy Statement applies to our Website and the Services as defined in the Terms of Service Agreement.

Codejig Limited complies with the General Data Protection Regulation that is enforceable from 25 May 2018.

Codejig Limited is an ultimate data controller and processor of the entire scope of personal data received from you as a customer, according to the EU General Data protection Regulation.

1. Information We Collect

When creating your personal Codejig account to access and use Codejig Services, Codejig Limited requires you to provide your contact information, such as your email address, name (“Required Contact Information”) and password.

When registering your company for Codejig Services and filling out information about it (in other words, creating an account for your company), Codejig Limited may ask you to specify a country where your company is established, provide its name, phone number, business ID, and tax ID, the latter applies only if your company is registered for VAT, (“Required Company Information”) as well as billing information such as billing address of your company (“Company Billing Information”).

If your organization is established in Finland, you may provide only its business ID (Y-tunnus), and then on click of the Fill data button, Codejig Limited will search for data about your organization by the indicated business ID in the Finnish Business Information System (BIS), retrieve the company data and automatically fill in the fields used to collect Required Company Information and Company Billing Information.

Upon providing Required Company Information and Company Billing Information, you are also asked to indicate a number of employees your company has together with its annual turnover in order to determine for what subscription plan/subscription plans your organization qualifies before starting a 30-day free trial of the Services (“Subscription-Related Company Information”).

Data collected about your company (“Company Information”, “Company Billing Information” and “Subscription-Related Company Information”) is regarded to be non-personal information as it does not refer to any specific individual.

If you are designated as an administrator of the company account, you can invite other users to join your company for Codejig Services. To invite other users, you are required to provide their real email addresses in Codejig User Portal. Invited users will receive emails from Codejig Limited to their indicated email addresses being notified that they have been specified as potential users under a specific company account. They will be encouraged to create their personal accounts. As an administrator, you can also create local accounts as defined in the Terms of Service Agreement for other users. In this case, Codejig Limited will ask you to provide contact information of a user, such as their email address, name (first name and last name), and password.

As you navigate our Website (www.codejig.com), Codejig Limited may also collect information through the commonly-used information-gathering tool Google Analytics. Website Navigational Information includes standard information from your Web browser (such as browser type and browser language), your Internet Protocol (“IP”) address, unique device identifiers, and the actions you take on our Website (such as the Web pages viewed and the links clicked).

Also, Codejig Limited will collect information about your usage of the Services. In particular, we will track how often you log into our Services and retain information about the time of last visit to monitor whether hosting resources allocated to you are used reasonably and to timely detect idle services that have not been accessed and used for more than 1 year and, therefore, have to be terminated. Also, we may collect information about your additional purchases, specifically, we will keep statistics of what Licence types you have purchased as well as the number of acquired Licences. We may also analyze your usage of containers and Builders.

When you use Codejig Invoice Generator, which is a free online invoice generation tool, Codejig Limited may also collect information about your company (its name and a country where it is established), your contact persons, your customer and their contact

details as well as selected layout parameters. Codejig Limited do not collect information about invoiced goods or services, their quantities and amounts. Also, we do not collect or process information regarding payment details, such as bank account details, SWIFT code, etc. We will not use this information for any purposes other than specified in the section “How We Use Information” and may share it only with parties and for the purposes listed in the “How We Share Information Collected” section. We will not use or share this information to target third-party company or vendor advertising at you or your customers.

Codejig Limited may also collect and process technical information received from our log files to detect any technical issues that may occur throughout your use of our Services and resolve them in a timely manner.

Since we post advertisement banners of our Company and Services on third-party websites, we may also collect and analyze the data on users that have visited our Website through the click on such banners.

We may also receive information from our partners and affiliated companies in order to operate our business, improve or develop Codejig Services, protect our legal rights as well as to deliver personalized services to you.

We do not collect or process Content or other information uploaded, posted or stored through your use of the Services. You are responsible for keeping your Content private and preventing it from being disclosed. However, per your request and with your consent, Codejig technical support representatives may receive access to your Content to resolve any issues or to provide additional services. When accessing your Content, Codejig staff must abide by our data privacy and security requirements and are not allowed to use personal data they receive for any purpose other than that for which access was granted. After resolving the issues or rendering additional services, Codejig staff will be denied access to your Content.

Our Services and Website may change over time and we may introduce new features that may collect new or different types of information.

If you disagree on any provisions of any of the terms, policies or rules applied to our Website or Services, you have the right to change the privacy settings in different aspects or withdraw your consent to use our Website and Services.

2. Legal Basis for Collecting Information

We have the following legal bases for collecting and processing information about you:

- You have given us consent to collect and process your data for particular purposes as specified in this Privacy Statement.
- We require your data to deliver the Services to you, including customer support and personalized customizations, as well as to provide you access to the Services.
- We need information about you to comply with our legal obligations.
- To meet our legitimate interests (unless they contradict your legal rights to have your personal data protected) or a legitimate interest of a third party. For example, for analytical purposes, for the improvement and development of the Services, to market our Services and to protect our legal rights.

3. How We Collect Information

We collect information when you create your personal account, register your company for Codejig Services (create the company account), indicate Subscription-Related Company Information, invite other users to join your company, create local accounts for other users, navigate our Website, generate invoices using Codejig Invoice Generator, sign in, pay for issued invoices, make additional purchases, contact us for support, give us feedback, or click the advertisement banners.

4. How We Use Information

Codejig Limited uses your Personal Data for the following purposes:

- **Account Registration.** We may use your name, and email address to register your Codejig account for the Services we provide and to communicate important information to you. Also, we use information you provide about your company to create an account for it.
- **Providing Access to Codejig Accounts and the Services.** Your email address and password will be used solely for the purpose of providing access to your personal account or to the account of your company (if you are an administrator of the company account) as well as to the Services you have been licensed to access.

- **Processing Payments.** In case of a subscription requiring payment, your company's billing information will be used solely for issuing invoices and processing payments.
- **Providing Customer Service and Technical Support.** We may use your name and email address, how you interact with our Services, and information about your Web browser configuration to resolve questions you may have about our Services and to follow up with you about your experience while providing required technical support. We offer various communication channels you can use to communicate your issues or requests to our support team, for example, you can submit a support ticket via the Helpdesk, send emails or call a Codejig support representative on skype or send messages in Skype. Your online communication with our support team is encrypted but you should not supply more personal information, including tax data, than is required to address your specific issue. Your emails, tickets, messages and a transcript of each Skype session are retained to resolve questions or issues related to the Services.
- **Improving Services and Developing New Services.** We will use your information and data retrieved from technical logs to personalize or customize your experience with the Services, develop new features or Services, and to improve the overall quality of the Services.
- **Improving Our Website.** Codejig Limited uses Website Navigational Information to operate and improve the Codejig Website.
- **Measuring Effectiveness of Our Marketing Campaigns.** Codejig Limited uses Website Navigational Information to measure the effectiveness of our marketing campaigns.
- **Operating Our Business.** We use data to develop aggregate analysis and business intelligence that enable us to operate, protect, make informed decisions, and report on the performance of our business.
- **Protecting the Services.** We may use your personal data to help us protect our Services, including to combat fraud and protect your information.
- **Communicating with You and Telling You About Other Services.** We may use your information to communicate with you about our Services and personalize our communications with you. For example, we may contact you by email or other means to inform you when it is necessary to pay for issued invoices, when you are about to run out of available support hours, discuss your licensing terms, or let you know when security updates are available, or to tell you about our new Services. We may also use your company information that you indicate while using Codejig Invoice Generator to tell you about Codejig ERP and other Codejig Services, their features and advantages.

- **To market and promote our Services.** We may use your personal information, company information you provide while generating invoices with the help of Codejig Invoice Generator and information about how you use the Services to provide you with communications that may be of particular interest to you, including by email or in a form of advertisement banners displayed on other companies' websites and such platforms as Facebook and Google. We may also use information about your customers you indicate for creating online free invoices to market our Services to them as well.
- **Advertising.** Codejig Limited does not use your personal data to target ads of third-party companies or vendors to you.
- **Additional purposes.** If we need your information for purposes not specified above, we will ask for your consent in each individual situation.

5. How We Share Information Collected

Codejig Limited discloses data collected in the following ways:

- **To affiliated companies.** The protections provided in this Privacy Statement apply to all Codejig-controlled affiliates and subsidiaries, which are data processors according to GDPR. Affiliates and subsidiaries are companies related by common ownership or control. The reasons why we share your information include for our everyday business purposes, such as to: maintain your accounts, operate our business, etc. We will also share your information in order for us to be able to offer our Services to you. We may also share information about your experience so that we can operate our business effectively, detect and prevent fraud, and improve our Services.
- **To Codejig Limited's Partners.** We may share information with third parties that provide localization, consulting, sales, support and training services in relation to Codejig Services. We share information with such third parties to enable them to provide their services so that you can receive localized version of the Services, timely and personalized support, required customizations. The protections provided in this Privacy Statement apply to all partners of Codejig Limited that are data processors according to GDPR.
- **To third-party service providers.** Those might be companies we've hired to provide hosting services or assist in protecting and securing our systems, provide analysis or other services for us, who may need access to personal data or information about your company to provide those functions. Codejig Limited does

not control third parties' use of the personal data that we collect, and their use of the information will be in accordance with their own privacy policies.

- **When required by law or to respond to legal process**, including law enforcement or other government agencies.
- **To protect our customers**, for example to prevent spam or attempts to defraud users of our Services, or to help prevent the loss of life or serious injury of anyone.
- **To maintain the security of our products.**
- **To protect the rights or property of Codejig Limited**, including enforcing the terms governing the use of the Services - however, if we receive information indicating that someone is using our Services to traffic in stolen intellectual property of Codejig Limited, we will not inspect a customer's or a company's private content ourselves, but we may refer the matter to law enforcement.
- **If we sell, merge, or transfer any part of our business**, we may be required to share your information and data about your company. If so, you will be notified about the upcoming changes in advance and asked if you'd like to continue using the Services.

6. How We Use Cookies and Google Analytics

Codejig Limited uses Google Analytics for the Website (www.codejig.com) to analyse how the Website is used. Aside from the approximate location (IP address), the information collected by Google Analytics is mostly anonymous traffic data including browser information, device information, language, time of visit, pages visited, time spent on each page of the webpages, and the URI you came through to arrive at the Website. Google Analytics does not personally identify you, it only collects data about how you use the Website. Google Analytics functions by implementing cookies that collect information about your Website usage and send recorded data to Google that is subsequently used to generate analytical reports. Such cookies will be referred to as third-party cookies in our Cookie Policy, the latter also lists all cookies implemented by Google Analytics along with their expiration time and description. We do not collect additional information, such as your age, gender, interests, bank details or clickstream. The collected information is used to provide an overview of how people are accessing and using the Codejig Website. It is not used for any additional purpose, such as to profile those who access the Website.

Also, third-party Youtube cookies are placed on your device when you watch Codejig Limited's Youtube videos that are embedded in the Website. Since the

privacy-enhanced mode is enabled for those videos, Youtube does not drop any cookies and does not collect information about your usage behaviour unless you play a video. For more information about the privacy-enhanced mode, please get acquainted with [this YouTube Help article](#).

We have no control over Youtube cookies since they are set by the website itself. Please review [Google Privacy Policy](#) to understand why and how Google collects and shares your data.

Unless you choose to identify yourself to Codejig Limited, either by creating an account, or filling out a Web form (such as a “Try ERP for Free”, a “Start Free Trial”, or a “Free Forever” Web form) or have previously identified yourself to Codejig Limited, you remain anonymous to us. When you visit, access and use the Services, Codejig Limited also uses cookies. Servers send a cookie to your computer or device. Codejig Limited uses cookies to provide you access to the Services, in particular, Codejig Limited uses session-based cookie to enable you to sign in. Session cookies exist only during one session. They disappear from your computer or device when you close your browser or turn off your computer. When you sign into the Services using your personal Codejig account, we store a unique ID number, and the time you signed in, in an encrypted cookie on your device. This cookie allows you to move from page to page within the Services without having to sign in again on each page. You can also save your sign-in information so you do not have to sign in each time you return to the site.

Your Other Rights in Relation to Our Use of Cookies

According to provisions of GDPR in terms of use of cookies, and due to respect of the privacy of users of Codejig Services, we admit and respect the following rights of users to:

- Be fully informed about all of the aspects of the use of cookies.
- Know what are the purposes of use of each type of cookies that are used.
- Have the access to the full list of cookies that are used.

For more information on cookies and other similar technologies that are used by Codejig Services and the purposes of their use, revise our Cookie Policy.

How to Control Cookies

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 in our Services, in particular, you will not be able to sign in or use the Services. Instructions for blocking or deleting cookies in browsers may be available in each browser's privacy or help documentation.

How to Control Google Analytics

If you want to stop the Website collecting data about your website usage via Google Analytics, you can:

1. Disable cookies in your browser
2. Disable Javascript in your browser
3. Use Google's Opt-out browser add-on
4. Use a third-party tool such as Disconnect, Ghostery or Do Not Track Me

The first two options will affect your online experience (some functionality and features may not work).

7. How We Retain Your Data

We use data hosting service providers in the Netherlands to store data we collect. We will retain and use your information as required by applicable regulations and Codejig Limited's information management policies to comply with our legal and reporting obligations, resolve disputes, enforce our agreements, complete any outstanding transactions and for the detection and prevention of fraud.

8. How Long We Retain Information

We will retain your information as long as necessary to serve you or as otherwise needed to operate our business. For time limits on how long your information can be kept not to be vague, Codejig Limited has set fixed data retention periods, the length of a specific retention period depending on a type of information collected. After a retention period for a particular information type ends, Codejig Limited will delete or anonymize such information. Retention periods for different types of information are the following:

Company Information: we will keep all information you have provided about your company while registering it for Codejig Services ("Required Company Information", "Company Billing Information" and "Subscription-related Company Information") until your company's account is terminated either by us or by you. If

account termination is initiated by you, we will immediately delete all collected company data after closing the account of your company. If the suspension or termination of the company account is performed on our part due to the absence of a full, on time payment from you, we will delete all company data after a 30-day period within which you can make payment to renew the account. If we believe that you or other users under your company's account have violated the terms and conditions outlined in the Terms of Use Agreement or in the event of any suspected illegal activity or fraud, we will retain information about your company to comply with our legal obligations, to resolve disputes, or to otherwise enforce our agreements. We may also retain some information about your company to enhance the efficiency of our business or to develop new or improve existing Services. We will take measures to anonymize information that is kept with the aim of facilitating the performance of our business or developing/improving the Services and eliminate all data that specifically identifies your company. Such information will be only used for the analysis of how our Services are utilized.

Account Information: we will retain all information you have specified in your personal Codejig account until you request us to terminate it or until we decide to close your personal account due to the fact that it has been inactive for an extended period of time (for more than 5 years) or if we suspect that any illegal activity is conducted under your personal account. Information about all modifications you have introduced to your personal data will be kept as well. Modification history will be erased together with your personal data.

Information You Share with Our Support Team or Your Feedback: even if your personal account or the account of your company is terminated and you no longer have access to Codejig Services, we will retain information about issues or requests you have submitted to Codejig support team as well as any other feedback received from you in order to assess the quality of our Services with the aim of subsequent improvement of existing Services and development of new products and services.

Marketing Information: when your account or your company's account is terminated, we may continue to communicate with you about our Services, give you important business updates that may affect you, and let you know about products and services that may interest you, unless you have opted out of receiving marketing communications.

Website Navigational Information: we will retain information gathered by Google Analytics about your Website usage for as long as it is needed for statistical,

historical and analysis purposes. When it is no longer required for any of the above-mentioned purposes, it will be deleted.

Information you provide while creating free online invoices with Codejig Invoice Generator: we will keep information about your company and your customers along with your layout preferences as long as it is needed for marketing, statistical, historical and analysis purposes. If you do not wish to receive marketing communications from us, you can opt out of them. Your information will be deleted as soon as it becomes irrelevant for any of the mentioned purposes.

9. How We Keep Your Data Secure

Codejig Limited is committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorized access, use or disclosure. For example, we store the personal data you provide on computer systems that have limited access and are in controlled facilities. When we transmit highly confidential data (such as a password) over the Internet, we protect it through the use of encryption. However, since no security measures employed can ensure the absolute safety of your data, we cannot guarantee that your personal data, information about your company or your content cannot be accessed or disclosed by unauthorized third parties during the transmission through the Internet or while being stored by our hosting service provider or in the Services.

Nevertheless, we take the following steps to preclude any possibility of a data breach:

- Constantly work to update our security practices to implement accepted best methods to protect your Personal Information, and review our security procedures carefully.
- Comply with applicable laws and security standards.
- Securely transmit your sensitive Personal Information.
- Train our staff and require them to safeguard your data.

10. How You Can Access and Control Your Information

In connection with your right to access and control your Personal Information you provide to us, you may access and update your information, request correction or deletion of your information either through the Codejig User Portal or through our customer support.

Right of access. The right of access entitles you to obtain a copy of your personal information. You can make your request in a written form or verbally. Codejig Limited undertakes to respond to your information request without undue delay. However, the allowed response time is one month after the receipt of your request. You have the right to inquire about only your personal information. If the fulfillment of your request would result in the disclosure of information about other individuals, Codejig Limited is not obliged to respond to it unless the other individual has given consent to the disclosure or it is rational to fulfill the request without the individual's consent. Codejig Limited does not charge a fee for completing your request. Codejig Limited will provide you with information in an intelligible, easily accessible form that will be delivered in a commonly used electronic format, unless you express a desire to receive it in any other format.

Right to rectification. You also have the right to have your personal data updated. If your personal data is inaccurate, you may have it rectified. Or, if it is incomplete, you are able to have it completed. You can update your personal data either through the Codejig User Portal or by requesting Codejig customer support. In the Codejig User Portal, you can modify certain information in your personal Codejig account by yourself. In particular, you can change your password, add additional email addresses and designate one of the newly-added emails as a primary one (you will be able to use it as a login instead of the email you have provided while creating your Codejig account; also, you will receive communications from us to this email address). To have your first name and last name changed, you have to contact Codejig customer support.

If you are a local user as defined in the Terms of Use Agreement, who does not have a personal Codejig account, contact the administrator of your company's account to request the change of your credentials (email and password), first name and last name.

As an administrator of the company account, you can update information provided about your company. Apart from the indicated country of establishment, business ID and VAT settings, you can change all other company details by yourself by accessing the company account (billing information, phone number, company name). Since Codejig Limited verifies the received company data for accuracy before licensing the Software for the company, it will not comply with the requests to update your company's country of establishment or business ID. However, if your company either becomes eligible for VAT registration or, on the contrary, has to cancel its registration after you have specified VAT information for it, you can contact Codejig customer support to change VAT settings for your company.

Right to erasure. We also admit your right to request a complete erasure of the full amount of your data from our Services, databases or other information storages and perform that erasure as soon as possible, without undue delay, unless there are other legitimate, legal reasons.

Right to restrict processing. Also, you have the right to restrict the processing of your personal data. By requesting the restriction, you ask us to stop using your data but not to stop storing it. This right is not absolute and is applicable only under specific circumstances. For example, if you contest the accuracy of your personal data, believe that your data has been processed unlawfully, or object to the processing of your data under Article 21(1) of the GDPR.

Right to data portability. You have the right to obtain your personal information in a structured, commonly used and machine readable format that will enable you to transfer your data to and use it in any other technical environment. After receiving the portability request, Codejig Limited obliges to provide you with a file containing your personal information within a reasonable time frame, without undue delay. You also may ask us to transmit your personal data to another service provider. Each individual request to transmit your data will be assessed by Codejig Limited to ascertain that the transmission is technically feasible. If no technical limitations or obstacles are detected, Codejig Limited will fulfill the transmission request.

Right to opt out of communications. You can withdraw your consent to be contacted by Codejig Limited at any time. If you wish to stop receiving marketing communications from us, you have to click the "unsubscribe" link in the email or newsletter you received.

Remember that even if you choose not to receive marketing communications from us, we will continue to send you mandatory service or transactional communications.

Right to opt out of cookies. You can control how Codejig Limited uses cookies by following guidelines specified in the section "How to control cookies" and its subsection "How to Control Google Analytics".

11. International Transfer of Personal Data

We primarily store collected information in the Netherlands. In accordance with and as permitted by applicable law and regulations, we reserve the right to transfer your information, process and store it outside of your country of residence to wherever we or

Services for you and in accordance with this Policy. When we transfer your information, we take all appropriate measures to safeguard it. We may transfer your data only in compliance with provisions regarding data transfer outlined in Chapter 5 of the GDPR. In particular, as far as transfers outside the EU are concerned, we may transfer your data only to third countries that are recognized by the Commission as countries ensuring the appropriate level of data protection, or to organizations employing adequate safeguards, or when derogations provided by the GDPR are applicable. Specifically, we may transfer your information to our affiliated company based in Ukraine with the aim of processing your information to deliver our Services to you or resolve detected issues upon your request.

12. Changes to This Privacy Statement

From time to time we may change or update our Privacy Statements and Policies. We reserve the right to make changes or updates at any time. We will update this Privacy Statement when necessary to reflect customer feedback, changes in our Services or any changes in applied legislation. When we post changes to this Statement, we will revise the "Effective" date at the top of the statement. We will notify you about the upcoming changes in advance via email or through the notification in the Codejig User Portal and ask to express consent for your use of our Services after a notice of change or posting of an updated Privacy Statement. Please review any changes carefully. If you object to any of the changes and no longer wish to use our Services, you may stop using the Services and request us to close your account(s). All changes are effective since the date stated in the Privacy Statement.

We will also retain prior versions of this Privacy Statement in an archive for your review. We encourage you to review our Privacy Statement whenever you use the Software and/or Services to stay informed about our privacy practices and the ways you can help protect your information.

13. Contacting Us

Codejig Limited controls and processes your information.

If you have questions or comments about this Privacy Statement or regarding how your information is used, please contact us. We appreciate your feedback and comments.

Via Email. If you have questions or complaints regarding our Privacy Statement or practices, please contact us by email at privacy@codejig.com. We will respond to questions or concerns within 30 days.

Via customer support. You may communicate the issues that have occurred, or your concerns and/or comments to our customer support service at support@codejig.com.