

WEBSITE DATA PROTECTION NOTICE

Sqope S.A. (**Sqope** or **we**) places the highest value on the confidentiality of its clients and the information that is provided to us or collected by us during the course of our business. We are a Luxembourg company and our operations are subject to Luxembourg professional secrecy law, data protection as well as personal privacy regulations. In particular, Sqope acknowledges that processing of personal data is subject to Regulation 2016/679 (EU) 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 (**GDPR**) as well as to the Swiss Data Protection Act and its Ordinance for its activities in Switzerland (together **Data Protection Law**). We thus process all personal data in compliance with Data Protection Law.

This Website Data Protection Notice is directed to users or visitors of our website (the **Website**), as well as to any individuals or organizations' representatives who interact with us through the Website (e.g., by browsing the Website or submitting information online) (together **Users** or **you**).

If you have any questions about the processing of your personal data or our privacy policy, or if you wish to exercise any of your rights, we invite you to contact us by sending an e-mail to at dpo@scope.lu or by sending a letter to the below address:

Sqope S.A. (HQ)
26, Boulevard Royal
L-2449 Luxembourg
LUXEMBOURG

When you are in contact with Sqope for a specific business intelligence service or when you use our ordering portal, further information is available to you here.

1.

WHAT PERSONAL DATA DO WE COLLECT?

The type of personal data we process depends on how you interact with us and/or which services of ours you are using.

Sqope collects and processes personal data that you provide voluntarily through our Website (e.g., when you voluntarily subscribe to our Newsletter when you complete our Contact Us form in order to request information about our offers or services). [Whenever you use our Website, we may also collect personal data about you through your system/device and use of our Website OR Sqope does not otherwise automatically collect information from your device when you visit our Website]. [The personal data we collect may include:

- Name and contact data (e.g., first and last name, email address, postal address, phone number, and other similar contact data,
 - User content (e.g., communications provided by you in relation to your use of our Contact Us form),
- 2.
- Device and network information (e.g., information about your device, such as IP address, browser type and version, operating system, browsing activity).]

When you are asked to provide personal data, you may decline. However, if you do not provide the required data for the service you ask for, Sqope may not be able to render its services.

FOR WHAT PURPOSES AND ON WHAT BASES DO WE USE YOUR DATA?

Sqope processes your data for the following purposes:

- to respond to requests sent via the Contact Us form,

- to ensure your subscription to the Newsletter,
- to ensure the delivery of the service you have requested when entering into a business/contractual relationship with Sqope your personal data may be processed (if this is the case, please refer to our Data Protection Notice for Clients),
- for our legitimate interests (e.g., to administer, protect and improve our Website, to administer and manage our business relationship with you, to handle potential claims and disputes and in particular to establish, to exercise or defend any legal rights, to send you our newsletter),
- to comply with our legal obligations (e.g., to respond to a court order or a regulator).

HOW LONG DO WE KEEP YOUR DATA?

3. Sqope reserves the right to retain your data for a period not exceeding (i) the period necessary to fulfil the purposes for which they were collected (subject to legal periods of limitation), (ii) the period necessary to satisfy legal obligations to which Sqope is subject, or (iii) a period as required or permitted by law.

For example, your personal data will be stored:

- as regards information you provided on our Contact Form: for the time necessary to respond to your question or handle your request. The retention of such information will normally not exceed three years from registration, unless you have requested us to delete such information (subject however to our legal obligations),
- as regards technical data collected during your use of the Website: for a maximum period of time of six months from the date of collection.

4. DO WE TRANSFER YOUR DATA TO THIRD PARTIES?

Sqope may disclose personal data to third parties (service providers, subsidiaries, professional advisors) when it is necessary for the performance of any services requested or authorized by the Client..

5. Whenever Sqope transfers your personal data to third parties, we will ensure that appropriate measures are in place to protect your data. Sqope only deals with subcontractors who, in the course of performing their services, process your personal data in accordance with the applicable data protection legislation.

DO WE TRANSFER YOUR DATA OUTSIDE THE EU

6. Sqope is a global company and may occasionally transfer personal data to its Swiss or Israeli offices. The European Commission has recognized both [Switzerland](#) and [Israel](#) as providing adequate protection thus these transfers are lawful according to the GDPR. Scope and its subsidiary take all necessary measures to secure the transfer of your personal data and ensure its protection.

WHAT ARE YOUR RIGHTS?

Sqope commits itself to facilitate the exercise of your rights, where this is technically and legally possible. We will endeavor to respond to your request as soon as possible and in any event within the deadlines set by the GDPR. We may ask you to provide us with more information to respond to your request and/or to verify your identity.

In accordance with the GDPR, you have the following rights:

- **Right to access your personal data:** you have the right to ask us confirmation of whether your personal data is being processed by Sqope and, if so, obtain access to such data; we process a large quantity of information, and can thus request, in accordance with the GDPR, that before the information is provided, you specify the transaction, information or processing activities

to which your request relates;

- **Right to rectification:** if the data we hold, collect and process about you is inaccurate or incomplete, you have the right to obtain from us without undue delay their rectification;
- **Right to withdraw your consent:** if you have provided your consent to the processing of your personal data, you can withdraw such consent at any time.
- **Right to erasure ("right to be forgotten"):** you have the right to ask us to delete your personal data, except in cases where the processing of data is necessary for:
 - the exercise of the right to freedom of expression and information;
 - the respect of a legal obligation;
 - the establishment, exercise or defence of legal rights.
- **Right to restriction of processing:** if you dispute the accuracy of the data used by us or the lawfulness of the processing, you have the right to object to their suppression and to demand instead that their use be limited.

In the event that Sqope does no longer need your data and would like to delete them, you have the right to request the restriction of processing of certain data when they are still required for the exercise of your legal rights.

- **Right to object:** you may, at any time, object to the use of some of your personal data for reasons related to your particular situation. We will consider your objection and comply with it, unless we have a compelling legitimate reason or for reasons of defending legal rights. In the case, it is a matter of commercial prospecting, you may object without reason.
- **Right to lodge a complaint with the supervisory authority:** you have the right to lodge a complaint with the National Commission for Data Protection ("[CNPD](#)"), where you believe that your data is being processed in a way that does not comply with the GDPR or if you have not received a response to your request due to an unjustified delay.

If you no longer wish to receive our Newsletter and related marketing materials, please click on the "unsubscribe" link at the bottom of our Newsletter e-mail at any time.

7.

WHAT PROCEDURES DO WE ADOPT IN THE EVENT OF A BREACH OF YOUR DATA?

Sqope undertakes to notify data breaches to the competent supervisory authority without undue delay and, if possible, no later than 72 hours after having become aware of it, unless the breach in question is unlikely to result in a risk to your rights and freedoms.

We will inform you directly of any breach of personal data by Sqope , its subcontractors or any other third party acting on behalf of Sqope without undue delay, only when the data breach is likely to result in a high risk to your rights and freedoms.

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IS THIS POLICY SUBJECT TO CHANGE?

This policy is subject to change. We will keep you informed of any changes by various communication means (for example, by adding a statement on the home page of our Website or by sending you an e-mail).

9.

INDIVIDUALS TARGETED BY SQOPE' BUSINESS INTELLIGENCE SERVICES

For individuals who enquire about the way Sqope processes personal data in the context of its due diligence services, please note that Sqope provides services to financial industry, compliance and risk professionals, helping them with efficiency tools and data to assess and improve risk and compliance

management. Such services may require the processing of personal data from research subjects provided by our customers or publicly available sources to assist our customers with risk and compliance activities.

When performing this processing, Sscope simply acts as a processor to these financial industry actors.

For more information about how your bank, counterparty, finance or risk professional handles personal data, please contact them directly or consult their data protection notice.