

# Midaxo privacy policy governing the website, events, marketing, and sales

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Midaxo is a global supplier of SaaS software for Corporate Development and M&A with offices in the EU and in the USA. We are committed to protecting your personal data.

This Midaxo Privacy Policy ("Privacy Policy") describes how we collect, use, disclose, transfer, and store your personal data for the activities described below, including when you visit a Midaxo website that links to this Privacy Policy ("Website"), when you attend our marketing and learning events both online and offline ("Events"), and when we interact with you in marketing, sales, or account management capacity. This Privacy Policy describes your choices and rights related to your personal data.

If you are a customer or a user of Midaxo's Cloud-Based Enterprise Applications ("Service"), please refer to the Midaxo Service Privacy Policy for more details.

A reference to "Midaxo," "we," "us," or the "Company" is a reference to Midaxo Ltd and its subsidiaries Midaxo, Inc. and Midaxo B.V. Midaxo is the controller for the personal data discussed in this Privacy Policy.

We recommend that you read this Privacy Policy in its entirety to ensure you are fully informed. The document has the following sections:

1. Collecting personal data
2. Using personal data
3. Disclosing data
4. Transferring data
5. Retaining data
6. Cookies and tracking technologies
7. Your rights over your personal data
8. Legal basis for processing personal data
9. Security
10. Changes to this Privacy Policy
11. Contacting us

## 1. Collecting personal data

### 1.1 Personal data we collect directly from you

#### 1.1.1 Website

As a visitor to the Website you may choose to provide us with your personal data such as:

- First name
- Last name
- Business email
- Phone number
- Company name

- Job level
- Functional role
- Street address

To access some areas of the Website, you will need to have account authentication credentials. As part of your account, you may choose to provide us with additional data, such as:

- Photo
- Social media profiles
- Areas of expertise

#### 1.1.2. Midaxo forums

You may post comments or questions on our Websites; for example, on a blog. Some of these forums allow you to provide your personal data and create a profile. Personal data you submit in these public areas can be read and collected by others who access them. You should only post personal information to online forums with the awareness that the information will be available to others in the forum. Comments posted by individuals in an online forum reflect their views and should not be considered to reflect the opinion of Midaxo.

#### 1.1.3 Events

If you register to attend a Midaxo-sponsored Event, we may require certain data, including:

- First name
- Last name
- Business email
- Company name
- Emergency contact (in some instances)
- Dietary preferences (in some instances)
- Billing information (such as billing name, billing address, and credit card number)

#### 1.1.4 Account management

We collect business contact information for account management purposes related to Midaxo Service or professional services.

#### 1.1.5 Cookies, web beacons, and similar technologies

Midaxo may use website tracking technologies to observe your activities, interactions, preferences, transactional information, and other computer and connection information (such as an IP address) relating to your use of our websites and services. We may also use log files, cookies, and similar technologies to collect information about the pages you view, links you click, and other actions you take when accessing our website or emails.

If Midaxo collects any other personal data from you, we will explain the purposes at the time we collect it.

### 1.2 Personal data obtained from third-party sources

Midaxo may also collect business contact information about you from other sources, including third parties from whom we have purchased business contact information and from publicly accessible websites, such

as your company's website, professional network services, or press releases. Business contact information may include:

- First name
- Last name
- Business email
- Phone number
- Company name
- Job level
- Functional role
- Business street address
- Online identifier
- Employment history

In some instances, Midaxo may combine the personal data you have provided to us with personal data collected from other sources as described above. We process this data to update, expand, and analyze our existing marketing records; identify new customers; create more tailored advertising or website experience, and send marketing emails.

## 2. Using personal data

### 2.1 Contacting you

Midaxo uses the data we collect about you to provide Midaxo websites, services, and support. For example, if you provide data to us in a "Contact Us" form, we will use your data to respond to the request.

Midaxo uses your personal data and information about your activity on our websites to contact you for marketing purposes per your marketing preferences, including telemarketing calls, and to send marketing emails that we believe may be of interest to you, such as product announcements, newsletters, educational materials, and details on upcoming events. We also use it to send administrative information, such as notices related to products, services, or policy changes.

### 2.2 Planning and managing Events

Midaxo uses your data for Event planning and management, including registration, billing, and connecting with other event attendees, or contacting you further about relevant products and services. Any information you provide about emergency contacts or dietary preferences would be used for your safety and health.

### 2.3 Improving our services

Midaxo uses the data we collect to understand how our websites and services are being used and to make improvements. For example, we may use the search queries entered into Midaxo's Resource Center to improve search capabilities or performance. Additionally, we use questions posted or comments on the Website to enrich the content or help guide future enhancements to our products and services. We use third party services, such as Google Analytics, to view aggregated information about Website interactions. Where possible, Midaxo takes steps to minimize or mask the information sent to third-parties (such as encoding the data).

## 2.4 Enhancing security

Midaxo may use your information to diagnose website technical problems, as well as to prevent, detect, mitigate, and investigate potential security issues, as well as fraudulent or illegal activities.

## 2.5 Providing education and training

If you participate in a Midaxo-offered education or training course, your enrollment and attendance information will be recorded to track and potentially report your participation and completion.

## 2.6 Personalizing your experience

Midaxo also may use your data to personalize your experience on our Website. Midaxo or our services providers use Website tracking technologies to display products or features that are tailored to your interests and to present advertising on other sites. For more information on these technologies, see the “Cookies and tracking technologies” section below.

## **3. Disclosing data**

### 3.1 Affiliates and service providers

Midaxo may share data with Midaxo affiliates and third-party service providers or vendors contracted to provide services on our behalf. These third-party service providers or vendors may use data we provide to them only as instructed by Midaxo.

### 3.2 Webinars, Events, and other activities

Midaxo may offer the following solely or jointly with third parties or partners: webinars, events, whitepaper downloads, or other services related to Midaxo offerings or services. We may share your contact information and interests in these offerings or services with these approved third parties to communicate with you about Midaxo.

When you attend an Event (either sponsored by Midaxo or one where Midaxo is a participating vendor) and have your badge scanned or you are otherwise identified, your data will be shared with Midaxo, as well as with any partner or third party participating in that Event, and potentially with the entity sponsoring your attendance at the Event. For example, if your badge is scanned as you attend a session at a Midaxo-sponsored conference, Midaxo and any co-presenters will have access to that information to understand who was in attendance, and potentially follow up with you on relevant products or services. If you do not want your data shared with Midaxo or partners in this manner, do not have your badge scanned. If your badge is scanned by a partner or a third party at an event, your data will be governed by that party’s privacy statement.

### 3.3 Additional disclosures

Midaxo may disclose your personal data if we have a good faith belief that such action is necessary to:

- Conform to legal requirements or comply with legal processes
- Protect and defend our rights or property
- Enforce the Website Terms and Conditions
- Act to protect the interests of our users or others

If Midaxo goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, your personal data may be among the assets transferred.

Midaxo does not sell personal data that we collect or process under this Privacy Policy.

#### 4. Transferring data

Your personal data may be stored and processed in the United States and in any other country where Midaxo or its affiliates, subsidiaries, or third-party service providers maintain facilities or personnel. When you provide personal data to Midaxo, we may process and transfer your data within the United States and around the world. We follow applicable data protection laws when transferring personal data.

Note that the data stored and processed in Midaxo's Service is governed by Midaxo's Service Privacy Policy and separate agreements with Midaxo's customers.

Midaxo complies with the U.S. Department of Commerce-maintained EU-US Privacy Shield Framework regarding the collection, use, and retention of personal data transferred from the European Economic Area (EEA) to the United States. You can find the EU-US Privacy Shield Framework's website <https://www.privacyshield.gov/>. If there is any conflict between the terms in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, Midaxo is subject to the regulatory enforcement powers of the US Federal Trade Commission. In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Midaxo's accountability for Personal Data that it receives in the United States under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, Midaxo remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process personal data on its behalf do so in a manner inconsistent with the Principles, unless Midaxo proves that it is not responsible for the event giving rise to the damage.

As a way to remedy problems arising out of its failure to comply with the Privacy Shield Principles, Midaxo is committed to cooperating with European Union data protection authorities ("DPAs") in the investigation and resolution of complaints brought under the Privacy Shield and to abiding by any advice given by the DPAs. Under certain conditions, you may be entitled to invoke binding arbitration at no cost to you when other dispute resolution procedures have been exhausted. You can find more [here](#).

#### 5. Retaining data

Midaxo will retain your personal data at least as long as necessary to fulfill the service that you have requested, comply with any laws or regulations, resolve disputes, and enforce our agreements. Midaxo may retain your data longer for a legitimate business interest where business benefit is not outweighed by your personal rights and freedoms. Data entered into a Midaxo Service is retained in accordance with any applicable agreement between Midaxo and its customer.

#### 6. Cookies and tracking technologies

Midaxo or Midaxo's service providers may observe your activities, interactions, preferences, transactional information, and other computer and connection information (such as an IP address) relating to your use of Midaxo Website. We may collect and store this data and combine this data with other personal data provided to Midaxo.

Midaxo uses cookies and other similar technologies, such as web beacons, HTML5 Local Storage, local shared objects, tags, and scripts on our Website and in email communications. We use these technologies to authenticate your access to various areas of our Website, understand your interests, analyze web traffic,

combat fraud, provide interest-based advertising, improve our products and services as further described above in the “Use” section, and tailor content to your preferences. In emails we send, we may use these technologies to track their effectiveness.

You can configure your browser settings to manage certain tracking technology interactions. For some tracking technologies, you may need to take additional steps to manage their use and removal. Please review your browser’s privacy settings.

Online advertising may use data collected about your web browsing behavior, such as the pages you have visited or the searches you have conducted. This data may be used to display more relevant advertisements and content to you on non-Midaxo websites. The data used for targeted advertising may come from Midaxo or through third-party ad networks

Type of cookie	Description
<b>Required</b>	These cookies and similar technologies enable basic features of the site to function and collect statistical information about visitors to our Website to manage site usage. All of the information collected is aggregated and used anonymously. Some cookies that will enable a more personalized experience. If required by local law, these cookies will not be used until you opt-in to their functionality.
<b>Functional</b>	Functional technologies allow the Midaxo Website to remember information you have entered or choices you make and provide enhanced and more personalized features based on your interaction with the site.
<b>Advertising</b>	Advertising technologies are used to deliver advertising that is relevant to your interests. These technologies are also used to limit the number of times you see an advertisement and to help measure the effectiveness of the advertising campaign. After visiting our site, you may see an advertisement for Midaxo on another site.

Without a common industry or legal standard for interpreting Do Not Track (DNT) signals, Midaxo does not respond to browser DNT signals. We will continue to monitor further development of a DNT standard by the privacy community and industry.

## 7. Your rights over your personal data

Depending on where you are located, you may have certain legal rights over the personal data we hold about you, subject to local privacy laws. These may include the right to:

- Access the personal data we hold about you
- Have incorrect personal data updated or deleted
- Have your personal data deleted
- Restrict the processing of your personal data
- Object to the processing of your personal data carried out on the basis of our legitimate interests or for direct marketing purposes
- Receive a copy of your personal data in an electronic and machine-readable format
- Not be subject to a decision based solely on automated processing, including profiling, which produces legal effects or otherwise significantly affects you (“Automated Decision-Making”). Midaxo does not perform Automated Decision-Making as part of the processing activities covered by this Privacy Statement.
- Receive the categories of sources from whom we collected your personal data
- Opt out of marketing communications at any time by clicking on the “Unsubscribe” or “Opt out” link in marketing emails we send you or by contacting us
- Complain to a regulator or data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority.

Midaxo will not discriminate against you for exercising your rights.

You, or an authorized individual that we can verify, is acting on your behalf, can exercise the applicable rights by contacting us using the contact details at the bottom of this Privacy Policy.

## 8. Legal basis for processing personal data

Our legal grounds for collecting and using your personal data as described in this Privacy Policy fall into the following four categories.

- **Consent:** In some cases, we ask you for your consent to process your personal data, such as when we need your consent for marketing purposes. You can withdraw your consent at any time, which will not affect the lawfulness of the processing before your consent was withdrawn. If you would like to withdraw your consent, you can do so by emailing to [privacy@midaxo.com](mailto:privacy@midaxo.com).
- **Legitimate Interest:** We process certain data for the legitimate interests of Midaxo, our affiliates, our partners, or our customers. These legitimate interests include, for example, contacting you to provide support or sending you marketing information (subject to applicable law); detecting, preventing, and investigating illegal activities and potential security issues; and maintaining and improving the Website and mobile applications. We will rely on our legitimate interests for processing personal data only after balancing our interests and rights against the impact of the processing on individuals.
- **Performance of a contract:** Sometimes, we process personal data to perform our obligations under an agreement with you. For example, we use payment information you provide when you register for an event to process your payment.
- **Other legal bases:** In some cases, we may have a legal obligation to process your personal data, such as in response to a court or regulator order. We also may need to process your personal data to protect vital interests, or to exercise, establish, or defend legal claims.

## 9. Security

We use technical and organizational measures that provide a level of security appropriate to the risk of processing your personal data. However, the security of information transmitted through the internet can never be guaranteed. You are responsible for maintaining the security of your password or other forms of authentication involved in accessing password-protected or secured resources.

## 10. Changes to this Privacy Policy

This Privacy Policy may be amended or revised from time to time at Midaxo's discretion. Changes to this Privacy Policy will be posted on the Website and links to the Privacy Policy will indicate that the statement has been changed or updated. If we propose to make any material changes, we will provide notice on this page prior to the change becoming effective. We encourage you to periodically review this Privacy Policy for the latest information on our privacy practices.

## 11. Contacting us

If you have any questions about this Privacy Policy, or wish to exercise your rights, please contact us at [privacy@midaxo.com](mailto:privacy@midaxo.com) or at:

Midaxo Ltd  
Attn: Privacy  
Kumpulantie 3

Midaxo, Inc.  
Attn: Privacy  
31 Milk Street, Suite 201

00520 Helsinki  
Finland

Boston, MA 02109  
USA

To contact our Data Protection Officer, please email [privacy@midaxo.com](mailto:privacy@midaxo.com).

Midaxo will respond to your request within a reasonable timeframe or as required by law.

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