

## Privacy Policy

### Collection and Use of Personal Information

1. Personal information is data that can be used to identify or contact an individual.
2. The User may be asked to provide personal information at any point you are in contact with the IIAM app.
3. IIAM. and its affiliates may share this personal information with each other and use it in consistency with this Privacy Policy.
4. You are not required to provide the personal information that we have requested, but, if you chose not to do so, in many cases we will not be able to provide you with our products or services or respond to any queries you may have.

Below you will find some example on how the personal information that IIAM. may collect and how we use it:

### What Personal Information We Collect General

5. When you register with IIAM, we will need to collect a variety of information, including your name, your mailing address, phone number, email address, date of birth, university study.
6. Only through explicit and informed consent from you will we be allowed to collect your information. This consent is considered given when clicking the “consent given” tab within the IIAM App.
7. Your personal information will not be used for anything other than what you have given consent for.
8. If at any time you want to revoke this consent, an email will need to be sent to [info@iiam.nl](mailto:info@iiam.nl) stating this. All the information we have on you will be removed immediately.

9. At any time if you want to know what information IIAM has on you, send an email to [info@iiam.nl](mailto:info@iiam.nl) with this request, and it will be sent to you.
10. In some cases, we may collect credit card information (e.g. your credit card number and expiration date, billing address, etc), which may constitute Personal Data, to secure payments.

### Redeeming Deals

11. If you redeem our “Deals”, we collect information about the transaction.

### Device Information

12. We also obtain information about the devices you use. Information such as the operating system, hardware and software versions, battery level, signal strength, browser type, app and file names and types, and plugins may be collected..
13. We obtain information about operations and behaviours performed on the device, such as whether a window is foregrounded or backgrounded, or mouse movements (this helps distinguish humans from bots).
14. Unique identifiers and device IDs will be obtained too.
15. Bluetooth signals, and information about nearby Wi-Fi access points, beacons, and cell towers will be collected.
16. Information you allow us to receive through device settings you turn on, such as access to your GPS location, camera or photo.
17. Data from cookies stored on your device, including cookie IDs and settings will be collected.

### How We Use Your Personal Information

18. The personal information we collect allows us to keep you up to date on IIAMs latest deals, software updates, and upcoming events.

19. We also use your personal information to help us create, develop, operate, deliver, and improve our products, services, content and advertising, and for loss prevention and anti – fraud purposes.
20. We may use your personal information, including your date of birth, to verify identity, assist with identification of users, and to determine appropriate services. For example, we may use the date of birth to determine the age of the IIAM account holders.
21. From time to time, we may use your personal information to send important notices, such as communications about new deals and changes to our terms and conditions, and policies. This information is important to your interaction with IIAM, and as such you may not opt out of receiving these communications.

#### Location

22. We use location – related information - such as your current location, where you live, and the businesses you're near – to provide, personalize, and improve our Product. Location related information could be based on things like your precise device location (if you have allowed us to collect it) and IP addresses.

#### Product research and development

23. We use the information we have to develop, test, and improve our products (the App and deals), including conducting surveys and research, and testing and troubleshooting new product features.

#### Promote Safety, Integrity, and Security

24. We use the information we have to verify accounts and activity, combat harmful conduct, detect and prevent spam and other bad experiences, maintain the integrity of our Products, and promote safety and security.

## Communicate with You

25. We use the information we have to send you marketing communications, communicate with you about our Products, and let you know about our policies and terms. We also use your information to respond to you when you contact us.

## Collection and Use of Non – Personal Information

26. We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non – personal information for any purpose.
27. The following are some examples of non – personal information that we collect and how we may use it:
- We may collect information such as post code, unique device identifier, referrer URL, location, and the time zone where an IIAM deal is used so that we can better understand customer behaviour and improve our products, and services.
  - We may collect information regarding customer activities on our website, App store, and from other services. This information is gathered and used to help us provide more useful information to our customers and to understand which parts of our App, deals, and services are of most interest. Gathered data is considered non – personal information for the purpose of this Privacy Policy.
  - With your explicit consent, we may collect data about how you use your device and applications in order to help app developers improve the app.
28. If we do combine non – personal information with personal information, the combined information will be treated as personal information for as long as it remains combined.

## Cookies and Other Technologies

29. IIAM websites, online services, email messages, interactive applications, and advertisements may use “cookies” and other technologies such as pixel tags and web beacons. These technologies help us better understand user behaviour, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of advertisements and web searches.
30. We treat information collected by cookies and other technologies as non – personal information. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information. Likewise, to the extent that non – personal information is combined with personal information, we will treat the combined information as personal information for the purposes of this Privacy Policy.
31. IIAM and our partners also use cookies and other technologies to remember personal information when you use our website, online services, and applications. Our goal in these instances is to make your experience with IIAM more convenient and personal. For example, knowing your first name lets us welcome you the next time you visit the IIAM app.
32. If you want to disable cookies, you are able to do so from your web browser. Please note that certain features of the IIAM website will not be available once cookies are disabled.
33. We gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit websites and applications, operating system, date/time stamp, and clickstream data.
34. We use this information to understand and analyse trends, to administer the site, to learn about user behaviour on the site, to improve our product and services, and to gather demographic information about our user base as a whole. IIAM may use this information in our marketing and advertising services.

35. In some of our email messages, we use a “click – through URL” linked to content on the IIAM website. When customers click one of these URLs, they pass through a separate web server before arriving at the destination page on our website. We track this click – through data to help us determine interest in particular topics and measure the effectiveness of our customer communications. If you prefer not to be tracked this way, please do not click text or graphic links in the email messages.
36. Pixel tags enable us to send email messages in a customer can read, and they tell us whether the mail has been opened. We may use this information to reduce or eliminate messages sent to customers.

#### Disclosure to Third Parties

37. We work with third – party partners who help us to provide and improve our Products or who use our App to grow their business, which makes it possible to operate our company. We do not sell any of your information to anyone, and we never will. We also impose strict restrictions on how our partners can use and disclose the data we provide.
38. At time IIAM may make certain personal information available to strategic partners that work with IIAM to provide products and services, or that help IIAM market to customers. Personal information will only be shared by IIAM to provide or improve our products, services and advertising; it will not be shared with third parties for their marketing purposes.

Here are the types of third parties we share information with:

#### Partners who use our analytics services:

39. We provide aggregated statistics and insights that help people and businesses understand how people are engaging with their posts, listings, Pages, videos, and other content on and off Facebook. For example, Page admins and Instagram

business profiles receive information about the number of people or accounts that viewed, reacted to, or commented on their posts, as well as aggregate demographic and other information that helps them understand interactions with tier Page or account.

#### Measurement Partners

40. We share information about you with companies that aggregate it to provide analytics and measurement report to our partners.

#### Partners offering goods and services with our Products

41. When you subscribe to get tickets for events, or use the in – App deals, the content creator or seller can receive your public information and other information you share with them, as well as the information needed to complete the transaction.

#### Researchers and Academics

42. We also provide information and content to research partners and academics to conduct research that advances scholarship and innovation that support our business or mission, and enhances discovery and innovation on topics of general social welfare, technological advancement, public interest, health and well – being.

#### Law enforcement or legal requests

43. We share information with law enforcement or in response to legal requests in circumstances.

## Legal Basis for Processing Data

44. We collect, use and share the data that we have in ways described below:

- As necessary to fulfil our Terms and Conditions
- Consistent with your consent, which you may revoke at any time through the mechanisms explained above (email to [info@iiam.nl](mailto:info@iiam.nl))
- As necessary to comply with our legal obligations
- To protect your vital interests, or those of others
- As necessary in the public interest
- As necessary for our (or others') legitimate interest, including our interests in providing an innovative, personalized, safe, and profitable service to our users and partners, unless those interests are overridden by your interest or fundamental rights and freedoms that require protection of personal data.

## How Can You Exercise Your Rights Provided under the GDPR?

45. Under the General Data Protection Regulation, you have the right to access, rectify, port and erase your data. You also have the right to object to and restrict certain processing of your data. This includes:

- The right to object to our processing of your data for direct marketing, which you can exercise by emailing [info@iiam.nl](mailto:info@iiam.nl) to delete your info.
- The right to object to our processing of your data where we are performing tasks in the public interest of pursuing our legitimate interests or those of a third party.

## Data Retention, Account Deactivation and Deletion

46. We store data until it is no longer necessary to provide our services and App deals, or until your account is deleted – whichever comes first. This is a case – by



– case determination that depends on things like the nature of the data, why it is collected and processed, and relevant legal or operational retention needs.

47. When you delete your account, we will delete all your personal data.

#### How Do We Respond to Legal Requests or to Prevent Harm?

48. It may be necessary – by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence – for IIAM to disclose your personal information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

49. We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. Additionally, in the event of a reorganisation, merger, or sale we may transfer any and all personal information we collect to the relevant third party.

50. We access, preserve and share your information with regulators, law enforcement or others:

- In response to a legal request, if we have a good faith belief that the law requires us to do so. We can also respond to legal requests when we have a good faith belief that the response is required by the law in that jurisdiction, affects users in that jurisdiction, and is consistent with internationally recognized standards.
- When we have a good faith belief it is necessary to detect, prevent and address fraud, unauthorized use of our Products, violations of our terms or policies, or other harmful or illegal activity; to protect ourselves (including our rights, property, or Products), you or others, including as part of investigations or regulatory inquiries; or to prevent death or imminent bodily harm.

## How Will We Notify You of Changes to this Policy?

51. We will notify you before we make changes to this Policy and give you the opportunity to review the revised Policy before you choose to continue using our Products.

## Protection of Personal Information

52. IIAM takes the security of your personal information very seriously. IIAM online services such as the website and app protect your personal information during transit using encryption such as Transport Layer Security (TLS).
53. When your personal data is stored by IIAM, we use computer systems with limited access housed in facilities using physical security measures.

## Integrity and Retention of Personal Information

54. IIAM makes it easy for you to keep your personal information accurate, complete, and up to date. We will retain your personal information for the period necessary to fulfil the purposes outline in this Privacy Policy unless a longer retention period is required or permitted by law.

## Access to Personal Information

55. You can ensure that your contact information and preferences are accurate, complete, and up to date by contacting us by email [info@iiam.nl](mailto:info@iiam.nl)
56. For other personal information we hold, we will provide you with access (including a copy) for any purpose including to request that we correct the data if it is inaccurate or delete the data if IIAM is not required to retain it by law or for legitimate business purposes.
57. We may decline to process requests that are frivolous, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by

local law. Access, correction of deletion request can be made via email (again email?).

### Location – Based Services

58. To provide location – based services on IIAM deals, apps, website, and our partners may collect, use, and share precise location data, including the real – time geographic location of your computer or device.
59. Where available, location – based services may use GPS, Bluetooth and your IP Address, along with crowd – sourced Wi – Fi hotspot and cell tower location, and other technologies to determine your devices’ approximate location.
60. Unless you provide explicit consent, this location data is collected anonymously in a form that does not personally identify you and is used by IIAM and our partners to provide and improve location – based products and services. For example, your device may share its geographic location with application providers when you opt in to their location services.

### Third – Party Sites and Services

61. IIAM website, products, apps, and services may contain links to third – party websites, products, and services. Our products and services may also use or offer products or services from third parties.
62. Information collected by third parties, who may include such things as location data or contact details, is governed by their privacy practices. We encourage you to read their privacy practices.

### Our Companywide Commitment to Your Privacy

63. To make sure your personal information is secure, we communicate our privacy guidelines to IIAM employees and strictly enforce privacy safeguards within the Company.

## Privacy Questions

64. If you have any questions or concerns about IIAM's Privacy Policy or data processing or if you would like to make a complaint about a possible breach of local privacy laws, please email at [info@iiam.nl](mailto:info@iiam.nl).
65. When a privacy question or access/download request is received we have a dedicated team, which sorts through the contacts and seeks to address the specific concern or query, which you are seeking to raise.
66. Where your issue may be more substantive in nature, more information may be sought from you.
67. All such substantive contacts receive a request. If you are unsatisfied with the reply receive, you may refer your complaint to the relevant regulator in The Hague. If you ask us, we will attempt to provide you with information about relevant complaint avenues, which may be applicable to your circumstances.
68. IIAM may update its Privacy Policy from time to time. When we change the policy in a material way, a notice will be posted on our website along with the updated Privacy Policy.

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