

# Privacy Policy

Effective on: of July 2022.

Purpose of this privacy policy at YoHe, we are committed to protecting your data. We also work very hard at being transparent about the information we hold about you and our clients. Using data allows us to develop a better understanding of how you and other users interact with our services, and in turn to provide you with relevant and timely information about the work that we do. Data also helps us to engage with current and potential customers.

YoHe collects personal data in the course of our business. The definitions of personal data vary depending on the laws where you are located. For example, in the European Union (EU), personal data is defined broadly, and would include data that may be used to contact or identify a person (e.g., email, telephone number) as well as pseudonymous data that is generally only able to identify a computer, browser or a mobile device. YoHe will explain the different types of personal data below, and will try to be clear when we're describing our use of each throughout this Policy.

The purpose of this policy is to explain how information:

- is collected on <https://yohe.io> and all subdomains ("Site") and used and processed by YoHe ("YoHe" or "We");
- is collected from our clients and prospective clients;
- is collected, used and disclosed via our technology platform (the YoHe "Platform").

Our objective is to give you a clear explanation about how we collect and process your information, including any data you may provide through this Platform or Site and when you sign up to our newsletters, register for an event or ask us to get in touch with you.

It is important that you read this privacy policy together with any other notices we may provide on specific occasions when we are collecting or processing information about you, so that you are aware of how and why we use your information. This privacy policy supplements our other policies and is not intended to override them.

This policy explains:

- Who we are
- Information we may collect about you
- How we collect your data
- How we may use your information
- Disclosure of your details to third parties
- Security of your information
- Data retention
- Your legal rights



- Notification of changes to our privacy policy
- Contact details and further information
- If you have any questions, please contact our Data Protection Officer using the contact details at the end of this policy.

## 1. Who we are Yo

He sells or grants licences for the use of an application which enables the Client to ask his customers (in general consumers) to participate in a survey in order to be able to obtain feedback from the consumers, about his own products and services.

YoHe, a company (referred to as " YoHe", "we", "us", "our" in this Privacy Policy) is a company that collects and/or processes your data.

YoHe application (our "Platform").

## 2. Information we may collect about you through the Platform

Platform are primarily directed to the Users of our clients. We collect personal data via the Platform that can be used to identify or contact a unique person ("PII").

We generally will only collect PII via the Platform when you provide it directly to us.

For example, you may provide PII such as an email address or a telephone number by sending us an email or filling out a form on the Platform.

## 3. Information we may collect about you through the Site

Site is primarily directed to our clients and prospective clients (our "Clients"). We collect personal data via the Site that can be used to identify or contact a unique person ("PII").

We generally will only collect PII via the Site when you provide it directly to us.

For example, you may provide PII such as an email address or a telephone number by sending us an email or filling out a form on the Site.

## 4. How we collect your data

We collect different information about you in a number of ways:

- Information you give us;



- Automated technologies or interactions.

When you visit Site, some information is automatically collected. This may include information such as the Operating System running on your device, Internet Protocol address, access times. In many jurisdictions, this type of pseudonymous information is considered personal data. In this privacy policy, we'll refer to this type of pseudonymous information as "Pseudonymous Personal Data."

When you use the Platform, some information may also be collected automatically, depending on the settings of the site where the Platform is installed. This may include information such as IP, Browser, Screen Resolution, Device Model, and so on. Such information will also be referred to as "Pseudonymous Personal Data".

### **Users under 13, children**

We do not knowingly contact or collect information from children under 13. If you believe we have inadvertently collected such information, please contact us so we can promptly obtain parental consent or remove the information. If you are under 16, or the age of majority in the jurisdiction in which you reside, you may only use the Site and/or Platform with the consent of your parent or legal guardian.

## **5. How we may use your information**

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you (e.g., where we process your email address in order to access our systems or for billing purposes);
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal or regulatory obligation;
- Where we have your explicit consent before using information. However, generally we do not rely on consent as a legal basis for processing personal data and you have the right to withdraw consent to marketing at any time by contacting us. You will find the relevant contact details at the end of this policy.
- Purposes for which we will use your PII and other personal data
- We use the information we collect primarily to provide, maintain, protect and improve our current products, to develop new ones and to manage Client accounts and human resources functions.

We use PII for the general purpose it was provided. For example, if you ask a question about our products and services, we may send you an email in response, and might even have a salesperson contact you to gauge your interest in learning more about our services.

In general, we may use your information to:



- Improve our Services, Platform and how we operate our business;
- Understand and enhance your experience using our Platform, products and Services;
- Provide and deliver products and Services you request;
- Respond to your comments or questions and allow our Services team to provide service;
- Send you related information, including confirmations, invoices, technical notices, updates, security alerts and support and administrative messages;
- Communicate with you about promotions, upcoming events and news about products and services offered by YoHe and our selected partners;
- Link or combine it with other information we get from third parties, to help understand your needs and provide you with better service;
- Protect, investigate and deter against fraudulent, unauthorized or illegal activity.
- Marketing communications
- We aim to communicate with you about the work that we do in ways that you find relevant, timely, respectful, and never excessive. To do this, we use data that we have stored about you, such as which events you have booked for in the past, as well as any contact preferences you may have told us about.

We use our legitimate organizational interest as the legal basis for communications by email and for the collection of PII in the context of our sales and marketing activities where we have evaluated that our interests are not overridden by your fundamental rights. We will give you an opportunity to opt out of receiving electronic communications. If you do not opt out, we will provide you with an option to unsubscribe or manage your preferences in every email that we send you subsequently. Alternatively, you can use the contact details at the end of this policy to update your contact preferences.

We prohibit Clients from placing sensitive information (e.g., passwords, authentication credentials, credit cards, social security or driver's license numbers) or information that is deemed sensitive by applicable law or self-regulatory codes such as the Digital Advertising Alliance. YoHe functions strictly as the data processing agent of our Clients. As a data processor and agent of our Clients, YoHe processes data via the Platform as directed by our clients and for no other purposes. Accordingly, other than those aforementioned restrictions, the data stored on the Platform is subject to the privacy policies of each Client.

### **If you fail to provide PII**

Where we need to collect PII by law, or under the terms of a contract we have with you and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with more information). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.



## 6. Disclosure of your details to third parties

### Sharing of information

There are certain circumstances under which we may disclose your information to third parties.

We may share your information with certain third-parties as specified below:

- With third-party agents who work on our behalf as sub-processors, provided such third parties agree to adhere to the same privacy principles as YoHe;
- To protect the rights and property of YoHe, our agents, Clients and others including enforcement of our agreements, policies and terms of use;
- In an emergency, including protection of the personal safety of any person;
- For the purposes of a business deal (or negotiation of a business deal) involving sale or transfer of all or a part of our business or assets (business deals may include, for example, any merger, financing, acquisition, divestiture or bankruptcy transaction or proceeding);
- As required in response to a lawful request by public authorities, including meeting of national security or law enforcement requirements;
- Our privacy policy does not cover any third-party website and applications services. To learn about those third parties' privacy practices, please visit their privacy policies. We do not sell PII collected via the Platform or collected pursuant to our sales and marketing activities to third parties for any purpose.

## 7. Security of your information

We take reasonable steps to help protect your information in an effort to prevent loss, misuse, unauthorized access, disclosure, alteration and destruction.

We have put in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your information as secure as possible. We will ensure that any third parties we use for processing your information do the same and that they will only process your information on our instructions. The third parties will also be subject to a duty of confidentiality.

It is your responsibility to protect your usernames and passwords to help prevent anyone from accessing or abusing your accounts and services. You should not use or reuse the same passwords you use with other accounts as your password for our services. No security or encryption method can be guaranteed to protect information from hackers or human error. Information we collect may be stored or processed on computers located in any country where we do business.

YoHe may store and process PII in the European Economic Area. By using our Platform as a Client, you consent to this transfer of your information into the European Economic Area.



## 8. Using cookies

Cookies are pieces of information stored directly on the computer that you are using. Cookies allow us to collect information such as browser type, time spent on the web-sites, pages visited, language preferences, and other anonymous traffic data. We and our service providers use the information for security purposes, to facilitate navigation, to display information more effectively, and to personalize your experience. We also gather statistical information about the use of the Platforms in order to continually improve their design and functionality, understand how they are used and assist us with resolving questions regarding them. Cookies further allow us to select which of our offers are most likely to appeal to you and display them while you are on the Platforms. We may also use cookies or other technologies in online advertising to track responses to our ads and to serve ads in our partner networks. We do not respond to do-not-track signals. We engage in cross-site tracking, such as retargeting campaigns.

If you do not want information collected through the use of cookies, most browsers allow you to automatically decline cookies or be given the choice of declining or accepting a particular cookie (or cookies) from a particular website. You may also wish to refer to <https://www.allaboutcookies.org/manage-cookies/index.html>. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Platforms. You also may not receive advertising or other offers from us that are relevant to your interests and needs.

## 9. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

YoHe retains Client data for so long as you remain are a Client and will delete Client's information within 12 months of either party's termination of applicable Client agreement upon written request. We retain data for a reasonable time thereafter for audit purposes and as otherwise required by law.

## 10. Your legal rights

YoHe acknowledges that EU and Swiss individuals have certain legal rights including the right to complain to an EU supervisory authority and the right to access the personal data that we maintain about them. An EU or Swiss individual who seeks access, or who seeks to



correct, amend, or delete inaccurate data, should direct their query to [privacy@yohe.io](mailto:privacy@yohe.io). If requested to remove data, we will respond within 30 days.

Please note that YoHe is a processor of the data contained on the Platform. If you seek to exercise data subject access rights for data processed via the Platform, we ask that you reach out to YoHe's Clients.

Under these circumstances, you have rights under data protection laws in relation to your personal data, as follows:

a) Request access to your personal data

You have a right to request a copy of the personal data that we hold about you. Please use the contact details at the end of this policy if you would like to exercise this right, or any of the rights listed below. If you are a European resident and consider our use of your personal data to be unlawful, you have the right to lodge a complaint with the relevant supervisory authority.

b) Request correction of your personal data

You have the right to request that we correct the personal data we hold about you, although we may need to verify the accuracy of the new information you provide to us as well as possibly your identity, depending upon your request.

c) Request erasure of your personal data

You have the right to request that we delete or remove personal data where there is no good reason for us continuing to process it. Please note that we may not always be able to comply with your request for erasure if there are specific legal reasons- which will be notified to you at the time of your request.

d) Object to processing of your personal data

You have the right to object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

e) Request restriction of processing your personal data

You have the right to request that we suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

f) Request transfer of your personal data



You have the right to request that the personal data we hold about you is transferred to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

#### g) Right to withdraw consent

In circumstances where we are relying on your consent to process your personal data, you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. Please also note the following:

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **Access to your personal data**

If you are a YoHe Client, you can contact us by email to request to see any PII we have stored, such as your name, email, address or phone number.

### **Your information choices and changes**

You may opt out of receiving promotional emails from YoHe by following the instructions in those emails. If you opt out, we may still send you non-promotional emails, such as emails about your YoHe projects or our ongoing business relationship. An individual wishing to limit





the use or sharing of their data should contact email [privacy@yohe.io](mailto:privacy@yohe.io)

Individuals who have provided information directly to one of YoHe's Clients must send follow-up requests to change or delete such information to that particular YoHe Client.

## 11. Notification of changes to our privacy policy

YoHe may change this Policy from time to time. If we make any changes to this Policy, we will change the "Last Updated" date above.

You agree that your continued use of our Platform and/or Services and/or Sites after such changes to our Privacy Policy have been published will constitute your acceptance of such revised Policy. Please visit this section periodically in order to keep up to date with changes in our privacy policy.

## 12. Contact details and further information

Please get in touch with us if you have any questions about any aspect of this privacy policy, and in particular if you would like to object to any processing of your personal data that we carry out for our legitimate organizational interests.

Please also contact us if you have any questions about the information we hold about you, or to change your contact preferences with us:

Email us: [privacy@yohe.io](mailto:privacy@yohe.io) to contact with our Data Protection Officer.

### **Contacting YoHe**

YoHe provides periodic training for its employees involved in the collection and dissemination of data. In addition, YoHe's internal policies and procedures provide for disciplinary action if our employees fail to follow this Privacy Policy. We periodically self-assess and review these internal policies and procedures to review compliance.

YoHe commits to resolve complaints about your privacy and our collection or use of your personal data. European Union or Swiss individuals with inquiries or complaints regarding this privacy policy should first contact YoHe at: [privacy@yohe.io](mailto:privacy@yohe.io)

