

SumUp Analytics Privacy Policy

Effective Date: 08/30/2018

SumUp Analytics, Inc. (“we”, “us”, “our”, or “SumUp”) respects the privacy of our users. This Privacy Policy describes how we collect, use, and share information relating to individuals in connection with SumUp’s software for text extraction, identification, and interpretation (the “Platform”), and our website, which is located at www.sumup.ai (the “Site,” or collectively with the Platform, the “Services”).

By using the Platform or visiting the Site, clicking “I agree” or any other button indicating your acceptance of this Privacy Policy, or otherwise providing information to SumUp, you are consenting to the collection, use, and sharing of your information as described in this Privacy Policy. This Privacy Policy is incorporated by reference in the SumUp Terms of Service, which governs your use of the SumUp Platform.

Information That We Collect

The information we or our service providers may collect from you includes the following:

- **Account and profile information.** When you sign up for the Platform, we collect your first and last name, company name, telephone number, and email address, as well as certain other information that is optional for you to provide, such as your job title.
- **Contact information.** When you request information about our Services or a product demonstration through the Site, we collect your email address.
- **Information you provide to us through the Platform.** We collect information that you provide to us directly or through the Platform. For example, when you upload files to the Platform for analysis, we collect those files, any text extracted from those files, and associated metadata.

As described in the Terms of Service, if you provide us with information relating to third parties (including individuals), you represent that you have provided all notices and obtained all consents from those third parties to the extent any such notice or consent is legally required to enable SumUp to engage in the data processing functions described in this Privacy Policy.

- **Information we collect automatically.** When you use our Services, we or our third-party service providers may automatically receive and record certain information. For example, this may include your device’s IP address (which we may truncate), user-agent string, information about your use of the Services during your current session and over time (including the pages you view and the files you download), the date and time of your visit, links you click, searches conducted, the website visited before navigating to the Services, your software and hardware attributes (including browser and operating system type and version, App version, device type, and unique device identifiers and/or advertising identifiers such as IDFA), preferred language, and your general location

inferred from IP address. We may also collect additional, more detailed information about how you interact with the Services, including your clicks, taps, mouse movements, and scrolling behavior. To obtain such information, we or our third-party service providers may use the following technologies to recognize your device and collect information about your use of the Services:

- **Server logs.** When you use the Services, we automatically receive and record certain information from your computer (or other device) and your browser. To obtain such information, we may use server logs or applications that recognize your device and gather information about its online activity.
- **Cookies.** We also use cookies on the Services. Cookies are small files that are stored on your device by your web browser. A cookie allows us to recognize whether you have visited before and may store user preferences and other information. If you are concerned about having cookies on your device, you can set your browser to refuse all cookies or to indicate when a cookie is being set, allowing you to decide whether to accept it. You can also delete cookies from your device. However, if you choose to block or delete cookies, certain features of the Services may not operate correctly.
- **Web beacons, tags, pixels, and similar technologies.** The Services or the emails that you receive from us may use an application known as a “web beacon” (also known as a “tag” or “pixel”) or similar technologies. Web beacons are small strings of code that provide a method for delivering a graphic image on a web page or in an email message for the purpose of transferring data. For example, it may allow an email sender to determine whether a user has opened a particular email.

As discussed in more detail below, the information collected by us or third parties using these technologies may be used for a variety of purposes, including analytics. We also may combine information collected through the Services with information that we collect in other contexts, such as information from our email communications with you, or data that we receive from third-party sources. We will treat such combined information in accordance with this Privacy Policy.

Prohibited Content

As described in the Terms of Service, SumUp does not permit its users to process through the Services the following types of information: (1) Protected Health Information as defined at 45 C.F.R. § 160.103, or any other sensitive health information—for example, medical records or related insurance claims information; (2) consumer reports as defined by the Fair Credit Reporting Act or state analogues, or any loan applications or personal credit reports; (3) real estate transaction records; (4) tax filings; (5) underwritten insurance policies (either personal or assets); (6) Nonpublic Personal Information as defined in the Gramm-Leach Bliley Act or state analogues, or any bank account statements; (7) Cardholder Data or Sensitive Authentication Data as defined by the Payment Card Industry Data Security Standard, or any credit card statements; (8) police or other law enforcement records; (9) employment records; (10) Internal Revenue

Service Form W-2s or Form 1099-Ss; (11) USCIS Form I-9s; (12) Social Security Numbers; and (13) Visa applications.

How We Use the Information We Collect

SumUp and our service providers use the information we collect through the Platform to provide our Services to you, including to let you sign up for an account and use the Platform, and to fulfill the terms of any agreement you have with us. We also use your contact information and account and profile information: to respond to your inquiries about our Services; to contact you about our Services or to send you promotional information about our Services, as well as other topics that are likely to be of interest to you, including newsletters, updates, or other non-operational communications; to improve your user experience and the quality of our Services; to comply with legal and/or regulatory requirements; and to manage our business.

In addition to the purposes above, we use the information that we collect automatically through the Services for such purposes as: counting and recognizing visitors to the Services; analyzing how visitors use the Services and various features; improving the Services and enhancing users' experiences with them; creating new products and services or improving our existing products and services; enabling additional website analytics and research concerning the Services; and managing our business.

SumUp may also use the information we collect in order to compile aggregated and de-identified information that does not identify you or any other third parties individually. Such information may include, for example, the volume of data processed on our platform in different languages, or the number of unique searches on our Platform. This information may be used for our business purposes, which may include offering products or services, research, marketing or analyzing market trends, and other purposes consistent with applicable laws.

How We Share Information

We share your information with other parties for a variety of purposes, as described below.

Service providers. SumUp uses third-party service providers that perform services on our behalf, including, for example, data hosting companies, web-hosting companies, emailing vendors, and analytics providers. These service providers may collect and/or use your information to assist us in achieving the purposes discussed in this Privacy Policy.

Analytics. We partner with certain third parties to obtain the automatically collected information discussed in this Privacy Policy and to engage in analysis, auditing, research, and reporting. These third parties may use web logs or web beacons, and they may set and access cookies on your computer or other device.

- **Google Analytics.** Our Services use Google Analytics to help collect and analyze certain information for the purposes discussed above. You may review Google Analytics' security and privacy principles by clicking [here](#) and opt out of the use of cookies in web browsers by Google Analytics by clicking [here](#).

- **Hotjar.** We use [Hotjar](#) in order to better understand our users’ needs and to optimize the Services and user experience. Hotjar is a technology service that helps us better understand our users’ experience (e.g., how much time they spend on which pages, which links they choose to click, what users do and don’t like, etc.) and this enables us to build and maintain our Services with user feedback. Hotjar uses cookies and other technologies to collect data on our users’ behavior and their devices, including clicks, taps, mouse movements, and in some cases the equivalent of a recording of a user’s interaction with the Services. Hotjar represents that it stores this information in a pseudonymized user profile and will never use this information to identify individual users or to match the information with further data on an individual user. For further details, please see Hotjar’s privacy policy by clicking on [this link](#).

Hotjar states that you can opt-out of the creation of a user profile, Hotjar’s storing of data about your usage of our Services, and Hotjar’s use of tracking cookies on other websites by following this [opt-out link](#).

The use of online tracking mechanisms by third parties is subject to those third parties’ own privacy policies, and not this Privacy Policy. If you prefer to prevent third parties from setting and accessing cookies on your computer or other device, you may set your browser to block cookies. Although our Services currently do not respond to “do not track” browser headers, you can limit tracking and analytics by taking the steps discussed above.

Legal purposes. We also may use or share your information with third parties when we believe, in our sole discretion, that doing so is necessary:

- To comply with applicable law or a court order, subpoena, or other legal process;
- To investigate, prevent, or take action regarding illegal or prohibited activities, suspected fraud, violations of our terms and conditions, or situations involving threats to our property or the property or physical safety of any person or third party; or
- To establish, protect, or exercise our legal rights or defend against legal claims.

Organizational transfers. We may share your information with third parties to facilitate the financing, securitization, insuring, merger, acquisition, sale, assignment, bankruptcy, or other disposal of all or part of our organization or assets.

Aggregated and de-identified information. We may share aggregated and de-identified information with third parties, such as by publishing or sharing reports with third parties about trends in the usage of the SumUp Services.

External links

The Services may contain links to websites of other third parties. If you follow a link to any of these websites, please note that these websites (and any services that may be accessible through them) have their own privacy policies. We are not responsible for the privacy practices of other websites or the information you share through such other websites. We encourage Services users to be aware when they leave the Services and to read the privacy policies applicable to such

third-party websites. This Privacy Policy applies solely to information collected in connection with the Services.

Your Rights and Choices

SumUp provides you with choices to review, access, and update your information or to exercise your data protection rights, as follows:

- If you no longer want to receive promotional communications from SumUp, please follow the “unsubscribe” instructions that are included at the bottom of each message. Please note that if you unsubscribe from our promotional communications, you will still receive administrative messages from us.
- If you would like to opt out of analytics, please follow the instructions above in the section titled “How We Share Information.”
- You may have additional rights under applicable laws to request access to, correction of, deletion of, or restrictions on the processing of certain information. You also may have rights under applicable laws to opt out of or withdraw consent to further processing, request copies of your data, or lodge a complaint with a data protection authority in your jurisdiction. To make such request and/or inquire about such rights, please send us an email at privacy@sumup.ai with “Attn: Privacy/Legal” in the subject line. For your protection, we may only implement requests related to information that we have associated with the email address you use to send us your request, and we may need to verify your identity before implementing your request.

Information for Individuals Outside the United States

The information that we collect through or in connection with our Services may be transferred to and processed in the United States for the purposes described above. SumUp also may subcontract the processing of your data to, or otherwise share your data with, third parties in the United States or other countries outside your country of residence. The data protection laws in these countries may be different from, and less stringent than, those in your country of residence. By visiting or using the Services, clicking “I agree” or any other button indicating your acceptance of this Privacy Policy, or otherwise providing information to SumUp, you explicitly consent to such transfer and processing.

We may implement standard contractual clauses, contractual arrangements, or other mechanisms, as appropriate, to safeguard your information during such cross-border transfers. We also may transfer information to the United States or another country as necessary for the performance of our agreements with you or to establish, exercise, or defend legal claims.

If you are an EU resident, our legal basis for processing information will depend on the type of information at issue and the purpose for which it is collected and used. In many cases, we rely on your consent to process information, or we process information as necessary for the performance of our agreements with you. We also may rely on our legitimate interests to

process your information, for the purposes described in this Privacy Policy, except where such interests are overridden by your data protection interests or fundamental rights and freedoms.

Children’s Privacy

The Services are not intended for nor directed to individuals that are deemed to be children under applicable data protection or privacy laws. We request that such individuals do not provide information to us through any of the Services.

Data Security and Retention

We use reasonable physical, technical, and administrative safeguards to protect your information against loss or unauthorized access, use, modification, or deletion. However, no website is 100% secure, and we cannot guarantee the absolute security of any information you transmit to the Services or to us.

We retain your information for as long as reasonably necessary to fulfill the purposes described in this Privacy Policy, or as required by law.

Changes to this Policy

SumUp may make changes to the Services in the future and, as a consequence, will need to revise this Privacy Policy to reflect those changes. SumUp will post all such changes on the Site and Platform, so you should review this page periodically. If we make a material change to the Privacy Policy, you will be provided with appropriate notice.

How to contact us

If you have any questions or comments regarding our Privacy Policy, please email us at privacy@sumup.ai with “Attn: Privacy/Legal” in the subject line or contact us by mail at:

SumUp Analytics Inc.

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