

Data Privacy Notice | EDGE Empower

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In this Data Privacy Notice (the “Privacy Notice”), EDGE Strategy AG (“EDGE Strategy”, “us”, “our”), describes how edgeempower.com, (“the Website” or “Website”) operate and how EDGE Strategy collects, uses, and shares information, including personal data, gathered from visitors (“you”, “your”) to the Website or in the course of business activities conducted by EDGE Strategy elsewhere, when EDGE Strategy acts as the controller of that data and when its processing is governed by the Swiss data protection law or the European Union’s (“EU’s”) General Data Protection Regulation (“GDPR”), or any other applicable regulation.

Note that this Privacy Notice does not apply to how EDGE Strategy treats personal information when our products and services are used. Such information is governed by the terms of the applicable services agreement and data processing addendum, rather than this Privacy Notice.

Collecting information

EDGE Strategy collects information that you provide to us as well as from third parties. Furthermore, EDGE Strategy collects information from you automatically when you use the Website.

Information You Provide to Us: EDGE Strategy collects information from you when you use the Website or services available through the Website. The information referenced above may include your personal data including, by way of example, your name, postal address, telephone number, fax number, e-mail address, subscriber/screen name.

Data Collected from Third Parties: EDGE Strategy may obtain data from third parties and, where permitted by law, appends this data to other data that we already maintain about you. For additional information, see Cookies and other tracking technologies as well as Third-party services below.

Automatically Collected Data: EDGE Strategy and its third-party service providers collect data about you automatically when you visit the Website, namely through ‘cookies,’

'web beacons,' and other tracking technologies. When you access the Website, communications data (e.g., home service domain name and Internet protocol address) or utilization data (e.g., information on the beginning, end, and extent of each access, as well as information on the services that you accessed) may be generated. As permitted by applicable law, EDGE Strategy and its third-party service providers may combine this information with the personal data that EDGE Strategy collects about you. For additional information, see Cookies and other tracking technologies as well as Third-party services below.

Information that we require

Where the collection and processing of personal data are required by law, EDGE Strategy will request it from you. Failure to provide such data may result in EDGE being unable to provide products or services you request.

Using your information

The following is an overview of the purposes for which EDGE Strategy uses your information, including your personal data. Additional details on how EDGE Strategy process your personal data may be provided to you in a separate notice(s) or contract(s).

All processing (i.e., use) of your personal data is justified by a "condition" (called a "legal basis") for processing. In addition, processing of sensitive personal data is always specifically justified. In the majority of cases, processing will be justified on the following legal bases:

- the processing is necessary for EDGE Strategy to comply with a legal obligation (such as contractor vetting, accounting and tax recordkeeping, and responding to a law enforcement or court orders);
- the processing is in EDGE Strategy's legitimate interests, and not overridden by your interests and fundamental rights, and notably EDGE Strategy's legitimate interests in using Website visitor, customer, and supplier data to conduct and develop EDGE Strategy's business activities with such visitors, customers, suppliers, and others. For example, EDGE Strategy may rely on our legitimate interests when processing personal data to understand your business needs, to

improve our products and services (such as by soliciting your comments or tracking preferences on the Website), for marketing and promotional purposes, to investigate, prevent, or take action regarding illegal activities;

- you have consented to the processing (such as to send you direct marketing information).

EDGE Strategy (or a third party operating on our behalf) may use your information, including your personal data, for the following purposes, as permitted by law:

- To provide products and services to you, to communicate with you about your use of such products and services, provide you with product updates/releases and news, respond to your inquiries, fill your orders, and/or for other customer service-related purposes.
- To help EDGE Strategy better understand your business needs; to support a potential or current customer relationship with you, and to better understand how EDGE Strategy can improve its products and services, such as by soliciting your comments or tracking your preferences when browsing the Website.
- To contact you about our products and services and to conduct surveys to better understand your needs as a potential or current customer.
- For marketing and promotional purposes, including through email or equivalent electronic means. For example, EDGE Strategy may use personal data such as an email address to send news and newsletters, special offers and promotions, and to otherwise contact customers about its products, services, or information that we think may interest customers. EDGE Strategy may also use personal data to assist them in advertising its products and services on third-party websites where proper consent has been obtained.
- For research and development purposes, including to improve our products and services.
- To improve the Website by tracking your activities on the Website; to understand the demographics of visitors to the Website by tracking your activities on the Website, and for other research and analytical purposes.

- To comply with applicable legal obligations, including to respond to a subpoena or court order.
- To protect the rights and interests of EDGE Strategy as well as the rights and interests of other customers, suppliers, visitors to the Website, or other third parties, where we believe it is necessary to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person or violations of this Privacy Notice.

Sharing information

EDGE Strategy may share your information, including your personal data, for any of the reasons described in USING YOUR INFORMATION above as follows:

- **EDGE Certified Foundation** We may share the information that we collect from you with the EDGE Certified Foundation.
- **Service Providers.** We may share the information that we collect from you with third-party vendors, service providers, contractors, and agents who perform functions on our behalf. For example, we may use third parties to conduct surveys on our behalf, to perform information technology and other technical support functions, and for other purposes consistent with the purposes for which you have provided information to us.

We may also share your information in the following circumstances:

- **Business Transfers.** If EDGE Strategy is acquired by or merged with another company, if all or substantially all of the assets of EDGE Strategy are transferred to another company, or as part of preparation for such a transaction or as part of a bankruptcy proceeding, EDGE Strategy may transfer in whole or in part the information we have collected from you to such other company.
- **In Response to Legal Process.** We may also share the information that we collect from you to comply with the law, a judicial proceeding, court order, or another legal process, such as in response to a court order or a subpoena.
- **To Protect Us and Others.** We may share the information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the

safety of any person, violations of this Privacy Notice, or as evidence in litigation in which we, our affiliates, or subsidiaries are involved.

- **Aggregate and De-Identified Information.** We may share aggregate or de-identified information with third parties for marketing, advertising, research, or similar purposes, including to assist us in determining relevant advertising platforms as well as to determine the success of our various campaigns.

Cookies and other tracking technologies

When you view the Website, EDGE Strategy and its service providers may store some data on your device in the form of a 'cookie,' 'web beacon,' or other tracking technologies (collectively, "cookies") to automatically recognize your device when you visit the Website. Cookies help EDGE Strategy in many ways. For example, cookies can allow EDGE Strategy to tailor your Website visit to better match your interests, as indicated by your activities when browsing the Website or other sites. Furthermore, cookies, for example, also help EDGE Strategy and its service providers to understand what advertisements you have been shown or clicked on as well as to present you with advertisements that are more relevant to you.

PLEASE SEE MORE DETAILED INFORMATION ABOUT THESE COOKIES, INCLUDING INFORMATION ABOUT HOW TO BLOCK OR MANAGE THE COOKIES, IN EDGE STRATEGY'S COOKIES NOTICE.

Third-party services

EDGE Strategy may use with the Website plug-ins provided by a third party (Plug-in Providers) when you use the Website. Plug-in Providers never store data outside of the scope of their specific purpose. Notably, they do not store data in relation with the general day-to-day use of our products and services.

To the extent such Plug-in Providers make use of cookies, the information below should be read in conjunction with the Cookies notices.

Plug-in Providers are as follow:

Google LLC

- **Purpose:** Collects and analyzes data related to site usage and performance.
- **Privacy policy available at:** <https://policies.google.com/privacy>

HubSpot, Inc.

- **Purpose:** Customer support requests, or other direct communications with the company.
- **Privacy policy available at:** <https://legal.hubspot.com/privacy-policy>

LinkedIn Corporation

- **Purpose:** Collects and analyzes data related to site usage and performance.
- **Privacy policy available at:** <https://www.linkedin.com/legal/privacy-policy>

Twitter, Inc.

- **Purpose:** Provides advertising or advertising-related services such as data collection, behavioural analysis or retargeting.
- **Privacy policy available at:** <https://twitter.com/en/privacy>

Find out more about the purpose and scope of the data collection as well as about the processing and use of your data by Plug-in Providers and about your rights and possibilities to change settings to protect your data in the privacy statements of the respective providers linked above.

Retention of your information

EDGE Strategy apply a general rule of keeping personal data only for as long as required to fulfill the purposes for which it was collected, which in most cases corresponds to the applicable statute of limitations. Personal data used for marketing will be retained no longer than is permitted pursuant to applicable law. However, in some circumstances EDGE Strategy may retain personal data for other periods of time, for instance where we are required to do so in accordance with legal, tax, or accounting

requirements, or if required to do so by a legal process, legal authority, or other governmental entity having authority to make the request, for so long as required.

Your rights regarding information

EDGE Strategy will take steps in accordance with applicable law to keep your personal data accurately, complete, and up-to-date. You are entitled to have inadequate, incomplete, or incorrect personal data corrected (that is, rectified).

You also have the right to request access to your personal data as well as to obtain additional information about the processing.

In the event your personal data is processed on the basis of your consent, you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

Further, you are entitled to object to the processing of your personal data and have your personal data erased, under certain circumstances.

Your rights also include:

- *Right to erasure* – you are entitled to have your personal data erased under specific circumstances, such as where you have withdrawn your consent, where you object to processing based on legitimate interests, and we have no overriding legitimate grounds (see below) or where personal data is unlawfully processed.
- *Right to the restriction of processing* – you have the right to restrict our processing of your personal data (that is, allow only its storage) where:
 - you contest the accuracy of the personal data until we have taken sufficient steps to correct or verify its accuracy;
 - where the processing is unlawful but you do not want us to erase the personal data;
 - where we no longer need your personal data for the processing, but you require such personal data for the establishment, exercise or defence of legal claims; or

- where you have objected to processing justified on legitimate interest grounds (see below), pending verification as to whether we have compelling legitimate grounds to continue processing.

Where your personal data is subject to restriction, we will only process it with your consent or for the establishment, exercise or defence of legal claims.

- *Right to object to processing based on legitimate interest legal basis* – where we are relying upon legitimate interests to process personal data, you have the right to object to that processing. If you object, we must stop that processing unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or we need to process the personal data for the establishment, exercise, or defence of legal claims. Where we rely upon legitimate interest as a basis for processing, we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.
- *Right to object to direct marketing (including profiling)* – you have the right to object to our use of your personal data (including profiling) for direct marketing purposes, such as when we use your personal data to invite you to our promotional events.
- You also have the right to lodge a complaint with the supervisory authority of your habitual residence, place of work, or place of alleged infringement, if you consider that the processing of your personal data infringes applicable law.

Please contact us as indicated in EXERCISING YOUR RIGHTS; QUESTIONS AND COMMENTS below if you wish to exercise any of your rights, or if you have any inquiries or comments regarding the processing of your personal data.

Security

To help protect your personal data against accidental or unlawful destruction, loss, or alteration, and against unauthorized disclosure or access, EDGE Strategy uses reasonable technical and organizational security measures. However, please note that no data transmission over the Internet, especially the use of email, can be guaranteed to be secure. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

Links to other websites

Please be aware that the Website may contain links to other, third-party websites that operate independently from EDGE Strategy in whole or in part and to which this Privacy Notice does not apply. Such third-party websites may also reference or link to an EDGE Strategy website.

EDGE Strategy shall not be responsible for the privacy practices or the content of such third-party websites and denies any responsibility for such privacy practices and content. Without limiting the foregoing, any transactions that you enter with any vendor, merchant, or another party that you access through such third-party websites are solely between you and that vendor, merchant, or another party.

This Privacy Notice shall not apply to any such third-party sites. For applicable provisions governing privacy on third-party sites, please refer to the privacy disclosures (if any) of the third-party site.

Changes to our Privacy Notice

We will update this Privacy Notice from time to time in response to changing legal, technical or business developments. The most current version of this Privacy Notice will govern our use of your personal information. If we make a material update to our Privacy Notice, we may provide you with notice prior to the update taking effect, consistent with the significance of the updates we make. We encourage you to periodically review this Privacy Notice to stay informed about our collection, processing and sharing of your personal information. You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.