

License Manager PRIVACY POLICY

Valid as of 12.11.2021

The mobile application License Manager (hereinafter “**App**”), collects some personal data. We assure you that we take all reasonable measures to protect your personal data. Below you can find information on the handling of your personal data (hereinafter collectively referred to as the “Privacy Policy”) by Novomatic when you install, access and use the App on your phone or other mobile device, or when you log in to the web application License Manager available at the website <https://lm.novomatic-tech.com/> (“**Website**”) or you contact us by a contact form or using any of our contact data e.g as indicated on our website.

1. Data Controller

1.1. The data controllers of your personal data processed in accordance with this Privacy Policy are the following two entities:

1.1.1. NOVOMATIC AG with its registered address in Gumpoldskirchen, Republic of Austria (2352 Gumpoldskirchen, Niederösterreich, Wiener Str. 158), tax identification number ATU15031007, registry number 69548b, website: <https://www.novomatic.com> email: info@novomatic.com (hereinafter: “**NAG**”),

1.1.2. NOVOMATIC Technologies Poland Spółka z o.o. of Zabierzów, ul. Krakowska 368, 32-080 Zabierzów, entered into the Register of Entrepreneurs of the National Court Register, maintained by the District Court for Kraków-Śródmieście in Kraków, Division XII of the National Court Register, under KRS number 0000861826, NIP 6762075844, REGON 351548393, share capital: PLN 656,000.00 (hereinafter: “**NTP**”).

The data controllers shall be referred to jointly as “Novomatic” or “we”, “us”.

In all matters regarding your personal data, you can contact us:

- by mail or personally – NAG at Wiener Str. 158, 2352 Gumpoldskirchen, Niederösterreich, Austria/Österreich, NTP at ul. Krakowska 368, 32-080 Zabierzów, Poland
- by e-mail: info@novomatic.com

2. Purpose and legal basis of processing personal data

We will process your personal data that we obtain or otherwise have access to in situations covered by this Privacy Policy for the following purposes:

- to provide our services whenever you are using the App – based on the necessity to perform a contract to which you are a party to or in order to take steps prior to entering into a contract,
- to provide our services whenever you are an employee or any kind of representative acting on behalf of the user of the App – based on our legitimate interest as service providers,
- to respond to your messages, including requests or complaints requests for contact sent to us via any available contact channel – based on our legitimate interest as a personal data controller that we have in answering to messages,
- to analyze the use of the App or the Website, as well as to improve their functioning and security – based on our legitimate interest as a personal data controller providing services via the App and Website,
- to pursue and defend against claims, before courts and administrative authorities and outside them – based on our legitimate interest as a personal data controller facing such claims,
- to send newsletters or other materials of informative, legal or technical nature (such as information about any interruptions in provision of our services, about new functionalities, updates or patches) – based on our legitimate interest or based on the necessity to perform a contract (if such actions are a part of our obligations resulting from a contract between you and us),
- for data archiving and backing up – based on an obligation imposed on us as a data controller to implement security measures to ensure a level of security appropriate to the risk.

3. Data processed for the purpose of providing our services – scope of processing

We collect personal data from you and process it further if you disclose it to Us in connection with the use of services that we provide via the Website and App, and if it is necessary for the performance and settlement of our services. In particular, the data is collected for the purposes of creating and using the user account, using any functionalities of the App or ensuring that the App is functioning in a proper manner (e.g. by responding to errors or detecting inappropriate use of the App).

Providing some data is obligatory (necessary for you to be able to use the App), in which case you will be notified by us each time. If you do not provide your personal data in such circumstances, we may not be able to start or continue to provide our Services or a part thereof.

Detailed rules concerning the use of our App, including the license based on which the App is being provided to you, are set out in the End User License Agreement of our service, which are made available for download from our website (hereinafter "EULA").

The data we collect about you may include the following:

1) In case of NAG:

- a) your identification data (e.g. first and last name, name and address of the company, role within the company you work for, login and password you use for logging into the App),
- b) contact data (telephone number, address, e-mail address),

2) In case of NTP:

- a) data connected with using the App by the user,
- b) other data about the activity of the user within the App.

4. Data processed for contact purposes – scope of processing

In the event that you decide to contact us using any contact form available on our Website or in the App, or using our email addresses, phone numbers or other channels of contact we provide, we will process personal data that you provide to us or that are necessary to respond to your inquiry (including identification and contact details, as well as the IP address when using a contact form on our Website), or which you decide to provide us with. We process this data to the extent it is necessary:

- in order to reply to a message sent to us and further contact with you,
- for archiving and backing up data in connection with the obligation imposed on us as a data controller to properly protect data.

In the event that you sign up to our newsletter we will process such data as: e-mail address, name, date and time of signing up to our newsletter.

5. Data processed in connection with the use of our Website – scope of processing

If you use the Website, we save data such as: IP address, type and version of the device and browser you use, region where you are located, Website settings that you use, choices made e.g. in the area of cookies or language, and how you use the Website. In most cases, we will not be able to identify you as a user and this data will be anonymous to us. However, in a situation where we are able to connect them with you, which may occur when we have additional data from another source (e.g. we will save such data when you contact us using any contact form we provide), they may become your personal data for us. We process this data:

- to the extent that they are necessary for purposes resulting from legitimate interests pursued by us, that is in particular:
 - adjusting the way the Website is displayed and personalizing it,
 - analyzing the Website's behavior to improve its functioning and protect against abuse.

6. How long we process personal data

Your personal data will be processed:

- to fulfill our obligations or exercise our rights from the contract that is entered into when a user is using our App – for a period of the duration of the contract (in case of data necessary to be kept for the whole duration of the contract – i.e. identification data) and in case of data regarding specific offers or contracts signed by the users using the App (not longer than five years from the end of the year the data was gathered),
- to contact you – from the day they were collected and as long as we are holding the conversation in the matter in which you made contact,
- for sending newsletter – from the day you give your consent and up to the day you withdraw your consent, but not longer than for 5 years from the end of the year during which the consent has been given,
- for the purposes of pursuing and defending against claims – for a period not exceeding the limitation period for claims,
- for the purposes of performing obligations imposed by law – for a period not longer than necessary to demonstrate that these obligations were carried out by Novomatic,
- for the purpose of improving the functioning and security of the Website or the App – for the time for which these data are necessary to achieve this purpose, but no longer than until you express an effective objection to their processing,
- for archiving and backup purposes – for the period determined in accordance with the backup and archiving policy at Novomatic, but not longer than 5 years from the end of the year a back-up or archive is made.

7. Data recipients

We will use due diligence in the selection of entities to which we will transfer your data and in the case of such selected entities we will require that they protect your data by appropriate technical and organizational measures. Your personal data may only be disclosed:

- to third parties providing services to us that are needed to achieve the purposes in relation to which we process your data (e.g. hosting and IT services, payment and banking services, login validation, logistics partners),
- to data processors, i.e. entities with which we have entered into data processing agreements,
- to recipients to whom the disclosure is required by applicable law or order of a court or other authority,

- to other recipients, if you give us your consent to disclose data to them or if the transfer of data to them is necessary to protect your vital interests or vital interests of other individuals or for the common good.

8. Transfer of data to third countries

We do not transfer your personal data to recipients outside the European Economic Area (EEA). Whenever we decide to transfer your personal data outside the EEA to countries that do not provide the same or an adequate level of protection for personal data as in the EU, we will ensure that this is done on a valid legal basis and using the safeguards required by law.

9. Links to other websites

The Website and the App may contain links to other websites and service providers such as payment service providers. When you visit these pages we strongly recommend that you read the rules pertaining to processing of personal data of the users of these websites.

10. Rights of the Data Subject

Below you will find information about your rights with regard to processing of your data. For each of the following rights, you can contact us in particular using the contact details provided in section 1 of this Privacy Policy.

- **The right to obtain information, access to data and to receive a copy of the data.** You have the right at any time to request information about your personal data that we store or to which we have access. At your request, a copy of your personal data that is subject to processing will be presented to you free of charge. For sending each subsequent copy of data we have the right to request a fee that will cover the reasonable costs of handling such a request.
- **Right to withdraw consent.** Each time your data is processed based on your consent given, you have the right to withdraw this consent at any time, whereas withdrawal of consent will not affect the lawfulness of data processing that happened before you withdraw your consent.
- **The right to rectify personal data.** We take reasonable steps to ensure that your personal data is correct, complete and up to date. If it is necessary to change these data, please let us know.
- **Right to data portability.** You have the right to request the transfer of your personal data in a structured, commonly used machine-readable format, as well as to request the transfer of

data to another data controller, when your consent is the legal basis for the processing of your personal data.

- **The right to delete data and to limit processing.** In the cases indicated in the provisions of law on the protection of personal data, you have the right to request the deletion of your personal data. However, this right is not absolute – there may be occasions when we are still entitled to process your personal data. You can also request a restriction on the further processing of your data.
- **Right to object to processing.** In the cases indicated in the provisions of law, you have the right to object to the further processing of your data when the legal basis for the processing of personal data is our legitimate interest.
- **The right to lodge a complaint with a supervisory authority.** You have the right to lodge a complaint with the supervisory body dealing with the protection of personal data – in principle, it will be the Austrian Data Protection Authority (Österreichische Datenschutzbehörde, Barichgasse 40-42, 1030 Vienna, Austria, dsb@dsb.gv.at).

11. Security measures

We use adequate technical and organizational security measures in order to keep your data safe and intact. The following are the examples (non-exhaustive list) of the measures currently in use by Novomatic:

1. encryption of the connection (SSL),
2. data storage on external servers of reputable suppliers,
3. backups stored in a physically separate location,
4. encryption of login data,
5. encryption of data stored in databases,
6. protection against interference in the process and data by means of blockchain elements.

12. Cookies Policy

The Website and the App uses cookies (small text files that are operated by the Website and saved on your device) and other similar technologies (pixel tracking and local storage). The entity using these tools is Novomatic.

The Website and the App use the tools indicated above for various purposes, including:

1. ensuring the proper operation of the Website and the App,
2. behavioral analysis to ensure the security and proper functioning of the Website and App,

3. saving data in the session in order to facilitate the completion of forms and the use of the Website and the App.

We use the following types of cookies:

- analytical cookies that investigate user behavior on the Website and in the App;
- functional cookies enabling to remember the settings selected by the user and personalization, i.a. in terms of the selected language or the cookies options you select.;
- third-party cookies – the Website may also store cookies from other entities (including analytical and marketing cookies) from Google.

Cookies and other tools we use are not primarily intended to process or store personal data in order to directly identify you. They also do not change the user's browser settings or change the configuration of the user's device. Exceptional situations, when data collected using cookies may be considered as your personal data, as well as your related rights, are described in detail in the relevant part of the Privacy Policy.

Ways to disable cookies

By accessing our Website, you have the option of giving your consent to the use of cookies from third parties (Google Analytics). Even if you have already agreed, you can still use the options described below.

Any user can disable cookies in their web browser. In order to facilitate the way of managing cookies, below are links to some pages dedicated to specific browsers.

- Google Chrome
– <https://support.google.com/chrome/answer/95647?Every=GENIE.Platform%3DDesktop&hl=en>
- Opera – <https://help.opera.com/en/latest/web-preferences/#cookies>
- Firefox
– <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Apple Safari
– <https://support.apple.com/en-us/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
- Windows Internet Explorer
– <https://support.microsoft.com/fil-ph/help/17442/windows-internet-explorer-delete-manage-cookies>

Users can also set their browsers in a way so that they have to accept cookies each time. Then, the browser will ask the user for permission to grant access each time before granting access to the cookie. This gives the user control over what is stored on his device or in his browser, however, it has the disadvantage that it slows down the ability to navigate the Website and other websites.

You have the option of disabling the transfer of your data for analytical and statistical purposes using Google Analytics. To do this, you can install the browser extension in accordance with the instructions at this address: <https://support.google.com/analytics/answer/181881?hl=en>.

