AxonIQ's Privacy Policy

Last updated on June 26, 2025

This AxonIQ Privacy Policy (this "Privacy Policy") informs you about the collection and processing of your personal data by AxonIQ B.V. and its subsidiaries (hereinafter "AxonIQ", "we", "us", or "our") related to your use of the AxonIQ website www.Axoniq.io and associated websites and the use of our products and services. AxonIQ understands that you value your privacy, and we take that seriously.

This Privacy Policy does not apply to websites or products or services that display or link to different privacy policies. This Privacy Policy also does not apply where AxonIQ processes personal information of our customers on their behalf; our collection and processing of such personal information is governed by our agreements with those customers.

1. Why we process personal data

AxonIQ processes your personal data for the following purposes: (i) to provide products and services offered by AxonIQ and its affiliates, including sending invitations to seminars, events and sharing communications such as newsletters (subject to your contact preferences); (ii) to fulfil our obligations and duties as may be set forth in the contract between AxonIQ and your company; (iii) based on AxonIQ's legitimate interests, where the use of your information is necessary to achieve a legitimate interest and AxonIQ's reasons for using it are not overridden by your rights. Examples of such legitimate interests include offering information and/or services to individuals who visit our websites or who have shown an interest in our products and services, preventing fraud or criminal activity, safeguarding our IT systems, and conducting and analyzing our marketing activities.

2. How we collect information

When you visit our websites

On our websites we collect personal data you provided yourself. You may provide personal data when you (i) register for any of our services or events; (ii) submit requests, suggestions, or other communications to us; or (iii) interact with our websites in any way that submits, releases or displays your personal data to us.

When you use our products and services

By using our products and services, you may provide certain personal information - for example, when you register for an AxonIQ subscription and create an account to access and use an AxonIQ service, when you consult with customer support, or if you send us an email or communicate with us in any way.

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3. The personal information we collect

Personal information we collect may include:

- Business contact information: such as your name, job title, organization, phone number, email address and country;
- Marketing information: such as your contact preferences (if you opt in);
- Account log-in credentials: such as your email or username and password when you sign up for an
 account with us and the unique User/ team ID assigned to you in our systems;
- Troubleshooting and support data: such as personal information you provide or we otherwise access in
 connection with support queries we receive from users. This may include, for example, contact or
 authentication data, the content of your chats and other communications with AxonIQ, and the product
 or service you are using related to your help inquiry; and
- When you apply for a job via our website you will provide personal information such as your CV or resume.

Certain information is collected automatically from your browser or device, such as:

- Operating system and device information;
- Geolocation;
- IP address; and
- Browser information, such as browser type, pages visited and date and time of visit.

4. Anonymous Usage Data Collection

When using our software that contains anonymous usage data collection, the following information is collected (unless opted out):

Geolocation based on IP address (IP address itself is deleted after geolocation has been determined);

- Names and versions of all Axon modules used;
- Operating system and environment information;
- Anonymous usage statistics (e.g., features enabled); and
- Anonymized unique installation identifier (non-personal).

How We Use This Data

The data is used solely for:

- Notification of vulnerabilities and recommended updates;
- Understanding general usage trends to prioritize features;
- Identifying production use of commercial extensions (if applicable) for licensing compliance; and
- Accurate counting of corporate users based on supplied IP address lists (optional for users).

We do not store user content or data stored/processed by the software.

All data is transmitted securely using transport layer security (TLS) and stored in compliance with applicable data protection laws.

More details about the information collected through the anonymous usage data collection and how to opt out can be found here.

5. Personal data obtained from third party sources

We may occasionally receive your personal information from third party sources including our affiliates, marketing and research partners.

Users of our products or services may also provide your personal information when they identify you as a billing, support, or technical contact, or when inviting you to use our products or attend our events. If you integrate or link a third-party service with our websites or products, we may receive personal information about you from that third-party service based upon the settings and permissions you've established with such third party service, and that third party service's privacy practices.

When you participate in a training, we ask for personal information so that we can communicate with you and so you can see your fellow students and vice versa. You can use a nickname if you want to, but we need a valid email address to provide the training. If you choose to log on through any social media account like Google or Facebook, your public profile photo is used for your account. After you create an account, you can change your account information. You can choose to change your name, email address or photo or choose not to publish any profile photo.

6. Third parties

Your personal information may be provided to the following third parties:

- sub-processors, like our hosting provider, email provider or platform provider;
- payment providers that process your payments; or
- providers that place cookies (see <u>cookie notice</u>).

We may also share your personal data with our affiliates, agents and/or contractors for purposes including, but not limited to: facilitating the sales, delivery or fulfillment of orders, facilitating the services provided by third parties, verifying and authenticating your identity to provide you with services, providing products and services that you have purchased, responding to your enquiries and complaints, and in connection with supporting other legitimate business purposes of AxonIQ.

In the event our business is sold, we may also share your personal data with the buyer under our legitimate interest to ensure our business can be continued by the buyer. If you object to our use of your personal data in this way, the buyer of our business may not be able to provide services to you.

Some of these third parties process personal data outside of the EU/EEA.

AxonIQ will only transfer your personal data to countries that the European Commission has deemed to provide an adequate level of personal data protection or AxonIQ uses specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts ensure the same levels of personal data protection that would apply under the GDPR.

7. How long is personal data stored

AxonIQ will not keep your personal data any longer than is necessary in light of the reason(s) for which it was collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- For as long as you keep an active account on any AxonIQ product or service;
- For as long as you wish to receive emails with AxonIQ product and services information and wish to receive news and offers from AxonIQ;
- For as long as we have a legitimate business interest such as maintaining appropriate business and financial records, protecting our legal interests, resolving disputes, or complying with legal or regulatory requirements;
- For 4 weeks in case of personal data relating to job applications, or, with your consent, one year; or
- If none of the above is applicable, then we will keep your data for as long as necessary to fulfill the purpose of any processing.

In some circumstances AxonIQ may carefully anonymize your personal data so that it can no longer be associated with you, and we may use this anonymized information indefinitely without notifying you. We use this anonymized information to improve the way we work and our services.

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8. Cookies

AxonIQ uses cookies that may process some personal data. See our separate <u>cookie notice</u> for more information.

9. Rights of data subject

Depending on where you live and the applicable data protection laws, you may have various rights including:

- Access: You have the right to know what information AxonIQ holds about you and request copies of it.
 We may charge a reasonable fee for additional copies or excessive requests.
- Complaints: You have the right to complain about how AxonIQ processes your data.
- Correction or Rectification: If any of the information AxonIQ has about you is incorrect or incomplete, you have the right to ask AxonIQ to correct it.
- Erasure or Deletion: You may have the right to request AxonIQ to delete the information AxonIQ holds about you.
- Object to Processing: You have the right to object to the processing of your personal information where
 we rely on legitimate interests as the legal basis.
- Portability or Copies: You may have the right to ask AxonIQ to transfer your personal information to another organization or to you in a format that is accessible.
- Restriction of Processing: You may have the right to restrict how AxonIQ processes your personal information.

If you want to know what personal data AxonIQ has about you, you can check your account settings. You can also make changes to your personal information there. You can also ask AxonIQ for details of that personal data and for a copy of it (where any such personal data is held) or request changes or removal. All requests should be made in writing and sent to the email or postal addresses shown below.

10. Children's data

Our services are not directed to children under the age of 16, and we do not knowingly process their data without verified parental consent, as required under relevant applicable law.

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11. Contact details

For any questions on this Privacy Policy, the processing of your data, or to exercise your legal rights, you can contact our privacy officer using the contact details below. We may ask for identification before processing your question or request and if you are unable to provide us with such identification, we may be unable to comply with your request. AxonIQ operates on this basis to prevent the fraudulent, malicious, or otherwise adverse disclosure, deletion, or other malign activity in relation to your data.

AxonIQ B.V.
Attn. Privacy Officer
Lange Viestraat 2b
3511 BK Utrecht
The Netherlands
+31 30 2272607
privacy@axonig.io

12. Complaints

If you have any complaint regarding the processing of your personal data, please contact our privacy officer via the above contact details, so we can help you promptly. You also have the right to file a complaint with the relevant supervisory authority.

13. Changes to this Privacy Policy

AxonIQ recognizes that information privacy is an ongoing responsibility, and AxonIQ may therefore change this Privacy Policy from time to time. This may for instance be necessary if the law changes, or if AxonIQ changes its business in a way that affects the use of personal data.

Any changes will be immediately posted on the AxonIQ websites so you are informed of the changes. We recommend that you check this Privacy Policy regularly to keep up-to-date.

June 2025