

Privacy Policy
Effective since December 1, 2021

AcquiConnect OÜ, an Estonian Limited Liability Company (collectively "Aqcon", "we", "us" or "our") take privacy and data protection seriously. When you use our Website and Services, you trust us with your data and information. This privacy policy ("Privacy Policy") is meant to help you understand what data and information we collect, why we collect it, and what we do with it. This is important and we hope you will take the time to read it carefully.

1. INTRODUCTION

- 1.1 This Privacy Policy is published in compliance with applicable laws.
- 1.2 Protecting your privacy and the security of your personal information is of utmost importance to us. This Privacy Policy describes your privacy rights regarding our collection, use, storage, sharing, and protection of your personal data and information. This Privacy Policy applies to personal data and information collected by us in connection with the Services.
- 1.3 This Privacy Policy is incorporated into and forms part of the Terms of Service. Capitalized terms used but not defined in this Privacy Policy shall have the meaning attributed to it in our Terms of Service.

2. YOUR CONSENT

- 2.1 When you access and/or use the Website and the Services, you specifically accept this Privacy Policy.
- 2.2 By accessing, browsing, and/or using the Website and Services, you are specifically consenting to Aqcon collecting, using, and disclosing your personal data and information in accordance with this Privacy Policy. If you do not agree to the collection, use, and disclosure of your personal data and information in this way, please do not use the Website and the Services or otherwise provide us with your personal data and information.
- 2.3 You acknowledge that this Privacy Policy is a part of the Terms of Service, and you unconditionally agree that becoming a user of the Website and its Services signifies your: (i) assent to this Privacy Policy; and (ii) consent to us collecting, processing and/or disclosing your personal data or information in the manner and for the purposes set out in this Privacy Policy. Your visit to the Website and use of the Services is subject to this Privacy Policy and the Terms of Service.
- 2.4 Collection, use, and disclosure of information that has been designated as personal data or information under the applicable laws require your express consent. By affirming your assent to this Privacy Policy, you provide your express consent to such use, collection, and disclosure as required under applicable law.

3. COLLECTION AND USE OF DATA

- 3.1 Aqcon collects the following information when you access or use the Website or the Services:
 - 3.1.1. Name
 - 3.1.2. Email
 - 3.1.3. Phone number
 - 3.1.4. Business name
 - 3.1.5. Business website
 - 3.1.6. Address
 - 3.1.7. Professional title
 - 3.1.8. Aqcon password (in an encrypted form)

- 3.2 We collect all corporate information provided by our users. For example, in the case of investors, such information may include, inter alia, details of investors (private equity funds, family offices, and other financial institutions), their investment criteria, including target geography, revenue/EBITDA range, and other additional information on the type of companies they want to acquire or invest in, and in the case of sellers, the information on deals and estimated financials.
- 3.3 Certain information is collected automatically, such as internet protocol (IP) address, type of device, cookies, location, browser type, access time, error log, etc. IP addresses and cookies are received automatically from your internet browser and recorded into our server logs. This information is collected for all visitors, irrespective of their registration status with us.
- 3.4 The Website uses cookies to make your online experience more personalized. A cookie is a small text file that is automatically created on the hard disk of your computer by a web page server. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you. Cookies primarily inform the web server that you have returned to a specific page, so when you visit a previously visited page again, the experience will be personalized. We may also use the cookies to keep the user logged on even if he visits after a few days, or to provide such a user with a certain type of information based on his usage, etc. Most internet browsers automatically accept cookies, but you can modify your browser settings to decline cookies if you prefer. If you choose to decline cookies, you may not be able to experience the interactive features of the Website or you may experience technical problems in receiving information from the Website.
- 3.5 We may also obtain information about you, including personal data and information, from third-party websites or third-party service providers providing database services to create and store databases. These databases are used by us to promote and market Aqcon and its Services, including sending marketing emails to potential users of Aqcon.
- 3.6 We will only use your personal data and information when the law allows us to. We use the data and information collected from you for the following purposes:
 - 3.7.1. for the provision of Services to you, including customized Services in accordance with user preference (i.e. for performing our obligations towards you);
 - 3.7.2. verify your identity;
 - 3.7.3. enable you to access and use the Services;
 - 3.7.4. to provide you with necessary details about your Account and your license to use the Services, including for sending notifications for termination of the contract;
 - 3.7.5. process and complete transactions, and send you related information, including purchase confirmations and invoices;
 - 3.7.6. send messages, including responses to your comments, questions, and requests to Aqcon or other users;
 - 3.7.7. contact you at any telephone number, by placing a voice call or through text (SMS) or email messaging, as authorized by you under the Terms of Service;
 - 3.7.8. bill for the Services and to collect fees or monies owed;
 - 3.7.9. sending you business messages such as those related to payments;
 - 3.7.10. to do such activities for which you have explicitly given us consent;
 - 3.7.11. to comply with applicable laws, rules, and regulations, as updated from time to time;
 - 3.7.12. to inform you about our new products and/or services;
 - 3.7.13. manage and protect our information technology infrastructure;

- 3.7.14. manage risk, or to detect, prevent, and/or remediate fraud or other potentially prohibited or illegal activities and crimes;
 - 3.7.15. detect, prevent or remediate violations of the Terms of Service and our other policies;
 - 3.7.16. provide customer service and support;
 - 3.7.17. respond to your customer support inquiries and to facilitate the resolution of any customer support problems that may arise;
 - 3.7.18. send you technical notices, updates, security alerts, and support and administrative messages;
 - 3.7.19. advertise, promote and market our products and services and undertake all other types of business development activities;
 - 3.7.20. send promotional communications, such as providing you with information about products and services and other events;
 - 3.7.21. perform analysis, research, business, and operational analysis;
 - 3.7.22. to determine the behavior of users, including how users use the Website, including google analytics;
 - 3.7.23. to determine user interaction/messages with counterparties or other clients on the Website to ensure that users are getting responses from counterparties;
 - 3.7.24. to track user activity on the Website;
 - 3.7.25. provide, maintain and improve our products and services;
 - 3.7.26. measure the performance of the Services and improve their content and layout;
 - 3.7.27. generate reports about our user base and service usage patterns, analyze the accuracy, effectiveness, and popularity of the Services;
 - 3.7.28. to conduct data analytics studies to review and better understand customer satisfaction and needs;
 - 3.7.29. to protect your (or someone else's) interest;
 - 3.7.30. to deal with legal disputes, if any;
 - 3.7.31. to protect the public interest or for official purposes, if formally requested by any investigative or other governmental authority; and/or
 - 3.7.32. sending you information about Aqcon.
- 3.7 We share information, including personal information, with our employees to enable them to undertake, perform, and deliver the Services.
- 3.8 We share information, including personal data and information with our third-party service providers that we use to provide hosting for and maintenance of the Websites, application development, backup, storage, payment processing, analytics, market our services, comply with audits, perform web analysis and other services for us. These third-party service providers may have access to or process your personal data and information to provide these services for us. We do not permit our third-party service providers to use the personal data and information that we share with them for their marketing purposes or for any purpose other than in connection with the services they provide to us. Please note that third-party service providers have their own privacy policies, and Aqcon is not responsible for their actions, including their information protection practices.
- 3.9 Aqcon may disclose any information about you and/or content created by you to any governmental or law enforcement authorities/officials as we, in our sole discretion, believe necessary or appropriate to:

- 3.10.1. comply with an order from a court of competent jurisdiction, regulatory agency, and/or other governmental authority, wherever it operates or has a presence in;
 - 3.10.2. respond to claims, court orders, or other legal processes;
 - 3.10.3. prevent violations of our Terms of Service;
 - 3.10.4. enforce the terms of this Privacy Policies and other agreements with Aqcon;
 - 3.10.5. to establish or exercise our legal rights or defend against legal claims;
 - 3.10.6. protect, in Aqcon's sole discretion, the public or any person from any harm;
 - 3.10.7. investigate, prevent, stop, or take other action regarding any action perceived to be fraudulent, illegal, unethical, or legally actionable in Aqcon's sole discretion;
 - 3.10.8. to respond to the claims of violation of the rights of third parties and/or to protect the rights, property, and safety of Aqcon, its employees, users, strategic partners, third parties or the public and obtaining your consent is difficult; and/or
 - 3.10.9. generally comply with the law.
- 3.10 Aqcon disclaims any duty, obligation, or liability to provide you with prior or subsequent notice of disclosure of your data to government or law enforcement officials as above.
- 3.11 We may contact you as necessary to enforce our policies, applicable law, or any agreement we may have with you. When contacting you via phone, to reach you as efficiently as possible we may use, and you consent to receive, auto dialed or prerecorded calls and text messages. Where applicable and permitted by law, you may decline to receive certain communications.
- 3.12 We may share your information, including with potential acquirers, investors, and other counterparties, in connection with any corporate restructuring, including a merger, demerger, amalgamation, reorganization, sale of some or all of Aqcon's assets, a change in control transaction, or a financing or acquisition of all or a portion of our business by another company.
- 3.13 We may share your information in any other circumstances where we have your consent.
- 3.14 We will only use your personal data and information for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. In the event we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

4. PROTECTION OF YOUR DATA

- 4.1 Our Website secures the personal data and information provided by you on computer servers in a controlled and protected environment to prevent the loss, misuse, unauthorized access, disclosure, alteration, and destruction of the data and information.
- 4.2 Your personal data and information are maintained by Aqcon in electronic form on its equipment, and on the equipment of its employees, agents, representatives, and sub-contractors. Such information may also be converted to physical form from time to time. Aqcon takes all necessary precautions to protect your personal information both online and offline and implements reasonable security practices and measures including certain managerial, technical, operational, and physical security control measures that are commensurate concerning the information being collected and the nature of Aqconinc's business.
- 4.3 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorized manner. In addition, we have limited the access to your personal information to those who need to know. We have also put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

- 4.4 Notwithstanding the above, Aqcon is not responsible for the confidentiality, security, or distribution of your personal information by third parties outside the scope of our agreement with such third parties. Further, Aqcon shall not be responsible for any breach of security or for any actions of any third parties or events that are beyond the reasonable control of Aqcon including but not limited to, acts of government, computer hacking, unauthorized access to computer data and storage device, computer crashes, breach of security and encryption, poor quality of internet service or telephone service of the user, etc.
- 4.5 It is necessary that users keep their personal information including, but not limited to, email address and password confidential and must not share it with anyone to prevent unauthorized use or access to their personal information. We will not sell, trade or lease information collected from you without your consent, except in the circumstances as described in this Privacy Policy. We shall not be liable for disclosure of your username and password and you shall be solely responsible for protecting your username and password at all times. You shall be solely liable for any unauthorized use of the Website through your Account. In the event of such unauthorized usage, you shall notify us immediately and reset your password accordingly.
- 4.6 All our third-party service providers are contractually required to take appropriate security measures to protect your personal data and information in line with our policies. We do not allow our third-party service providers to use your personal data and information for their own purposes. We only permit them to process your personal data and information for specified purposes and in accordance with our instructions. Any processing of your data and information by the third party shall only be done by treating the information collected from you confidentially, legally, and securely.

5. DATA RETENTION

- 5.1 Aqcon implements reasonable security practices in the storage of personal data and information. The length of time Aqcon retains personal data and information varies depending on the nature of the services for which the data or information has been collected and statutory requirements wherever prescribed. We shall retain your personal data and information only for such period of time as is necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Although this period may extend beyond the end of your relationship with Aqcon, it will be retained for so long as necessary for Aqcon to respond to any issues arising from your relationship.
- 5.2 When Aqcon no longer needs personal data and information, we will destroy, delete, erase, or convert it to an anonymous form without any notice to the users. Aqcon may delete information including, but not limited to, content and records of user accounts without any prior notice to users. Aqcon recommends that you back up on your own computer any critical and important information prior to the expiry or termination of the Services availed from Aqcon. Should your account be terminated, Aqcon may immediately and permanently delete all stored messages, emails, content, and other records of your account without any prior notice.
- 5.3 Under certain circumstances, we alter the personal information collected from users to render it anonymous so that it could no longer be personally identifiable. In the event of such anonymization of data, we shall use such data without notifying you of such use and for any lawful purposes of whatsoever nature, whether mentioned in this Privacy Policy or not.

6. ACCESSING AND DELETING YOUR INFORMATION AND OPTING OUT

- 6.1 You may, under applicable law, have the right to access, correct, update, or delete the personal information Aqcon holds about you. In order to exercise your rights, to the extent permitted and required of Aqcon under applicable law, please contact us at support@aqcon.co.

- 6.2 We respect your communication preferences, if you no longer wish to receive notifications, you can adjust your preferences. If you prefer not to receive marketing emails that are tailored to your interests, you can opt-out by writing to us at support@aqcon.co at any time.
- 6.3 Aqcon may use your information to contact you in the future to inform you about the services Aqcon believes will be of interest to you. If Aqcon does so, each communication it sends to you will contain instructions permitting you to "opt-out" of receiving future communications. In addition, if at any time you wish not to receive any future communications or wish to have your name deleted from our mailing lists, please contact us at support@aqcon.co.
- 6.4 If you wish to cancel your account or request that we no longer use your information to provide you Services, contact us at support@aqcon.co. We will retain your information for as long as your account with the Services is active and as needed to provide you the Services and for such other purposes as set out herein. We shall not retain such information for longer than is required for the purposes for which the information may lawfully be used or is otherwise required under any other law for the time being in force. After a period of time, your data may be anonymized and aggregated, and then maybe held by us as long as necessary for us to provide our Services effectively, but our use of the anonymized data will be limited to analytical purposes. Please note that your withdrawal of consent or cancellation of account may result in Aqcon being unable to provide you with its Services or to terminate any existing relationship Aqcon may have with you.
- 6.5 If you wish to opt-out of receiving non-essential communications such as promotional and marketing-related information regarding the Services, please send us an email at support@aqcon.co.

7. LINKS TO THIRD PARTY SITES AND SERVICES

- 7.1 Our Services may contain links to third-party websites, including social media services. Your use of these features may result in the collection, processing, or sharing of information about you, depending on the feature. Please be aware that we are not responsible for the content or privacy practices of other websites or services that may be linked to our Services. We do not endorse or make any representations about third-party websites or services. The information you choose to provide to or that is collected by these third parties is not covered by our Privacy Policy. We strongly encourage you to read such third parties' privacy policies.

8. DISCLAIMER

- 8.1 While we give utmost importance to protecting user data and information, we cannot ensure that all your personal data and information will never be disclosed in ways not otherwise described in this Privacy Policy. Therefore, although we are committed to protecting your privacy, we do not promise, and you should not expect, that your personal information will always remain private. As a user of the Website, you understand and agree that you assume all responsibility and risk for your use of the Website, the internet generally, and the documents you post or access and for your conduct on and off the Website.

9. CHILDREN'S AND MINORS' PRIVACY

- 9.1 The Website and the Services are designed and intended for use by adults. If you are a minor, please do not share your personal data or information. If we discover that we have collected personal data or information from a minor, we will delete that personal data or information as soon as possible. In no event shall Aqcon be liable for any personal data or information provided by a minor.
- 9.2 We strongly encourage parents and guardians to supervise the online activities of their minor children to help provide a child-friendly online environment and prevent minors from disclosing their name, address, and other personally identifiable information online without parental permission. Although the Services are not intended for use by minors, we respect the privacy of minors who may inadvertently use the internet or the mobile application.

10. CHANGES TO PRIVACY POLICY

- 10.1 We reserve the right to update this Privacy Policy at any time, and from time to time, with or without advance notice. In the event, there are significant changes in the way we treat user's personal data and information, or in the Privacy Policy itself, we will display a notice on the Website or send users an email, so that you may review the changed terms prior to continuing to use the Services. Please check this page periodically for changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is used. Please review the changes carefully. Your continued access to the Website or use of our Services following the posting of changes to this Privacy Policy will mean you consent to and accept those changes. As always, if you object to any of the changes to our terms, and you no longer wish to use the Services, you may contact us at support@aqcon.co.
- 10.2 If a user uses the Services or accesses the Website after a notice of change has been sent to such user or published on the Aqcon Websites, such User hereby provides his/her/its consent to the changed terms.

11. ADDRESS FOR PRIVACY QUESTIONS

- 11.1 Should you have questions about this Privacy Policy or our information collection, use, and disclosure practices, please contact us at support@aqcon.co.
- 11.2 If you have any questions about this Privacy Policy, you may also contact the grievance officer. We will use reasonable efforts to respond promptly to any requests, questions, or concerns, which you may have regarding our use of your personal information. The grievance officers designated by Aqcon to hear any complaints relating to your personal data and information under this Privacy Policy are:

Estonia, Tallinn 10151
Ahtri tn 12
Attn: AcquiConnect OÜ