

# Quadient Inspire Evolve and Cloud Services

## PRIVACY NOTICE EMEA

### INTRODUCTION

Quadient and its affiliates (“Quadient”, “We”, “Our” or “Us”) is committed to respecting your privacy as a user of Our Customer (as defined in the relevant Customer Contract), (“You”). We recognize that when You choose to provide Us with Personal Information about yourself, You trust Us to act in a responsible manner.

That is why we have published this Quadient Inspire Evolve and Cloud Services Privacy Notice (also referred to as the ‘**Privacy Notice**’) to inform You of Our practices regarding the collection, use, and disclosure of information gathered from users of our Quadient Inspire Evolve Services and our Quadient Cloud platform at [quadientcloud.eu](http://quadientcloud.eu) (collectively “Services”). This Privacy Notice also explains the privacy rights You have in relation to these processing activities.

As used in this Privacy Notice, ‘Personal Information’ or ‘Personal Data’ means information that relates to an identified individual or to an identifiable individual. For example, this could include (among other things) Your name, address, email address, business contact details, or information gathered through your interactions with Us via Our Services.

### WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL INFORMATION?

Quadient CXM AG, operating under the commercial name of “Quadient”, and its affiliated group entities are responsible for the processing of Your personal information as described in this Privacy Notice, unless Quadient processes Your personal information on behalf and under the instruction of a Customer under a signed data processing agreement (the “DPA”).

In that case, such respective DPA will prevail over this Privacy Notice. You may request from the Customer, whose User You are, to see that DPA. It lists out all of the important sub processors which we have used and the measures that are in place to ensure proper data protections.

Otherwise, You can also find the standard template of the DPA and other additional information under [www.quadient.com/eula](http://www.quadient.com/eula) and in the User Terms and the General and Specific Service Conditions for the respective Quadient Inspire Evolve Service You are using.



## WHAT PERSONAL INFORMATION DO WE COLLECT?

At times We may request that You voluntarily supply Us with Personal Information. Generally, this information is requested when You register for an online service; or in connection with an online transaction.

### Personal Information

Personal Information collected by Quadient on the Services platform from customers, suppliers, business partners and their respective users may include, but is not limited to, the following:

- **Identity Data** including first name, last name, user name or similar identifier, business contact information, function and title.
- **Contact Data** may include billing address, email address and telephone numbers.
- **Transaction Data** may include Your preferred settings, uploaded content in the various Services as well as data on the batches and transactions from You and other users on your Service account.
- **Technical Data** includes internet protocol (IP) address, Your login data and other data created on Quadient's platform.
- **Usage Data** includes products or platform navigation, Your notification settings, preferences, inputs and saved content.
- We also collect, use and share **aggregated data** such as statistical or technical data and volume. For example, we may aggregate Your Usage Data to calculate the percentage of users accessing a specific service feature. However, if we combine or connect Aggregated Data with Your Personal Data so that it can directly or indirectly identify You, we treat the combined data as Personal Data which will be used in accordance with this User Privacy Notice.
- In rare situations, where it is required to fulfill our contractual obligations, we will also store **Customer Content or user data** that might contain special categories of data, e.g. for the unambiguous identification of a natural person, or as content of Customer created communications, like health data.
- **Cookies and Tracking:** We may also store personal information about You in cookies or tokens (files which are sent by us to your computer or other access device), which we can access when You log on or use our Service platform, e.g. for single sign-on, saved drafts or preferences, notices or other. If You want to manage or delete any specific settings, please check our user notification or preference center.

### Sensitive Personal Information

We ask that You do not send Us, and do not upload or share any sensitive Personal Information on the Service platform, unless it is expressly agreed in the DPA with the Customer whose user You are. Some examples of sensitive personal information are: government-issued IDs; special categories of data and any information that reveals racial or ethnic origin, religious, political or philosophical beliefs; trade union membership details; information about health, disabilities, or sexual orientation; credit history; and criminal records.

### Information from Children

Quadient does not knowingly collect or solicit personal information from anyone under the age of 16. In the event that We find out that we have collected personal information from a child under 16 (without verification



of parental consent), We will delete that information as quickly as possible. If You believe that we might have any information from or about a child under 16 on our Services platform, please contact Us using the online form.

As the use of the Quadient Inspire Evolve Services is restricted to business use only, individual users must be 18 years of age or older in order to use the Services.

## HOW MAY WE USE YOUR DATA?

The purposes for which Quadient use Your Personal Information for commercial and business purposes, are as described in detail in this section.

- If You request something from Quadient, for example, a product or service, a callback, or specific support or materials, We will use the Personal Information You provide to process and deliver on Your request or process Your uploaded content.
- We may use Your Personal Information to support Services the Customer has obtained from Us, such as notifying You of a Service update or fix. We may combine information from the Customer with information from other interactions with the Customer to provide You with more valuable suggestions in relation to Services support.
- To register You as a new user when You enter a Service platform, We may use Your name, address, telephone number and e-mail address so that We can administer the Service and notify Service users. As a user, we also use Your Personal Data to create and maintain the Customer's Services platform account, and to control access to it. This is done to provide our Services and facilitate performance, including: making verifications relating to You and Service verifications; to provide You with real-time logs of Your use of the Service platform; and to communicate with You about our Services, or respond to any requests You may submit for support.
- We intend to continue improving the content and function of our Services. For this reason, We may monitor Customer traffic patterns and Service usage to help us improve the design, functionality and layout of our Services and platforms.
- To manage our relationship with You, which may include notifying You about maintenance windows, changes to the Services, the terms of our User Privacy Notice; or even to ask You to complete a survey.
- To manage the security of our Services, platforms, networks and systems.
- To market our products and services or related products and services and to tailor marketing and sales activities.
- You may receive marketing communications from Quadient, unless You have specifically opted out of that marketing or changed Your notification settings, especially if You have:
  - a) Requested information.
  - b) Registered for a Service.
  - c) Provided Us with Your details when You enquired about a quote of Service.
  - d) Registered for a promotion.



You may also receive marketing material if You are on a list that has been lawfully acquired by Quadient or Your Personal Information has been referred to Us by a third party or colleague.

- Promotional offers from Us: We may use Your Identity, Contact, Technical, and Usage Data to form a view on what We think You may want or need, or what may be of interest to You. This is how We decide which products, Services and offers may be relevant for the Customer.
- Third-party marketing: Quadient does not share Your Personal Data with third parties to carry out their own marketing. Should this ever change we will obtain your opt-in consent before we share Your Personal Information with any company outside Quadient for marketing purposes.
- To comply with our contractual obligations, applicable laws and regulations.
- Other legitimate business purposes that may arise from time to time.

## SHARING YOUR PERSONAL DATA

Quadient may share Your Personal Data with other group entities in Quadient (“Affiliates”), third-party service providers; and according to Quadient’s legal and contractual obligations.

### Sharing within Quadient:

Quadient employees from Quadient Affiliates are authorized to access Your Personal Information only to the extent necessary to perform their job functions. This includes activities such as the servicing of a Customer agreement or activities related to Your user documentation.

### Sharing outside Quadient:

In no case do we sell, share or rent out Your Personal Information, content or contacts to third parties, nor use them for any purpose other than those set forth in our agreements or this Privacy Notice. We may share Your Personal Information with the following third parties for a legitimate business purpose, including:

- Third-party service providers processing Personal Data on Quadient’s behalf, for example to process and deliver the Services, manage and service Your data, distribute emails, carry out research and analysis, manage brand and product promotions as well as providing certain services and features.
- Other third parties, as required by law, to: (i) comply with a government request, subpoena, court order or applicable law; (ii) prevent illegal uses of Quadient Services and apps or violations of our websites’ and the apps’ terms of use and our policies; (iii) defend ourselves against third-party claims; and (iv) assist in fraud prevention or investigation (e.g., counterfeiting) (v) carry out the reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

Where We utilize third parties for the processing of any Personal Information, We implement reasonable contractual and technical protections. These limit the use of that information to the purposes of providing the Services as specified by Quadient.



## WHAT IS OUR LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION ABOUT YOU?

We will only use Your Personal Data when the contract between the Customer and Us and applicable law allows Us to.

For Personal Information collected about You in the EU, Our basis for processing is most commonly as follows:

- We need to perform the contract We are about to enter into or have entered into with the Customer for whom You are acting as a user of the Services.
- It is necessary for Our legitimate interests and Your interests and fundamental rights do not override those interests:
  - To keep Our records updated and in order to communicate with You and to respond to Your requests
  - To analyze, develop, improve and optimize the use of Our Services, and to maintain the security of Our platform, networks and systems.
- Where we need to comply with a legal or regulatory obligation, such as complying with a subpoena or other legal process, or to process an opt-out request:
  - Generally, We do not rely exclusively on consent as a legal basis for processing Your Personal Information and communicating with You. To the extent any processing is based exclusively on Your consent, You have the right to withdraw consent at any time by contacting the Customer's regional representative of Quadient's Data Protection team ([contact us](#)).

### Quadient's Range and Characteristics of Business

Quadient's products and services mainly address companies and businesses, but also non-commercial prospects may have an interest in Quadient's products and services. In many instances where personal information is collected, Quadient can rely on legitimate interest to send marketing communications.

## THIRD-PARTY SITES AND SERVICES

If You use any third-party services or visit any linked websites, We strongly suggest You to review their user privacy notice or privacy statement.

Quadient Services may contain links or interfaces to third-party services (e.g. APIs to SMS service providers) or to other websites that operate independently from Quadient. Such Services and websites will have their own privacy statements or notices. If You use any third-party services or visit any linked websites, We strongly suggest that You review their privacy statement or user privacy notice. Any information You provide when You visit a non-Affiliated Quadient Service (meaning outside of our platform) or website, is subject to their respective privacy statements or user privacy notices. Unless expressly agreed otherwise in a written agreement, We are not responsible for the third-party services, or content of any third-party services, that are not Affiliated with or owned by Quadient. Quadient are not responsible for any use of those services or websites, nor the privacy practices of those websites or services.



## YOUR RIGHTS

Depending on the place where You reside, You may have privacy rights for the Personal Information We process about You. Whether You are a customer user, supplier, consultant or other person that uses the Services, You can choose to access, correct, delete, restrict and ask for a copy of Your individual personal information.

If You reside in the EU, Switzerland, UK, Australia, [California](#)<sup>(3)</sup> or any adequate jurisdiction that provides these rights as a matter of law, You have the right to request: (i) access to Your Personal Data; (ii) correction of Your Personal Data if it is incomplete or inaccurate; (iii) deletion or restriction of Your Personal Data or (IV) ask for portability of Your Personal Information. Where We have obtained Your consent for the processing of Your Personal Data, You have the right to withdraw Your consent at any time for the future. You also have the right to object to the processing of Your Personal Data, including opting-out from the use for direct marketing purposes.

You may have additional rights pursuant to Your local law applicable to the processing. For example, if the processing of Your Personal Information is subject to the EU General Data Protection Regulation ("GDPR"), and Your Personal Information is processed based on legitimate interests, You have the right to object to the processing on grounds relating to Your specific situation.

### Right to Lodge a Complaint

You have the right to file a complaint with a competent data protection authority. However, if You have any questions, concerns or complaints regarding our compliant processing of Your Personal Information, **We ask that You please contact the Customer (Controller) on whose behalf You are using the Services or Quadient (as the Processor) first (4)**. We will investigate and attempt to resolve Your concerns over the use and disclosure of personal information in accordance with Our contractual obligations and applicable law.

If after raising Your concerns with the Customer, You still do not feel your concerns have been addressed, You can still lodge a complaint with Your competent data protection authority.

The name and contact details of the data protection authorities in the European Union can be found [here](#).

## YOUR CALIFORNIA CONSUMER PRIVACY ACT (CCPA) RIGHTS

The CCPA provides California residents with certain rights regarding their Personal Information, including the right to access, opt-out and deletion. Click [here](#) for Our CCPA Privacy Notice.

## HOW DOES QUADIENT SECURE YOUR PERSONAL INFORMATION?

Quadient takes appropriate precautions to protect Your Personal Information.

When You place orders or access Your account information, We offer the use of a secure server. The secure server software (SSL) encrypts all information You input before it is sent to Us. Furthermore, Quadient uses a variety of technical and organizational security measures, including encryption and authentication tools, to maintain the safety of Your personal data. Your personal data is processed in secured networks and is only accessible by a limited number of persons with special access rights to these systems.

When You use our emailing Service, You need to remember that most electronic communication by its nature, is not a reliably private means of communication, and that this may result in the transmission of unencrypted email in plain text over the public internet. As a user, You are responsible for encrypting any Personal Data or content



You use in conjunction with the Services. Email sent using the Services may be unsecured, may be intercepted by other users of the public internet, and may be stored and disclosed by third parties (such as a recipient's email Service provider). Although Services include support for TLS, content may be transmitted even if the recipient does not also support TLS, resulting in an unencrypted transmission.

When Quadient engages third-party sub-processors to assist in the provision of Services, such sub-processors shall be subject to the same level of data protection and security as Quadient, under the customer's terms and condition of services. Quadient also ensures appropriate contractual safeguards for cross-border transfers via agreeing on data-protection agreements and EU Standard Contractual Clauses or other adequate safeguards.

As appropriate, Quadient regularly verifies that its service providers satisfy these requirements.

## RETENTION OF YOUR PERSONAL DATA

**We retain Your Personal Data for as long as necessary to provide the Services and fulfil the purposes for which We collect it, except if required otherwise by contract or applicable law.**

Your registration information will be retained for as long as the Customer's account is active or as needed to provide the Customer with Our Services. If you wish to request that We no longer use Your registration information to provide the Customer with Our Services, contact Us using our [online form](#).

To determine the appropriate retention period for Personal Data, We consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of Your Personal Data, the purposes for which we process Your Personal Data and whether we can achieve those purposes through other means, as well as the applicable contractual and legal requirements.

## WHAT IF THERE ARE CHANGES TO OUR PRIVACY NOTICE?

**This Privacy Notice was last updated May 1, 2021. We may update this Privacy Notice from time to time.**

We may update this Privacy Notice from time to time to reflect changes to our Services, security or data governance practices and to comply with Our legal requirements. The revised Privacy Notice will be made available with an updated revision date. We encourage You to check back periodically for any changes or updates.

## HOW TO CONTACT US

If you have a question related to this User Privacy Notice, please contact Us at the following email address [privacyteam@quadiant.com](mailto:privacyteam@quadiant.com). Your message will be forwarded to the appropriate member of Quadient's Data Privacy Team, such as Regional Data Protection Officers or members of their teams.

If You are resident in California: To exercise [Your rights](#) described above, please submit a verifiable access request to us by either:

- Using the [online form](#); or
- Email Us at: [privacyteam@quadiant.com](mailto:privacyteam@quadiant.com)

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You need to provide enough information in Your request that allows Us to reasonably identify and verify that You are the person that we collected information about, and to check which Customer Contract and DPA Your Service usage and Personal Data processing may be subject to.

If You have any other concerns related to Personal Data and you want to report it anonymously, please also feel free to report your concern on the [Quadient Ethics Line](#).