

Privacy Policy

This privacy policy governs the way Sentifi AG, with registered office in Switzerland, Löwenstrasse 3, 8001 Zurich, and entered in the Commercial Register of the Canton of Zurich under No. CHE-402.406.817 (Sentifi) processes your personal data collected both offline and online, including through our website located at www.sentifi.com and its subdomains, and any mobile or localized version of our website, our downloadable mobile applications, our widgets, and our paid and non-paid products and services.

Sentifi takes data protection very seriously and is committed to the protection of your personal data. Sentifi complies with applicable data protection laws, i.e. the Swiss Federal Data Protection Act (FDPA) and the EU General Data Protection Regulation (GDPR).

This privacy policy constitutes an integral part of the [Terms of Use](#) and explains Sentifi's collection, use, disclosure, retention, and protection of your personal data collected both offline and online.

This privacy policy may be supplemented by additional privacy statements set forth on certain areas of our services, products or features.

Please note that we may amend this privacy policy from time to time, by posting the amended version on our website. We therefore recommend that you consult this privacy policy regularly.

1. Data collection, processing and use of your personal data

We collect and use your personal data as described in the following sections.

1.1 Information we collect when you visit and interact with our website

1.1.1 Both within and outside our login process

When you visit and interact with our website, our servers temporarily save every access to a log file. We automatically collect and store, without any action on your part, potentially personally-identifying data and other information from you, as further described below.

We may collect the following computer and connection information:

- Details of your visits to our website, including traffic data, location data, logs and other communication data;
- Resources that you access and use on our website;
- Information about the computer, mobile phone, tablet or other device you use to access our website, including IP addresses, geolocation information, operating system, unique device identifiers and browser type.

By default, IP address anonymization is enabled. This means that each new visitor IP address (ipv4 or ipv6 format) is stored in the database with the last components removed to protect user privacy.

This data is collected and processed for the purpose of allowing the use of our website (establishing a connection), ensuring system security and stability in the long term and allowing our Internet offering to be optimized, as well as for internal statistical purposes.

Only in the event of an attack on the website's network infrastructure or in case of a suspicion of unauthorized or abusive use of the website, the IP address will be evaluated for clarification and defense purposes and, if necessary, used for identification purposes in criminal proceedings and for civil and criminal proceedings against the users concerned.

The purposes described above, constitute our legitimate interest in data processing within the meaning of Art. 6 (1) (f) GDPR.

1.1.2 Registration for a Sentifi Intelligence account

When you register for a Sentifi Intelligence account on our website as a regular user, a Premium Member, or a Pro&Advanced Member, we may collect information such as your name, username, email address, telephone number, address, username of a third party authentication service whose application you have authorized or used to sign in to your Sentifi account (e.g. Twitter and LinkedIn usernames), and password.

We collect and process such data to facilitate initial account registration and creation. We may also use such data to provide you with customer service, in particular customer service related to your Premium Service subscription (product, technical or subscription-related questions), as applicable.

For these purposes, we rely on the performance of a contract as a legal basis to process your data, in accordance with Art. 6 (1) (b) GDPR, or on our legitimate interests, in accordance with Art. 6 (1) (f) GDPR, respectively.

1.1.3 Information we collect when you use the web contact form or live chat platform

If you contact us using the contact form <https://sentifi.com/page/contact/> on our website, we collect the following data from you (*mandatory):

- First name*
- Last name*
- Email address*
- Company*
- Position*
- Message*

If you contact us using the live chat platform, we collect the following data from you (*mandatory):

- Name*
- Email address*
- Message*

We may contract third parties for the contact form and the live chat functionality and may disclose your data to such third parties for this purpose (see also Section 2 "Disclosure of personal data to third parties" below). In addition to the above data, where a third party service is installed, it may collect browsing and usage data in the pages where the service is installed, even if users do not actively use the service. Moreover, live chat conversations may be logged.

We require the above information to respond to your requests and inquiries and for website analytics. For these purposes, we rely on our legitimate interests, in accordance with Art. 6 (1) (f) GDPR. You can object to this data processing at any time (see Section 9 "Contact").

1.1.4 Cookies and similar technologies

We may use cookies, web beacons, and similar technologies to collect information about the pages you view, the links you click, and other actions you take when interacting with and visiting our

website. We may tie the information thus collected to personal data about you that you provide to us or that we automatically collect, as described herein.

Among other things, cookies help us to make your visit to our website easier, more pleasant and more meaningful. Cookies are information files that your web browser automatically stores on your computer's hard drive when you visit our website.

Cookies neither damage the hard disk of your computer nor do they transmit your personal data to us.

The purposes described above, constitute our legitimate interest in data processing within the meaning of Art. 6 (1) (f) GDPR.

Most Internet browsers automatically accept cookies. However, you can configure your browser so that no cookies are stored on your computer or that a warning message will always appear when a new cookie arrives. For more information, please check the settings of your browser.

However, deactivating cookies may prevent you from using all the features of our portal.

You can read our full [Cookie Policy](#) for more information.

1.1.5 Tracking tools

Our website uses Google (Universal) Analytics , a web analysis service provided by Google Inc. (www.google.com). Google (Universal) Analytics uses methods that allow an analysis of the use of the website, such as "Cookies" (see above Section 1.1.4 "Cookies and similar methods"). The information about the usage of the website will generally be transmitted to a Google server in the USA and stored there. If IP anonymization is enabled on this website, your IP address will first be truncated within the member states of the European Union or other states party to the agreement on the European Economic Area, as well as in Switzerland, before being transmitted to the USA. In exceptional cases only, the complete IP address may be transmitted to a Google server in the USA and truncated there. The IP address that the user's browser transmits within the scope of Google Analytics will not be merged with any other data held by Google.

The information is used to evaluate the use of the website, to compile reports on the activities on the website and to provide other services related to the use of the website for the purposes of market research and tailor-made website design.

Users can prevent the collection of the data (including the IP address) generated by the cookie and related to the website use by the respective user for Google, as well as the processing of this data by Google, by downloading and installing the browser plug-in available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>.

As an alternative to the browser plug-in, you can click on the above link to prevent the acquisition by Google Analytics on this website in the future. An opt-out cookie is stored on the user's device. If the user deletes cookies (see above Section 1.1.4 "Cookies and similar technologies"), the link must be clicked again.

We further use DoubleClick by Google Inc for online advertising and to evaluate the use of our website. The combined use of initial provider cookies and third-party cookies (e.g. DoubleClick cookies) allows the evaluation in reports of how ad impressions are related to website visits. Third-party providers, including Google, have the ability to serve ads on websites and to tailor and optimize them based on demographics and interests (such as age, gender or interests) based on previous visits to the website. The data may be obtained from Google or third party visitor data.

We also use Tawk Live Chat software, a service provided by Tawk.to Inc to track visitor engagement with the Tawk.to widget. To opt out of Tawk tracking, please contact privacy@sentifi.com.

We also use Pardot B2B marketing automation by Salesforce, to track visitor and prospect activity . To opt out of Pardot tracking, please contact privacy@sentifi.com.

For the sake of completeness, we note that under US law, US authorities may carry out surveillance measures that allow the general storage of all data transferred from EU to the USA. This is done without distinction, restriction or exemption on the basis of the objective pursued and without objective criteria that would make it possible to restrict the US authorities access to personal data and its subsequent use for specific, strictly limited purposes that would justify access to that data.

For individuals residing in EU Member States, please note that, from the point of view of the European Union, the US does not have sufficient data protection levels due, inter alia, to the issues mentioned in this section. To the extent that we have explained in this privacy policy that recipients of data (such as Google) are located in the US, we will ensure, either by way of a contract or by requiring certifications from the companies at issue under the EU-US – Privacy Shield, that your data is adequately protected by our partners.

The purposes described above constitute our legitimate interest in data processing within the meaning of Art. 6 (1) (f) GDPR. You can object to this data processing at any time by following the opt-out mechanism as mentioned above .

1.2 Information we collect when you interact with our widgets

A widget is an element of a graphical user interface (GUI) that displays, in the case of Sentifi widgets, information about stock market prices and other stock market relevant news or provides a specific way for a user to interact with Sentifi's ecosystem.

Sentifi widgets are integrated using framing technology on internet platforms of media and financial service companies worldwide. From time to time, our widgets may include polls that we conduct (see Section 1.3 "Information we collect when you participate in our polls"). Our widgets may also provide further functionalities, such as the option to send feedback to Sentifi.

When you interact with our widgets (e.g. by clicking the widget or by providing feedback to Sentifi), we automatically collect and store, without any action on your part, potentially personally identifying data and other information from you, as further described below.

In addition to your email address and feedback, as applicable, which information you provide us, we may collect web traffic data and web analytics, which includes the following:

- User IP address;
- Optional User ID;
- Date and time of the request;
- Title of the page being viewed (Page Title);
- URL of the page being viewed (Page URL);
- URL of the page that was viewed prior to the current page (Referrer URL);
- Screen resolution being used;
- Time in local user's timezone;

- Files that were clicked and downloaded (Download);
- Links to an outside domain that were clicked (Outlink);
- Pages generation time (the time it takes for webpages to be generated by the webserver and then downloaded by the user: Page speed);
- Location of the user: country, region, city, approximate latitude and longitude (Geolocation);
- Main Language of the browser being used (Accept-Language header);
- User Agent of the browser being used.

By default, IP address anonymization is enabled. This means that each new visitor IP address (ipv4 or ipv6 format) is stored in the database with the last components removed to protect user's privacy.

In certain limited cases, the access to our widget may be subject to registration . In such case, you will be informed about the personal data that is required, such as your name, your occupation, etc.

For the purposes of tracking your activities in connection with our widgets, we use the web analytics service Matomo, that is provided by the company InnoCraft Ltd., 150 Willis St, 6011 Wellington, New Zealand. The information mentioned above is stored at Europe west 1 B datacenter of Google (Belgium). InnoCraft Ltd. will not associate your IP address with any other data held by InnoCraft Ltd.

We collect the above information for the following purposes:

- To analyze the performance of our widgets that are hosted on third party websites, to compile reports about such website activities and to provide us with further services relating to website and internet use for the purposes of market research and needs-based design for these websites;
- To improve widget performance metrics by making technological and content enhancements.

We may process non-identifying data without any justification. In the case the data collected when you interact with a widget is identifying and qualifies as personal data, we rely on our legitimate interests to process your personal data for the above purposes, in accordance with Art. 6 (1) (f) GDPR. You can object to this data processing at any time (see Section 9 "Contact").

In the event you voluntarily provide us with personal data (such as feedback on our widgets), we will also use consent in accordance with Art. 6 (1) (a) GDPR as the basis to process the personal data. You may withdraw your consent at any time (see Section 9 "Contact").

1.3 Information we collect when you participate in our polls

We may conduct polls from time to time, which polls are generally integrated in our widgets that are hosted on third party websites or platforms (see Section 1.2 "Information we collect when you interact with our widgets"). The polls may or may not require you to log-in to your account.

- If participation in our polls is subject to registration, you will be informed that registration is required. In such case, we may collect information such as your name, occupation, and location , in addition to your responses to the poll.
- If participation in our polls is not subject to registration, we will collect information regarding your browser session, in addition to your responses to the poll. The user IP address will be fully anonymized.

The data collected and processed in the context of the polls are so for the purpose of gauging community sentiments on the performance of a stock and sentiments on other financial market relevant topics, including the performance of a stock against an index, to predict macro economic events like interest rate hikes, etc. It is also used to prevent users from participating twice in the same poll.

In the case that participation in a poll is subject to a registration and in the case that personal data are consequently collected and processed, we will process the personal data based on your consent in the sense of Art. 6 (1) (a) GDPR. You may withdraw your consent at any time (see Section 9 “Contact”).

1.4 Information we collect when you provide us feedback

When you provide us feedback via our feedback form, we collect your name and email address, in addition to your responses to our feedback questionnaire.

We collect this information to thank you for providing your feedback and to follow-up with you regarding your feedback, if necessary.

We will use your consent in accordance with Art. 6 (1) (a) GDPR as the basis to process the personal data. You may withdraw your consent at any time (see Section 9 “Contact”).

1.5 Other information we collect that you directly give us

We may collect the following information that you otherwise directly give us:

If you contact us for any reason: information contained in correspondence between you and us (including your name and the content of our correspondence). We require this information to engage in correspondence with you.

When you register to use our mobile application: information such as a verifiable email address and a password. We require this information for account management.

For these purposes, we rely on the performance of a contract as a legal basis to process your data, in accordance with Art. 6 (1) (b) GDPR, or on our legitimate interests, in accordance with Art. 6 (1) (f) GDPR, respectively.

In the event you voluntarily provide us with personal data (such as when you contact us for any reason), we will also use your consent in accordance with Art. 6 (1) (a) GDPR as the basis to process the personal data. You may withdraw your consent at any time (see Section 9 “Contact”).

1.6 Information we collect from third parties

We may purchase or otherwise acquire information from third parties, such as from social media platforms (e.g. purchased public tweets from Twitter) and publishing outlets (e.g. news and blog posts from LexisNexis). This information may include data such as geographical location, timestamp of when the content was created, as well as the social media username, as applicable .

We use this information to analyze and derive financial insights. The analysis is done automatically. For this purpose, we rely on our legitimate interests, in accordance with Art. 6 (1) (f) GDPR. You can object to this data processing at any time (see Section 9 “Contact”).

2. Disclosure of personal data to third parties

We will only transfer your personal data to third parties if you have given your express consent, if there is a legal obligation to do so, or if it is necessary for the enforcement of our rights, in particular to assert claims arising out of the contractual relationship.

In addition, we will transfer your data to third parties as far as it is necessary for the use of the website, the provision of our products, services or features, the processing of your contact requests, to provide any services requested by you, the sending of marketing communications , the analysis of your user behaviour, the analysis of web traffic information, and to assist us with the prevention, detection, mitigation, and investigation of potentially illegal acts, fraud and/or security breaches, and other business operations.. The use of the data forwarded to third parties is strictly limited to the stated purposes.

Various third-party service providers are explicitly mentioned in this privacy policy (e. g. in Section 1.1.5 “Tracking tools”). An additional service provider to whom personal data is transferred or who has or can have access to your personal data is the company that implements the website, namely Dreamhost, whose data center is located in Hillsboro, Oregon.

The providers of the third party websites on which our widgets operate do not have access to your personal data. The providers may have access to non-identifying data, such as data related to the widget tracking where the IP address is fully anonymized or to aggregated poll results which do not contain any identifying information . Providers of third party websites will, however, in no case have access to identifying information related to your participation in our polls .

The use by the mentioned third parties of the disclosed data is strictly limited to these mentioned purposes. We will never disclose your personal data to a third party for marketing purposes without your consent.

3. Transmission of personal data abroad

We may transmit or forward your personal data to third-party companies located abroad if this is necessary in connection with the purposes mentioned above.

These third parties are required to protect your privacy to the same extent as we do. If the standard of data protection in a country is deemed inadequate in respect of Swiss standards or in respect of the GDPR, we will implement contractual measures to ensure that your personal data is protected at all times in accordance with Swiss legislation and the GDPR.

The website is hosted on a dedicated server of Dreamhost in Hillsboro, Oregon and we use Google Cloud, Zone Europe (Belgium) as our cloud provider. However, some of the third party service providers listed in this privacy policy are based in the USA, such as Google Inc, Tawk.to Inc., and Pardot LLC. Further information on data transfers to the USA can be found under Section 1.1.5 “Tracking tools” above.

4. Links to our social media presence

On our website, we have incorporated links to our social media profiles on the following social networks:

- Twitter Inc., 1355 Market Street Suite 900 San Francisco, CA 94103, USA;
- LinkedIn Corp., 1000 W. Maude Avenue, Sunnyvale, CA 94085, USA;
- Google+ of Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA;
- Facebook Inc., 1601 Willow Road, Menlo Park, CA 94025, USA.

If you click on the relevant social network icons, you will automatically be redirected to our profile on the relevant network. In order to use the functions of the relevant network there, you must partially log in to your user account for the relevant network.

When you open a link to one of our social media profiles, a direct connection is established between your browser and the server of the relevant social network. This gives the network the information

that you have visited our website with your IP address and accessed the link. If you access a link to a network while logged in to your account on the relevant network, the contents of our page may be linked to your profile in the network, which means that the network can link your visit to our website directly to your user account. If you want to prevent this, you should log out before clicking on the relevant links. An assignment takes place in any case, if you log into the relevant network after clicking on the link.

For more information about the purpose and scope of the data collection and further data processing by the above social media networks and your respective rights and data protection options, please see their respective privacy policies.

5. Third party websites

This privacy policy applies only to our website, among our other services and applications. Our website may contain links to or information on third party websites, which are provided for your convenience only. In addition, our widgets are hosted on, or embedded in, third party websites.

Any such third party websites are operated and controlled by third parties and over which we have no control. These third parties websites may send their own cookies and similar tracking technologies to your device, and may independently collect your personal data and may or may not have their own published privacy policies.

Sentifi is not responsible for these websites and it is their respective privacy policies – not this privacy policy –, if any, that will govern the collection and use of your personal data on them. We suggest contacting those websites directly for information on their privacy policies.

6. Right to information, deletion and correction

You have the right to know what personal data we maintain about you. We will provide you with a copy of such data on your request, free of charge.

If your data is incorrect or incomplete, you can ask us to correct it.

You have the right to ask us to delete your personal data, which we will honor, unless there is a legal retention duty that applies or unless we have another legal reason to decline your deletion request. In the case of a statutory retention period, we must retain the data until the expiry of the respective period. We will block any such data in our system and only use them to meet our legal obligations.

You also have the right to request the release of the data you have given us (right to data portability). On request, we will forward the data to a third party of your choice, in a commonly used file format.

Where the processing is based on our legitimate interests, you have the right to object at any time to the processing. Where processing is based on consent, you have the right to withdraw consent to the processing at any time. If you withdraw your consent, this will not affect the lawfulness of the processing based on your consent before its withdrawal.

In respect of your aforementioned rights, you can contact us at privacy@sentifi.com. You will find other options for contacting us under Section 9 “Contact” below. We may, at our discretion, require proof of identity to process your request.

This does not affect your right to complain to a data protection authority at any time.

7. Data security

We take appropriate technical and organizational security measures to protect your personal data against the risk of loss, misuse, unauthorized access, disclosure and alteration. For instance, all information you provide to us is stored on our secure servers behind firewalls. We continually adapt our security measures to reflect technological developments.

We also take internal protection measures. Our employees and the service providers that we mandate are obliged to maintain secrecy and comply with applicable data protection laws. In addition, employees and service providers are only granted access to personal data on a “need to know” basis.

8. Children’s Privacy

Our products, services and features are aimed at an adult audience, and are not intended for children under the age of 13. We do not knowingly collect or process personal data from individuals in this age group. If you have reason to believe that a child under the age of 13 has provided personal data to Sentifi, please contact us, and we will endeavour to delete that information from our databases.

9. Contact

If you have any questions or complaints about this privacy policy or the protection of your data, if you have any requests regarding the access, correction or deletion of your data, you can send an email to privacy@sentifi.com or fill out the online [contact form](#).

Or you can write to the address below:

Sentifi Group

Löwenstrasse 3

CH-8001 Zürich

Switzerland

Date: December 2020

1. **OWNERSHIP OF INTELLECTUAL PROPERTY**

All Intellectual Property contained within or pertaining to the Service shall belong to Sentifi absolutely, or in the case of third party intellectual property the respective third party licensors.

2. **WARRANTIES**

- 2.1. Each party warrants and represents to the other that it shall comply with all applicable laws and regulations in relation to the performance by it of its obligations under this Agreement.
- 2.2. Each Party warrants to the other that it has the authority to enter into this Agreement and that the performance of the obligations by both parties hereunder will not violate any regulatory requirements.

3. **DISCLAIMER OF WARRANTIES**

3.1. Exclusion of warranties and representations

Except as expressly set out in the Agreement Sentifi makes disclaims and excludes all other warranties, representations, conditions and other terms express or implied, (and where implied whether implied by statute, course of dealing, or otherwise), including without limitation any implied terms as to quality, conformance with description, or for purpose. Sentifi does not guarantee the adequacy, accuracy, timeliness or completeness of the Service or any component thereof. The Service is supplied "as is".

This disclaimer does not affect the legally indispensable entitlement of the Licensee to supplementary performance and other claims with regard to liability for defects.

3.2. No recommendation

A reference to or the disclosure of the attention to or the selection of news, blogs, images or any social media based texts to a particular company, commodity, currency, investment or security or financial product or any other financial asset provided in connection with the Service is not a recommendation to buy, sell or hold such financial asset.

4. **LIMITATION OF LIABILITY**

Sentifi's liability for the Service is excluded with the exception of damages arising out of intentional or grossly negligent acts by Sentifi.