

PRIVACY- EN COOKIESTATEMENT CIVINC

1 WHO IS RESPONSIBLE FOR THE PROCESSING OF (PERSONAL) DATA?

Civinc is an online discussion platform of Civinc B.V. (hereinafter “Civinc”), located at Tweede van der Helststraat 89h, 1073 AN Amsterdam. Civinc is active in the field of digital innovation.

We attach great importance to your privacy and the protection of personal data. That is why the use of Civinc is entirely voluntary and why we process your data anonymously to the extent possible. Below we will elaborate on this.

On the Civinc platform you can have conversations with people who have a different opinion about certain topics. By responding to statements and questions we match participants based on a different perspective in one-on-one chats. We refer to the application with which we make it possible to conduct these conversations hereinafter “the platform”. For more information on the working of the platform, see www.civinc.co/product.

We organize a Civinc session together with a participating organization (hereafter “customer”), with which we determine the theme and formulate the statements and questions. The aggregated responses to statements as well as the answers to closed and open questions will be shared with the customer in the form of a report. In certain sessions that also applies to an automated analysis of the content of the chat conversations by way of Artificial Intelligence (AI), based on which we can distill insight into the sentiment regarding the discussed themes amongst participants. This can concern, for example, an assessment of the nature and dynamics of the anonymous conversations, as well as identifying (a summary of) relevant generic and non-traceable arguments and ideas expressed on particular themes.

We never ask you for your name and cannot make a connection between the data that we gather and the data that can directly identify you, such as your name or contact details. We will never share any data with customers that can directly identify you, such as your name, contact details or the transcripts of chat conversations. We do not read the chat conversations. In chapter 7 we elaborate on this.

All personal data is collected, processed and secured in accordance with the General Data Protection Regulation (“GDPR”). Civinc is responsible for the processing operations listed below under the GDPR.

2 HOW CAN YOU GET IN TOUCH?

If you have any questions about this privacy statement, you can send an e-mail to hello@civinc.co, or by post to Civinc, attn. privacy contact person, Tweede van der Helststraat 89h, 1073 AN Amsterdam.

3 FROM WHOM DO WE PROCESS (PERSONAL) DATA?

We process the data of persons who use the Civinc platform and persons who contact us via email or social media. We only store data that cannot be directly traced back to you and are therefore anonymous, with the exception for when you choose to explicitly share personal details when using the platform or in your communications with us, such as in the chats or in a (feedback) form (see article 5).

4 WHAT DATA DO WE PROCESS?

Below is an overview of the categories of data that we process:

Categories of (personal) data	Examples
Data that says something about the use of the platform	<ul style="list-style-type: none"> ● That you use the platform ● The type of equipment you use ● The operating system you are using ● The internet browser you use ● The start time of the conversation and the time of end of the conversation ● The time of starting individual conversations with partners and the time of ending these individual conversations ● Information collected by means of cookies (see also article 5 and the Appendix) ● User ID: This is a number assigned to you as a user of the platform ● Your answers to statements and questions ● The number of messages sent between participants ● The content of the conversation (for a maximum of 48 hours after session ends, solely to run necessary data analysis) ● The duration of the chats ● Number of likes distributed and received ● Number of conversation partners ● Who proposes to switch position/partner ● Your answers to the questions before and/or after the conversations ● Whether you have reported your conversation partner
Communication and contact	<ul style="list-style-type: none"> ● (E-mail)-correspondence

Public messages about Civinc you leave on the internet	<ul style="list-style-type: none"> • Messages on social media
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5 HOW DO WE GET YOUR (PERSONAL) DATA?

We receive part of the data because you provide it to us when you use the platform. These data cannot be directly retraced to you, unless you actively (and against our advice) choose to share personal details in for example the chats or open text fields (see also article 7).

We receive another part of your data if you communicate with us outside of the use of the platform. If you follow Civinc on social media or interact with or about Civinc on social media, we may gain access to some of your public profile information. If you share information about Civinc via social media, your data may become visible via those social media. Civinc itself also follows social media channels and in this way can access data about you on social media.

Some data is collected using cookies and similar techniques. Cookies are small text files that are stored on your computer, smartphone or other device when you visit our website. Cookies help us to operate and analyze the website. Cookies can remember data from your previous visit to our website so that the site works better and shows more relevant information for you.

A complete overview of the cookies we use can be found in the Appendix. We only use the analytical cookies of Google Analytics. We have set these cookies in a privacy-friendly manner, in accordance with the manual of the Dutch Data Protection Authority (AVG).

6 FOR WHAT PURPOSES DO WE COLLECT YOUR DATA AND ON WHAT BASIS?

Goal & purpose	Examples
To enable (desired) use of the platform Basis: Execute agreement	To match you to a conversation partner To start the chat session.
To obtain insight into the sentiment and ideas of participants Basis: Legitimate interest We and our customer have a legitimate interest in being able to interpret the use of the platform and the opinions that are expressed and cannot be retraced to an individual	To give insights into the aggregated responses to statements of users To give insight into the responses of users to survey questions To give automated insights into the aggregated sentiment and dynamics of the conversations by use of natural language processing

<p>To improve our services</p> <p>Basis: Legitimate interest</p> <p>We have a legitimate interest to improve our platform</p>	<p>To obtain insight into how the platform is being used (e.g. which elements are being used often/rarely)</p> <p>To obtain insight into how the use of the platform is being experienced</p>
<p>To ensure the security and stability of IT systems and secure the platform</p> <p>Basis: Legitimate interest</p> <p>We and the users of the platform have a legitimate interest in securing our IT systems and the platform.</p>	<p>Monitoring IT systems.</p> <p>To conduct internal audits and investigations.</p> <p>To adequately secure the platform and user data.</p>
<p>To combat unlawful and/or punishable acts via the platform</p> <p>Basis: Complying with legal obligations resting on us and/or Legitimate interest</p> <p>We and third parties have a legitimate interest in being able to combat unlawful or criminal acts.</p>	<p>To investigate unlawful and/or criminal acts</p> <p>To provide data to third parties if we are obliged to do so.</p>

7 ANONYMIZATION AND FEEDBACK

What do we know of you?

We process anonymous data in order to be able to analyze the prevailing sentiment within the organization of the customer – how participant feel about certain topics. As mentioned before we primarily process 1) the responses of users to statements and the responses to closed and open questions, and 2) the content of the chat conversations. This data is only connected to a random thread of numbers and letters (such as SDFJ8234SEDh2489). We never connect this data to a name, emailaddress, telephone number or other data point that is directly linked to you. In effect we are unable to make such a connection in the first place.

It is possible to share information in the open text fields and/or the conversations that could identify you. We discourage to share such information. We explicitly recommend you against doing so in the introductory presentation that is shown before the session as well as on the platform itself. But even if you do decide to share this: we do not read the chat conversations and we do not share them with our customer. We do share the responses to statements from users and the responses to closed and open

questions. The extent to which this data says something about the user is very limited, and this data is grouped per statement or question.

How do we analyze these data?

The content of the chat conversations can be shared with Microsoft Azure, to enable analysis with Artificial Intelligence (AI) technology of OpenAI in the field of natural language processing. With use of the Large Language Models of OpenAI we are able to analyze the sentiment of the chats, without having to read them. In this way, we can for example identify which general arguments or ideas are expressed in the conversations on particular topics. The relevant parts of conversations are uncoupled from the broader context in which the session takes place. Microsoft Azure as such does not receive the complete context of these conversations. The conversation segments that are shared and analyzed are isolated from other anonymous data, such as responses to questions.

The AI analysis is an optional part of a session, meaning that the customer can determine whether or not it is being used. If we make use of this technology then we communicate this at the start of your session. The data will only be processed for the purposes as defined by Civinc in this document, and is not available to OpenAI itself (everything is processed by Microsoft Azure), is not used to improve OpenAI models, and is not used to improve any Microsoft or 3rd party products or services. For more information on Azure's data processing policy, you can visit this [website](#), and you can find more information about our approach to AI [here](#).

The responses to statements of users and the reactions to closed and open statements we analyze ourselves. We do this i.a. to develop a better sense of the prevailing sentiment around certain themes and to be able to verify this.

Which data do we share with the customer?

The data we collect will only be used at an aggregated level to compile a generic report that allows the customer to obtain a better understanding of the sentiment within the organization regarding a certain theme. We also visualize this in the form of a dashboard. In the report we share with the customer the responses to statements and closed and open questions, as well as the outcome of the AI analysis if relevant. This data only to a very limited extent tells something about the user and is grouped per statement or question. The customer *will* never see or obtain the transcript of the chat conversations. The customer also does not know which people within their organization have made use of the platform.

Which data do we store?

The content of the chat session is only read by the relevant conversation partners, and we delete these chats permanently within 48 hours after the end of the conversation. Microsoft Azure maintains their own retention periods of a maximum of 30 days for abuse monitoring purposes, after which everything is permanently deleted. The processing of data takes place on Microsoft (Azure) servers located in

Sweden, which ensures that the data will never leave the European Economic Area (EEA) (see also article 9.).

We store the responses to statements and the responses to closed and open questions for a longer period of time. This data helps us to verify our analyses and improve our service.

More information on the retention periods is found below.

8 TO WHOM DO WE PROVIDE THESE DATA?

We will share your answer(s) to the statement(s) and any other information you have provided at onboarding (such as group) with your conversation partner before the chat session starts.

In addition, we may use the services of third parties to process your data in accordance with this privacy and cookie statement. We have concluded a processing agreement with third parties that act as processor for us, which includes, among other things, that they will only process data on our behalf.

Data about the use of our platform can be used for research purposes. This data will either be completely anonymized, or otherwise used based on your expressed consent.

9 DO WE TRANSFER (PERSONAL) DATA TO OTHER COUNTRIES?

We may use third party services to process your data in accordance with this privacy and cookie statement, such as Microsoft Azure. The processing of data by these parties takes place within the European Economic Area (EEA). Your (personal) data thus shall not be saved or processed outside of the EEA by us or relevant third party services used by us, unless required by law or with your explicit consent. Any processing outside the EEA is subject to the SCCs/EU-US Privacy Framework.

Further information and/or a copy of the agreement concluded in this context can be obtained by sending an email to hello@civinc.co.

10 HOW LONG DO WE STORE YOUR DATA?

Your data will not be kept longer than we need it for the purposes for which it is collected or processed. Civinc uses the following retention periods, depending on the purpose and category of data:

- We do store the content of the chat sessions temporarily with an identifier. The chat in which you are active is temporarily encrypted on the server. This way we can restore your chat if, for example, you (accidentally) refresh the page. All chat content will be deleted within 48 hours after each session. Chat meta-data will be stored as outlined in paragraph 2 and 6.

- We store the general session statistics, responses to statements and (closed and open) questions for a period of three years, in order to be able to verify and substantiate analyses from relevant reporting to customers, and to conduct these again if necessary.

- We do not have access to or store your IP address. We use the Google Firebase service, which facilitates the connection between a user and the platform while shielding the IP address of the user from us (for more information regarding retention see [this link](#)).

11 WHAT HAPPENS IN THE EVENT OF THE TRANSFER OF THE COMPANY?

In the future, one or more parts or assets of Civinc may be transferred to a third party or Civinc may merge with a third party. In that case, any personal data you may have shared with us may be transferred to this third party, such as but not limited to email contact.

12 WHAT ARE YOUR RIGHTS?

You have a number of rights with regard to the processing of your data (see below). In the vast majority of instances we are unable to connect data that we process to individuals, notably when the platform is used in ordinary fashion. In case you have shared with us data that can identify you as an individual (see article 5), and you would like to exercise one of the rights listed below, please contact us via the contact details mentioned under article 2. This also pertains to when you would like more information about this. We will respond to your request as soon as possible.

- Right to withdraw your consent;
- Right of access;
- Right to rectification;
- Right to erasure;
- Right to restriction of processing;
- Right to data portability;
- Right to object to processing;
- Right to object to direct marketing;
- Right to object and human intervention in automatic decisions;
- Right to make a complaint. This can be done at Civinc via hello@civinc.co or at the Dutch Data Protection Authority.

13 AMENDMENTS

We may change our privacy and cookie statement from time to time. This is possible, for example, if there are new data processing operations or in connection with developments in technology or regulations. If necessary, we will inform you of this when you use the platform. If necessary, we will ask for your permission for a changed or new processing.

ATTACHMENT: COOKIES OVERVIEW

The table below shows an overview of the cookies we use, including the purposes for which they are used and the third parties involved:

1. Statistics

Statistical cookies help website owners understand how visitors use their website by collecting and reporting data. Where possible, the data is anonymized or pseudonymised.

Name	Provider	Purpose	Expiration date	Type
Google analytics	Google	Analytics (improving website, analysis)	2 years	Third party