

PRIVACY POLICY AND PERSONAL DATA

For the sake of clarity, Okay Auth SAS is the name of the company that markets the software suite known as Okay Suite. Hereinafter, the terms 'Okay Suite' and 'Okay Auth' shall be used interchangeably.

1. Terms of Use

This Privacy Policy is an integral part of the Terms of Use of Okay Suite, and the provisions of those Terms, including (but not limited to) those relating to limitation of damages, applicable law, and dispute resolution, apply to this Privacy Policy.

Unless otherwise specified, all defined terms used herein shall have the meanings assigned to them in the Terms of Use.

For the purposes of this document, "Information" refers to facts and other information and data about you, including (but not limited to) your personal information that you choose to disclose when using the service, such as your name, phone number, and email address.

"Personal Data/Personal Information" means personal data as defined in Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation - GDPR), processed by Okay Auth (or a subcontractor) on behalf of the client in accordance with or in relation to the agreement.

2. Your Consent

By accessing, viewing, and/or using the site and the service, you consent to:

- (i) The collection, transfer, handling, storage, disclosure, and other uses of your information as described in the Terms of Use and this Privacy Policy; and
- (ii) The transfer of such information outside the country where you reside and outside the European Economic Area (EEA) to other countries for storage, processing, and use by us, and the international transmission of data.

3. Information Collection

Tenant Creation: When a user creates or reconfigures a tenant, the business owner provides their email address, company name, contact details, and any other personal information or preferences you choose to provide.

Okay Suite Site Data: Our web servers automatically record information created by the user's use of the website. These data are collected by web server logs and cookies (see explanation in

section 4 below) and may include information such as the date and time of visits to the Okay Auth website, pages viewed, time spent on our site, and websites visited just before and just after our site.

Service Usage Data and Logs: We collect minimal usage statistics to maintain the quality of our service. To protect your business and provide the business owner with valuable audit and monitoring data, we record the following:

- **Administrator Actions:** We log all administrator actions, including inviting new team members, deleting team members, modifying team permissions, creating cloud-based access gateways, and any other actions that can be performed on our management portal.
- **Team Member Actions:** We log the timestamp of login, success/failure of login, location of the connected device, hostname of connected team member devices, the server to which the business user was connected, and connection timestamps. For private access gateways used to access secure business environments, we also log the original IP address from which the connection was established to enhance security and professional audit capabilities. For public locations (depending on the business owner's permissions), we do not log any IP addresses. For users of certain features, we may also collect and monitor data related to web browsing activity, including encrypted pages.

Information Posted on the Site: As a user, you may post comments on the site. Any personal information you choose to post on the site as part of these comments, as well as the sharing of this personal information, is at your own risk. Any personal information you post on the site may be recorded, copied, forwarded, or otherwise used by other users, and we cannot control the use of this personal information by these recipients. We cannot guarantee that the personal information you have posted on the site will not be used by unauthorized persons. You understand and acknowledge that, even after the deletion of personal information you have posted on the site, such personal information may be collected, used, and redistributed if stored by other users.

Contacting Okay Auth: If you send us an email or contact us in another way, we may retain your message, email address, and contact information to respond to your request. Providing such information is entirely optional.

4. Cookies

A cookie is a small text file, which often includes a unique anonymous identifier. When you visit a website, that site's computer requests permission from your computer to store this file in a part of your hard drive specifically designated for cookies. Each website can send its own cookie to your browser if your browser's preferences allow it, but to protect your privacy, your browser only permits a website to access the cookies it has already sent to you, not the cookies sent by other sites.

When you use our site, the site uses its own cookies to distinguish you from other users. Cookies, in conjunction with our web server log files, allow us to calculate the total number of people visiting our site and which parts of the site are most popular. This helps us gather feedback to continually improve our site and better serve our customers. Cookies do not allow

us to collect personal information about you, and we generally do not store any personal information you have provided to us in your cookies.

5. Information Sharing and Disclosure

We may use the information we collect for the purpose of:

- Facilitating the provision of the service to you, maintaining and improving the Okay Auth site and services, sending you notices, and protecting the rights of Okay Auth, its users, and third parties (for example, to prevent and detect (i) fraud against our service and (ii) abuse of our network (such as spam and other illicit activities)).
 - We do not disclose personally identifiable information to third parties, except when we:
 - Believe it is necessary to comply with a law, regulation, legal request, or legal process; to protect the rights, property, or personal safety of Okay Auth, its users, and any other person; to address fraud, security, or technical issues; or to protect the rights of Okay Auth (including investigating potential violations of these rights) or its property;
 - Are involved in a bankruptcy, merger, acquisition, reorganization, or sale of assets, where your information may be sold or transferred as part of that transaction. In such cases, your information may be transferred and become subject to a different privacy policy;
 - Believe it is necessary for the provision of the service, such as responding to your customer service requests or disclosure to third parties who host the service in a colocation facility for servers; or
 - Have obtained your consent, as provided, for example, in section 2 above.
 - We may share with third parties certain portions of aggregated information, which does not individually identify you.
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6. Protection of Personal Information

We take administrative and technical measures to protect your personal information from loss, theft, misuse, unauthorized access, alteration, disclosure, or destruction. We process personal information on servers located in various countries around the world. Any collection or misuse of information provided through our site or service constitutes a violation of this Privacy Policy. We will cooperate with appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between Okay Auth and an individual.

7. External Sites

We are not responsible for the practices employed by external sites linked to or from our site, nor for the information or content they contain. When a user uses a link to go from our site to external sites or when a user accesses an external site while using our service, our Privacy Policy is no longer in effect. A user's browsing and interaction on any external site, including

but not limited to websites that have a link on our site, are subject to that external site's own rules and policies.

8. Changes to This Policy

We may revise this Privacy Policy from time to time. Your continued use of the site and/or service will be deemed to constitute your acceptance of all such changes.

9. Access to Information

If, under applicable law, you have the right to access information about you, this right of access may be exercised in accordance with the applicable legislation. To make an access request, please send an email to: info@okaysuite.com

10. Contact Information

If you have any questions or comments regarding this Privacy Policy, please contact us at: info@okaysuite.com.

You can request our Data Processing Agreement or Addendum by emailing us at info@okaysuite.com, and we will provide you with a copy.
