

# **EDRAW PRIVACY POLICY**

## **1. Data controller and representative**

Through its website (the “Website”) and its desktop applications and mobile applications (the “Application”), Edraw implements the processing of personal data listed below. Michael Pohl ( pohl.m@Edraw.de ) is the designated representative of Edraw in EU in accordance with the Regulation No. 2016/679 on the protection of natural persons with regard to the processing of personal data (the “GDPR”).

Please read carefully the following privacy policy which provides you, as the user of the Website and/or Application (the “User” or “You”), with the relevant information regarding the various processing of personal data implemented by Edraw, in accordance with GDPR.

## **2. Data processing implemented by Edraw**

### **2.1 Processing of personal data related to your visit to our website and the purchase and use of our products**

When the User visits to our Website, or purchases a Edraw product through the Website or the Application, or use our products, Edraw implements a processing of personal data as follows:

#### **2.1.1 Personal data collected**

Regarding this processing, Edraw collects the following personal data through the collection forms in the ordering process or other processes.

- Name;
- Gender;
- Age;
- Email address;
- Address;
- Country;
- Postal code;
- Phone number;
- Company name and industry you work for;
- Order information, such as the products you purchase, date and amount of the order;
- Payment information such as Credit card information (type, number, expiration date, CVV security code)/debit card information or other payment/billing information.
- Information we get from your visit to our websites. We collect information about how you visit our websites (including the webpage that led you to a Edraw website, the search terms entered into a search engine which led you to a Edraw website);
- Information we get from your use of our products. We collect information about the products that you use and how you use them and your local device information, including but not limited to your device information, operating system, user name, your Edraw ID, location, IP address,

operating log information, crash reports and the information and format of the files you are working with(with your additional consent);

- your product serial number;
- Content of customer support communications.

#### 2.1.2 Purpose and legal basis of the processing

Edraw uses the information we collect about you for the following purposes:

In order for Edraw to provide the User with the ordered product(s);

For the performance of a contract to which the User is party, in accordance with Article 6.1.b of the GDPR and the collected data are necessary in order for Edraw to identify and bill the User and to charge its bank card number;

For Verifying your identity and Providing customer service or support;

Analyze your use of our websites and products to better understand how they are being used so we can improve our services and the user experience and engage and retain users.

#### 2.1.3 Recipients of the personal data

We may also transmit your personal information with companies that help us to run our business by processing personal information on behalf of us for the purposes identified above. Such companies include providers of payment processing services, server services providers, data analysis services providers, fraud monitoring and prevention providers, email delivery service providers, social media, and other marketing platforms and service providers.

In addition, Edraw may disclose the User's personal data:

- if Edraw is under a duty to disclose or share such personal data in order to comply with any legal obligation, or in order to protect the rights, property or safety of its business, its customers or others; and
- to successors in title or replacement operators of all or part of Edraw's respective businesses.

#### 2.1.4 Transfer of personal data

The collected personal data may be transferred by Edraw to recipients which are located outside the European Union and such destinations may not have laws which protect the User's personal data to the same extent as in the European Union.

Edraw ensures that the User's personal data processed by Edraw or by its suppliers and partners operating outside the European Union are treated securely and are protected against unauthorized access, loss or destruction, unlawful processing and any processing which is inconsistent with the purposes set out in this privacy policy.

Please find below the relevant information on transfer:

- Edraw may transfer the collected information to third party payment processors to complete the charge process;
- Edraw may transfer the collected information to providers of third party email delivery service to send promotion emails, or to other marketing platforms and service providers to complete

relevant service;

- Edraw may use third party track tools (such as Adwords, Bing, bugsplat, Criteo, Disqus, Facebook, Firebase, Flurry, Google Analytics, Hotjar, LinkedIn, Pardot, Quora, JPUSH) to track the information on how users use the products and websites, such information will be stored in third party servers. Such third party track tools may send the data analysis report to Edraw for Edraw's above mentioned purpose;
- Edraw may store the collected information on the servers leased from providers of third party server service.

#### 2.1.5 Duration of the storage

Edraw will store the collected personal data for the duration of the contract and 60 days after the termination of the contract. Beyond this duration, in order for Edraw to be able to demonstrate the existence of a right or a contract or a legal obligation, the relevant personal data will be stored through intermediary archives for a duration that will not exceed what is strictly necessary regarding the purpose of the storage and in accordance with the applicable legislation.

Regarding banking information, said information will be deleted once the payment has been processed and has become effective. Withdrawal time period could additionally apply. The number and the expiration date of the credit card number (not the CVV security code) could be stored through intermediary archives for evidence purposes in case of a claim regarding the payment, for the duration provided by Article L. 133-24 of the French Monetary and Financial Code (13 months or 15 months in case of deferred charge card).

## **2.2 Processing of personal data related to comments areas**

When the User decides to comment a Edraw product through the Website or the Application, Edraw implements a processing of personal data as follows:

### 2.2.1 Personal data collected

Regarding this processing, Edraw collects the following personal data:

- Email address;
- Name or nickname;
- profile photo;
- Other potential personal information provided by the User through its comment (age, location, etc.);
- The content of your comment.

### 2.2.2 Purpose and legal basis of the processing

This processing is implemented by Edraw in order to improve its products and provide the consumers and potential consumers with a better and transparent information about the Edraw products. Said comments and the related personal data are provided by the User on a voluntary basis so that the processing of the collected personal data relies on the User's consent.

Edraw may use the comments (with your relevant information) you post for marketing purpose in order for others to better understand and use our products.

### 2.2.3 Recipients of the personal data

Edraw may transmit the collected personal data to third party email delivery service providers, social medias, other marketing platforms and service providers .

### 2.2.4 Transfer of personal data

The collected personal data are transferred by Edraw to recipients which are located outside the European Union and such destinations may not have laws which protect the User's personal data to the same extent as in the European Union.

Edraw ensures that the User's personal data processed by Edraw or by its suppliers and partners operating outside the European Union are treated securely and are protected against unauthorized access, loss or destruction, unlawful processing and any processing which is inconsistent with the purposes set out in this privacy policy.

Please find below the relevant information on transfer:

- Edraw may transfer the collected information to providers of third party email delivery service to send promotion emails, to other marketing platforms and service providers to complete relevant service.
- Edraw may store the collected information on the servers leased from providers of third party server service.

### 2.2.5 Duration of the storage

Edraw will store the collected personal data for not more than 5 years after the collection.

## **2.3 Processing of personal data related to newsletters and advertising emails**

The User may want to subscribe to Edraw's newsletter in order to be provided with information and news regarding Edraw products. In this case, Edraw implements a processing of personal data as follows:

### 2.3.1 Personal data collected

Regarding this processing, Edraw only collects your provided information such as the User's email address, name or nickname, country, preferred product, and your operation to the promotion emails.

### 2.3.2 Purpose and legal basis of the processing

Edraw implements the processing of personal data in order to provide consumers and potential consumers with information and news regarding Edraw products.

The subscription to Edraw's newsletter and the related provision of personal data is made on a voluntary basis so that the processing of the collected personal data relies on the User's consent.

### 2.3.3 Recipients of the personal data

Edraw may transmit the collected personal data to providers of email delivery service and other service providers such as data analysis providers and server providers.

### 2.3.4 Transfer of personal data

The collected personal data are transferred by Edraw to recipients which are located outside the European Union and such destinations may not have laws which protect the User's personal data to the same extent as in the European Union.

Edraw ensures that the User's personal data processed by Edraw or by its suppliers and partners operating outside the European Union are treated securely and are protected against unauthorized access, loss or destruction, unlawful processing and any processing which is inconsistent with the purposes set out in this privacy policy.

Please find below the relevant information on transfer:

- Edraw may transfer the collected information to providers of email delivery service providers to send newsletters or promotion emails.
- Edraw may store the collected information on the servers leased from providers of server service.
- Edraw may use third party track tools (such as Google Analytics) to track the information on the user's operation to the advertising emails, such information will be stored in third party servers. Such third party track tools may send the data analysis report to Edraw for Edraw's above mentioned purpose.

### 2.3.5 Duration of the storage

Edraw will store the collected personal data for 3 years from their collection or from the last contact from the User (whichever is later).

At the end of this 3 years time period, Edraw may contact the User in order to know if the User wishes to keep receiving commercial information from Edraw. In case Edraw would not receive any positive and explicit answer from the User, the personal data would be deleted or archived in accordance with the applicable legislation.

## **2.4 Cookies and trackers**

When the User consults the Website and/or the Application, Edraw implements cookies and other trackers on the User's device.

For additional information on cookies and trackers, please read Edraw's [cookies policy](#)

### 3. User's rights

To the extent required by the law of your jurisdiction, you may have below rights. Before you exercise below rights, you may consult your legal counsel if the laws of your jurisdiction stipulate below rights.

| <b>Rights</b>                     | <b>Content</b>   |
|-----------------------------------|--|
| The right to be informed          | The User has the right to be provided with clear, transparent and easily understandable information about how Edraw collects and uses personal data and its rights. This is the reason why Edraw is providing the User with the information in this privacy policy.  |
| The right of access               | The User has the right to obtain access to its personal data (if Edraw is processing it), and other certain information (similar to that provided in this privacy policy).   |
| The right to rectification        | The User is entitled to have its personal data corrected if it's inaccurate or incomplete.   |
| The right to erasure              | This 'the right to be forgotten' enables the User to request the deletion or removal of its personal data where there's no compelling reason for Edraw to keep using it. This is not a general right to erasure; there are exceptions.   |
| The right to restrict processing  | Under certain circumstances, the User has the rights to 'block' or suppress further use of its personal data.  |
| The right to data portability     | The User has the rights to receive its personal data provided to Edraw in a structured, commonly used and machine readable format and has the right to transmit those data to another controller.  |
| The right to object to processing | The User has the right to object, on grounds relating to its particular situation, at any time, to the processing of its personal data.  |
| The right to lodge a complaint    | The User has the right to lodge a complaint about the way Edraw handles or processes its personal data with its national supervisory authority (in France, the CNIL).  |
| The right to withdraw consent     | If the user has given its consent for a specific processing of its personal data implemented by Edraw, the User has the right to withdraw its consent at any time. In case the User does so, it does not mean that anything Edraw has done with the User's personal data with its consent up to that point is unlawful). |

The right to define instructions

The User has the right to define general or specific instructions regarding storage, deletion and use of its personal data after death.

#### **4. Revision of this Privacy Policy**

Occasionally, we may change this privacy policy (or other documents related to privacy policy) to allow Edraw to use or share your personal data in a different way. If we do, the links to the policy on our websites (which are generally found in the footer of the website) will indicate that the policy has been changed. For new users, the change will become effective upon posting. For existing users, if the change is significant, it will become effective 30 days after posting. We encourage you to periodically review the privacy policy for the latest information on our privacy practices.

#### **5. Contacting Edraw**

If the User needs to contact Edraw for any reason (including to exercise any of its rights in relation to data protection as set out above) please contact [privacy@edrawsoft.com](mailto:privacy@edrawsoft.com). Edraw will act on the User's requests and provide information free of charge, except where the requests are manifestly unfounded or excessive (in particular because of their repetitive nature) in which case Edraw may charge a reasonable fee (taking into account the administrative costs of providing the information or communication, or taking the action requested), or refuse to act on the request.