

# Bravo.one Privacy Notice

Version effective as of 01 July 2020

With this Privacy Notice we, the Kallis Filoxeniaki Ltd (**P.O. Box 30870, 5346 Ayia Napa, Cyprus**) describe how we collect and further process personal data on the internet platform and mobile app Bravo.one (hereinafter **Bravo.one**, Bravo, we or us). This Privacy Notice is not necessarily a comprehensive description of our data processing. It is possible that other Privacy Notices are applicable to specific circumstances.

The term "personal data" in this Privacy Notice shall mean any information that identifies, or could reasonably be used to identify any person.

If you provide us with personal data of other persons (such as family members, work colleagues), please make sure the respective persons are aware of this Privacy Notice and only provide us with their data if you are allowed to do so and such personal data is correct.

This Privacy Notice is in line with the EU General Data Protection Regulation (**GDPR**).

## Controller / Data Protection Officer / Representative

The Controller of data processing as described in this Privacy Notice, i.e., the responsible person, is **Rafael Kallis** (Kallis Filoxeniaki Ltd, P.O. Box 30870, 5346 Ayia Napa, Cyprus), unless we have informed you differently in certain cases. You can notify us of any data protection related concerns using the following contact details: P.O. Box 30870, 5346 Ayia Napa, Cyprus, and [gdpr@bravo.one](mailto:gdpr@bravo.one).

You can contact our data protection officer pursuant to art. 37 GDPR using the following contact: Rafael Kallis (P.O. Box 30870, 5346 Ayia Napa, Cyprus), who additionally is our representative in the EEA according to article 27 GDPR, with e-mail [gdpr@bravo.one](mailto:gdpr@bravo.one).

## Collection and Processing of Personal Data

We primarily process personal data that we obtain from our clients and other business partners as well as other individuals in the context of our business relationships with them or that we collect from users when operating our websites, apps and other applications.

Apart from data you provided to us directly, the categories of data we receive about you from third parties include, but are not limited to, information from public registers, information about you given to us by individuals associated with you, e.g., family, consultants, legal representatives, etc., in order to conclude or process contracts with you or with your involvement, e.g., references, your delivery-address, powers of attorney, information regarding legal regulations such as anti-money laundering and export restrictions, bank details, information regarding insurances, our distributors and other business partners for the purpose of ordering or delivering services to you or by you, e.g., payments made, previous purchases, information about you found in the media or internet, insofar as indicated in the specific case, e.g., in connection with job applications, media reviews, marketing/sales, etc., your address and any interests and other socio-demographic data, e.g., for marketing purposes, data in connection with your use of our websites and apps, e.g., IP address,

MAC address of your smartphone or computers, information regarding your device and settings, cookies, date and time of your visit, sites and content retrieved, applications used, referring website, localization data.

## Purpose of Data Processing and Legal Grounds

We primarily use collected data in order to conclude and process contracts with our clients and business partners, in particular in connection with providing the services of Bravo.one to our clients and the procurement of products and services from our suppliers and subcontractors, as well as in order to comply with our domestic and foreign legal obligations. You may be affected by our data processing in your capacity as an employee of such a client or business partner.

In addition, in line with applicable law and where appropriate, we may process your personal data and personal data of third parties for the following purposes, which are in our, or, as the case may be, any third parties', legitimate interest, such as:

- providing and developing our products, services and websites, apps and other platforms, on which we are active;
- communication with third parties and processing of their requests, e.g., job applications, media inquiries;
- review and optimization of procedures regarding needs assessment for the purpose of direct customer approach as well as obtaining personal data from publicly accessible sources for customer acquisition;
- advertisement and marketing (including organizing events), provided that you have not objected to the use of your data for this purpose (if you are part of our customer base and you receive our advertisement, you may object at any time and we will place you on a blacklist against further advertising mailings);
- market and opinion research, media surveillance;
- asserting legal claims and defense in legal disputes and official proceedings;
- prevention and investigation of criminal offences and other misconduct (e.g. conducting internal investigations, data analysis to combat fraud);
- ensuring our operation, including our IT, our websites, apps and other appliances;
- acquisition and sale of business divisions, companies or parts of companies and other corporate transactions and the transfer of personal data related thereto as well as measures for business management and compliance with legal and regulatory obligations as well as internal regulations of Kallis Filoxeniaki Ltd.

If you have given us your consent to process your personal data for certain purposes, e.g., when registering to receive newsletters or carrying out a background check, we will process your personal data within the scope of and based on this consent, unless we have another legal basis, provided that we require one. Consent given can be withdrawn at any time, but this does not affect data processed prior to withdrawal.

## Cookies / Tracking and Other Techniques Regarding the Use of our Website

We typically use "cookies" and similar techniques on our websites and apps, which allow for an identification of your browser or device. A cookie is a small text file that is sent to your computer and automatically saved by the web browser on your computer or mobile device, when you visit our website, or install our app. If you revisit our website, or use our app, we may recognize you, even if

we do not know your identity. Besides cookies that are only used during a session and deleted after your visit of the website ("session cookies"), we may use cookies in order to save user configurations and other information for a certain time period (e.g., two years) ("permanent cookies").

Notwithstanding the foregoing, you may configure your browser settings in a way that it rejects cookies, only saves them for one session or deletes them prematurely. Most browsers are preset to accept cookies. We use permanent cookies for the purpose of saving user configuration (e.g., language, automated log-in), in order to understand how you use our services and content, and to show you customized offers and advertisement (which may also happen on websites of other companies; should your identity be known to us, such companies will not learn your identity from us; they will only know that the same user is visiting their website has previously visited a certain website; please note that it cannot be prevented that you as a person becomes identifiable in a statistical sense via metadata floating around on the web; to minimize identifiability we generally keep exchanged data records to a minimum, following the principle of data avoidance and minimization). Cookies can be sent to you from us, other cookies may be sent to you from business partners with which we collaborate. If you block cookies, it is possible that certain functions (such as, e.g., language settings, shopping basket, ordering processes) are no longer available to you.

In accordance with applicable law, we may include visible and invisible image files (e.g. pixels) in our newsletters and other marketing e-mails. If such image files are retrieved from our servers, we can determine whether and when you have opened the e-mail, so that we can measure and better understand how you use our offers and customize them. You may disable this in your e-mail program, which will usually be a default setting.

By using our websites, apps and consenting to the receipt of newsletters and other marketing e-mails you agree to our use of such techniques. If you object, you must configure your browser or e-mail program accordingly or uninstall the app, should the respective setting not be available.

#### Amazon Web Services

We use Amazon Web Services (AWS) and connected services to operate our websites and apps. This includes services like Amazon S3, Amazon EC2, Amazon ECR, Amazon EKS, Amazon CloudFront, Amazon Simple Email Service, and others. The operating company is Amazon Web Services Inc., 410 Terry Avenue North, Seattle WA 98109, USA. For more information about Amazon's privacy found at <https://aws.amazon.com/privacy/>.

#### Flywheel

We use Flywheel to operate our websites and apps. This includes services like WordPress hosting, White Label, Add-ons, Performance Insights, and others. The operating company is Fancy Chap Inc. D/B/A Flywheel, 1405 Harney Street, #201 Omaha, NE 68102, USA.

More information about Flywheel's privacy policy can be found under <https://getflywheel.com/legal/privacy-policy/>, or consult <https://getflywheel.com/legal/> for an overview over many legal documents of Flywheel.

#### Google Analytics

We may use Google Analytics on our website. These are services provided by third parties, which may be located in any country worldwide (the operating company of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA) and which allow us to measure and evaluate the use of our website on an anonymized basis. For this purpose, permanent cookies are used, which are set by the service provider. The service provider does not receive (and does not retain) any personal data from us, but the service provider may track

your use of the website, combine this information with data from other websites you have visited and which are also tracked by the respective service provider and may use this information for its own purposes (e.g. to controlling of advertisements). If you have registered with the service provider, the service provider will also know your identity. In this case, the processing of your personal data by the service provider will be conducted in accordance with its data protection regulations. The service provider only provides us with data on the use of the respective website (but not any personal information of you).

If you do not want information to be recorded, you can deactivate this on all websites that use Google Analytics by setting the Do-Not-Track header in the user's browser. Information about the opt-out opportunity can be found on the website: <https://tools.google.com/dlpage/gaoptout?hl=en>. Further information and the applicable data protection provisions of Google are available under <https://policies.google.com/privacy?hl=en> and under <https://www.google.com/analytics/terms/>.

### Google Fonts

Our website uses Google Fonts to display external fonts. This is a service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Google guarantees that it will follow the EU's data protection regulations when processing data in the United States. To enable the display of certain fonts on our website, a connection to the Google server in the USA is established whenever our website is accessed. When you access our site, a connection to Google is established from which Google can identify the site from which your request has been sent and to which IP address the fonts are being transmitted for display.

Google offers detailed information at <https://adssettings.google.com/authenticated> and <https://policies.google.com/privacy> in particular on options for preventing the use of data.

### Google reCAPTCHA

We may use Google (Invisible) reCAPTCHA on our website to check and prevent automated servers („bots“) from accessing and interacting with our website. The request serves to distinguish whether the input was made by a human or automatic machine processing. This is a service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Through certification according to the EU-US Privacy Shield Google guarantees that it will follow the EU's data protection regulations when processing data in the United States. This service allows Google to determine from which website your request has been sent and from which IP address the reCAPTCHA input box has been used. In addition to your IP address, Google may collect other information necessary to provide and guarantee this service. This service is subject to Google's Privacy Policy, <https://policies.google.com/privacy>, and Terms of Service, <https://policies.google.com/terms>.

You can find more detailed information on Google reCAPTCHA and the associated data protection declaration at <https://policies.google.com/technologies/ads>.

### Google AdWords

We may use Google Conversion Tracking on our website, an analysis service of Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google"). During the course of this, Google AdWords sets a cookie on your computer ("conversion cookie"), provided that you have reached our website via a Google advertisement. These cookies lose their validity after 30 days and are not for personal identification purposes. If you visit certain websites of ours and the cookie has not yet expired, we and Google can identify that someone has clicked on the advertisement and has been forwarded to our website this way. Every AdWords customer receives a different cookie. Cookies can therefore not be tracked via the websites of AdWords customers. The information obtained using

the conversion cookie is used to create conversion statistics for AdWords customers who have chosen conversion tracking. AdWords customers can see the total number of users who clicked on their advertisement and were forwarded to a website with a conversion tracking tag. However, they do not receive any information, with which users can be personally identified. If you do not want to participate in tracking, you can object to this use by preventing the installation of cookies with an appropriate setting of the Do-Not-Track header in your browser software.

You can find more detailed information about terms and conditions of use and data privacy at: <https://policies.google.com/privacy>.

### Google Maps

We may use Google Maps on our website. This is a service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Through certification according to the EU-US Privacy Shield Google guarantees that it will follow the EU's data protection regulations when processing data in the United States. If you access the Google Maps components integrated into our website, Google will store a cookie on your device via your browser. By connecting to Google in this way, Google can determine from which website your request has been sent and to which IP address the directions are transmitted. If you do not agree to this processing, you have the option of preventing the installation of cookies by making the appropriate settings in your browser.

In addition, the use of Google Maps and the information obtained via Google Maps is governed by the Google Terms of Use <https://policies.google.com/terms> and the Terms and Conditions for Google Maps [https://www.google.com/intl/en\\_us/help/terms\\_maps.html](https://www.google.com/intl/en_us/help/terms_maps.html).

### YouTube

We may use YouTube on our website, a video portal operated by YouTube LLC, 901 Cherry Ave, 94066 San Bruno, CA, USA, hereinafter referred to as „YouTube “. YouTube is a subsidiary of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. YouTube is used in its advanced privacy mode to show you videos. According to YouTube, the advanced privacy mode means that the data specified below will only be transmitted to the YouTube server if you actually start a video. Without this mode, a connection to the YouTube server in the USA will be established as soon as you access any of our websites on which a YouTube video is embedded. YouTube will record and process at a minimum your IP address, the date and time the video was displayed, as well as the website you visited. In addition, a connection to the DoubleClick advertising network of Google is established. If you are logged in to YouTube when you access our site, YouTube will assign the connection information to your YouTube account. To prevent this, you must either log out of YouTube before visiting our site or make the appropriate settings in your YouTube account. For the purpose of functionality and analysis of usage behavior, YouTube stores cookies on your device via your browser. If you do not agree to this processing, you have the option of preventing the installation of cookies by making the appropriate settings in your browser.

Further information about the collection and use of data as well as your rights and protection options in Google's privacy policy found at <https://policies.google.com/privacy>.

### Mailchimp

We may use MailChimp to send our newsletter to you (our subscribers). MailChimp is a service provided by The Rocket Science Group, LLC, 512 Means Street, Suite 404, Atlanta, GA 30318, USA. The data stored when you registered for the newsletter (email address, name, IP address, and time and date of registration) will be sent to a server operated by The Rocket Science Group in the United

States and stored there in accordance with the EU-US Privacy Shield. Further information about the data protection offered by MailChimp can be found at: <http://mailchimp.com/legal/privacy/>.

You may cancel your newsletter subscription and revoke your consent to the storage of this data at any time with future effect. For instructions to take this step, please refer to the confirmation email and each newsletter.

#### SendGrid

We may use SendGrid to send emails to you. SendGrid is a service provided by Twilio, 25 N Wall Quay, North Wall, Dublin 1, D01 H104, Ireland. SendGrid stores communications-related personal information, like phone numbers for number-based communications, email addresses for email communications, IP addresses for IP-based communications, or device tokens for push notifications, show up in Twilio's systems when we use or intend to use this information to contact you through Twilio's products and services. Additionally, your personal information may show up in "friendly names," which are strings we provide, if we choose to include your personal information as part of a string. Your personal information may also be contained in the content of communications we send or receive using Twilio's products and services.

Further information about the data protection offered by SendGrid and Twilio can be found under <https://www.twilio.com/legal/privacy>, <https://www.twilio.com/gdpr> and <https://www.twilio.com/legal/privacy#sendgrid-services>.

#### Jetpack

We may use Jetpack on our website. Jetpack is a service provided by Aut O'Mattic A8C Ireland Ltd., Business Centre, No.1 Lower Mayor Street, International Financial Services Centre, Dublin 1, Ireland. Jetpack is a service which allow us to measure and evaluate the use of our website on an anonymized basis. For this purpose, permanent cookies are used, which are set by the service provider. The service provider does not receive (and does not retain) any personal data from us, but the service provider may track your use of the website, combine this information with data from other websites you have visited and which are also tracked by the respective service provider and may use this information for its own purposes (e.g. to controlling of advertisements). If you have registered with the service provider, the service provider will also know your identity. In this case, the processing of your personal data by the service provider will be conducted in accordance with its data protection regulations. The service provider only provides us with data on the use of the respective website (but not any personal information of you). Further information and the applicable data protection provisions of Jetpack and Automattic are available under <https://automattic.com/privacy/>.

#### Plug-ins

We may use plug-ins from social networks such as LinkedIn, Twitter, YouTube, Google+, Facebook, Pinterest or Instagram on our websites. This is visible for you (typically based on the respective symbols). We have configured these elements to be disabled by default. If you activate them, the operators of the respective social networks may record that you are on our website and where on our website you are exactly and may use this information for their own purposes. This processing of your personal data lays in the responsibility of the respective operator and occurs according to its data protection regulations. We do not receive any information about you from the respective operator.

## Social Logins

We may collect your public profile data only from your consent that you grant before initiating a Social Login, from the social network used to login at this website. This data may include your first name, last name, email address, link to your social media profile, unique identifier, link to social profile avatar, etc. This data is used to create or augment your user profile on our website. You can revoke this consent at any time by sending us an e-mail or by deactivating the respective plug-ins at the side of the plug-in operator.

## Protecting our privacy

You can learn more about opting out of receiving personalized ads and data collecting services at <https://optout.aboutads.info> and <https://optout.networkadvertising.org>.

## Data Transfer and Transfer of Data Abroad

In the context of our business activities and in line with the purposes of the data processing set out in Section “Purpose of Data Processing and Legal Grounds”, we may transfer data to third parties, insofar as such a transfer is permitted and we deem it appropriate, in order for them to process data for us or, as the case may be, their own purposes. In particular, the following categories of recipients may be concerned:

- our service providers (within Kallis Filoxeniaki Ltd or externally, such as e.g. banks, insurances), including processors (such as e.g. IT providers);
- dealers, suppliers, subcontractors and other business partners;
- clients;
- domestic and foreign authorities or courts;
- the media;
- the public, including users of our websites and social media;
- competitors, industry organizations, associations, organizations and other bodies;
- acquirers or parties interested in the acquisition of business divisions, companies or other parts of Kallis Filoxeniaki Ltd;
- other parties in possible or pending legal proceedings;
- affiliates of Kallis Filoxeniaki Ltd;

together **Recipients**.

Certain Recipients may be within EU but they may be located in any country worldwide. In particular, you must anticipate your data to be transmitted to any country in which Kallis Filoxeniaki Ltd is represented by affiliates, branches or other offices (Kallis Filoxeniaki Ltd, registered in Cyprus) as well as to other countries in Europe and the US where our service providers are located (such as, for example, Microsoft, Oracle, SAP, Amazon). If we transfer data to a country without adequate legal data protection, we ensure an appropriate level of protection as legally required by way of using appropriate contracts (in particular on the basis of the standard contract clauses of the European Commission, which can be accessed [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)) or binding corporate rules or we rely on the statutory exceptions of consent, performance of contracts, the establishment, exercise or enforcement of legal claims, overriding public interests, published personal data or

because it is necessary to protect the integrity of the persons concerned. You can obtain a copy of the mentioned contractual guarantees at any time from the contact person named under Section “Controller / Data Protection Officer / Representative” above insofar they are not available under the aforementioned link. However, we reserve the right to redact copies for data protection reasons or reasons of secrecy or to produce excerpts only.

### Third Party Vendors

The following is a list of current third-party vendors that may either directly or indirectly collect information from you. Please review the relevant privacy policies (links current as of the date of publication of this Privacy Policy) for further information on how each third party handles your Personal Information:

- Amazon Web Services <https://aws.amazon.com/privacy/>
- Flywheel <https://getflywheel.com/legal/privacy-policy/>
- Clubhouse <https://clubhouse.io/privacy/>
- Google <https://policies.google.com/privacy/>
- Jetpack <https://automattic.com/privacy/>
- Mailchimp <https://mailchimp.com/legal/privacy/>
- GitHub <https://help.github.com/articles/github-privacy-statement/>
- SendGrid <https://sendgrid.com/policies/privacy/>
- Medium <https://help.medium.com/hc/en-us/categories/201931128-Policies-Safety/>
- Twitter <https://twitter.com/en/privacy>
- LinkedIn <https://www.linkedin.com/legal/privacy-policy/>
- YouTube <https://policies.google.com/privacy/>

### Retention Periods for your Personal Data

We process and retain your personal data as long as required for the performance of our contractual obligation and compliance with legal obligations or other purposes pursued with the processing, i.e., for the duration of the entire business relationship (from the initiation, during the performance of the contract until it is terminated) as well as beyond this duration in accordance with legal retention and documentation obligations. Personal data may be retained for the period during which claims can be asserted against our company or insofar as we are otherwise legally obliged to do so or if legitimate business interests require further retention, e.g., for evidence and documentation purposes. As soon as your personal data are no longer required for the above-mentioned purposes, they will be deleted or anonymized, to the extent possible. In general, shorter retention periods of no more than twelve months apply for operational data, e.g., system logs.

### Data Security

We have taken appropriate technical and organizational security measures to protect your personal data from unauthorized access and misuse such as internal policies, IT and network security solutions, access controls and restrictions, encryption of data carriers and transmissions, pseudonymization, and inspections.

## Obligation to Provide Personal Data to Us

In the context of our business relationship you must provide us with any personal data that is necessary for the conclusion and performance of a business relationship and the performance of our contractual obligations (as a rule, there is no statutory requirement to provide us with data). Without this information, we will usually not be able to enter into or carry out a contract with you (or the entity or person you represent). In addition, the website cannot be used unless certain information is disclosed to enable data traffic (e.g. IP address).

## Profiling and Automated Individual Decision-Making

We may partially process your personal data automatically with the aim of evaluating certain personal aspects (profiling). In particular, profiling allows us to inform and advise you about products possibly relevant for you more accurately. For this purpose, we may use evaluation tools that enable us to communicate with you and advertise you as required, including market and opinion research.

## Your Rights

In accordance with and as far as provided by applicable law (as is the case where the GDPR is applicable), you have the right to access, rectification and erasure of your personal data, the right to restriction of processing or to object to our data processing in addition to right to receive certain personal data for transfer to another controller (data portability). Please note, however, that we reserve the right to enforce statutory restrictions on our part, for example if we are obliged to retain or process certain data, have an overriding interest (insofar as we may invoke such interests) or need the data for asserting claims. If exercising certain rights will incur costs on you, we will notify you thereof in advance. We have already informed you of the possibility to withdraw consent in Section “Purpose of Data Processing and Legal Grounds” above. Please further note that the exercise of these rights may be in conflict with your contractual obligations and this may result in consequences such as premature contract termination or involve costs. If this is the case, we will inform you in advance unless it has already been contractually agreed upon.

In general, exercising these rights requires that you are able to prove your identity (e.g., by a copy of identification documents where your identity is not evident otherwise or can be verified in another way). In order to assert these rights, please contact us at the addresses provided in Section “Controller / Data Protection Officer / Representative” above.

In addition, every data subject has the right to enforce his/her rights in court or to lodge a complaint with the competent data protection authority.

## Amendments of this Privacy Notice

We may amend this Privacy Notice at any time without prior notice. The current version published on our website shall apply. If the Privacy Notice is part of an agreement with you, we will notify you by e-mail or other appropriate means in case of an amendment.

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