

PRIVACY POLICY

This Privacy Policy sets out the personal data that Focal Technologies Ltd. (“**Focal**”) collects, processes and discloses information collected from users of the <https://www.focal.inc> website (“**Website**”). This privacy policy applies to the Website and all products and services offered by Focal.

1. Personal Data

Focal may require basic information which identifies you as an individual, such as your name, email address and phone number, in order to transact business with you, on behalf of the company you work for, as our customer. We will only use such personal data for the purposes of providing information that you have requested, fulfilling business transactions or in cases, you have given consent to use that information. For the sake of clarity, an individual may, however, visit our Website anonymously.

We may collect the following information (“**Personal Data**”):

- i. First name and last name;
- ii. Job title or description;
- iii. Company or organization name;
- iv. Company address, including country;
- v. Contact information including email address and telephone number(s);
- vi. Company or organization payment information;
- vii. Usernames (account alias) and passwords according to the SaaS product specifications to allow users to login and use the SaaS product;
- viii. Time zone and date/time preferences for SaaS product usage;
- ix. IT information required to provide access to systems and networks such as IP addresses, log files and login information, encryption generation keys; and/or
- x. Metadata, such as logs, for usage information and activity logs, with identifying characteristics such as names of individuals (users) who have used the service, which functions they used and/or IP addresses of users.

For the sake of clarity, Focal does not collect sensitive information such as racial or ethnic origin, political opinions, religious or philosophical beliefs or any similar information.

2. Web Browser Cookies

Based on your consent, the Website may use cookies to enhance the user experience. User's web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. Users may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the Website may not function properly.

3. Use of Data

Focal uses the Personal Data for the following purposes:

- i. To perform the service/agreement;
- ii. To optimize system operation based on usage and enable future product development and improvements;
- iii. To analyse system usage to help maintain the operational system
- iv. To enable you to access customer support portals or to provide customer support services to you
- v. To optimize system operation based on usage and enable future product development and improvements
- vi. To enable our compliance with export control and other laws and regulations
- vii. To improve customer service;
- viii. To inform users about our services (marketing);
- ix. To improve our Website;
- x. We may use the feedback you provide to improve our products and services; and/or
- xi. To send emails.

4. Data Security

Focal follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. We maintain appropriate administrative, technical and physical safeguards to protect the Personal Data against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the Personal Data in our possession. This includes, for example,

firewalls, password protection and other access and authentication controls. We use SSL technology to encrypt data during transmission through the public internet.

However, no method of transmission over the internet, or method of electronic storage, is completely secure. We cannot ensure or warrant the security of any information you transmit to us or store on the service, and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If you believe your Personal Data has been compromised, please contact us as set forth in the end of this Policy.

5. Disclosing Personal Data

We may transfer, process and store Personal Data we collect through the Services in centralized databases and with service providers located in the U.S. The U.S. may not have the same data protection framework as the country from which you may be using the Services. For the sake of clarity, Focal will comply with GDPR requirements providing adequate protection for the transfer of personal information from Europe to the U.S. Also, we may transfer your data to the U.S., the EEA, or other countries or regions deemed by the European Commission to provide adequate protection of personal data in connection with storage and processing of data, fulfilling your requests, and operating the Service.

6. Data Retention

We only retain the Personal Data collected from a User for as long as the account is active or otherwise for a limited period of time as long as we need it to fulfil the (business) purposes for which we have initially collected it, unless otherwise required by law. We will retain and use information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. All contents of closed accounts are deleted within six (6) months of the date of closure.

7. Third-Party Services

The Service may contain features or links to websites and services provided by third parties. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators' policies, if any, governing privacy and security, even

if accessed through the Service. Focal are not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the Service. We encourage you to learn about third parties' privacy and security policies before providing them with information.

7.1 Sharing with other third parties

If you choose to work with third-party integrations in Focal (e.g., media exports to YouTube, an application that uses the YouTube API Services and users agree to be bound by the [YouTube Terms of Service](#) and [Google Privacy Policy](#). You can revoke Focal's access to your data by Logging out in the Youtube Export modal in the Focal App, revoke Focal's access to your data via the [Google security settings page](#). Using third-party products or integrating with third-party applications could involve importing data from that third party to Focal and/or exporting data from Focal to that third party. If this requires connecting your Focal account to your account on the third-party application, you will be asked for permission.

These third-party products are not controlled by us, and this privacy policy does not cover how third-party apps use your information. You should review the terms and conditions of any third party apps before connecting them to the Service.

8. Access, Correction, Deletion

Focal respects your privacy rights and provides you with reasonable access to the Personal Data that you may have provided through your use of the services. If you wish to access, amend, update, correct, or delete any Personal Data we hold about you, or transfer any information about you that we have obtained, you may contact us as set forth at the end of this Policy.

At any time, you may object to the processing of your Personal Data, on legitimate grounds, except if otherwise permitted by applicable law. If you believe your right to privacy granted by applicable data protection laws has been infringed upon, please contact us as set forth in the end of this Policy and our Data Protection Officer will contact you. You also have a right to lodge a complaint with data protection authorities.

9. Changes to this Policy

Focal has the discretion to update this privacy policy at any time. When we do, we will revise the updated date at the bottom of this page. YOU ACKNOWLEDGE AND AGREE THAT IT IS YOUR RESPONSIBILITY TO REVIEW THIS PRIVACY POLICY PERIODICALLY AND BECOME AWARE OF MODIFICATIONS.

10. Contacting us

If you have any questions about this Privacy Policy or the practices of this service/website, please contact us at:

Focal Technologies Oy
PL 1188 00101 HELSINKI
Email: team@focal.inc