Privacy Policy

Last updated: February 05, 2025

This Privacy Policy describes how Covve may collect, use, store and/or otherwise process Personal Data of the Users of Covve Card.

Any processing undertaken in this context shall be in compliance with the provisions of the GDPR and the Cyprus Law providing for the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of such Data of 2018 (Law 125(I)/2018).

References in this policy to "we", "us" and "our" are references to Covve. References to "you" and "your" are to the Users.

Covve Card is an online (virtual) business card and optional contactless physical business card and mobile app. This Privacy Policy has been designed to protect your data and to be straightforward and easy to understand.

In a nutshell:

- We never resell personal information about you.
- Protection of your Data is our top priority and we take significant measures to keep it safe and secure.

Definitions

Covve Card ("the Card") and/or the Service

Refers to both the virtual business card profile of a User and the optional physical contactless card.

Covve

Refers to Covve Visual Network Limited, a limited liability company registered under the laws of the Republic of Cyprus, with registration number HE 286317, which is the owner of the Contactless business card.

Personal Data (or Data)

Any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an

online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

In the context of the Service, Personal Data refers to data relating solely to the User/Users, as these are set out in the *Types of Data Collected* paragraph *below*.

Usage Data

Information collected automatically from Covve (or third-party service providers retained by Covve), as set out in detail in the *Types of Data Collected* paragraph *below*.

User/Users

The individual/individuals (natural persons) using the Service.

Data Subject

The natural person to whom the Personal Data relates.

In the context of the services provided by Covve via the Service, Data Subject refers to User/Users.

Data Processor

The natural person, legal person, public administration or any other body, association or organization authorized by the Data Controller to process the Personal Data.

Data Controller

The natural person, legal person, public administration or any other body, association or organization with the right, also jointly with another Data Controller, to make decisions regarding the purposes, and the methods of processing of Personal Data and the means used, including the security measures concerning the operation and use of the Service.

Data Controller

With respect to the processing of personal data of the Users, Covve acts as a Data Controller. Our contact details are set out below:

Covve Visual Network Limited. Michalaki Karaoli 8, 4th floor Anemomylos Building 1095 Nicosia, Cyprus. support@covve.com

Types of Data collected

Covve collects your Personal Data either by you when you access the Services and populate your business card data or automatically when using the Service.

Covve may collect the following types of information relating to Users, which also include Personal Data:

- **Full name and email address of a User**: whenever a User communicates with Covve with an inquiry, for support or for changing their subscription plan.
- **User profile data**: Data that the user populates in their online business card profile which can include name, email, telephone number, linkedin link, avatar picture, address, note.
- System Logs and Maintenance
 For operation and maintenance purposes, Covve and any third-party service providers retained by Covve may collect files that record interaction with Covve (System Logs).
- Usage Data: Information collected automatically by Covve (or third party service providers retained by Covve), which can include: the unique device identifier, the time of server requests, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited.

Users are responsible for any Personal Data of third parties obtained and/or published and confirm that they have the third party's consent to provide the Data to Covve.

Mode and place of processing the Data

Methods of processing

Data is processed in a proper manner and appropriate security measures are undertaken to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated.

In addition to Covve, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of the site (administration, sales, marketing, legal, system administration) or external parties (such as third party technical service providers, mail carriers, hosting providers, IT companies,

communications agencies) appointed, if necessary, as Processors or by potential purchasers or assignees of the Covve business.

We may share some of the Data with subsidiaries, joint ventures, or other companies under a common control (i.e. affiliates). If another company acquires our company, business, or our assets, that company will possess the Data collected by us and will assume the rights and obligations regarding the Data as described in this Privacy Policy.

Place

The Data is processed at the operating offices of Covve and in any other places where the parties involved with the processing are located. For further information, please contact Covve.

Transfers of data to countries outside the EEA may take place as part of the services described in this Privacy Policy. Any such transfers will be undertaken in compliance with the general principles on transfers, as these are set out in the GDPR and the Cyprus Law providing for the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of such Data of 2018 (Law 125(I)/2018).

Retention time

The Data is kept for the time necessary to provide the service requested by the User, or stated by the purposes outlined in this document, and the User can always request that Covve corrects, suspends or removes the data.

The legal bases for the use of the collected Data

The Data concerning you as a User is collected to allow Covve to provide the Service.

We may also process your Personal Data where it is necessary for compliance with a legal obligation to which we are subject, for example if we are required by law to disclose certain Data to public authorities.

Finally, it may be necessary for us to process your Personal Data for the purposes of legitimate interests pursued by us and where such interests are overridden by the interests or fundamental rights and freedoms of Users. For example, your Personal Data may be used for legal purposes in Court proceedings or in the stages leading to possible legal action arising from improper use of the Application or the related services.

Detailed information on the purposes of the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Hosting and backend as a service

These services have the purpose of hosting data and files that enable Covve to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of Covve. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Microsoft Azure (Microsoft Corporation)

Microsoft Azure is a hosting service provided by Microsoft Corporation.

Personal Data collected: Various types of Data as specified in the privacy policy of the service.

Place of processing: Europe — <u>Privacy Policy</u>.

LogEntries (Rapid7 LLC)

LogEntries is a server log management service provided by Rapid7 LLC.

Personal Data collected: Various types of Data as logged by Covve's servers for troubleshooting and system monitoring purposes.

Place of processing: Europe - Privacy Policy

Analytics

The services contained in this section enable Covve to monitor and analyze web traffic and can be used to keep track of User behavior. These are only used in relation to the DCA.

Google Firebase & Analytics (Alphabet Inc) (DCA only)

Google Analytics collects usage information used to analyse the use of the DCA for quality and improvement purposes.

Personal Data collected: Cookie and Usage data.

Place of processing: Europe — Privacy Policy.

Traffic optimization and distribution

These services allow Covve to distribute their content using servers located across different countries and to optimize their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between Covve and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information User are transferred.

F5 (F5, Inc.)

F5, Inc. is a technology company specializing in application security, multi-cloud management, online fraud prevention, application delivery networking (ADN), application availability & performance, network security, and access & authorization. All traffic to Covve's systems is filtered through F5's security solution.

Place of processing: Europe

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from Covve at any time. Please see the contact information at the beginning of this document.

The rights of Users

You have the following legal rights with regard to the processing of your Personal data:

- the right of access to the personal data we hold about you
- the right to obtain rectification of any inaccurate personal data
- the right of erasure of your personal data
- the right of restriction of processing of your personal data
- the right to object to processing of your personal data
- the right to data portability
- the right to lodge a complaint with the relevant data protection supervisory authority in Cyprus, the details of which are available on their website at: www.dataprotection.gov.cy.
- Where the processing of any of your Personal Data is based on your consent, you may withdraw such consent at any time either by deleting your account or by contacting support@covve.com.

You may exercise your above rights by contacting us at support@covve.com.

Covve does not support "Do Not Track" requests.

To determine whether any of the third party services it uses honor the "Do Not Track" requests, please read their privacy policies.

Changes to this Privacy Policy

Covve reserves the right to make changes to this Privacy Policy at any time by giving notice to its Users on this page and by way of an in-app pop up notification. It is strongly recommended to check this page often, referring to the date of the last modification listed at the top. If a User objects to any of the changes to the Policy, the User must cease using Covve and can request that Covve removes the Personal Data. Unless stated otherwise, the then-current privacy policy applies to all Personal Data Covve has about Users.