

Aveny Privacy Policy

Aveny and all affiliated entities ("Aveny, we, us, our") process personal data from service users and from visitors to our website ("you, your"). We are committed to protecting your privacy and we consider preserving the confidentiality of your personal data as one of our main objectives. This privacy policy explains what personal data we process, the purposes and legal basis of our processing activities, and how the processing activities are carried out. It also explains your rights under the applicable data protection laws, including the European Union's General Data Protection Regulation ("GDPR").

1. Important terms used in this privacy policy

- 1.1 "You" - The visitor of the Aveny website.
- 1.2 "Personal data" - Any information relating to an identified or identifiable natural person.
- 1.3 "Processing" - Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 1.4 "GDPR" - The General Data Protection Regulation (Regulation 2016/679), a European Union regulation which lays down rules relating to the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of personal data.
- 1.5 For the purpose of this privacy policy, all the terms above and others in this policy such as "Data Controller", "Data Subject", and "Processor" shall have the same meanings as are assigned to them in the GDPR.

2. Data controller and Privacy officer

The **data controller** responsible for the data processing is:

uButler B.V.
Postjeskade 23H
1058 DE Amsterdam
Nederland (Netherlands)
Netherlands Chamber of Commerce registration number: 65327144

Aveny has appointed a **Privacy Officer** who is freely contactable for any information relating to the processing of your personal data by Aveny at privacy@ubutler.nl

3. What types of personal data we collect

- 3.1 When you create an account with us to use our services and during the provision of our service, we may collect and process the following personal data:
 - **Contact details:** name, phone number, email address, postal address
 - **Device and usage information:** user operating system and version, application version that is used, cookie identifiers
- 3.2 We may automatically collect and process information as you navigate our websites and use our services.

4. How we obtain personal data

4.1 Information **you provide us**: We collect personal data from you when you fill out the form to join the waitlist.

4.2 Information we collect **automatically**: We automatically collect online identification information from you when you use our application or online portal.

5. How and why we use your personal data

5.1 We process data that is necessary to send you updates and invite you to the Aveny application once launched.

5.2 We process data to pursue **our legitimate interests** to provide you the best experience possible. For this, we do the following:

- We introduce you to our Service;
- We communicate with you about changes in our Service;
- We evaluate and analyse your experience and the quality of our Service using data and analytical tools, and use this information to develop new products and improve the quality of our Service;
- We maintain the functionality and security of our network and IT systems, we resolve any bugs in our system.

5.3 We process data to **meet our obligations under the law**. This primarily involves financial data and information that we need to meet our accountability obligations under the GDPR, fiscal and criminal laws.

5.4 We process the **sensitive data** we receive from you to provide our Service **only based on your consent**, which you can withdraw any time.

6. With whom we share your personal data

6.1 In order to operate our Service, we may share the personal data we collect about you with our **third-party service providers**. We conclude data processing agreements with our third-party service providers which guarantee that **they also provide sufficient guarantees to protect your personal data** and act in a GDPR compliant manner.

6.2 Below is the list of our third-party service providers and how we use their services:

<i>Name</i>	<i>Purpose</i>	<i>Location</i>
Cloudflare	Content delivery network and security services	US
Webflow	Website hosting and design platform	US
Mailsuite	Email management and productivity tool	Ireland
Zapier	Automation and integration services	US
Google Workspace	Cloud-based email, document storage, and collaboration tools	EU

7. International Transfers

7.1 The personal data we collect and process about you may be transferred, processed, and stored outside the European Economic Area (EEA). Whenever your data is **transferred outside EEA**, we ensure there is a similar degree of protection with EU standards by implementing one of the following safeguards:

7.1.1 We will only transfer your personal data to countries that have been deemed to provide an **adequate level of protection** for personal data by the European Commission.

7.1.2 Where we use service providers based in the United States, we ensure appropriate safeguards are in place to guarantee the continued protection of your personal data by signing **the Standard Contractual Clauses (SCCs)** approved by the European Commission, which **give personal data an equivalent protection it has in Europe**.

8. Analytics and cookies

8.1 We optimise our Service for you and for this purpose we **analyse the activity data** deriving from the use of our Service. We use a third party analytics service for this purpose.

8.2 We do not place first-party cookies on your device.

8.3 We place third-party cookies on your device. We use the data collected through cookies to improve our website and to analyse and measure audience and traffic. We notify you of this cookie with a cookie banner on our homepage.

9. How long we store your personal data

9.1 If you are a user of our services, we will **delete your personal data** from all servers **12 months after the last time you use submit the data** or **earlier if requested**.

10. Automated decision making

We do not use automated decision making in our Service.

11. Your rights and how to exercise them

11.1 You have the **right to receive information** about the personal data we collect and store about you.

11.2 You have the **right to obtain a copy of personal data** we hold about you.

11.3 You have the **right to make us correct any inaccurate data** we have about you.

11.4 You have the **right to restrict** our use of your personal data or **have your data deleted** completely.

11.5 You have the **right to receive** the personal data concerning you in a format that would **enable you to port your data** to another service.

11.6 You have the **right to file a complaint** with the supervisory authority, as elaborated on in clause 12 of this privacy policy.

11.7 If we collect and store your data based on your consent, you have the **right to withdraw consent** at any time.

11.8 You can exercise any of these rights, by emailing the Privacy Officer at privacy@ubutler.nl.

12. How to raise a complaint with the supervisory authority

12.1 If you have reason to believe that we processed your personal data in breach of our legal obligations, you have the right to lodge a complaint with a supervisory authority.

12.2 The supervisory authority in the Netherlands can be contacted via:

Autoriteit Persoonsgegevens
Postbus 93374
2509 AJ Den Haag
Netherlands
Telephone number: +31 070-8888 500
Website: www.autoriteitpersoonsgegevens.nl

13. Changes to our privacy policy

13.1 We review our privacy policy at least once a year.

13.2 We reserve the right to alter the privacy policy at any moment. In case of significant changes, active users shall be notified. The latest version of the privacy policy is uploaded to our website at all times. Your further use of our services after the change will be subject to the updated privacy policy.

13.3 This privacy policy is publicly available on www.aveny.app/privacy-policy, as well as visible and accessible in all Aveny Services.

14. Applicable laws

14.1 We process your personal data in compliance with the General Data Protection Regulation (2016), and the Dutch Implementation Act GDPR, as well as any other applicable laws.

14.2 Any legal right or obligation that is not mentioned in this Privacy Policy, yet included in the GDPR or any other applicable laws, exists alongside the clauses in this policy.