

# PRIVACY POLICY

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This Privacy Statement describes how we collect and use personal data collected through websites, products and services, events, or marketing activity for our Ttexture and Cloud Insider offerings (together, "Ttexture Offerings").

"We", "us" or "ttexture" refers to Ttexture GmbH, Grabenweg 68, 6020 Innsbruck, Austria and other Ttexture group companies which link to this Privacy Statement.

This Privacy Statement describes how we process personal data for our own purposes. Where we process personal data on behalf of our customers, we will enter into a separate written contract specifying all applicable terms (Data Processing Agreement). We do not control the data processing or protection practices of our customers, which may differ from those set out in this Privacy Statement.

## **WHAT PERSONAL DATA DO WE COLLECT?**

We collect personal data in the course of providing Ttexture Offerings to you:

**Data you give us:** In order to use Ttexture Offerings, you may need to create a personal user account on our platform. For this purpose, we may ask you to provide your name, company affiliation, occupation, industry, address, email address, username and password, communication preferences and other relevant information. If you purchase directly from us, we may ask you to provide additional information including credit card information, bank details, company registration number, and tax number.

**Data we obtain or generate otherwise:** Identifiers, such as unique user identifiers, unique device identifiers, IP addresses, cookie identifiers, information about your Ttexture Offering entitlements; geolocation information; technical information such as information about operating systems, device types, browsers, technical errors, and information about your use of Ttexture Offerings (features used, date and time). We also use cookies (small text files stored by your web browser when you use websites) and related technologies, such as pixels and beacons (collectively "Cookies"), to collect and store information when you use our websites or Ttexture Offerings. We use third-party analytics tools, such as Google Analytics, to improve your user experience and to help us understand how, when and why you use our applications. Google Analytics is a service provided by Google Inc. in the United States of America (see subcontractors below).

## HOW DO WE USE PERSONAL DATA?

We use your personal data mindfully, primarily for the following purposes:

- To validate your identity as necessary to perform our contract with you.
- To execute purchase and payment transactions with you, in relation to Txture Offerings.
- To deliver Txture Offerings to you, including personalized insights and recommendations, as necessary to perform our contract with you.
- To send you important information, such as about your account or purchases, within the scope of our contract with you.
- To send you information you requested, for example in responding to customer inquiries.
- To anonymize, aggregate, or de-identify your personal data so it can no longer identify you, for the purpose of conducting research and analysis.
- To develop and improve our current and future Txture Offerings, including through the use of automated systems that analyze data using machine learning and other analytic techniques.
- To understand the ways Txture Offerings are used and who is using them.
- To make strategic decisions concerning our business operations, including reporting on the performance of our business.
- To send you learning content, tutorials, suggestions, newsletters, surveys, or other information, including information that may be relevant to your interests or preferences.
- To send you promotional offers, advertising, or other marketing content about Txture Offerings or, only with your prior consent, about third party offerings; you may withdraw your consent at any time.
- To detect, prevent, or otherwise address non-valid use or fraud.
- To enforce, and review compliance with, the legal terms that govern Txture Offerings.

Where we rely on your consent to process personal data, you may withdraw your consent at any time by contacting us at [privacy@txture.io](mailto:privacy@txture.io).

Where we rely on our legitimate interests to process your personal data, we balance your rights against ours so that our interest is not overridden by the interests you have to protect your data.

You may also have the right to object to that processing on the basis of circumstances specific to you. For more information, see “Your Rights” in the table below.

## HOW DO WE SHARE PERSONAL DATA WITH OTHERS?

We disclose personal data described above to the following categories of persons:

Our service providers, including vendors, consultants, and other service providers who perform services or functions on our behalf, for business purposes. For example, our service providers include companies who support us with marketing, sales, consulting, communications, social media, market research, security, user verification, localization, and payment processing. Our service providers process your information subject to contractual terms that restrict their ability to use your information. For a list of data processors we use, see “Data Processors” in the table below.

- Our resellers, with whom you interact to facilitate your relationship with us.
- Affiliated entities of the Ttexture group of companies (see above).
- Persons to whom we are required by law to provide information, such as pursuant to a court order, or persons where we believe in good faith that the disclosure is necessary to prevent or respond to fraud, or protect the rights of Ttexture and its customers.
- Persons involved in the consideration, negotiation, completion of a business transaction, including the sale, merger, consolidation, acquisition, change in control, transfer of substantial assets, bankruptcy, or reorganization, and any subsequent integration.
- We may also disclose your personal information to other parties when we have your consent to do so or when you direct us to.

## HOW DO WE PROTECT YOUR DATA?

We maintain a combination of reasonable physical, administrative, and technological controls to protect your data from unauthorized access or malicious actions. We take

reasonable measures to limit the access employees, contractors, and agents of ours have to your personal data to those who need to know this data to perform their assigned functions.

## **DATA TRANSFERS ACROSS BORDERS; DATA RESIDENCY**

In the provision of Ttexture Offerings, we process personal data at all of our business locations (see here). However, we will not transfer personal data about individuals, who have signed up to our EU offerings or who we know are resident in the European Union, to other countries unless the European Commission has determined that such country has an adequate level of data protection.

Ttexture Offerings are based on cloud infrastructure services provided by Google Inc., USA, primarily using its data processing region europe-west3 (Frankfurt), but also others. While this means data remains resident within that data processing region while at rest, data may be processed in the United States of America in certain circumstances. Please refer to <https://cloud.google.com/> for further information.

## **YOUR MARKETING AND COOKIE CHOICES**

When we send you marketing emails, they might include a web beacon or similar technology that lets us know if you received or opened the email and whether you clicked on any of the links in the email. You can opt-out of marketing emails that may use web beacons by expressing your preferences to us or by clicking on the opt-out link contained within the email. Alternatively, you can opt-out of receiving any marketing communication from Ttexture by email to [privacy@ttexture.io](mailto:privacy@ttexture.io)

With the exception of Cookies that are strictly necessary for our applications, we provide you with choices about our use of Cookies on our applications, including seeking your consent as may be required by law. You can manage your preferences for Cookies on our websites. Please keep in mind that you may also need to clear your Cookies on each browser on each device, in order to reset these settings.

You can also modify your browser settings to control whether your computer or other device accepts or declines Cookies. These settings are generally available within your browser's "Help", "Tools" or "Edit" menus. Keep in mind that your browser settings may prevent you from accessing all functionality on our website.

## CHANGES AND UPDATES

We may change this Privacy Statement to reflect changes in the law, our data handling practices, or the features of our business. The updated Privacy Statement will be available here.

## IMPORTANT INFORMATION

### Data Controller

Txture GmbH, Grabenweg 68, 6020 Innsbruck, Austria

### Email Contact

privacy@ttexture.io

### Data Processors (sub-contractors)

#### Google LLC

Txture Offerings and analytics are based on services provided by

Google, Inc.

1600 Amphitheatre Parkway Mountain View

CA 94043, USA

Google itself uses further subprocessors, which are disclosed here:

<https://cloud.google.com/terms/subprocessors>

#### HubSpot

2nd Floor 30 North Wall Quay

Dublin 1, Ireland

Telefon: +353 1 5187500

More information here: <https://legal.hubspot.com/privacy-policy>

## **LinkedIn**

Wilton Place  
Dublin 2, Ireland

More information here: <https://www.linkedin.com/legal/privacy-policy>

## **AWS**

Amazon Web Services EMEA SARL  
38 Avenue John F. Kennedy  
L-1855  
Luxembourg

More information here: <https://aws.amazon.com/privacy/>

## **Atlassian**

Atlassian B.V.  
c/o Atlassian, Inc.  
350 Bush Street, Floor 13  
San Francisco, CA 94104

More information here: <https://www.atlassian.com/legal/privacy-policy>

## **Sentry**

Functional Software, Inc.  
45 Fremont Street, 8th Floor  
San Francisco, CA 94105

More information here: <https://sentry.io/privacy/>

## **Mixpanel**

MIXPANEL S.L.  
Avenida Diagonal  
442 – P. 3 PTA. 1 08037  
Barcelona, Spain

More information here: <https://mixpanel.com/legal/privacy-policy>

## Legal Basis

We process personal data on one or more of the following legal bases:

- as necessary to enter into a contract with you or a legal entity you represent, to perform our contractual obligations, to provide Ttexture Offerings, to respond to requests from you, or to provide customer support;
- where we have a legitimate interest, as described in this Privacy Notice;
- as necessary to comply with relevant law and legal obligations; or
- with your consent; when you consent to our processing your personal information for a specified purpose, you may withdraw your consent at any time, and we will stop any further processing of your data for that purpose.

## Your Rights

Subject to applicable law, you have the right to:

- ask if we hold personal data about you and request copies of such data and how it is processed;
- request that inaccurate personal data is corrected;
- request deletion of personal data that is no longer necessary for the purposes underlying the processing;
- object to the processing of personal data; and
- opt-out of certain direct marketing communications;
- opt-out of certain disclosures of your personal information to third parties;
- withdraw any consent you have given to process personal data, at any time;
- request portability of personal data that you have provided to us, where the processing of such personal data is based on consent or a contract with you and is carried out by automated means.

If you wish to do any of these things, contact [privacy@ttexture.io](mailto:privacy@ttexture.io)

## Data Protection Officer

Since Ttexture Offerings are addressed at B2B customers, they do not require the processing of personal data at a “large scale” within the meaning of Art 37 GDPR and therefore Ttexture does not currently have a Data Protection Officer.



## **Supervisory Authority**

The competent data protection authority supervising us is:

Österreichische Datenschutzbehörde

Barichgasse 40-42

1030 Wien, Austria

e-mail: [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)