

Keen Software House Privacy Policy

The revised privacy policy will be effective starting on May 25, 2018

What this policy covers

Your privacy is important to us, and so is being transparent about how we collect, use, and share information about you. This policy is intended to help you understand:

- [What information we collect about you](#)
- [How we use information we collect](#)
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- [How we store and secure information we collect](#)
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This Privacy Policy covers the information we collect about you when you use our products or Products and Services, or otherwise interact with Keen (for example, attending Keen events), unless a different privacy policy is displayed. This policy also explains your choices about how we use information about you. Your choices include how you can object to certain uses of information about you and how you can access and update certain information about you. **If you do not agree with this policy, do not access or use our Products and Services or interact with any other aspect of our business.**

When we refer to "Keen Software House", "Keen", "we", "our" or "us" in this policy, we mean Keen Software House a.s. and Keen SWH LTD., which controls the information Keen collects when you use the Products and Services. We also own and operate a number of websites and offer related Products and Services, like support. We refer to all of these products, together with our other Products and Services and websites as "Products and Services" in this policy.

What information we collect about you

We collect information about you when you provide it to us, when you use our Products and Services, and when other sources provide it to us, as further described below.

Information you provide to us

We collect information about you when you input it into the Products and Services or otherwise provide it directly to us.

- **Account and Profile Information:** We collect information about you when you register for an account, create or modify your profile, set preferences, sign-up for or make purchases through the Products and Services. For example, you provide your contact information and, in some cases, billing

information when you register for the Products and Services. You also have the option of adding a profile photo, bio, and other details to your profile information to be displayed in our Products and Services. We keep track of your preferences when you select settings within the Products and Services.

- **Content you provide through our products:** The Products and Services include the Keen web, desktop and mobile products you use, where we collect and store content that you post, send, receive and share. This content includes any information about you that you may choose to include. Please be aware that our Products may contain third-party content (e.g. mods, extensions or add-ons) that are developed and controlled without our approval or supervision. Keen does not have access to and is not responsible for data collected through this content.
- **Content you provide through our websites:** The Products and Services also include our websites owned or operated by us. We collect other content that you submit to these websites, which include social media or social networking websites operated by us. For example, you provide content to us when you provide feedback or when you participate in any interactive features, surveys, contests, promotions, sweepstakes, activities or events. This also includes all personal and professional information you provide through recruitment process.
- **Information you provide through our support channels:** The Products and Services also include customer support, where you may choose to submit information regarding a problem you are experiencing with a Product or a Service. Whether you designate yourself as a technical contact, open a support ticket, speak to one of our representatives directly or otherwise engage with our support team, you will be asked to provide contact information, a summary of the problem you are experiencing, and any other documentation, screenshots or information that would be helpful in resolving the issue.
- **Payment Information:** We collect certain payment and billing information when you register for certain paid Products and Services. For example, we ask you to designate a billing representative, including name and contact information, upon registration. You might also provide payment information, such as payment card details, which we collect via secure payment processing Products and Services.

Information we collect automatically when you use the Products and Services

We collect information about you when you use our Products and Services, including browsing our websites and taking certain actions within the Products and Services.

- **Your use of the Products and Services:** We keep track of certain information about you when you visit and interact with any of our Products and Services. This information includes the features you use; the cards, boards, teams and other links you click on; the type, size and filenames of attachments you upload to the Products and Services; frequently used search terms; and how you interact with others on the Products and Services. We also collect information about the teams and people you work with and how you interact with them, like who you collaborate with and communicate with most frequently.

- **Device and Connection Information:** We collect information about your computer, phone, tablet, or other devices you use to access the Products and Services. This device information includes your connection type and settings when you install, access, update, or use our Products and Services. We also collect information through your device about your operating system, browser type, IP address, URLs of referring/exit pages, device identifiers, and crash data. We use your IP address and/or country preference in order to approximate your location to provide you with a better Service experience. How much of this information we collect depends on the type and settings of the device you use to access the Products and Services.
- **Cookies and Other Tracking Technologies:** Keen and our third-party partners, such as our analytics partners, use cookies and other tracking technologies to provide functionality and to recognize you across different Products and Services and devices. For more information, please see our Cookies and Tracking Notice, which includes information on how to control or opt out of these cookies and tracking technologies.

Information we receive from other sources

We receive information about you from other Service users, from third party Products and Services and related companies, and from our business and channel partners.

- **Other users of the Products and Services:** Other users of our Products and Services may provide information about you when they submit content through the Products and Services. For example, you may be mentioned by someone else on a card, or a team member may upload content about you to a board. We also receive your email address from other Service users when they provide it in order to invite you to the Products and Services. Similarly, an administrator may provide your contact information when they designate you as another administrator for a board, team or an enterprise or business account.
- **Other Products and Services you link to your account:** We receive information about you when you or your administrator enable third-party apps or integrate or link a third-party service with our Products and Services. For example, if you create an account or log into the Products and Services using your Google credentials, we receive your name and email address as permitted by your Google profile settings in order to authenticate you. You or your administrator may also integrate our Products and Services with other Products and Services you use, such as to allow you to access, store, share and edit certain content from a third-party through our Products and Services. For example, you may authorize our Products and Services to access and display files from a third-party document-sharing service within the Products and Services interface. Or you may authorize our Products and Services to sync a contact list or address book so that you can easily connect with those contacts within the Products and Services or invite them to collaborate with you on our Products and Services. The information we receive when you link or integrate our Products and Services with a third-party service depends on the settings, permissions and privacy policy controlled by that third-party service. You should always check the privacy settings and notices in these

third-party Products and Services to understand what data may be disclosed to us or shared with our Products and Services.

- **Keen Partners:** We work with a global network of partners who provide consulting, implementation, training and other Products and Services around our products. Some of these partners also help us to market and promote our products, generate leads for us, and resell our products. We receive information from these partners, such as billing information, billing and technical contact information, company name, what products you have purchased or may be interested in, evaluation information you have provided, what events you have attended, and what country you are in.
- **Other partners:** We receive information about you and your activities on and off the Products and Services from third-party partners, such as advertising and market research partners who provide us with information about your interest in, and engagement with, our Products and Services and online advertisements.

How we use information we collect

How we use the information we collect depends in part on which Products and Services you use, how you use them, and any preferences you have communicated to us. Below are the specific purposes for which we use the information we collect about you.

- **To provide the Products and Services and personalize your experience:** We use information about you to provide the Products and Services to you, including to process transactions with you, authenticate you when you log in, provide customer support, and operate and maintain the Products and Services. For example, we use the name and picture you provide in your account to identify you to other Service users.
- **For research and development:** We are always looking for ways to make our Products and Services smarter, faster, secure, integrated and useful to you. We use collective learnings about how people use our Products and Services and feedback provided directly to us to troubleshoot and to identify trends, usage, activity patterns and areas for integration and improvement of the Products and Services. In some cases, we apply these learnings across Keen owned or operated Products and Services to improve and develop similar features or to better integrate the Products and Services you use. We also test and analyze certain new features with some users before rolling the feature out to all users.
- **For recruitment purposes:** We are looking for the brightest people to hire into our teams. Information you share with us will be used solely for the purpose to select and hire into our companies, not traded elsewhere.
- **To communicate with you about the Products and Services:** We use your contact information to send transactional communications via email and within the Products and Services, including confirming your purchases, reminding you of subscription expirations, responding to your comments, questions and requests, providing customer support, and sending you technical notices, updates, security alerts, and administrative messages. Depending on your settings, we send you email notifications when you or others interact on the Products and Services. We also provide tailored communications based on

your activity and interactions with us. For example, certain actions you take in the Products and Services may automatically trigger a feature or third-party app suggestion within the Products and Services that would make that task easier. We also send you communications as you onboard to a particular Service to help you become more proficient in using that Service. These communications are part of the Products and Services and in most cases you cannot opt out of them. If an opt out is available, you will find that option within the communication itself or in your account settings.

- **To market, promote, and drive engagement with the Products and Services:** We use your contact information and information about how you use the Products and Services to send promotional communications that may be of specific interest to you, including by email, as well as on platforms like Facebook and Google. These communications are aimed at driving engagement and maximizing what you get out of the Products and Services, including information about new features, survey requests, newsletters, and events we think may be of interest to you. We also communicate with you about new product offers, promotions and contests. You can control whether you receive these communications as described below under "Opt-out of communications."
- **Customer support:** We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash information, and to repair and improve the Products and Services. Where you give us permission to do so, we share your information with a Keen Expert for the purpose of responding to support-related requests. Please be aware the Keen experts are other Keen users, not employees of, or directly affiliated with Keen.
- **For safety and security:** We use information about you and your Service use to verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of Service policies.
- **To protect our legitimate business interests and legal rights:** Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.
- **With your consent:** We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Products and Services, with your permission.
- **Legal bases for processing (for EEA users):** If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the Products and Services you use and how you use them. This means we collect and use your information only where:
 - We need it to provide you the Products and Services, including to operate the Products and Services, provide customer support and personalized features and to protect the safety and security of the Products and Services;
 - It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market

and promote the Products and Services and to protect our legal rights and interests;

- You give us consent to do so for a specific purpose; or
- We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Products and Services.

How we share information we collect

We share information we collect about you in the ways discussed below, including in connection with possible business transfers, but we are not in the business of selling information about you to advertisers or other third parties.

Sharing with other Service users

When you use the Products and Services, we share certain information about you with other Service users.

- **For collaboration:** You can create content, which may contain information about you, and grant permission to others to see, share, edit, copy and download that content based on settings you or your administrator (if applicable) select. Some of the collaboration features of the Products and Services display some or all of your profile information to other Service users when you share or interact with specific content. For example, when you comment on a card, we display your profile picture and name next to your comments so that other users with access to the card understand who made the comment. Similarly, when you join a team, your name, profile picture and contact information and will be displayed in a list for other team members so they can find and interact with you. Please be aware that some boards can be made publicly available, meaning any content posted on that board, including information about you, can be publicly viewed and indexed by and returned in search results of search engines. You can check the board settings at any time to confirm whether a particular board is public or private.
- **Managed accounts and administrators:** If you register or access the Products and Services using an email address with a domain that is owned by your employer or organization, or associate that email address with your existing account and such organization wishes to establish a Keen Products and Services account, certain information about you including your name, profile picture, contact info, content, and account use may become accessible to that organization's administrator and other Keen service users, as permitted by your administrator, to provide you additional products and Products and Services or to integrate your Keen Products and Services and other products and Products and Services. For example, your organization may request that we provide extra security controls around your account to protect information about your organization. If you are the administrator of a

board, team or enterprise or business account within the Products and Services, we may share your contact information with current or past Service users, for the purpose of facilitating Service-related requests.

- **Community Forums:** Our websites offer publicly accessible blogs, forums, bug trackers, and wikis like Keen Community. You should be aware that any information you provide in these websites - including profile information associated with the account you use to post the information - may be read, collected, and used by any member of the public who accesses websites. Your posts and certain profile information may remain even after you terminate your account. We urge you to consider the sensitivity of any information you input into these Products and Services. To request removal of your information from publicly accessible websites operated by us, please contact us as provided below. In some cases, we may not be able to remove your information, in which case we will let you know if we are unable to and why.

Sharing with third parties

We share information with third parties that help us operate, provide, improve, integrate, customize, support and market our Products and Services.

- **Service Providers:** We work with third-party service providers to provide website and application development, hosting, maintenance, backup, storage, virtual infrastructure, payment processing, analysis and other Products and Services for us, which may require them to access or use information about you. If a service provider needs to access information about you to perform Products and Services on our behalf, they do so under instruction from us, including abiding by policies and procedures designed to protect your information.
- **Keen Partners:** We work with third parties who provide consulting, sales, development, support and technical Products and Services to deliver and implement customer solutions around the Products and Services. We may share your information with these third parties in connection with their Products and Services, such as to assist with billing and collections, to provide localized support, and to provide customizations. We may also share information with these third parties where you have agreed to that sharing.

Cellense, s.r.o., Zálužická 1, Bratislava 821 01, Slovak Republic, Company ID No.: (IČO) 47 523 697 ("BuffPanel") processes your personal data for the statistical purposes pursuant to the Article 89 GDPR as a data controller. Recipients of your personal data include staff of BuffPanel employees or staff of other sub-contractors (mainly hosting and cloud providers for BuffPanel) located in the EU. Such processing will only occur as long as you continue to use our services. As a data controller, BuffPanel does not process any special categories of personal data, does not monetize personal data and does not perform automated individual decision-making. If you have any question about BuffPanel's processing of personal data, please visit <https://BuffPanel.com/terms/terms-of-privacy.html> or contact BuffPanel directly at BuffPanel@BuffPanel.com. Please note we are not entitled to handle your request if your request is related to purposes pursued by BuffPanel as a data controller. You may also lodge a complaint at the Office of Personal Data Protection in Slovakia, where the EU establishment of BuffPanel is located (<https://dataprotection.gov.sk/uouu/en>). Nothing prevents you to lodge complaint elsewhere. For clarity, we use BuffPanel as a data processor to support our services we provide to you. When selecting BuffPanel as a data processor, we have accessed the guarantees provided by BuffPanel to comply with the GDPR. This information is required because BuffPanel legitimately process your personal data for their own above mentioned purposes of processing as well.

- **Links to Third-Party Sites:** The Products and Services may include links that direct you to other websites or Products and Services whose privacy practices may differ from ours. Your use of and any information you submit to any of those third-party sites is governed by their privacy policies, not this one.
- **With your consent:** We share information about you with third parties when you give us consent to do so. For example, we may display personal testimonials of satisfied customers on our public websites. With your consent, we may post your name alongside the testimonial.
- **Compliance with Enforcement Requests and Applicable Laws; Enforcement of Our Rights:** In exceptional circumstances, we may share information about you with a third party if we believe that sharing is reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, (b) enforce our agreements, policies and terms of service, (c) protect the security or integrity of our products and Products and Services, (d) protect Keen, our customers or the public from harm or illegal activities, or (e) respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

Sharing with affiliated companies

We share information we collect with affiliated companies and, in some cases, with prospective affiliates. Affiliated companies are companies owned or operated by Keen. The protections of this privacy policy apply to the information we share in these circumstances.

- **Business transfers:** We may share or transfer information we collect under this privacy policy in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of the Keen businesses to another company. You will be notified via email and/or a prominent notice on the Products and Services if a transaction takes place, as well as any choices you may have regarding your information.

How we store and secure information we collect

Information storage and security

We use data hosting service providers in the EU and the United States to host the information we collect, and we use technical measures to secure your data. While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others. We will respond to requests about this within a reasonable timeframe.

How long we keep information

How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete

or anonymize your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

- **Account information:** We retain your account information until you delete your account. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations and to continue to develop and improve our Products and Services. Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Products and Services, not to specifically analyze personal characteristics about you.
- **Information you share on the Products and Services:** If your account is deactivated or disabled, some of your information and the content you have provided will remain in order to allow your team members or other users to make full use of the Products and Services. For example, we continue to display comments and content you provided to boards or cards.
- **Managed accounts:** If the Products and Services are made available to you through an organization (e.g., your employer), we retain your information as long as required by the administrator of your account. For more information, see "Managed accounts and administrators" above.
- **Marketing information:** If you have elected to receive marketing emails from us, we retain information about your marketing preferences unless you specifically ask us to delete such information. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.
- **Recruitment process:** We keep all information necessary for hiring process for the time of duration of this selection process unless you specifically ask us to delete your information during the process.

How to access and control your information

You have certain choices available to you when it comes to your information. Below is a summary of those choices, how to exercise them and any limitations. We will respond to requests about this within a reasonable timeframe.

Your Choices:

You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), to request the deletion or restriction of your information, or to request your information in a structured, electronic format. Below, we describe the tools and processes for making these requests. You can exercise some of the choices by logging into the Products and Services and using settings available within the Products and Services or your account. Where the Products and Services are administered for you by an administrator (see "Notice to End Users" below), you may need to contact your administrator to assist with your requests first. For all other requests, you may contact us as provided in the Contact Us section below to request assistance.

Your request and choices may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we or your administrator are permitted by law or have compelling legitimate interests to keep. Where you have asked us to share data with third parties, you will need to contact those third-party service providers directly to have your information deleted or otherwise restricted. If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed.

- **Access and update your information:** Our Products and Services and related documentation give you the ability to access and update certain information about you from within the Product or Service. For example, you can access your profile information from your account and search for content containing information about you using key word searches in the Service. You can update your profile information within your profile settings and modify content that contains information about you using the editing tools associated with that content.
- **Deactivate membership:** You or an administrator can deactivate your access. If you can deactivate your own access, that setting is available to you in your account settings. Otherwise, please contact your administrator. If you are an administrator and are unable to deactivate an account through your administrator settings, please contact Keen support. Please be aware that deactivating access to a board, team or enterprise does not delete your information from that board, team or enterprise; your information remains visible to other Service users based on your past participation within the Products and Services. For more information on how to delete your information, see below.
- **Delete your information:** Our Products and Services and related documentation give you the ability to delete certain information about you from within the Service. For example, you can remove content that contains information about you using the key word search and editing tools associated with that content and you can remove certain profile information within your profile settings. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.
- **Request that we stop using your information:** In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. For example, if you believe a Product or a Service account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this policy. Where you gave us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. You can also opt-out of our use of your information for marketing purposes by contacting us, as provided below. When you make such requests, we may need time to investigate and facilitate your request. If there is a delay or dispute as to whether we have the right to continue using your information, we will restrict any further use of your information until the request is honored or the dispute is resolved, provided your administrator does not object (where applicable). If you object to

information about you being shared with a third-party app, please disable the app or contact your administrator to do so.

- **Opt out of communications:** You may opt out of receiving promotional communications from us by using the unsubscribe link within each email, updating your email preferences within your Service account settings menu, or by contacting us as provided below to have your contact information removed from our promotional email list or registration database. Even after you opt out from receiving promotional messages from us, you will continue to receive transactional messages from us regarding our Products and Services. You can opt out of some notification messages in your account settings. Please note, you will continue to receive generic ads.
- **Turn off Cookie Controls:** Relevant browser-based cookie controls are described in our Cookies & Tracking Notice.
- **Send "Do Not Track" Signals:** Some browsers have incorporated "Do Not Track" (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. Because there is not yet a common understanding of how to interpret the DNT signal, our Products and Services do not currently respond to browser DNT signals. You can use the range of other tools we provide to control data collection and use, including the ability to opt out of receiving marketing from us as described above.
- **Data portability:** Data portability is the ability to obtain some of your information in a format you can move from one service provider to another (for instance, when you transfer your mobile phone number to another carrier). Depending on the context, this applies to some of your information, but not to all of your information. Should you request it, we will provide you with an electronic file of your basic account information and the information you create on the spaces under your sole control, like your own boards.

How we transfer information we collect internationally

International transfers of information we collect

We collect information globally and primarily store that information in the European Union. We transfer, process and store your information outside of your country of residence, to wherever we or our third-party service providers operate for the purpose of providing you the Products and Services. Whenever we transfer your information, we take steps to protect it.

Other important privacy information

Notice to End Users

Our products are intended for both personal use or use by teams and organizations. Where the Products and Services are made available to you through an organization (e.g. your employer), that organization is the administrator of the Products and Services and is responsible for the end-users and/or Service sites over which it has control. If this is the case, please direct your data privacy questions to your administrator, as your use of the Products and Services is subject to that organization's policies. We are not responsible for the privacy or security practices of an administrator's organization, which may be different than this policy.

Even if the Products and Services are not currently administered to you by an organization, if you are a member of a team administered by an organization, or if you use an email address provided by an organization (such as your work email address) to access the Products and Services, then the administrator of that team or the owner of the domain associated with your organizational email address (e.g. your employer) may assert administrative control over your account and use of the Products and Services at a later date. You will be notified if this happens.

Administrators are able to restrict your access to and privileges within the respective board, team or enterprise the administrator controls. In some cases, enterprise administrators can also:

- require you to reset your account password;
- restrict, suspend or terminate your access to the Products and Services or your account;
- control your ability to edit, restrict, modify or delete account information;
- change your account information, including profile information or the email address associated with your account;
- access information in and about your account;
- access or retain information stored as part of your account; and

If you do not want an administrator to be able to assert control over your account or use of the Products and Services, you should deactivate your membership with the relevant board, team or enterprise or remove any email addresses containing a domain owned or controlled by the administrator entirely from your account. Once an administrator asserts control over your account or use of the Products and Services, you may no longer be able to withdraw membership or change the email address associated with your account without administrator approval.

Please contact your organization or refer to your administrator's organizational policies for more information.

Our policy towards children

The Products and Services are not directed to individuals under 16. We do not knowingly collect personal information from children under 16. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information. If you become aware that a child has provided us with personal information, please contact our support Products and Services.

Changes to our Privacy Policy

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice by adding a notice on the Products and Services homepages, login screens, or by sending you an email notification. We will also keep prior versions of this Privacy Policy in an archive for your review. We encourage you to review our privacy policy whenever you use the Products and Services to stay informed about our information practices and the ways you can help protect your privacy.

If you disagree with any changes to this privacy policy, you will need to stop using the Products and Services and deactivate your account(s), as outlined above.

Contact Us

Your information is controlled by Keen. If you have questions or concerns about how your information is handled, please direct your inquiry to info@keenswh.com.