Privacy Policy for Value on Board

Last Updated: April 7, 2025

1. Introduction

Value on Board GmbH ("Value on Board," "we," "us," or "our") is committed to protecting your privacy and ensuring the security of your personal data. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our end-to-end low-code/no-code AI-supported platform for complex business applications ("Platform"), visit our website at www.valueonboard.com, or engage with our services.

By accessing or using the Platform, you consent to the practices described in this Privacy Policy. If you do not agree with the terms of this Privacy Policy, please do not access the Platform.

2. Information We Collect

2.1 Personal Data

We may collect personal data that you voluntarily provide to us when you:

- Register for an account
- Use our Platform
- Subscribe to our newsletter
- Request customer support
- Participate in surveys or promotional activities
- Contact us directly

The personal data we collect may include:

- Contact information (such as name, email address, phone number, and company name)
- Account credentials (such as username and password)
- Professional information (such as job title, department, and company)
- Payment information (such as billing address and payment method details)
- User preferences (such as notification and communication preferences)

2.2 Usage Data

We automatically collect usage data when you access and use our Platform, including:

- IP address
- Browser type and version
- Operating system
- Device information
- Pages visited
- Time and date of your visit
- Time spent on pages
- Clickstream data
- Other diagnostic data

2.3 Data Created Through the Platform

As a low-code/no-code platform provider, Value on Board enables users to create and manage various types of data. We process this data on behalf of our customers in accordance with their instructions and our Terms of Service.

3. How We Collect Your Information

3.1 Direct Collection

We collect information directly from you when you:

- Complete forms on our Platform
- Create an account
- Subscribe to our services
- Communicate with us via email, phone, or other channels
- Participate in user surveys or provide feedback

3.2 Automated Collection

We use cookies and similar tracking technologies to automatically collect certain information. For more information about our use of these technologies, please see our Cookie Policy.

3.3 Third-Party Sources

We may receive information about you from third-party sources, such as:

- Business partners
- Service providers
- Public databases
- Social media platforms (if you connect your account with us)

4. How We Use Your Information

We use the information we collect for the following purposes:

4.1 Providing and Improving Our Services

- To provide and maintain our Platform
- To improve our Platform and services
- To develop new features, products, and services
- To process transactions and manage your account
- To provide customer support and respond to your inquiries

4.2 Communications

- To communicate with you about your account or use of our Platform
- To send you updates, security alerts, and administrative messages
- To send you marketing communications (subject to your preferences)
- To respond to your inquiries and provide customer support

4.3 Analytics and Research

- To analyze usage patterns and trends
- To evaluate and improve the performance and quality of our Platform
- To develop new features, products, and services
- To conduct research and analytics to improve our business operations

4.4 Security and Compliance

- To verify your identity and prevent fraud
- To detect, prevent, and address technical issues
- To ensure the security of our Platform
- To comply with legal obligations

4.5 Personalization

- To personalize your experience on our Platform
- To deliver content and product recommendations tailored to your interests
- To display relevant advertising (if applicable)

5. Data Processing as a Service Provider

As a provider of a low-code/no-code platform, Value on Board processes data on behalf of our customers according to their instructions. In this role:

• We process data solely for the purpose of providing our services to our customers

- We implement appropriate technical and organizational measures to ensure the security of processed data
- We support our customers in fulfilling their obligations under applicable data protection laws
- We do not use customer data for our own business purposes beyond what is necessary to provide our services

6. Legal Basis for Processing (EU Users)

For users in the European Union, we process your personal data based on the following legal grounds:

6.1 Contract Performance

Processing necessary for the performance of a contract with you or to take steps at your request before entering into a contract.

6.2 Legitimate Interests

Processing necessary for our legitimate interests, provided those interests are not overridden by your rights and interests. Our legitimate interests include:

- Operating and improving our Platform
- Marketing our products and services
- Protecting our Platform, users, and business from fraud and harm
- Complying with legal obligations

6.3 Consent

Processing based on your consent. You can withdraw your consent at any time.

6.4 Legal Obligation

Processing necessary to comply with our legal obligations.

7. Data Sharing and Disclosure

We may share your information with the following categories of recipients:

7.1 Service Providers

We share information with third-party service providers who help us operate our Platform and conduct our business, such as:

- Cloud hosting providers
- Payment processors
- Customer support services
- Analytics providers
- Marketing and communication services

7.2 Business Partners

We may share information with business partners with whom we jointly offer products or services.

7.3 Affiliates

We may share information with our affiliated companies for purposes consistent with this Privacy Policy.

7.4 Legal Requirements

We may disclose information if required to do so by law or in response to valid requests by public authorities (e.g., a court or government agency).

7.5 Business Transfers

In connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company, user information may be shared or transferred.

7.6 With Your Consent

We may share your information with third parties when you have given us your consent to do so.

8. International Data Transfers

Value on Board is headquartered in Germany, and we may transfer your personal data to countries outside the European Economic Area (EEA). When we transfer personal data outside the EEA, we ensure that appropriate safeguards are in place, such as:

- Standard Contractual Clauses approved by the European Commission
- Binding Corporate Rules
- Privacy Shield certification (where applicable)
- Other legally approved transfer mechanisms

9. Data Security

We have implemented appropriate technical and organizational measures to protect your personal data against unauthorized access, loss, or alteration, including:

- Encryption of sensitive data
- Regular security assessments
- Access controls and authentication requirements
- Secure development practices
- Employee training on data protection
- Hosting on AWS in Germany with enterprise-grade security features
- Implementation of zero-trust architecture

However, no system can be 100% secure, and we cannot guarantee the absolute security of your information.

10. Data Retention

We retain your personal data for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you
- Our legal obligations
- Applicable statute of limitations
- Ongoing or potential legal disputes
- Guidelines from relevant data protection authorities

When we no longer need your personal data, we securely delete or anonymize it.

11. Your Data Protection Rights

Depending on your location, you may have certain rights regarding your personal data:

11.1 For EU Residents

Under the General Data Protection Regulation (GDPR), you have the following rights:

- **Right to access** the right to request information about how we process your personal data
- **Right to rectification** the right to request that we correct inaccurate or incomplete information
- **Right to erasure** the right to request that we delete your personal data in certain circumstances
- **Right to restrict processing** the right to request that we limit how we use your personal data

- **Right to data portability** the right to receive your personal data in a structured, commonly used format
- Right to object the right to object to our processing of your personal data
- **Rights related to automated decision-making** the right not to be subject to a decision based solely on automated processing

11.2 For California Residents

Under the California Consumer Privacy Act (CCPA), you have the right to:

- Know what personal information is collected about you
- Know whether your personal information is sold or disclosed and to whom
- Opt out of the sale of your personal information
- Access your personal information
- Request deletion of your personal information
- Not be discriminated against for exercising your privacy rights

11.3 How to Exercise Your Rights

To exercise your data protection rights, please contact us at privacy@valueonboard.com. We will respond to your request within the timeframe required by applicable law.

12. Children's Privacy

Our Platform is not intended for children under the age of 16, and we do not knowingly collect personal data from children under 16. If you are a parent or guardian and believe that your child has provided us with personal data, please contact us. If we become aware that we have collected personal data from children without verification of parental consent, we will take steps to remove that information from our servers.

13. Third-Party Links and Services

Our Platform may contain links to third-party websites, services, or applications that are not owned or controlled by Value on Board. This Privacy Policy does not apply to such third-party services, and we are not responsible for their privacy practices. We encourage you to review the privacy policies of any third-party services you access.

14. Updates to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. We will notify you of any material changes by posting the new Privacy Policy on this page and updating the "Last Updated" date. For significant changes, we will provide additional notice, such as a banner on our Platform or a direct notification. Your continued use of

the Platform after the changes have been made will constitute your acceptance of the updated Privacy Policy.

15. Cookie Policy

We use cookies and similar tracking technologies to enhance your experience on our Platform, analyze usage patterns, and deliver personalized content. For more information about our use of cookies and how you can control them, please see our Cookie Policy.

16. Data Protection Officer

We have appointed a Data Protection Officer (DPO) who is responsible for monitoring our compliance with applicable data protection laws. You can contact our DPO at dpo@valueonboard.com.

17. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us at:

Value Based Solutions Kft.

1075 Budapest, Károly körút 5. A. ép. 1/2 1. Hungary

Email: info@valueonboard.com

18. Supervisory Authority

If you are in the European Union and believe that we have not adequately addressed your data protection concerns, you have the right to lodge a complaint with your local data protection authority.