



PRIVACY POLICY

EU/EEA Residents appendix

The General Data Protection Regulation EU 2016/679 (hereinafter GDPR) shall be applicable to residents and users of the website in the European Union (EU) and European Economic Area (EEA). Below you will find additional information required as per applicable data protection legislation.

1. Description of data processing and cookies

When you visit our website, we might collect and process your personal data for the following purposes and legal grounds:

PURPOSE	LEGAL GROUND
Process and respond to your requests when you reach us via our contact forms.	(Pre)contractual or legitimate interest, Art. 6(1)(b) and 6(1)(f) GDPR respectively.
Improve website performance and browsing experience.	Legitimate interest, Art. 6(1)(f) GDPR
Display content on our website including videos	Consent or legitimate interest, Art. 6(1)(a) and 6(1)(f) GDPR respectively
Maintain the security of our website	legitimate interest, Art. 6(1)(f) GDPR
Analyze site usage and enhance site navigation	Consent or legitimate interest, Art. 6(1)(a) and 6(1)(f) GDPR respectively
Marketing purposes	Consent or legitimate interest, Art. 6(1)(a) and 6(1)(f) GDPR respectively
Share information with advertising partners	Consent, Art. 6(1)(a) GDPR

When you use our website, we may use cookies and similar technologies. Our cookie banner and cookie policy show you the list of the cookies we use, including their provider, purpose, description and other relevant information. You can adjust your preferences and withdraw your consent at any time in the pop up on the left side of the page. See the Cookie Policy ([Cookies Policy - Clever Leaves](#)) for more information.



2. Data retention

Unless we have provided you with specific information about the retention of your personal data, we retain your data as long as is necessary to fulfill the purposes for which it has been collected. Data no longer required will be deleted.

3. Social links

On our website, we place social media buttons (such as LinkedIn and Twitter) in the form of links. We only display a button and do not integrate any social media plugins. This means that personal data from you will only be transferred to the social media provider if you click on the button.

If you are already logged into the social media service, when you click on the respective social media button, the social media service may also use this data to identify your username and, possibly, even your real name.

We have no control over the extent, nature and purpose of such data processing by the social media service. Please note that the social media service might use this data to create pseudonymised and even individualised user profiles.

You can find further information about how social media providers use your data on the privacy policies provided on their respective social media platforms.

4. Google Products

4.1. Google Analytics

We use the web analysis tool "Google Analytics" to design our websites according to your needs. Google Analytics creates usage profiles based on pseudonyms. For this purpose, permanent cookies are stored on your end device and read out by us. In this way, we are able to recognize returning visitors and count them as such.

Within the framework of Google Analytics, Google Ireland Limited and Google LLC (United States) support us. The data processing can therefore also take place outside the EU or EEA. With regard to Google LLC, no adequate level of data protection can be assumed due to the processing in the United States. There is a risk that authorities may access the data for security and monitoring purposes without you being informed or having the right to appeal. Please take this into account if you decide to give your consent to our use of Google Analytics.

If you wish to withdraw your consent, you can change your cookies preferences in the pop up on the left side of the page.



4.2. Google reCAPTCHA

In order to fulfill our legitimate interest to protect the security and integrity of our website, we utilize Google reCAPTCHA. This service is designed to identify and prevent automated software (bots) from engaging in abusive activities on our site, such as spamming or creating false accounts.

In order to determine whether a user is a human or a bot, Google reCAPTCHA analyzes various data such as IP address, the amount of time spent on the website, and mouse movements made by the user. This data is sent to Google, where it may be stored and analyzed.

It's important to note that this service may involve transferring your personal data to Google servers located in the United States, a country that does not offer the same level of data protection as the European Economic Area. You are free to not click on the reCAPTCHA box, however, that may limit your possibility to use the contact form.

5. Contact form

You are welcome to reach us via our contact form. In order to use our contact form, we ask you to provide the following information: your name, email, field of interest, and subject. Furthermore, you can decide for yourself whether you would like to provide us with further information (e.g., in the message text box). This information is provided voluntarily and is not required for contacting us. We process your details on the basis of your consent.

Your data will only be processed to answer your request. We will delete your data if they are no longer required and there are no legal obligations to retain them.

You can revoke your consent to the processing of your voluntarily stated information at any time. To do so, please use the email address provided in the section "Data protection requests" of this policy.

6. Transfer to Third Parties

Clever Leaves may share your personal data with:

- Our contractors and suppliers, including those who provide us with information technology services, such as hosting and technical support;
- our professional advisors and auditors;
- our business partners;
- regulators, governments and legal authorities, when required by the applicable regulation.



When we share your personal data with our service providers, the transfer falls under the scope of a data processing agreement which obliges our service providers to follow our strict instructions and comply with contractual obligations.

The personal data that we collect may be processed by Clever Leaves affiliated companies and trusted third parties. In some cases, we may transfer personal data to third countries outside the EU. Some of the countries to which your personal data is transferred may not offer an adequate level of protection equivalent to the protection offered by the laws in the EU. In such cases, to ensure that your personal data remains protected when it is transferred outside of the EU, we make sure that appropriate measures are implemented, including our intragroup agreement, or Standard Contractual Clauses issued by the European Commission.

Our business partners, such as Google, may transfer your data to countries (including the United States) in which data protection laws do not offer an adequate level of protection. When data are transferred to such countries, the authorities may have access to the data, without any legal recourse being available. In such cases, we ask you for your consent to perform this transfer based on Art. 49.1 (a) GDPR. If you wish to withdraw your consent, you can change your cookies preferences at any time in the pop up on the left side of the page.

7. Your rights as a data subject

According to Art. 12-22 GDPR, you may have the right to:

- access your data as well as receive a copy of your data;
- rectification and erasure;
- restriction of processing;
- data portability;
- object, if the data is processed pursuant to the legitimate interests of Clever Leaves;
- lodge a complaint with a supervisory authority if you believe that the processing of your personal data infringes applicable data protection regulations.

8. Data protection requests

Questions or comments regarding your rights as a data subject should be submitted to Clever Leaves by e-mail at info@cleverleaves.com.