Essential Content of the Joint Controller Agreement

entered into between Dealfront Group GmbH, Dealfront Germany GmbH and Dealfront Finland Oy Oy (jointly the "Parties" and each a "Party" or "Data Controller") pursuant to Art. 26 GDPR.

"Personal Data", "Process/Processing", "Data Subject", and "Supervisory Authority" shall have the same meaning as in the GDPR.

Dealfront Group GmbH, Dealfront Germany GmbH and Dealfront Finland Oy Oy are active in creating, marketing and providing technologies for the analysis and processing of media and digital information on the internet. The Parties have developed a new joint platform for the products of the Group to further develop the Group's business (herein referred to as "Platform"). The Parties have jointly developed the algorithms, data models and processing activities ("Software") underlying the services offered on the Platform and jointly decided on the methods, characteristics, functionalities and other properties of said Software.

To this end, the Parties have entered into a Joint Controller Agreement under which they have jointly determined the purposes and methods of processing of personal data.

In particular, the Joint Controller Agreement stipulates:

- the main categories of personal data collected and processed through and in connection with the Platform and the services provided in connection therewith;
- the decisions regarding the ways and means of acquisition and processing of such personal data;
- the assignment of tasks and activities to each Data Controller (e.g. the information obligations under the GDPR, handling of Data Subject Rights Requests);
- that the Data Controllers cooperate and provide each other with a reasonable level of assistance and information to ensure compliance and enable the other party to be able to demonstrate compliance with the GDPR and any other applicable law;
- that Dealfront Group GmbH shall name itself in the privacy notice displayed on the Platform as
 the central point for Data Subject requests regarding the Joint Data Processing and that all other
 Parties shall forward any Data Subject requests immediately to Dealfront Group GmbH; and
- that the Parties shall implement appropriate technical and organisational measures to ensure the security of the Joint Data Processing in accordance with Art. 32 GDPR.

Any complaints and requests to exercise the rights granted to the Data Subjects by Articles 12-23 of the GDPR will be handled by the Data Controllers according to their respective division of responsibilities, in compliance with the GDPR and any other legislation applicable from time to time to the processing of personal data.

In this regard, the contacts regarding privacy support and the competent operating office for such matters are:

privacy@dealfront.com

Data Subjects may exercise their rights vis-à-vis both all Data Controllers pursuant to Article 26 (3) of the GDPR by taking action against each Data Controller, independently of the other, before the competent Supervisory Authority and/or the competent national ordinary courts.