# Privacy policy concerning personal data

Last revised: 7 December 2018

KEEPEEK undertakes to offer its Users every guarantee regarding the security and confidentiality of their personal data (hereinafter referred to as Data), collected and processed during the use of the KEEPEEK Application under the conditions specified in the General terms and conditions of use.

In accessing the KEEPEEK Application and/or using any of the services offered by KEEPEEK, the User agrees to the collection and processing of their Data under the terms and conditions set out below.

This policy may be modified at any time in order to comply with any legislative, regulatory, jurisprudential or technical changes.

KEEPEEK undertakes to comply with the current legislation concerning the processing of Data and the protection of privacy, in accordance with Law No. 78-17 of 6 January 1978 relating to information technology, data files and civil liberties as well as Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of Data.

KEEPEEK therefore informs you of the following:

# 1. Identity of the controller

The entity responsible for the processing of User Data is KEEPEEK, a Joint Stock Company with a capital of €75,908, registered in the Paris RCS under the no. 505 319 889, and whose head office is located at 2 rue de la Roquette, passage du Cheval Blanc 75011 Paris.

Data is stored mainly on servers provided by the host of the Application identified in the Legal Notice.

# 2. Data Collected

In order to provide its services, KEEPEEK may collect User Data.

#### 2.1. Data transmitted by Users

Upon registration and use of the Platform, the User directly provides Data to KEEPEEK. This Data mainly includes: surname, first name, email.

#### 2.2. Data compiled

When using the Application, KEEPEEK compiles Data related to connection via the Internet or the use of the Application. This Data mainly includes: action and access logging, cookies, audience measurement tools.

# 3. Purposes of Data Processing

KEEPEEK is likely to process User Data for the following purposes:

- 3.1. Execution of the hosting contract
- 3.2. Execution of database and log backups
- 3.3. Execution of client-specific processing, carried out through the use of synchronisation scripts
- 3.4. Providing information about the Application (including new releases, events linked to its use, commercial offers, etc.,) about the company, and its activity
- 3.5. Providing statistics on application use
- 3.6. Providing a Face Recognition Feature in the Application
- 3.7. Follow-up of the commercial relationship

## 4. Data recipients

The Data collected or processed during the use of the Application by the User are intended for entities of KEEPEEK, persons empowered and authorised by KEEPEEK and for which their duties require that they have access to the Data for processing purposes as well as:

- the technical subcontractors chosen by KEEPEEK, in particular to host User Data
- KEEPEEK service providers, in order to ensure the proper functioning of the Application

## 5. Duration of Data retention

Data are stored by KEEPEEK only for the duration necessary for processing purposes as indicated in Article 3 above and in accordance with applicable regulations.

KEEPEEK undertakes to archive, anonymise, and delete Data as soon as the purpose or the retention limit has been reached.

The maximum retention periods apply unless a request for erasure or cessation of processing occurs before the limit is reached. However, at the end of this period, the Data may be archived in order to meet the legal, accounting and tax obligations of KEEPEEK.

#### 6. Data transfer outside the European Union

Data are not transferred to service providers or subcontractors outside the European Union.

# 7. Data security

In accordance with the Applicable Regulations, KEEPEEK makes every effort to process Data in a secure and confidential manner.

In particular, KEEPEEK implements organisational and technical security measures to preserve the confidentiality of data. The level of security of these measures is appropriate to the risks involved in the processing of Data.

## 8. Rights in regard to Data

The User has the following rights in regard to their data:

- A right to access the Data,
- A right to rectify the Data,
- A right to object to the collection and processing of Data,
- A right to erasure of their Data,
- A right to a limitation in the collection and processing of their Data,
- A right to Data portability.

The User may exercise their rights by sending a request by email to the KEEPEEK Data Protection Officer, at <u>dpo@keepeek.com</u>, or by post to the following address:

KEEPEEK - For the attention of the DPO – 2 rue de la Roquette, Passage du Cheval Blanc 75011 Paris.

The User is informed that the exercise of certain rights, including the right to oppose and the right to erasure, may restrict or prevent the access and/or use of the KEEPEEK Application.

## 9. Contact and Complaints

Any request that the User may have concerning the processing of their Data may be sent by email to the KEEPEEK Data Protection Officer, at <u>dpo@keepeek.com</u>, or by post at the following address:

KEEPEEK - For the attention of the DPO – 2 rue de la Roquette, Passage du Cheval Blanc 75011 Paris.

If the User believes that KEEPEEK does not comply with its obligations in regard to their Data, they may lodge a complaint with the competent Data Protection Supervisor of the European Union Member State in which they habitually reside.