



## Privacy & Cookies Policy

This "Privacy and Cookies Policy" is updated regularly: we invite you to consult it as often as possible in order to be informed of any latest changes. Last version of 05/25/2023.

### I: Scope of Skeepers' "Privacy and Cookie Policy"

Skeepers, SAS with a capital of 11,470,723 euros, registered with the Marseille Trade and Companies Register under number 879 038 990, and whose registered office is located at 18-20 Avenue Robert Schuman, CS 40494, 13002 Marseille, is the owner of the <https://skeepers.io/en/> website. It offers a range of products to cover the entire Customer Experience chain, from review to re-engagement (Solutions Ratings & Reviews (Verified Reviews), FeedBack Management, Customer Data Activation, Influencer Marketing, Live Shopping and Consumer Videos).

Skeepers is particularly concerned about issues related to confidentiality, as well as the protection of Personal Data of Users of its website and/or services, as well as those relating to its Customers. It takes this into account from the design of any new solution it offers to its customers.

It thus guarantees the highest level of protection of Personal Data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (known as the "General Data Protection Regulation", hereinafter "GDPR"), French law (Loi Informatique et Libertés de 1978, known as "LiL") and, in general, with any regulations applicable to it regarding the protection of such Personal Data ("Data Protection Regulations").

This "Privacy and Cookie Policy" describes in detail the policy and practices of Skeepers (or "the Skeepers Group") regarding the collection, use and disclosure of Personal Data that it processes on its behalf or on behalf of its Customers.

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### III: Content of the Skeepers Group's "Privacy and Cookie Policy"

#### 1: Definitions

"**Supervisory authority**" means an independent public authority established by a Member State pursuant to Article 51 of the GDPR, and to which any data subject may lodge a complaint concerning the protection of his or her personal data, i.e. the Commission Nationale de l'Informatique et des Libertés (CNIL) in France;

"**Client**", a natural or legal person benefiting from the Services of the Skeepers Group;

"**Consent**" of the data subject, i.e. any freely given, specific, informed and unambiguous indication of his or her wishes by which the data subject consents, by a statement or by a clear affirmative action, to the processing of personal data relating to him or her;

"**Consumer**", a natural person who acts for purposes that do not fall within the scope of his commercial, industrial, craft or liberal activity;

"**Personal data**" means **any information relating to an identified or identifiable natural person (hereinafter referred to as "data subject")**; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to its physical, physiological, genetic, mental, economic, cultural or social identity.

More simply, "**personal data**" is to be understood as **any information concerning Users**;

"**Skeepers Group or Skeepers**", an economic entity formed by Skeepers and all Group Subsidiaries;

"**Data Protection Regulation**": Includes REGULATION (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, known as the General Data Protection Regulation (or GDPR), the Directive on Privacy and Electronic Communications 2002/58/EC (as amended by Directive 2009/136/EC, and as amended and replaced where necessary) and their transposition into national law, Law No. 78-17 of 6 January 1978 relating to data processing, files and freedoms, known as the "Data Protection Act"; and any regulations, rules, derivative or associated legislation implemented by the European Union, a Member State of the European Economic Area and any State outside the European Union and the European Economic Area concerning the processing and protection of Personal Data (as amended and replaced from time to time);

"**Joint controllers**" are two or more controllers who jointly determine the purposes and means of the processing of personal data that they implement;

"**Data controller**" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing; where the purposes and means of such processing are determined by Union or Member State law, the controller may be designated or the specific criteria for his or her appointment may be provided for by the law of the processing or the specific criteria for his or her appointment may be provided for by the law of the processing or processing by Union or by the law of a Member State;

"**Service(s)**" / "**Solutions**" means the service(s) provided by the Skeepers Group - Ratings & Reviews (Verified Reviews), FeedBack Management, Customer Data Activation, Influencer Marketing, Live Shopping and Consumer Videos - subscribed to by the Customer;

"**Site**" or "**Platform**", website from which the Skeepers Group offers its Ratings & Reviews (Verified Reviews), FeedBack Management, Customer Data Activation, Influencer Marketing, Live Shopping and Consumer Videos solutions, accessible from the following domain name: <https://skeepers.io/en/>;

"**Processor**" means the natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller;



“**Processing**” means any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

More simply, “**Processing**” is any form of use of your data;

“**User**” means a person browsing the <https://skeepers.io/en/> website;

“**Personal data breach**” means a breach of security resulting in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

## 2: Processing of Personal Data by the Skeepers Group

Skeepers receives, collects and processes your Personal Data from various sources, which are explained to you below (ORIGIN OF YOUR DATA):

### A) The processing of Personal Data carried out by Skeepers (Data Controller) on its website

#### 1. The contact form

For any contact request made via the form available on the page <https://skeepers.io/en/contact-en/> the User gives his consent to Skeepers, via a checkbox, to process the following Personal Data:

- Surname and first name;
- Email address;
- Company name.

They must be filled in in order to be able to contact you again to respond to your request, but also to offer you our other Services that may be of interest to you, taking into account your needs (Ratings & Reviews (Verified Reviews), FeedBack Management, Customer Data Activation, Influencer Marketing, Live Shopping and Consumer Videos). Otherwise, it will be impossible to send the contact form.

Skeepers will also be able to process any other personal data that the User has chosen to communicate to it deliberately, during their exchanges.

Your information will be kept for three years, before deletion.

#### 2. Demo request

For any demo request made via the form available on the page <https://skeepers.io/en/demo-en/> the User gives his consent to Skeepers, via a checkbox, to process the following Personal Data:

- Surname and first name;
- Email address;
- Company name;
- Position held;
- Country.

They must be filled in in order to be able to contact you again to respond to your request, but also to send you personalized communications and offer you our other Services that may be of interest to you, taking into account your needs (Ratings & Reviews (Verified Reviews), FeedBack Management, Customer Data Activation, Influencer Marketing, Live Shopping and Consumer Videos ). Otherwise, sending the contact formulation will be impossible.



Skeepers will also be able to process any other personal data that the User has chosen to communicate to it deliberately, during their exchanges.

Your information will be kept for three years from the last contact, before deletion.

### **3. Subscribe to the Newsletter**

For any subscription to the Newsletter made via the insert at the bottom of the page of the website <https://skeepers.io/en/> the User gives his consent to Skeepers, by entering his email address, so that it sends him his letter of distribution.

The User can unsubscribe at any time via the unsubscribe link at the bottom of each email.

Your information will be kept until you exercise your rights of opposition and/or deletion.

### **4. Management of applications and interviews (constitution of a library)**

Any application received for a job offered within the Skeepers Group, or spontaneously, will be treated with the utmost care and attention.

If unfortunately your profile has not been retained, we will keep your information (resume and cover letter) for 2 years, before deleting it, unless you exercise your right to oppose or delete them before the end of the deadline.

Their processing is justified by the legitimate interest of the Skeepers Group to recruit and to build a CV library. The pre-contractual basis justifies the processing and storage of data when the candidate has been selected to join the Skeepers Group.

You have various rights over your information, including those of access, updating, opposition and deletion, the modalities of exercise of which are presented to you in the section "5: Rights relating to Personal Data and their management".

### **5. Cookies**

Access to and navigation on the Site <https://skeepers.io/en/> triggers the processing of data collected through cookies, pixels and other similar technologies, tracers (collectively referred to as "Cookies" in this "Privacy and Cookie Policy") necessary for the Site to function, in order to make your visit to the Site as simple, reliable and useful as possible.

Non-essential cookies are subject to the prior consent of the User before they are deposited.

- **What is a cookie?**

Cookies are basic digital information (text files) concerning the use that Internet users make of the Internet; They do not identify you personally, but identify the computer you are using, thanks to the data of your hardware and software. This data may include: your IP address and browser settings (type of browser used, browser language, time zone, referring website, domain names of sites visited, and information about your online activity: dates and times of access and website addresses from which you accessed the Site).

Thus, Cookies allow during your various visits to the Skeepers Site, to recognize your computer or mobile device and thus to personalize and improve your navigation. Cookies and other Trackers contain information that the Site uses to make communication with your browser more efficient.

To learn more about cookies, including how to block them on Chrome, Firefox and Internet Explorer browsers: <https://www.cnil.fr/fr/cookies-les-outils-pour-les-maitriser>

However, you are not advised to disable so-called "essential" Cookies from your browser because it would be possible that you no longer have access to the Site and that you can no longer browse it.

If necessary, Skeepers declines all responsibility for the consequences related to the degraded behavior of the Site resulting from the impossibility of using the Cookies necessary for its operation.



- **Why does Skeepers use cookies?**

1/ Skeepers uses **so-called "essential" Cookies** ("necessary" is the term used by specialized sites, in particular on that of the CNIL) which have the function of facilitating your access to the Site, while helping you to navigate and use all the features of the Site.

These Cookies also make it possible to detect and prevent fraud.

These cookies do not require your consent as they are strictly necessary for the Site to function.

In order to find out more, you can consult them when you first arrive on the <https://skeepers.io/fr/> website and at any time from the button of the Cookies banner, in the "Personalize" section, then "Strictly necessary cookies", and finally "Cookie details".

2/ Skeepers also uses **functionality and performance Cookies** that provide it with information about the use made of its Site, and allow it to better understand how it can improve its Site.

These Cookies are used by Skeepers:

- for marketing purposes to generate various statistics such as demographic statistics;
- to measure the performance and traffic of its Website;
- in order to optimize the experience on its Website.

**[“DO NOT SHARE/SELL MY PERSONNAL DATA”]**

In order to find out more, refuse or accept all or part of these functionality and performance Cookies, you can go, when you first arrive on the <https://skeepers.io/en/> website and at any time from the button of the Cookies banner, in the "Customize" section, then "Functionality cookies", "Performance cookies", and finally "Cookie details". Thanks to the buttons at your disposal, you can accept all of them, reject them all or accept some and refuse others.

3/ By visiting the Skeepers <https://skeepers.io/en/> Site, **"Third Party Cookies"** may be installed: these are Cookies placed on a User's computer by the server of a domain Distinct from the Skeepers Site. Thus, a Third Party Cookie "collected" on the Skeepers Site has not been placed by itself but by its advertising partners, by social networks. They may be used by these companies to build a profile of your interests and provide you with relevant advertisements on other websites. They do not directly store personal data, but are based on the unique identification of your browser and internet device. If you do not allow these cookies, your advertising will be less targeted.

**[“DO NOT SHARE/SELL MY PERSONNAL DATA”]**

In order to find out more, refuse or accept all or part of these Third Party Cookies (called "Social Network Cookies" and "Cookies for targeted advertising"), you can go, when you first arrive on the <https://skeepers.io/en/> website and at any time from the button of the Cookies banner, in the "Personalize" section, then "Social network cookies", "Cookies for targeted advertising", and finally "Cookie details". Thanks to the buttons at your disposal, you can accept all of them, reject them all or accept some and refuse others.

Youtube's privacy policy can be found at the following link: [https://www.youtube.com/intl/ALL\\_fr/howyoutubeworks/user-settings/privacy/](https://www.youtube.com/intl/ALL_fr/howyoutubeworks/user-settings/privacy/)

LinkedIn's privacy policy can be found at the following link: <https://fr.linkedin.com/legal/privacy-policy>



**B) The processing of Personal Data carried out by Skeepers (Processor) under its Ratings & Reviews solutions (Verified Reviews), FeedBack Management, Customer Data Activation, Live Shopping**

Skeepers is required to process Personal Data under its Ratings & Reviews (Verified Reviews), FeedBack Management, Customer Data Activation, Live Shopping solutions as a Processor on behalf of its Customers.

Its Customers, as Data Controllers, ensure compliance with the Principles relating to the processing of Personal Data (Article 5 of the GDPR), i.e. the lawfulness, fairness and transparency of the collection of Personal Data that they operate from their consumers, end customers, prospects and more generally all "Data Subjects", which they then pass on to the Skeepers Group.

**The Skeepers Group requires its Customers to comply with the GDPR and to inform, prior to any collection of their data and in accordance with Articles 12 et seq. of the Regulation, their consumers, end customers, prospects and more generally all "Data Subjects", in order to avoid any confusion during the processing of their Personal Data by the Skeepers Group.**

The Personal Data that is communicated to the Skeepers Group must be accurate, adequate, relevant and limited to what is necessary for explicit and legitimate purposes determined by the Data Controllers. Skeepers, under its Ratings & Reviews solutions (Verified Reviews), FeedBack Management, Customer Data Activation, Live Shopping keeps them securely for a period not exceeding that necessary in relation to the purposes for which they are processed.

**Skeepers Group Customers remain solely responsible to Data Subjects for any lack of information, inaccuracy, error or omission relating to their Data.**

**The Skeepers Group therefore declines all responsibility in the event of violation of these fundamental principles by its Customers, and invites Data Subjects who believe that their rights have been violated, to contact the company in question directly.**

**The table below details the data processing(s) implemented by SKEEPERS under the Rating & Reviews solution on behalf of its Clients**

<p><b>Nature of the operations carried out on personal data</b></p>	<ul style="list-style-type: none"> <li>■ Reception</li> <li>■ Collection</li> <li>■ Registration</li> <li>■ Conservation</li> <li>■ Modification</li> <li>■ Consultation/Access</li> <li>■ Use</li> <li>■ Erasure</li> <li>■ Organization</li> <li>■ Extraction</li> <li>■ Communication</li> <li>■ Dissemination</li> <li>■ Provision</li> <li>■ Destruction</li> </ul>
<p><b>Purposes of personal data processing operations carried out by SKEEPERS on behalf of the Customer</b></p>	<ul style="list-style-type: none"> <li>• Collection, management, publication and dissemination of consumer reviews on the Customer's website, as well as on partner commercial sites and search engines;</li> <li>• Receipt of Customer data;</li> <li>• Sending email/SMS campaigns;</li> <li>• Receipt and management of Customer Consumer Reviews;</li> <li>• Extraction and analysis of verbatims, keywords and the polarity of verbatim;</li> <li>• Allow the Data Controller to respond to the questions / needs of its customers in case of dissatisfaction related to said purchase;</li> <li>• Publication of consumer reviews on the Customer's website, third-party sites (syndication) and on search engines.</li> </ul>
<p><b>Categories of personal data processed</b></p>	<ul style="list-style-type: none"> <li>• Name of the Consumer;</li> </ul>

	<ul style="list-style-type: none"> <li>• First name of the Consumer;</li> <li>• First name and first letter of the Consumer's surname on published Reviews;</li> <li>• Consumer's email;</li> <li>• Phone number if sending SMS;</li> <li>• Order number / reference;</li> <li>• Order date;</li> <li>• Address IP ;</li> <li>• Verified Reviews widget cookies;</li> <li>• The Product purchased;</li> <li>• The place of purchase (in case of in-store purchase);</li> <li>• The ratings assigned by the Consumer to his consumer experience;</li> <li>• His comments and observations on his consumption experience;</li> <li>• The date and time of publication of the Customer Review;</li> <li>• The Consumer's response(s) to the Merchant Partner's comment(s) in relation to a Review;</li> <li>• The Consumers' answer(s) to questions asked by Internet users on the Customer's website.</li> </ul> <p><b>Sensitive data / "DO NOT USE MY SENSITIVE DATA": No sensitive data will be accepted/processed.</b></p> <p>Data processed by Skeeper as part of its service: Username and password of the Customer for the connection to the back office.</p>
<b>Categories of data subjects</b> (hereinafter "Data Subjects")	<ul style="list-style-type: none"> <li>■ Consumers</li> <li>■ Customer's employees</li> </ul>
<b>Retention period(s)</b>	<p>Personal data is kept for 3 months from the sending of the VERIFIED REVIEWS email, if no review is filed, or 18 months from the filing of the Review, when a consumer has filed a Review.</p> <p>The personal data attached to each Review is deleted by automated anonymization.</p> <p>Opinions thus anonymized are kept for a period of 5 years, from the date of their publication, only for statistical purposes.</p> <p>They are deleted from the database and backups at the end of 5 years from collection. The data deletion process takes place over one (1) rolling month.</p> <p>Username and password for connection to the back office: Duration of the Contract.</p>

The table below details the data processing(s) implemented by SKEEPERS under the Feedback Management solution on behalf of its Customers

<b>Nature of the operations carried out on personal data</b>	<ul style="list-style-type: none"> <li>■ Reception</li> <li>■ Collection</li> <li>■ Registration</li> <li>■ Conservation</li> <li>■ Modification</li> <li>■ Consultation/Access</li> <li>■ Use</li> <li>■ Erasure</li> <li>■ Organization</li> <li>■ Structuring</li> </ul>
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	<ul style="list-style-type: none"> <li>■ Adaptation</li> <li>■ Extraction</li> <li>■ Communication</li> <li>■ Dissemination</li> <li>■ Provision</li> <li>■ Interconnection</li> <li>■ Destruction</li> </ul>
<p><b>Purposes of personal data processing operations carried out by SKEEPERS on behalf of the Customer</b></p>	<p><b>Main purposes:</b></p> <ul style="list-style-type: none"> <li>• Sending a customer satisfaction survey to an Internet user (questionnaires, display of their profile), according to their behavior previously determined by the CUSTOMER with regard to the analysis of the user's journey on the sites published by the CLIENT. This is done through the display of a pop-up containing a clickable link redirecting to the satisfaction survey</li> <li>• Collection of information relating to the experience of Internet users, customers, prospects, partners, employees... of the CLIENT or "customer insights": responses to surveys, opinions, information on lived experiences, etc. either through an API, or by display on the Customer's websites and mobile, or by email, or by SMS and QRcode;</li> <li>• Loading third-party Customer experience data / historical data, continuous enrichment of the CUSTOMER's database by completing the information in the CUSTOMER's CRM tool.</li> </ul> <p><b>Sub-purposes:</b></p> <ul style="list-style-type: none"> <li>o Receipt of Customer data;</li> <li>o Invitation to the CLIENT's contacts to participate in a survey by sending messages;</li> <li>o Improvement of the operability of customer insights by applying enrichments, transformations and analyses determined by the CLIENT: data recoding, transcription, translation, semantic analysis, etc. ;</li> <li>o Allow the CLIENT to react, according to the insights collected, in order to address the risks/opportunities and expectations of its customers, prospects, partners, employees etc. ;</li> <li>o Re-engagement of the CLIENT's contacts based on the insights collected;</li> <li>o Analysis of collected insights to improve customer experience, develop customer centricity in their organization, etc.</li> <li>o Communication of summary results of insight analyses, and/or associated raw data.</li> <li>o Management of Solution Users designated by the Client (assignment of access rights as well as document sharing rules and results);</li> <li>o Evaluation of teams and people, internal or external to the CLIENT's organization, thanks to the related insights.</li> </ul>
<p><b>Categories of personal data processed;</b></p>	<p>Non-exhaustive list, according to the needs of the Data Controller that it must determine below:</p> <ul style="list-style-type: none"> <li>o Name of Respondent;</li> <li>o First name of the Respondent;</li> <li>o Respondent's email;</li> <li>o Account name;</li> <li>o ID Client ;</li> <li>o Logs :</li> </ul> <ul style="list-style-type: none"> <li>• User login,</li> <li>• Time the action was performed,</li> <li>• Page on which the action was performed,</li> <li>• Result of the action;</li> </ul>



	<ul style="list-style-type: none"> <li>o Customer feedback collected defined by the CUSTOMER (level of satisfaction, comments...) "Raw Insights";</li> <li>o Insights to implement the re-engagement actions determined by the CLIENT;</li> <li>o Cookies ;</li> <li>o Etc.</li> </ul> <p><b>Sensitive data / "DO NOT USE MY SENSITIVE DATA": No sensitive data will be accepted/processed.</b></p> <p>Data processed by Skeepers as part of its service: Username and password of the Customer for the connection to the back office.</p>
<p><b>Categories of data subjects</b> (hereinafter "Data Subjects")</p>	<ul style="list-style-type: none"> <li>■ Respondents (determined according to the needs of the Customer: employees, customers of the Customer, prospects, partners etc.)</li> <li>■ Users</li> </ul>
<p><b>Retention period(s)</b></p>	<p>The answers to the questionnaires and the personal data attached to them are active and available on the customer's account for a period of 24 months. This retention period is justified in order to carry out statistical studies relevant to the Customer.</p> <p>It is possible to configure a shorter period At the request of the Customer, however, the following restrictions will apply:</p> <ul style="list-style-type: none"> <li>• FM will no longer be able to provide statistics on shipments made beyond the chosen period;</li> <li>• FM will no longer be able to apply the rules of non-over-solicitations beyond the chosen period;</li> <li>• FM is no longer able to provide sending logs to the Customer beyond the chosen period;</li> <li>• In addition, the minimum retention period for Backups is 15 days. Contact data will therefore be kept in these backups 15 days after deletion in the main database;</li> <li>• Finally, application logs can contain contact data and are kept for 6 months. It is not possible to purge these logs of specific data.</li> </ul> <p>For all these reasons, our recommendation is not to lower the retention period of answers and data on the platform to less than 6 months.</p> <p>At the end of the chosen retention period, the answers to the questionnaires and the personal data attached to them are kept for a further period of 12 months. They cannot be consulted by the Customer, their conservation is only justified by the activation of the reversibility clause that may occur during this period and will allow their extraction.</p> <p>Beyond these additional 12 months, personal data will be anonymized.</p> <p>The data is kept according to the following policy:</p> <p>SFTP servers: 30 days</p> <p>User logins: 6 months</p> <p>Database snapshots: 15 days backup retention</p> <p>Username and password for connection to the back office: Duration of the Contract.</p>

The table below details the data processing(s) implemented by SKEEPERS under the Customer Data Activation solution on behalf of the Customer

<p><b>Nature of the operations carried out on personal data</b></p>	<ul style="list-style-type: none"> <li>■ Reception</li> <li>■ Collection</li> <li>■ Registration</li> <li>■ Conservation</li> <li>■ Modification</li> <li>■ Consultation/Access</li> <li>■ Use</li> <li>■ Erasure</li> <li>■ Organization</li> <li>■ Structuring</li> <li>■ Extraction</li> <li>■ Communication</li> <li>■ Dissemination</li> <li>■ Provision</li> <li>■ Rapprochement</li> <li>■ Interconnection</li> <li>■ Destruction</li> </ul>
<p><b>Purposes of personal data processing operations carried out by SKEEPERS</b></p>	<p>Main purposes:</p> <ul style="list-style-type: none"> <li>• Site attendance measurement;</li> <li>• Customer behavior monitoring for a reconciliation of the online and offline journey;</li> <li>• Commercial prospecting operations.</li> </ul> <p>Sub-purposes:</p> <ul style="list-style-type: none"> <li>• Collect and clean a brand's consumer data;</li> <li>• Have a complete view of all a consumer's interactions in a single unified base (PULSE);</li> <li>• Reconcile web data with data from transactional systems to reconcile identities;</li> <li>• Facilitate customer knowledge by enriching customer data with qualification;</li> <li>• Facilitate customer knowledge by enriching customer data with segmentation;</li> <li>• Facilitate customer knowledge by enriching customer data with product recommendation;</li> <li>• Determine the most attractive consumers to receive a communication based on a purpose (statistical or probabilistic models);</li> <li>• Run a marketing campaign for a list of eligible consumers;</li> <li>• Personalize consumer content during the sending of a marketing campaign;</li> <li>• Measure the performance of marketing campaigns;</li> <li>• Automate the sending of marketing campaigns to eligible consumers;</li> <li>• Tracking of opening marketing emails (use of a pixel, deposit of a cookie);</li> <li>• Transfer campaign data to partners selected by the end customer;</li> <li>• Hosting of customer data using the PULSE platform.</li> </ul>
<p><b>Categories of personal data processed</b></p>	<p>As part of the provision of the PULSE platform, the Customer may collect (to be determined by the Customer below):</p> <ul style="list-style-type: none"> <li>• Personal data identifying persons (surname, first name, date of birth);</li> </ul>

	<ul style="list-style-type: none"> <li>• Personal data relating to personal life (postal address, e-mail, telephone number, number of children);</li> <li>• Personal data related to transactions of products and services purchased;</li> <li>• Personal data related to navigation;</li> <li>• Location-related personal data;</li> <li>• Cookies (tag inserted on the site made available to the Customer) they allow the Customer:             <ul style="list-style-type: none"> <li>o To establish statistics and volumes of frequentation and use of the various sections of the site (audience measurement cookies);</li> <li>o To reconcile the online and offline behavior of consumers (when connecting to the account on the Customer's Site, at the time of opening marketing emails "email opening pixel", while browsing the Customer's Site);</li> <li>o To personalize the offers of goods and services offered to the user.</li> </ul> </li> </ul> <p><b>Sensitive data / "DO NOT USE MY SENSITIVE DATA": No sensitive data will be accepted/processed.</b></p> <p>Data processed by Skeepers as part of its service: Username and password of the Customer for the connection to the back office.</p>
<b>Categories of data subjects</b> (hereinafter "Data Subjects")	<ul style="list-style-type: none"> <li>■ Prospects</li> <li>■ Consumers</li> </ul>
<b>Retention period(s)</b>	<p>Each customer determines within the framework of its internal policy the appropriate retention period of its data.</p> <p>Unless otherwise instructed by the Customer, the data is retained by Skeepers for the duration of the contractual relationship.</p>

**The table below details the data processing(s) implemented by SKEEPERS under the Live Shopping solution on behalf of the Customer**

<b>Nature of the operations carried out on personal data</b>	<ul style="list-style-type: none"> <li>■ Reception</li> <li>■ Collection</li> <li>■ Registration</li> <li>■ Conservation</li> <li>■ Consultation/Access</li> <li>■ Use</li> <li>■ Erasure</li> <li>■ Communication</li> <li>■ Dissemination</li> <li>■ Provision</li> <li>■ Destruction</li> </ul>
<b>Purposes of personal data processing operations carried out by SKEEPERS on behalf of the Customer</b>	<p><b>Main purpose:</b> Connecting potential buyers on the Customer's online sales platform, with the Customer's sellers and/or advisors, through the dissemination of Live Shopping, with the aim of triggering acts of purchase on said online sales platform.</p> <p><b>Sub-purposes:</b></p> <ul style="list-style-type: none"> <li>• Creation of the "User" status;</li> </ul>

	<ul style="list-style-type: none"> <li>• Management of registrations of potential buyers who wish to be notified of the Customer's Live Shopping via its form;</li> <li>• Automated sending of SMS and emails to the persons concerned by the notification management partner to remind the Live Shopping;</li> <li>• Listing of Live Shopping and opening of a live or replay;</li> <li>• Assignment of a Session ID number "Customer ID" for the purpose of managing Shopping party broadcast flows and achieving service performance metrics, generating statistics for the Customer via the Tag, as soon as you participate in Live Shopping or access to its replay;</li> <li>• Creation of a virtual shopping cart, known as the "pre-purchase process", to allow the finalization of the purchase on the Customer's online sales platform, according to the purchase process proposed by the Customer;</li> <li>• Provision of a feature allowing the Customer's employees to block ill-intentioned persons or who would have inappropriate behavior or abusive writings or racist, sexist and generally considered illegal in the countries concerned ("moderation" function in the chat);</li> <li>• Recording, hosting and conservation of videos in order to allow replay on the sites and pages identified by the Customer;</li> <li>• Broadcast of the replay on the channels chosen by the Customer.</li> </ul> <p><b>Specific treatments for the "Competitions" service:</b></p> <p><b>Main purpose:</b> Development and distribution of attractive content encouraging prospects to participate in contests using a widget implemented on the shopping party player of Skeepers Customers.</p> <p><b>Sub-purposes:</b></p> <ul style="list-style-type: none"> <li>▪ Registration of entries via a content-integrated registration form</li> <li>▪ Random draw of participants who have filled in the form triggered by the administrators from the back office carried out by an algorithm</li> <li>▪ Display of winners to Skeepers administrators on the back office.</li> <li>▪ Distribution of the winners by depositing a CSV file with a limited lifespan of 2 weeks on a secure FTP to the Skeepers client.</li> </ul> <p><b>Specific treatments for the "Shoppable Content" service:</b></p> <ul style="list-style-type: none"> <li>• Dissemination on the Customer's website of a video carousel allowing prospects to view the brands' products in order to acquire them, using a Widget implemented on the Customer's site;</li> <li>• Deposit of an OCS "Online Collect Service" tracker for the purpose of achieving performance metrics to demonstrate the impact of the presence of videos or live on the purchasing behavior of prospects on customers' e-commerce site.</li> </ul>
<p><b>Categories of personal data processed</b></p>	<ul style="list-style-type: none"> <li>• Session ID "Customer ID": assigned to each user on each Live Shopping login, whether live or replay (examples of data collected: number of viewers, products put in the basket, type of audience, number of messages, number of cores, average viewing time per spectator, duration of the event, browser, operating system and brand of the connection tool, UserAgent etc.);</li> <li>• Video: image and voice of the Customer's employees;</li> </ul>

	<ul style="list-style-type: none"> <li>The telephone numbers OR email addresses of potential buyers who wish to be notified of the Customer's Live Shopping via the Customer's form.</li> </ul> <p><b>For processing specific to the "Competition" service:</b></p> <ul style="list-style-type: none"> <li>Navigation : <ul style="list-style-type: none"> <li>o Number of page views (based on TargetR experience)</li> <li>o Time per page (based on CibleR's experience)</li> <li>o Current status (in the TargetR experiment) <ul style="list-style-type: none"> <li>Participant identification: <ul style="list-style-type: none"> <li>o Auto-generated TargetR client identity</li> <li>o Email</li> <li>o First name</li> <li>o Surname</li> <li>o Telephone</li> <li>o Physical address (in case of distribution of physical gifts)</li> </ul> </li> </ul> </li> </ul> </li> </ul> <p><b>Specific treatments for the "Shoppable Content" service:</b></p> <ul style="list-style-type: none"> <li>Image and voice</li> <li>OCS ("Online Collect Service"): Performance measurement cookie: Full IP, Customer ID, page views, average viewing time, clicks, impressions, number of viewers, audience type, duration of the event, UserAgent: browser, OS, brand of the connection tool and operating system, identifier of products in the cart, amount of the basket, content of transactions, display, live playback or replay etc.</li> </ul> <p><b>Sensitive data / "DO NOT USE MY SENSITIVE DATA": No sensitive data will be accepted/processed.</b></p> <p>Data processed by Skeeper as part of its service: Username and password of the Customer for the connection to the back office.</p>
<p><b>Categories of data subjects</b> (hereinafter "Data Subjects")</p>	<ul style="list-style-type: none"> <li>The sellers and/or advisors of the Customer (employees of the Customer);</li> <li>Potential buyers;</li> <li>Participants in competitions (end customers or prospects)</li> </ul>
<p><b>Retention period(s)</b></p>	<ul style="list-style-type: none"> <li>Session ID "Customer ID": kept for the duration of the Session;</li> <li>Javascript tag: Duration of the Contract (used to display product videos (Shoppable content) and shopping lives;</li> <li>Application logs: 6 months;</li> <li>Username and password for connection to the back office: Duration of the Contract.</li> <li>Skeepers stores and retains videos for replay on sites and pages identified by Customer for the duration of the Agreement;</li> </ul>

	<ul style="list-style-type: none"> <li>The information collected to notify potential buyers of the Live Shopping to which they have registered is deleted 24 hours after the date and time of the Live Shopping.</li> </ul> <p><b>For processing specific to the "Competition" service :</b></p> <ul style="list-style-type: none"> <li>12 months by default, destruction on request</li> </ul> <p><b>Specific treatments for the "Shoppable Content" service :</b></p> <ul style="list-style-type: none"> <li>Image and voice: duration of the contract</li> <li>OCS ("Online Collect Service") : 13 months</li> </ul>
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Personal data are processed only by the competent services, which have to know information for the proper exercise of their missions. They are subject to a Confidentiality Agreement.

### **C) The processing of Personal Data carried out by Skeepers and its Customers (Distinct Data Controllers) under its Influencer Marketing and Consumer Videos solutions**

Customers who use Skeepers' Influencer Marketing and/or Consumer Videos solutions acknowledge that they act as Distinct Data Controllers: they must comply with their legal obligations and maintain the confidentiality and security of the Data they share with each other ("Shared Data").

The Distinct Data Controllers have formalized an Agreement on the specific conditions under which each of them will act as a Distinct Data Controller on the Shared Data. The broad outlines of this agreement must be made available to data subjects within, for example, the privacy policies or any other appropriate document of the Distinct Data Controllers, in order to comply with their duty to inform, which they undertake to do.

This Skeepers Privacy and Cookies Policy states that the Distinct Data Controllers undertake, in particular, to:

- collect and process Personal Data in accordance with the regulations in force, in compliance with the Principles relating to the processing of Personal Data (Article 5 of the GDPR). The legal basis chosen for the processing of data subjects by Skeepers under its Influencer Marketing and Consumer Videos solutions is the contractual basis (Article 6 §1 b) of the GDPR), Users subscribing to its Services;
- comply, prior to and throughout the duration of the processing, with the applicable laws and regulations on the protection of Personal Data, and in particular the GDPR;
- implement organizational, technical, software and physical measures to protect the Data against alteration, destruction and unauthorized access;
- ensure that persons authorised to process the Data undertake to respect confidentiality or are subject to an obligation of confidentiality;
- guarantee Users the effective exercise of all the rights they have under the GDPR;
- not to use the Shared Data for purposes other than those expressly determined between them;
- never transfer or make available the Shared Data and files to third parties for any purpose whatsoever and in particular for commercial prospecting purposes without the User's prior consent;
- keep the Shared Data only for as long as strictly necessary.

For a complete list of Customers with whom the Skeepers Group is a Distinct Data Controller, please write to [privacy@skeepers.io](mailto:privacy@skeepers.io).

The table below details the data processing(s) implemented by SKEEPERS under the Consumer Videos solution:

<p><b>Nature of the operations carried out on personal data</b></p>	<ul style="list-style-type: none"> <li>■ Reception</li> <li>■ Collection</li> <li>■ Registration</li> <li>■ Conservation</li> <li>■ Modification</li> <li>■ Consultation/Access</li> <li>■ Use</li> <li>■ Erasure</li> <li>■ Extraction</li> <li>■ Communication</li> <li>■ Dissemination</li> <li>■ Provision</li> <li>■ Interconnection</li> <li>■ Destruction</li> </ul>
<p><b>Purposes of personal data processing operations carried out by Skeepers</b></p>	<p><b>Main purpose:</b></p> <p>Creation, processing and distribution of promotional videos on the Internet.</p> <p><b>Sub-purposes:</b></p> <ul style="list-style-type: none"> <li>• Management of participation in Campaigns, delivery of Rewards;</li> <li>• Receipt of data from the Customer's employees and/or customers;</li> <li>• Collection of information from Users of the Consumer Videos platform;</li> <li>• Sending communications to Users;</li> <li>• Processing of information from Users of the Consumer Videos platform for the management of applications;</li> <li>• Transfer of personal data to the Customer for the selection of Users;</li> <li>• Management of the order and distribution of Products sent to selected Users, Testers (unless otherwise requested by the Customer who wishes to deliver his products himself, in this case, the email address, postal address and telephone number of the Testers will be communicated to the Customer);</li> <li>• Reminder of Testers who have not made Videos by any means (email, telephone, mail);</li> <li>• Processing of Testers' information for the production of videos;</li> <li>• Proposal of similar campaigns;</li> <li>• Receipt of personal information from the Customer's employees to provide access to a platform;</li> <li>• Export of personal information of users of the Consumer Videos platform related to the Customer;</li> <li>• Image rights management;</li> <li>• Dissemination of videos;</li> <li>• Data analysis, identification of usage trends;</li> <li>• Marketing analysis and statistics.</li> </ul>
<p><b>Categories of personal data processed ("Shared Data")</b></p>	<ul style="list-style-type: none"> <li>• Name;</li> <li>• Forename;</li> <li>• Photo ;</li> <li>• Video;</li> <li>• Date of birth;</li> <li>• Email;</li> </ul>



	<ul style="list-style-type: none"> <li>• Phone number;</li> <li>• Postal address;</li> <li>• Interests;</li> <li>• Information published on social networks;</li> <li>• Address IP ;</li> <li>• Tracers;</li> <li>• History and details of participation in the Campaigns;</li> <li>• Number and dates of Videos and Content published on the Platform;</li> <li>• Reviews and votes on Videos.</li> </ul> <p><b>Sensitive data / "DO NOT USE MY SENSITIVE DATA": No sensitive data will be accepted/processed.</b></p>
<b>Categories of data subjects</b> (hereinafter "Data Subjects")	<ul style="list-style-type: none"> <li>■ Users of the Consumer Videos platform;</li> <li>■ Testers</li> <li>■ End customers / consumers or prospects of the Customer;</li> <li>■ Customer's contacts and business partners;</li> <li>■ Employees or external hired by the Client.</li> </ul>
<b>Retention period(s)</b>	<p>Contact data, video data processed by the solution are active and available on the customer's account for 12 months.</p> <p>After 12 months, data related to videos and videos are kept for 20 years.</p> <ul style="list-style-type: none"> <li>• Videos can be made available when purchasing a new license at the customer's request.</li> <li>• Archived video-related data (contact data / video data) can be made accessible at the customer's request.</li> </ul> <p>After one year, the archived data (contact data / video data) is anonymized and saved for statistical purposes. Anonymization consists of substituting fake data for all personal data. Once anonymized, the data is no longer accessible to the customer.</p> <p>The length of time that active data and archive data is retained can be based on customer requirements</p> <p>Testers' Data is kept for the duration of their activity on their Tester space. They will be anonymized 6 months after the closure of their account;</p> <p>Testers Data is deleted within 2 years of their last activity on their account;</p>

The table below details the data processing(s) implemented by SKEEPERS under the Influencer Marketing solution.

<b>Nature of the operations carried out on personal data</b>	<ul style="list-style-type: none"> <li>■ Reception</li> <li>■ Collection</li> <li>■ Registration</li> <li>■ Conservation</li> <li>■ Modification</li> <li>■ Consultation/Access</li> <li>■ Use</li> <li>■ Erasure</li> <li>■ Organization</li> <li>■ Extraction</li> <li>■ Communication</li> </ul>
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	<ul style="list-style-type: none"> <li>■ Dissemination</li> <li>■ Provision</li> <li>■ Reconciliation</li> <li>■ Interconnection</li> <li>■ Destruction</li> </ul>
<p><b>Purposes of the processing of personal data by SKEEPERS</b></p>	<p><b>Main purpose:</b></p> <ul style="list-style-type: none"> <li>• Put the Client in contact with influencers, users of the platform, in order for the latter to create content presenting and/or mentioning the Client's products / services on social networks and / or on the Client's websites, according to the campaigns chosen by the latter.</li> <li>• If subscribed: Put the Customer in contact with consumers, users of the platform, in order for the latter to write written opinions about the Customer's products / services on the Customer's websites.</li> </ul> <p>Influencers and consumers, when designated together, are called "Creators".</p> <p><b>Sub-purpose:</b></p> <ul style="list-style-type: none"> <li>• Selection of influencers who meet Skeepers' prerequisites;</li> <li>• Creation and management of Influencers and Consumers' accounts;</li> <li>• Creation and management of influencer review campaigns, and, if subscribed, consumer reviews;</li> <li>• Display of Influencers' profiles on the Platform (name, age, gender), Client's access to the Skeepers Influencer community;</li> <li>• Matching according to the profile of the Influencers, their interests, social media settings, campaigns conducted and campaigns of the Client;</li> <li>• Acceptance or rejection of Influencers by the Client;</li> <li>• Solicitation of written reviews from consumers;</li> <li>• Delivery of products by Skeepers to Creators; OR Transmission to the Customer of the postal address, the email address and if necessary the telephone number of the Creators, in the event that the Customer takes care of the delivery of the products;</li> <li>• Publication of content presenting and/or mentioning the Customer's products/services on the Influencers' social networks;</li> <li>• Evaluation rating of the Influencer by the Client (scoring);</li> <li>• Dissemination of consumers' textual opinions on the Customer's e-commerce site and/or that of the Customer's partners;</li> <li>• Sending the Newsletter: the latest campaigns, which match the profile of the influencer, including that of the Client;</li> <li>• Reporting dashboard integrated with the Platform;</li> <li>• Onboarding and training session;</li> <li>• Ongoing account management: <ul style="list-style-type: none"> <li>○ Creation <ul style="list-style-type: none"> <li>○ Email and phone support</li> <li>○ Assistance with campaign strategy and best practices.</li> </ul> </li> </ul> </li> </ul> <p><b>Specific treatments for the "Shoppable Content" service:</b></p> <ul style="list-style-type: none"> <li>• Dissemination on the Customer's website of a video carousel allowing prospects to view the brands' products in order to acquire them, using a Widget implemented on the Customer's site;</li> </ul>

	<ul style="list-style-type: none"> <li>• Deposit of an OCS "Online Collect Service" tracker for the purpose of achieving performance metrics to demonstrate the impact of the presence of videos on the purchasing behavior of prospects on customers' e-commerce site.</li> </ul>
<p><b>Categories of personal data processed</b></p>	<p><b>Mandatory for registration on the Platform:</b></p> <ul style="list-style-type: none"> <li>o Email;</li> <li>o Location (country);</li> <li>o Date of birth.</li> </ul> <p><b>Mandatory for Consumer Campaigns:</b></p> <ul style="list-style-type: none"> <li>o Name and Surname;</li> <li>o Genre ;</li> <li>o Complete postal address;</li> <li>o Phone number.</li> </ul> <p><b>Required for Influencer Campaigns:</b></p> <ul style="list-style-type: none"> <li>o Name and Surname;</li> <li>o Genre ;</li> <li>o Complete postal address;</li> <li>o Phone number;</li> <li>o Public data accessible from the Influencers' account on their social networks, retrieved via API.</li> </ul> <p><b>Customer username and password for login to the back office</b></p> <p><b>Not necessarily informed by the Influencers:</b></p> <ul style="list-style-type: none"> <li>o Image (and voice if Video);</li> <li>o Skin color;</li> <li>o Relational status;</li> <li>o Parenting;</li> <li>o Number of children;</li> <li>o Animals;</li> <li>o Purchasing habits;</li> <li>o Skin type and concerns;</li> <li>o Beauty habits;</li> <li>o Hair color/type;</li> <li>o Household income;</li> <li>o Diet;</li> <li>o Color of the eyebrows;</li> <li>o Glasses;</li> <li>o Sizes;</li> <li>o Lifestyle;</li> <li>o Skin problems;</li> <li>o Preferred brands;</li> <li>o Cookies.</li> </ul> <p><b>Sensitive Data / "DO NOT USE MY SENSITIVE DATA":</b>  <b>for more information on the processing of your Sensitive Personal Data on the Influencer Marketing Platform, please visit the following link:</b>  <a href="https://www.octoly.com/privacy?locale=fr-FR">https://www.octoly.com/privacy?locale=fr-FR</a></p> <p><b>For treatments specific to the "Shoppable Content" service:</b></p> <ul style="list-style-type: none"> <li>▪ Image and voice</li> <li>▪ OCS ("Online Collect Service"): Performance measurement cookie (Full IP, Customer ID, page views, average viewing time, clicks, impressions, number of viewers, audience type, duration of the event, UserAgent: browser, OS, brand of the connection tool and operating system, identifier of the products in the cart, amount of the cart bet, content of transactions, etc.)</li> </ul>

<b>Categories of data subjects</b> (hereinafter "Data subjects")	<ul style="list-style-type: none"> <li>■ Pre-selected influencers who meet the criteria determined by Skeepers and chosen by the Client.</li> <li>■ Consumers using the Platform</li> </ul> <p><b>For treatments specific to the "Shoppable Content" service:</b></p> <ul style="list-style-type: none"> <li>■ Prospects</li> </ul>
<b>Retention period(s)</b>	<p>The personal data of Creators are kept for the duration of their activity on their Creator space. They will be anonymized 6 months after the closure of their account. Accounts are deleted after 24 months of inactivity.</p> <p>Username and password for connection to the back office: Duration of the Contract.</p> <p><b>Specific treatments for the "Shoppable Content" service</b> :</p> <ul style="list-style-type: none"> <li>▪ Image and voice: duration of the contract</li> <li>▪ OCS ("Online Collect Service") : 13 mois</li> </ul>

#### D) The processing of Personal Data by Skeepers (Data Controller) with regard to its Customers

As part of the subscription to one or more Skeepers Group solutions, and subsequently as part of this collaboration, Skeepers processes the Personal Data of its Customers.

**The table below details the data processing implemented by the Skeepers Group in connection with its relations with its Customers:**

<b>Nature of the operations carried out on personal data</b>	<ul style="list-style-type: none"> <li>■ Reception</li> <li>■ Collection</li> <li>■ Registration</li> <li>■ Conservation</li> <li>■ Modification</li> <li>■ Consultation/Access</li> <li>■ Use</li> <li>■ Erasure</li> <li>■ Extraction</li> <li>■ Communication</li> <li>■ Dissemination</li> <li>■ Provision</li> <li>■ Interconnection</li> <li>■ Destruction</li> </ul>
<b>Purposes of the personal data processing operations carried out by Skeepers in connection with its relations with its Customers</b>	<ul style="list-style-type: none"> <li>• Listening and recording of telephone and video conversations in the context of incoming and outgoing calls with prospects/customers in order to improve the quality of the service provided;</li> <li>• Manage the contractual / commercial relationship;</li> <li>• Create and manage the Client's Back Office;</li> <li>• Allow access to and use of the Platform and its services;</li> <li>• Perform all operations related to the Services,</li> <li>• Communicate with the Customer in the context of the performance of the Services or for information purposes in the event of changes to the General Conditions;</li> <li>• Provide support service;</li> </ul>

	<ul style="list-style-type: none"> <li>• Perform marketing and statistical analyses;</li> <li>• Conduct customer review surveys;</li> <li>• Analyze data, audience types and usage trends;</li> <li>• Produce statistics in order to improve the operation and optimize the Platform;</li> <li>• Analyze Data, Audit, and identify usage trends</li> <li>• Maintain the Platform in its proper functioning and in a secure environment;</li> <li>• Resolve any technical incidents encountered;</li> <li>• Sending commercial information in connection with the Services subscribed;</li> <li>• Request payment for the Services subscribed;</li> <li>• Manage unpaid, litigation and litigation;</li> <li>• Detection, prevention and fight against fraud and cybercrime;</li> <li>• Keeping of general and auxiliary accounts;</li> <li>• Responses to official requests from public or judicial authorities empowered for this purpose;</li> <li>• Acquisition audit by potential buyers.</li> </ul>
<b>Categories of personal data processed</b>	<ul style="list-style-type: none"> <li>• Surname;</li> <li>• Forename;</li> <li>• Business email address;</li> <li>• Business phone number;</li> <li>• Image (if video interview);</li> <li>• Voice (if video/audio interview);</li> <li>• Identifier;</li> <li>• Password;</li> <li>• Connection logs;</li> <li>• Cookies and other Tracers;</li> <li>• Bank details.</li> </ul>
<b>Categories of data subjects</b> (hereinafter "Data Subjects")	<ul style="list-style-type: none"> <li>• Employees, assimilated or external hired by the Customer</li> </ul>
<b>Legal bases (depending on purpose)</b>	<ul style="list-style-type: none"> <li>• Pre-contractual / contractual</li> <li>• Legitimate interest of Skeepers</li> <li>• Consent (prior to recording of video/audio interview)</li> <li>• Legal obligation</li> </ul>
<b>Retention period(s)</b>	<p>Five (5) years from the end of the contractual relationship between the Skeepers Group and the Customer (prescription of common law in civil and commercial matters).</p> <p>Three (3) years from the last contact in the context of a commercial prospection.</p> <p>Retention for a maximum of 6 months from the date of recording of the audio or video interview. Data from analysis documents (reports and analysis grids) are retained for one (1) year from their collection.</p> <p>Retention for the duration of the dispute, deletion of data once all remedies have been exhausted and the decision has become enforceable or prescription of the legal action.</p> <p>In case of amicable settlement of the dispute, deletion as soon as the settlement is settled.</p> <p>Retention during the current accounting year, increased by ten (10) years from closing.</p>



Personal data is processed in the Skeepers Group only by the competent services, which have to know information for the proper performance of their tasks. They are subject to a Confidentiality Agreement.

### 3: Sharing of Personal Data collected

**At Skeepers, your Personal Data is not and will never be sold to third parties.**

However, it is important for you to be aware that Skeepers shares your Personal Data with third parties, and wants you to be fully informed. Skeepers uses third-party companies to:

- Maintain the technical functioning of its Platform and services;
- Perform certain services on its behalf.

These Processors and partners may have limited access to some of your Personal Data, strictly within the framework of the performance of their services. They have a contractual obligation to use them in accordance with the provisions and regulations applicable to the protection of Personal Data.

**The Skeepers Group undertakes to verify that all its Processors and partners scrupulously comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR) and to conclude contracts with them including a Data Processing Agreement and a Non-Disclosure Agreement.**

In this context, all Processors and partners of the Skeepers Group are required to provide sufficient guarantees demonstrating that the technical and organisational security measures applicable to the protection of Personal Data have been taken (Article 32 of the GDPR).

If you wish to know the complete and up-to-date list of Processors and service providers, you can contact the Skeepers Data Protection Officer by email at: [privacy@skeepers.io](mailto:privacy@skeepers.io).

The Skeepers Group may also share your information if it believes disclosure is necessary:

- To pursue claims against the Skeepers Group and comply with administrative and judicial procedures (e.g. judicial authorities);
- To comply with a legal obligation (e.g. public bodies such as URSSAF);
- Due to a merger, acquisition, sale of assets or receivership proceedings.

You have the right to object, at any time, to the transfer of your data to Third Parties, who are not Service Providers that Skeepers uses for the proper performance of the Services offered. We will then no longer transmit your data to these Third Parties, unless we can justify to you that we have legitimate and compelling reasons for the transfer/processing of your data that override your interests and your rights and freedoms, or for the establishment, exercise or defence of our legal claims.

Objecting to the transfer of your data to the Providers that Skeepers uses for the proper performance of its Services will result in the deletion of your Personal Data at Skeepers, as it is not possible for Skeepers to perform its Services without its Providers.

**Skeepers is committed to ensuring that your data is processed and hosted within the European Union and the European Economic Area.** However, with the express written consent of its Customers, who wish to benefit from certain specific services of Skeepers operated outside the territory of the European Union and the European Economic Area, a limited number of your Personal Data may be shared with service providers in countries outside the European Union and not considered to offer adequate data protection under the GDPR.

In this case, Skeepers ensures that Standard Contractual Clauses, in their latest version in force, are signed with said third-country service providers, and that additional technical measures are implemented in order to be able to provide a sufficient level of protection within the meaning of the supervisory authorities, including the European Data Protection Board in its "[Recommendations 01/2020 on measures that supplement transfer tools to ensure compliance with the EU level of protection of personal data](#)".

**It is possible, through certain Skeepers Solutions (Influencer Marketing and Consumer Videos) to connect your account, on our Platforms to other third-party accounts.** By connecting your account to other third-party accounts, you acknowledge and agree to the ongoing sharing of information about yourself to other parties (in



accordance with the privacy settings you have set on those third-party sites). If you do not want your Data to be shared in this way, do not use this feature.

You can disconnect your account from a third-party account at any time. You can learn how to disconnect your accounts from any third-party site by visiting your Account information page.

For more information on the processing of your Personal Data on the Consumer Videos Platform, the privacy policy can be consulted at the following link: <https://legal.uqv.skeepers.io/PP/fr/>

For more information on the processing of your Personal Data on the Influencer Marketing Platform, the privacy policy can be consulted at the following link: <https://www.octoly.com/privacy?locale=fr-FR>

#### **4: Retention, security and confidentiality of Personal Data**

**Skeepers only retains and stores your Personal Data for the time strictly necessary for the purposes defined in section "2: The processing of Personal Data by the Skeepers Group", in accordance with the recommendations of the CNIL, and in compliance with contractual, legal, accounting and tax obligations.**

Beyond this period, Personal Data is kept only for statistical and archival purposes and may not be used for other purposes. They can be kept for an unlimited period of time as long as they are anonymized, otherwise they will be destroyed.

In any case, Skeepers ensures the strict confidentiality of the Personal Data collected and processed. To this end, Skeepers has implemented organizational, technical, software and physical measures, described in its Information Systems Security Policy (ISSP) and its Secure Assurance Plan (PAS): they aim to protect your Data against alteration, destruction and unauthorized access in accordance with Article 32 of the GDPR.

Specifically, these measures include:

- A regular backup of Personal Data with regularly validated restoration processes, in technically and physically Distinct backups;
- Limited and controlled access to data (authentication and authorization control) subject to confidentiality;
- Secure hosting (Amazon Web Services host certified ISO 27001 for technical measures, ISO 27017 for cloud security, ISO 27018 for cloud privacy, SOC 1, SOC 2 and SOC 3, PCI DSS level 1, BSI Common Cloud Computing Controls Catalogue (C5), ENS High.);
- Data encryption (KMS encrypt) in transit and at rest;
- An in-depth security analysis to assess its level. It should be noted that if the required level is not reached, a new design phase is opened in order to reach the level required by the Skeepers Group;
- Annual audits carried out by accredited Third Parties.

In addition, Skeepers' information system is monitored by internal software to monitor its proper functioning and ensure that no vulnerabilities are present.

The Skeepers information system includes centralized and protected logging devices of the use of the services to detect any intrusion or fraudulent use, to try to identify the causes and origins and to avoid any contamination of other sites by rebound and finally to put the system back in place.

The security level of Skeepers' information systems is tested every 6 months to ensure that no inherent security vulnerabilities are accessible.

In accordance with Article 33 of the GDPR, Skeepers undertakes to notify the CNIL, as soon as possible, of any Data breach likely to create a risk to the rights and freedoms of Users. Skeepers undertakes to notify Data Subjects, without undue delay, of any Data breach that may result in a high risk to their rights and freedoms.





## 6: Rights relating to Personal Data and their implementation

In accordance with the regulations applicable to Skeepers regarding the protection of Personal Data, you have, at any time and for any reason, various rights with regard to the processing of Data for which you are the Data Subject.

These are the right of access, rectification, erasure and opposition, the right to limit processing, the right to data portability, the right not to be subject to automated individual decision-making (including the profiling), the right to set guidelines for the storage, erasure and communication of your Personal Data after your death.

For a better understanding of these rights and their usefulness: <https://www.cnil.fr/fr/les-droits-pour-maitriser-vos-donnees-personnelles>

**Skeepers guarantees to any person visiting its Site and / or using its Solutions and services, the exercise of these rights in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (RGPD) and the Data Protection Act (LiL).**

For the processing of personal data based on your consent, you have the right to withdraw it at any time, without this affecting the lawfulness of the processing, previously based on consent before withdrawal thereof.

Skeepers does not knowingly collect Personal Data from minors under the age of 13, for U.S. citizens, 16 years of age, for European citizens, 15 years old, for French citizens, for whom access to its services is prohibited. Nevertheless, if you are a minor, or a parent or legal guardian of that minor, and you believe that we hold your

Personal Data/Personal Data about that minor, you may obtain the deletion of your/her Personal Data after proving your identity and, if applicable, your legal authority over the minor.

**For any request to exercise a right, you must, in your message:**

**1) State the type** of right exercised (right of access, rectification, erasure, opposition, right to restriction of processing, right to data portability, right not to be subject to automated individual decision-making (including profiling), right to define guidelines for the storage, erasure and communication of your Personal Data after your death);

**2) Specify the address** (email or postal) **on which you wish to obtain a response from Skeepers** (otherwise we will choose the same channel as the one you used to contact us);

**3) Include a means to identify you** (order number, customer ID, etc. if the means communicated does not seem sufficient to prove your identity, a copy of your identity document may be required);

**4) Explain, if possible:**

- **the context in which your data was collected,**
- **as well as the Solution concerned** (Ratings & Reviews (Verified Reviews), FeedBack Management, Customer Data Activation, Influencer Marketing, Live Shopping and Consumer Videos).

**This information is valuable so that the Data Protection Officer / Data Protection Officer can answer you as soon as possible.**

**You can then write to the Data Protection Officer of the Skeepers Group, at the following email address:** [privacy@Skeepers.io](mailto:privacy@Skeepers.io) (for the right of deletion only: [datadeletion@skeepers.io](mailto:datadeletion@skeepers.io)) or by post, at the address indicated below:

SKEEPERS  
Legal Department - Data Protection Officer  
18-20 Avenue Robert Schuman  
CS 40494  
13002 Marseille

Skeepers informs you that no requests will be processed by telephone.

A response will be sent to you as soon as possible, which may not exceed one (1) month from the date of receipt of your request.

**SKEEPERS SAS** with a capital of 11 470 723 €  
18/20 Avenue Robert Schuman - CS 40494 - 13002 Marseille  
RCS Marseille 879 038 990 – NII FR01879038990 – Siret: 879 038 990 00 21  
<http://www.skeepers.io>



An extension of two (2) months is possible, in case of complex request, or if many applications have been received.

Your request, as well as any data useful for processing your request, will be kept for a period of three years (five years for the right to object) from receipt of your request. If a supporting document has been requested from you, or if you have sent it spontaneously, it will be kept for a period of one year.

If you consider, after contacting the Data Protection Officer, and a period of one month has elapsed, that your GDPR rights are not respected, send a complaint to the CNIL.