



Privacy & Cookie Policy

"Creators Privacy Policy"

The protection of your personal data is Skeepers' top priority.

The purpose of this Privacy and Cookies Policy (hereinafter **the "Creators Privacy Policy"**) is to inform You ("**Influencers**" and "**Testers**", hereinafter referred to together as "**Creators**", **but also Internet Users**) about the processing of your personal data by Skeepers, and your rights in this regard.

The Policy applies as soon as you arrive on the Skeepers website from the following URL: <https://community.skeepers.io/> (the " Site"), **when you register for the Platform on the following URL page <https://community.skeepers.io/sign-up/>** (the " Platform"). ") and every time you log in to it. The Policy governs the use of Data made by Skeepers, from your browsing on the Site, to all the services offered by or in connection with the Skeepers Platform.

If you are a prospect, brand customer ("**Brand**") subscribed to our Services, or if you are one of our suppliers, you should refer to the following Privacy Policy: <https://skeepers.io/en/privacy-cookie-policy/>. Indeed, in order to offer a better visibility and understanding of the data collection and processing carried out by Skeepers when delivering its Services, the information of Creators and Clients is divided into two documents.

The Creators' Privacy Policy may be modified to take into account, in particular, changes in the processing of Data implemented and applicable legislation. Thus, Creators are invited to take note of any new version made available by Skeepers.

This document was last updated in January 2024

In the event of disagreement with the new wording of the "Privacy Policy", you retain the right to request the deletion of all Personal Data concerning you by complying with the terms and conditions presented to you in section "12: Rights relating to Personal Data and their management". This right is conditional on the proper delivery of the required Content.



The Privacy Policy is divided as follows:

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1. Definitions

Capitalized terms are defined below:

"Supervisory Authority " means an independent public authority established by a Member State pursuant to Article 51 of the GDPR, and with 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;

"Campaign" means an operation shared with the Creators to promote the products and/or services of one or more Clients

"T&Cs": Refers to the General Terms and Conditions of Use;

"Customer" or "Brand": Refers to the legal person, company, manufacturer or entity, customer of Skeepers, marketing the product/service under a brand, subject of the Content;

" Personal Account " means the web interface reserved for Creators;

"Content": Refers to the texts, images, photographs, drawings, avatars, videos and more generally any visual, textual, sound and/or graphic publication of the Creator, representing the Brands' Products;

"Creator": Person previously registered and accessing the Skeepers platform for the purpose of generating Marketing and/or Consumer Video Influencer Content;

"Personal data " means any information relating to a natural person 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 the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

"Personal data" (hereinafter referred to as "Data") is therefore to be understood as any information that is specific to you (surname, first name, age, address, email, telephone number, etc.).

"Skeepers Group or Skeepers" refers to the economic entity formed by the company Skeepers, SAS with a capital of €11,480,257, registered with the Marseille Trade and Companies Register under number 879 038 990, whose registered office is located at 18-20 Avenue Robert Schuman, CS 40494, 13002 Marseille, and all the Group's Subsidiaries;

"Influencer": Creator who has received a product for free so that they can post dedicated Content on their social network (e.g. Instagram, TikTok, YouTube, Pinterest, Blog, etc.);



"Internet users": people browsing the <https://community.skeepers.io/> website ;

"Platform" means the website accessible from the <https://community.skeepers.io/sign-up/> connection link ;

"Products": Refers to the products and services marketed by the Client/Brand;

"Social Networks": Refers to all present or future social networks whose Content may be the subject of the Keepers Services, such as, by way of example: YouTube, Instagram, Facebook, Twitter, Twitch, Blogs, TikTok, Pinterest.

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

"Separate controllers" means two or more controllers who separately determine the purposes and means of the processing(s) of personal data that they implement;

'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 law or the law of a Member State, the controller may be designated or the specific criteria applicable to its appointment may be provided for by the law of the European Union, the Union or by the law of a Member State;

"Site": Refers to the website accessible at the address <https://community.skeepers.io/>;

"Service(s)" / " Solution(s)" refers to the service(s) provided by the **Skeepers Group** – in this case Influencer Marketing;

"Tester": Creator who has received a product free of charge in order to generate a video (Consumer Videos) or text (Influencer Marketing) review, which will be displayed on the Client's and/or its partners' e-commerce site.

"Data Processing" is a use of your Data, which can take any form (collection, recording, hosting, modification, transfer, etc.).

" User " means any person registering accessing the Platform from the connection link <https://community.skeepers.io/sign-up/> .

Any term specific to the protection of personal data (Data Controller, Data Subject, etc.) is defined in Article 4 of 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"**) which Skeepers undertakes to comply with.



2. General Information

By accessing and/or using the Site, the Platform and, in general, Skeepers' Services, you acknowledge that you have read the provisions of the Creators Privacy Policy as a whole.

Access to the Site, the Platform and the use of the Services is prohibited to any minor under the age of sixteen. Therefore, by accessing and using the Platform, the Site and the Services, you represent and warrant that you are over 16 years of age if you are European, over 15 years of age if you are French, and over 13 years of age if you are American. If you are under the age requirement, you must not at any time or in any way access or use the Site, the Platform and the Services. If you are a parent or legal guardian of a minor and you believe that we hold Data about that minor, you may obtain deletion of the Data after proving your identity and legal authority over the minor by writing to privacy@skeepers.io.

3. Data Controllers and Data Subjects covered by this Privacy Policy

Skeepers, a simplified joint-stock company (SAS) with a capital of €11,480,257, 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://community.skeepers.io/ website](https://community.skeepers.io/) and the [https://community.skeepers.io/sign-up/ Platform](https://community.skeepers.io/sign-up/). It offers Ratings & Reviews, Feedback Management, Customer Data Activation, Influencer Marketing, Live Shopping and Consumer Videos.

It is qualified as a separate Data Controller with its Clients, to whom it offers different types of Content, generated by Creators and/or Testers, sharing their experiences on the Products of the Brands received, with the aim of increasing their visibility, through the Influencers' accounts on social networks and/or on the websites of the Brands and other Third Party Platforms.

It is qualified as a joint Data Controller with the company Meta, the Facebook registration/login button being one of the means of accessing the Platform, the Instagram button inserted on the Site allowing access to the Instagram account of Skeepers. For more information on data processing and data protection at Meta: <https://www.facebook.com/about/privacy>. To have access to the Data Controller Agreement, which sets out the respective responsibilities for complying with the obligations arising from the GDPR with regard to the Joint Processing of registration/login to the Platform via the Facebook button: https://www.facebook.com/legal/controller_addendum.

It is qualified as a joint Data Controller with the TikTok company, the TikTok button inserted on the Site allowing access to the TikTok account of Skeepers. For more information on data processing and data protection at TikTok: <https://www.tiktok.com/legal/privacy-policy-eea?lang=fr>.



It is qualified as a joint Data Controller with company X (ex-Twitter), the X button inserted on the Site allowing access to Skeepers' X account. For more information on data processing and data protection at X (formerly Twitter): <https://twitter.com/fr/privacy>

In view of these elements, Skeepers is subject to the Personal Data Laws, in particular the General Data Protection Regulation ("**GDPR**"), French law (Loi Informatique et Libertés of 1978, known as "**LiL**") and, in general, to any Data Protection Regulations applicable to it (California Consumer Privacy Act – **CCPA**, California Privacy Rights Act (**CPRA**, etc.).

The Data Subjects concerned by the processing of the Data are the Creators and the Testers, including in particular the Internet Users browsing the Site ("**You**").

4. Origin of the data

We may receive your Data from different sources:

From your browsing on the Site and/or the Platform: Data concerning your computer's hardware and software ("fingerprinting") may be collected by Skeepers, unless you have expressed your opposition via the cookie panel and/or by the configuration of your web browser. This data may include: your IP address, browser type, domain names, dates and times of access and website addresses from which you accessed the Site/Platform as well as Platform usage data (actions performed by Creators and Testers on the Site and the Platform).

When registering or logging into the Platform by email: when you register for the Platform by email, you must provide Skeepers with the following Data:

- email
- country of residence,
- and date of birth.

Skeepers may also collect any anonymous demographic information, such as age or gender, without further information. You are responsible for updating this data and you agree to inform us of any changes to it in the marketing/customer department without delay. In addition, email exchanges may be recorded and stored in order to improve the quality of our customer service and to train our employees.

When you log in, Skeepers will only collect your email address.

When you register or connect to the Platform via social networks: if you access or identify yourself on the Site and/or on the Platform via a social network or any other service, or if you connect the Site and/or the Platform to a social network or any other service, such as Google, Youtube, Facebook, Twitter, TikTok or Instagram, the information that Skeepers collects may also include your username or username associated with the social network, any information or content that you have authorized the social network to share with Skeepers, such as your profile picture,



email address or friends list, and in general, any information that you have made public via these social networks. When you access the Site and/or the Platform via social networks or when you connect the Site and/or the Platform to a social network, you authorize Skeepers to collect, store and use this information for the performance of the Services.

For more information on Social Media Data, see **Article 6 of the Policy**.

Data will not be made public unless you share it from your Skeepers account.

You can connect your Skeepers account to other third-party accounts. By connecting your Skeepers account to other third-party accounts via Application Performing Interfaces (APIs) such as Google, Youtube, Facebook, Twitter, TikTok or Instagram, you acknowledge and agree to an ongoing communication of information about you 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 may 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.

The Site and/or the Platform may link to sites managed by third-party companies over which Skeepers has no control. This Privacy Policy applies only to information collected by Skeepers through the Site, Platform or Services and does not apply to such third-party sites, any Data you choose to disclose to such third-party sites remains under your sole control and responsibility. Skeepers does not monitor, control, or endorse the Data collection or privacy practices of third-party companies. Skeepers encourages you to review the privacy policies of the sites you choose to connect to, to understand how those sites collect, use, and share your information.

Skeepers is not responsible for privacy statements or any other content on sites other than the Site and the Platform.

Youtube's privacy policy can be found at the following link: https://www.youtube.com/intl/ALL_fr/howyoutubeworks/user-settings/privacy/

Google's privacy policy can be found at the following link: <http://www.google.com/policies/privacy>.

Facebook's privacy policy can be found at the following link: <https://fr-fr.facebook.com/about/privacy/>

The privacy policy of X (ex-Twitter) can be found at the following link: <https://twitter.com/fr/privacy>

Instagram's privacy policy can be found at the following link: <https://privacycenter.instagram.com/policy>



TikTok's privacy policy can be found at the following link: <https://www.tiktok.com/legal/privacy-policy-eea?lang=fr>

Cookies: Skeepers collects data through cookies, in particular to collect behavioural data by using Cookies and/or trackers.

For more information, see **Article 9 of the Privacy Policy: "Use of Cookies"**.

In the context of the use of the Platform: in the context of the use of the Skeepers Services, you are required to communicate information and Personal Data concerning you:

- Email;
- Location (country);
- Date of birth.

For Influencers connected via their social networks: Public data retrieved via API; Performance metrics.

For Testers wishing to receive Products:

- Name and surname;
- Gender;
- Full mailing address;
- Telephone number.

For Influencers wishing to receive Products:

- Name and surname;
- Gender;
- Full mailing address;
- Telephone number.

In addition, Skeepers may also collect other Data that is not mandatory and that you may choose not to provide. You can find some of them on your Personal Account from which you can modify and/or delete them at any time:

For Testers:

- Date of birth;
- Image (and voice if Video);
- Interests
- Social media (Instagram, Youtube, Twitter, Snapchat and/or Blog)
- Cookies;
- Tracers;
- Metrics on the performance of your Videos;
- IP address;
- the history and details of your participation in the Campaigns;
- the number and dates of Videos and Content published on the Platform;



- your views, opinions, and votes on other Testers' Videos;
- a copy of all exchanges with SKEEPERS as well as with the Trademarks, attachments attached that may contain Personal Data. ;

For Influencers:

- Image (and voice if Video);
- Skin color;
- Relationship status;
- Parenthood;
- Number of children;
- Animals;
- Purchasing habits;
- Skin type and concerns;
- Beauty habits;
- Hair color/type;
- Household income;
- Regime;
- Eyebrow color;
- Spectacles;
- Sizes;
- Lifestyle;
- Skin problems;
- Favorite brands;
- Interests;
- Cookies;
- Tracers;
- IP address;
- a copy of all exchanges with SKEEPERS as well as with the Trademarks, attachments attached that may contain Personal Data.

Skeepers reminds you that in accordance with the Terms and Conditions, you are responsible for the confidentiality of the username and password you have set to access your Personal Account on the Platform.

5. Data processed, basis for processing, storage period

This section summarises all the Data processing carried out by Skeepers in the context of the Platform and its Services.



Data processing

- *Context of collection: Registration, connection to the Platform, management of your Personal Account*

Purpose and Types of Data

When you register on the Platform and create your Personal Account, SKEEPERS necessarily processes the following Data:

- Email address;
- Country;
- Date of birth.

By logging in with your Facebook account, SKEEPERS has access to the information contained therein (see **3. Data source**).

For Influencers connected via their social networks (Instagram (> 1,000 followers), TikTok & YouTube): Public data retrieved via API; Performance metrics.

In addition, Skeepers may also collect other Data that is not mandatory and that you may choose not to provide. You can find some of them on your Personal Account from which you can modify and/or delete them at any time:

For Testers:

- Cookies;
- Tracers;
- IP address.

For Influencers:

- Image (and voice if Video);
- Skin color;
- Relationship status;
- Parenthood;
- Number of children;
- Animals;
- Purchasing habits;
- Skin type and concerns;
- Beauty habits;
- Hair color/type;
- Household income;



- Regime;
- Eyebrow color;
- Spectacles;
- Sizes;
- Lifestyle;
- Skin problems;
- Favorite brands;
- Interests;
- Cookies;
- Tracers;
- IP address;
- a copy of all exchanges with SKEEPERS as well as with the Trademarks, attachments attached that may contain Personal Data.

Hereinafter referred to as "**Your Personal Account Data**".

More generally, the Data collected will be used to ensure proper management of your Creator account.

Foundation

Contractual (membership of the Platform)

Persons/services having access/recipients of the Data

Skeepers employees in the course of their duties

Brands you've applied to

Amazon Web Services for hosting your data

Retention period:

The Data is kept for the duration of your activity on the Platform.

You can delete your profile at any time from your Personal Account. Your Data will be anonymized 6 months after the closure of your Account.

In any case, the Data will be deleted within 2 years of your last connection to your account.

- ***Collection Context: Campaign Management***

Purpose and Types of Data

Your Influencer profiles will be displayed on the Platform (name, age, gender), so that Brands can choose the ones that best meet their Campaign needs from the Skeepers Influencer community



Influencer profiles will be subject to a matching process with the Brands' campaigns: the match percentage will depend on your interests, your profile, your previous campaigns and your social media settings with regard to the Brands' needs that will have been expressed in the settings of their Campaigns.

Influencers' unsolicited applications will be accepted or rejected by the Brands with regard to their needs.

Testers may freely apply to the Campaigns in order to produce Gifted Reviews.

In the context of the delivery of the Brand's products, this will be carried out by Skeepers or by the Brand (in the latter case, Skeepers will communicate your surname, first name, postal address, email address and, if necessary, your telephone number, to the Brand, in order to inform you of the shipping confirmation, the dispatch, the delivery of the products)

Once you have received the Product, you will need to publish:

- the content desired by the Brand on your social networks (for Influencers),
- your written opinion on the Brand's Website (for Testers),

according to the conditions expressed in the Brand Brief. Your content/written review may be published on the Brand's Website, Brand Third Party Partners and/or the Brand's social media channels or Brand Third Party Partners.

An evaluation score will be issued by the Brands (scoring) with regard to the level of service delivered by the Influencers which feeds into the Influencer's Global Score.

A ranking of the ten best Influencers is made with regard to their performance metrics, generated by their posts (impression / interactions / reaches/ likes/comments/shares).

Influencers are categorized according to their Global Ratings and performance metrics (silver, gold, platinum).

SKEEPERS necessarily processes the following Data:

- Data from your Personal Account (see Data Processing previous)
- For the shipment of the Products:
 - Name and surname;
 - Gender;
 - Full mailing address;
 - Telephone number.

They may be supplemented by information specifically requested by the Brand in its Brief.



This information is transmitted to the Brand and, where applicable, to the Brand's third-party partners for the purposes referred to above.

If you are a Tester who has received a free product to generate a video review, please refer to the Consumer Videos Privacy Policy: <https://legal.ugv.skeepers.io/PP/en/>

Foundation

Contractual (General Terms and Conditions of Use of the Platform)

Persons/services having access/recipients of the Data

Skeepers employees in the course of their duties

Brands you've applied to

Hosting your data on Amazon Web Services

Product preparation and shipping service provider

Retention period:

The Data is kept for the duration of your activity on the Platform.

You can delete your profile at any time from your Personal Account. Your Data will be anonymized 6 months after the closure of your Account.

In any case, the Data will be deleted within 2 years of your last connection to your account.

- ***Collection Context: ARPP Certification***

Purpose and Types of Data:

As part of the partnership concluded with the ARPP (Professional Advertising Regulatory Authority), the Platform allows Influencers to obtain a Certificate of Responsible Influence, which will manifest itself in the issuance of a certification as well as the affixing of a badge on the profile of the Influencer who has successfully completed the training. For more information: <https://community.skeepers.io/blog/certificat-de-linfluence-responsible/> .

SKEEPERS necessarily processes the following Data:

- Name and surname,
- E-mail address
- Instagram handle



Foundations:

Contractual

Persons/services having access/recipients of the Data:

ARPP

Marketing Department

Skeepers employees in the course of their duties

Brands

Hosting your data on Amazon Web Services

Google Forms

Retention period:

Until certification expires

- ***Context of the collection: Communication on Campaigns***

Purpose and Types of Data:

From your Personal Account, you can authorize Skeepers to send you invitations to participate in other Campaigns that may or may not be similar to those in which you have already participated or according to your Preferences entered in your Personal Account.

SKEEPERS necessarily collects the following Data:

- E-mail address;
- and/or Telephone Number

Foundations:

Prior consent to receive similar or non-similar campaigns, you can object to their sending at any time from the unsubscribe link in each email and from your Personal Account.

Persons/services having access/recipients of the Data:

Marketing Department

Skeepers employees in the course of their duties

Brands

Hosting your data on Amazon Web Services

Email and SMS service providers



Retention period:

Until you unsubscribe from the communication

- ***Context of the collection: Newsletter***

Purpose and Types of Data:

From the "Subscribe to our newsletter" box on the Website and from your Personal Account, you can authorise Skeepers to send you newsletters about the latest developments on the Platform.

SKEEPERS necessarily processes the following Data:

- E-mail address

Foundations:

Prior consent (by entering your email address in the "Subscribe to our newsletter" box, you consent to receive the Skeepers Community Newsletter, which you can unsubscribe from at any time from the unsubscribe link included at the bottom of each email.

Persons/services having access/recipients of the Data:

Marketing Department

Skeepers employees in the course of their duties

Hosting your data on Amazon Web Services

E-mail service providers

Retention period:

Until you unsubscribe from the communication

- ***Context of the collection: Satisfaction surveys***

Purpose and Types of Data:

Skeepers may send you satisfaction surveys on the quality of the Platform and Services.

SKEEPERS necessarily processes the following Data:

- E-mail address;



Foundations:

As a legitimate interest, you can object to their sending at any time using the unsubscribe link in the email.

Persons/services having access/recipients of the Data:

Marketing Department

Hosting your data on Amazon Web Services

Email and SMS service providers

Retention period:

Until you unsubscribe from the communication

- **Context of collection: Contact, support and complaints**

Purpose and Types of Data

When you use the Platform, Skeepers informs you of technical developments and problems on the Platform and your account, provides assistance and processing of your requests for information or complaints.

SKEEPERS necessarily processes the following Data:

- E-mail address;
- Order ID (if applicable)
- The data in the Transmitted Attachment

Foundations

Contractual (General Terms and Conditions of Use of the Platform)

Persons/services having access/recipients of the Data:

Skeepers employees in the course of their duties

Brands

Provider of assistance and processing of your requests for information or complaints (Zendesk)

Hosting your data on Amazon Web Services

Retention period:

The Data is kept for the duration of your activity on the Platform.

You can delete your profile at any time from your Personal Account. Your Data will be anonymized 6 months after the closure of your Account.



In any case, the Data will be deleted within 2 years of your last connection to your account.

- **Context of the collection: operation and optimization of the Platform**

Purpose and Types of Data

Generate global statistics on the use of the Site and the Platform (audience measurements) through the deposit of Third-Party Cookies and other trackers. Please refer to the Cookie Banner for the exact list of cookies deposited.

Skeepers also carries out analyses of Data, in particular from Videos, to generate statistics for marketing purposes, usage trends, and the development of new Products and Services.

SKEEPERS necessarily processes the following Data: Cookies and other trackers, Data from your Personal Account and your Social Networks.

Foundations

Legitimate interest or consent (refer to the cookie banner)

Legitimate interest in generating performance statistics and metrics, dashboards.

Persons/services having access/recipients of the Data:

Marketing Department

Brands

Retention period:

Refer to the cookie banner.

The Data is kept for the duration of your activity on the Platform.

You can delete your profile at any time from your Personal Account. Your Data will be anonymized 6 months after the closure of your Account.

In any case, the Data will be deleted within 2 years of your last connection to your account.

- **Context of the collection: Litigation and responses to official requests from public or judicial authorities authorized for this purpose**

Purpose and Types of Data

Transmit any data requested by public or judicial authorities.



Use of Data in the context of litigation between Skeepers and the Influencers/Testers concerned.

Dataset

Foundations

Legal Obligation

Persons/services having access/recipients of the Data:

Accounting Department

Legal Department

Management of Skeepers

Public or judicial authority

Retention period:

Legal duration

In terms of pre-litigation: your Data is kept until the conclusion of a settlement agreement or, failing that, until the corresponding legal action is statute-barred;

In matters of legal disputes: your Data is kept until the decision has the force of res judicata final.

- ***Collection context: Detection, prevention and fight against fraud and cybercrime***

Purpose and Type of Data

Collect and process relevant data in order to detect, prevent, and fight fraud and cybercrime

Dataset

Foundations

Legal Obligation

Persons/services having access/recipients of the Data:

Accounting Department

Legal Department

IT Security Department

Management of Skeepers



- **Collection Context: Audit / Acquisition**

Purpose and Type of Data

Audit by potential investors, buyers, acquirers
Checks on the correct application of our processes
Verification of the processing of Data from the Testers database

Dataset

Foundations

Legitimate interest

Persons/services having access/recipients of the Data:

Management of Skeepers

External service provider

Potential buyer

6. "DO NOT USE MY SENSITIVE DATA" (CCPA/CPRA)

Sensitive data is a special category of personal data.

This is information that reveals the alleged racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Skeepers offers you, through its form, to fill in sensitive data: your skin color (racial/ethnic origin) or your skin problems (some are health data).

You never have to fill them in. By providing this data, you expressly express your wish for Skeepers to register it on the Platform and for it to be used as a pre-selection element by Brands that would target particular categories of Creators for their Campaign(s), only on the Platform. You can change your mind at any time by setting up your Creator profile.

7. Social media data

7.1. YouTube data



As a Creator, You acknowledge and agree that the Site and/or Platform use YouTube's API to collect and store the information and data available in Your YouTube account as described in YouTube's Privacy Policy <https://www.youtube.com/howyoutubeworks/user-settings/privacy/#your-data-in-youtube> ("**YouTube Data**").

YouTube Data is collected in order to (i) enable you to participate in YouTube Campaigns and (ii) extract statistics about your Skeepers activity. Your YouTube Data is stored in Skeepers' servers and may be shared with Skeepers' preferred partners for statistical purposes.

You can revoke Skeepers' access to your YouTube Data at any time via Google's security settings available at the following URL: <https://security.google.com/settings/security/permissions>.

7.2. Meta data (Instagram and Facebook)

As a Creator, You acknowledge and agree that Skeepers collects and stores the information and data available in your Instagram account or Facebook page, as appropriate, as described in the Privacy Policy of Instagram (https://privacycenter.instagram.com/policy/?section_id=1-WhatInformationDoWe) and Facebook (https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0) "**Meta Data**". By using the Platform, You agree to be bound by Meta's Privacy Policies.

Meta Data is collected in order to (i) allow you to participate in Instagram/Facebook Campaigns and (ii) extract statistics regarding your Skeepers activity.

Your Meta Data is stored in Skeepers' servers and may be shared with you and Skeepers' preferred partners for the purpose of improving the brand-influencer relationship, improving the user experience, and statistics.

You can revoke Skeepers' access to your Meta Data at any time through the security settings available at the following URL:

- for Instagram: https://help.instagram.com/536741816349927/?helpref=related_articles&cms_id=536741816349927
- and for Facebook: <https://www.facebook.com/help/792552774106866>

7.3. TikTok data

As a Creator, You acknowledge and agree that Skeepers collects and stores the information and data available in your TikTok account as described in the TikTok Privacy Policy <https://www.tiktok.com/legal/page/eea/privacy-policy/en> ("**TikTok Data**"). By using the Platform, You agree to be bound by TikTok's Privacy Policy.



TikTok Data is collected in order to (i) enable you to participate in TikTok Campaigns and (ii) extract statistics about your Skeepers activity.

Your TikYok Data is stored in Skeepers' servers and may be shared with you and Skeepers' preferred partners for the purpose of improving the brand-influencer relationship, improving the user experience, and statistics.

You can revoke Skeepers' access to your TikTok Data at any time via TikTok's security settings available at the following URL: <https://support.tiktok.com/fr/account-and-privacy>

8. Data Sharing / "DO NOT SHARE/SELL MY PERSONAL DATA" (CCPA/CPRA)

8.1 Operation of the Platform

In order to allow Skeepers to suggest Influencer profiles to Clients (the Brands), the Personal Account Data of all Influencers registered on the Platform will be automatically displayed within the Platform when creating an account.

This Data is displayed to the Brands on the Platform to allow you to apply for Campaigns, to allow the Brands to select you and to provide you with the Products when you have been chosen. This Data is also transmitted to them so that they can send you commercial and promotional communications by SMS, post or email (only when you have consented to this).

To find out more about the sharing of data with social networks and how to object to it, please refer to point 6. Network data.

To find out more about the sharing of Data via third-party Cookies and other trackers, and to find out how to object to it, refer to point 9. Use of Cookies

8.2 Sharing with subcontractors

Skeepers undertakes to verify that all its subcontractors and partners necessary for the performance of the services scrupulously comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR) and to enter into contracts with them including a Data Processing Agreement and a Non-Disclosure Agreement.

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

In order to ensure the proper functioning of its Services, Skeepers uses IT and technical service providers (e.g. those in charge of maintaining the IS) such as IT service providers (e.g. the hosting provider), SaaS solutions that need to have access to Data to carry out the mission entrusted to



them by Skeepers. Skeepers imposes strong obligations on these contracting parties in terms of processing, confidentiality and security of the Data to which these service providers have access.

Skeepers may also share your Data with its subcontractors in order to perform statistical analysis, send you an email, text message or letter, provide customer support, provide marketing activation, maintain a customer data platform or ensure deliveries of products. These subcontractors may have limited access to some of your Personal Data in the strict context of the performance of their services. They have a contractual obligation to use it in accordance with the applicable provisions and regulations on the protection of Personal Data. They only use your Data to provide the services to which Skeepers has subscribed, and this is done with the guarantee of maintaining the strict confidentiality of the Data. For a complete list of subcontractors, please write to privacy@skeepers.io.

Skeepers may also be required to communicate your Data to third parties in certain specific cases:

- If Skeepers is obliged to follow up on claims made against it and to respond to administrative and judicial proceedings (**right to defence**);
- If Skeepers intends to divest a business or assets (including by divesting the business carrying on that business or owning those assets), your Data may be disclosed to the acquirer and potential acquirers as part of an audit, including their advice. If all or a portion of Skeepers' assets are acquired by a third party, Data will be one of the transferred assets. The Data will be processed by the acquirer who will act as the new data controller and its Data protection policy will then govern the processing of the Data (**merger, acquisition, sale of assets**);
- If Skeepers is compelled to disclose or provide access to the Data to comply with a legal obligation or court order, or to enforce or apply the performance agreement or any other accepted circumstances, or to protect the rights, property, or safety of Skeepers, its customers, or its employees (**legal obligation**).

You have the right to object, at any time, to the Sharing of your data with Third Parties. We will then no longer transmit your data to these Third Parties, unless (i) these Service Providers are essential for the proper performance of the Services offered (you will then have to unsubscribe from the Platform) (ii) can justify to you that we have legitimate and compelling reasons for the Sharing/Processing of your data that override your interests and your rights and freedoms (iii) for the establishment, exercising or defending our legal rights.

For the sharing of data with social networks and ways to object to it, please refer to point 6. Network data.

For the deposit of cookies and how to object to them, please refer to point 9. Use of Cookies.

Sale of your data, special case of Reviews published on the Platform: By submitting your Review on the Platform, you authorize Skeepers to sell the information provided in a written Review about a product you have tested, to Brands that may be interested. If you do not want your Review to be sold, you must press the "Skip" button and do not post a Review.



Apart from this, Skeepers does not sell your Data.

9. Use of Cookies

Skeepers, or third parties authorized by Skeepers (such as advertisers or traffic analysis companies), may use tracking processes such as "cookies" in order to make your online experience as personalized as possible. A cookie is a set of information contained in a file **deposited on your terminal (computer, mobile) which is read by the publisher of the website or mobile application, and/or by its partners, when you visit or connect to our sites or mobile applications: this allows certain data from your visit** to be remembered. Cookies cannot run programs or spread viruses on your computer. A cookie is uniquely assigned to you and can only be read by a web server in the domain that issued it. For more information on cookies, please visit: www.allaboutcookies.org.

The cookies used by Skeepers have three distinct functionalities: they are (i) **necessary** for the operation of the site or mobile application (including through the use of a social network), or (ii) allow the **statistical analysis** of the audience.

1/ Cookies are necessary for the operation of the site or mobile application: they do not require your consent, as they **are essential**: these cookies are **necessary** for your authentication, to define the language in which we distribute our content, to manage the technical operation of our sites and mobile applications.

2/ Social network cookies are necessary for the operation of the Skeepers service for influencers because the registration of influencers requires the use of a social network (Instagram, Youtube, Facebook or TikTok).

- Youtube: https://www.youtube.com/intl/ALL_fr/howyoutubeworks/user-settings/privacy/
- Facebook: <https://fr-fr.facebook.com/about/privacy/>
- Instagram: <https://privacycenter.instagram.com/policy>
- TikTok: <https://www.tiktok.com/legal/privacy-policy-eea?lang=fr>

3/ Cookies that allow us to carry out statistical analyses, in order to understand your use of our sites and services and to improve them.

- **Hotjar**: <https://help.hotjar.com/hc/en-us/articles/115011789248-Hotjar-Cookie-Information>
- **Google Analytics**: <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

What information do we access?

We have access to:



- Type of equipment you use (Android, Apple, etc.),
- Type of operating system (Microsoft Windows, Linux, Android, iOS, etc.),
- Type of web browser software (Internet Explorer, Safari, Chrome, etc.),
- Dates and times of connection to our services,
- Address of the website from which you came before visiting our site
- Browsing data on our services
- Number of followers of the influencers' social network

What is the lifespan of cookies?

The cookie is valid for a **maximum of 13 months**, but some cookies have a shorter lifespan.

When you agree to the placement and reading of cookies on your device, you therefore agree to it for a maximum of 13 months.

On the other hand, if you refuse all cookies, **we may ask for your consent again after a period of 6 months.**

Finally, if you continue to visit our sites and mobile applications without accepting, we may ask for your consent to your next visit **to our sites and mobile applications.**

[Data Sharing / "DO NOT SHARE/SELL MY PERSONAL DATA"]

To learn more, refuse or accept all or part of these Cookies, you can go to the Cookies banner button when you first arrive on the <https://community.skeepers.io/en/> website, and at any time. If you refuse cookies, you may not be able to take full advantage of the interactive features of Skeepers services or of the sites you visit.

Brands can embed the SHOPPABLE CONTENT ADD-ON on their website or product pages. It is their responsibility to inform you and ask for your consent if necessary regarding the following cookie:

Name: Skeepers performance tracker

Host: Client's website

Cookie Type: Performance Cookie (1st Party)

Legal basis: Consent collected by the Client's Tag Manager

Purpose: performance metrics to demonstrate the impact of the presence of videos on prospects' purchasing behavior on customers' e-commerce sites .



Shelf life: 13 months

10. Duration of data retention

Except in special cases referred to in **Article 4. Data processed, basis for processing, retention period**, Data is stored in the following ways:

- Creators' Data (Influencers and Testers) is kept for the duration of their activity on their Creator space. They will be anonymized 6 months after the closure of their account.
- Creators' Data is deleted after a period of inactivity of 2 years on their account;
- In any case, **the closure of the Account can only take place if no Campaign for which the Creator has registered and for which he has received a product is in progress. In this case, the Creator must first perform his part of the Contract that binds him to Skeepers and the Brand or return the product received before his account can be closed.**

In general, your Data is only kept for the time strictly necessary for the purposes established in the previous articles of the Privacy Policy, in accordance with the recommendations of the CNIL, and in compliance with legal obligations, in particular accounting and tax obligations, in particular in order to scrupulously respect the duration of exploitation agreed to with regard to the rights to the Videos.

Beyond this period, the Data will be anonymized and only kept for statistical and archival purposes, and then it will be destroyed.

11. Data storage and security measures in place

Skeepers ensures the security of your Data and takes all necessary measures to ensure its confidentiality and prevent access, use, alteration, corruption, disclosure, and/or destruction by unauthorized persons.

To this end, Skeepers has implemented organizational, technical, software and physical measures in accordance with Article 32 of the GDPR listed in its Security Assurance Plan and Information Systems Security Policy. These include:

- Data anonymization techniques upon request;
- Regular backup of Personal Data with regularly validated restoration processes, in technically and physically separate backups;
- Secure hosting (Amazon Web Services hosting company ISO 27001 certified 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.);



- Protection in terms of access control (authentication and authorization control), processing, storage or exchange (encryption) to ensure confidentiality: access to your Data is limited and restricted only to the people/services that need to access it, who have signed a Confidentiality Agreement, this Data is stored on secure servers, Your Data is encrypted in transit and at rest (KMS encrypt). Access to your Data requires the use of a strong username and password.
- Skeepers' information system includes centralized and protected logging of the use of the services to detect any intrusion or fraudulent use, to try to identify the causes and origins, to avoid any contamination of other sites by bounce and finally to re-establish the system.
- 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;
- Ongoing audits (Bug Bounty) carried out by accredited Third Parties.

Despite all these measures, your attention is drawn to the fact that the Internet is not a completely secure environment, so it is not possible to guarantee the security of the transmission and storage of your Data.

In accordance with Article 33 of the GDPR, Skeepers undertakes to notify the CNIL, as soon as possible, of any Data breach likely to cause a risk to the rights and freedoms of the Users of its Platform, and to inform them if the risk is high.

Skeepers is committed to ensuring that your data is hosted within the European Union and the European Economic Area. However, some specific services of Skeepers are operated outside the territory of the European Union and the European Economic Area, so a limited amount of your Personal Data will be shared with these service providers in countries outside the European Union.

Skeepers then ensures that Standard Contractual Clauses are signed in their latest version in force with the said third-country service providers, and that additional technical measures are implemented in order to be able to ensure a sufficient level of protection for the Sharing of your Data, according to the recommendations 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".

12. Your rights

In the context of the Data processing carried out by Skeepers, you have the right to:

- To obtain access to/copy of your Processed Data;
- To obtain the rectification of your Data;



- To obtain the deletion of all or part of your Data when the Data, (i) is no longer necessary for the purposes for which it was collected, (ii) is based exclusively on consent, (iii) is the subject of an objection request;
- To object to the processing of your Data due to your particular situation;
- To obtain the restriction of processing, temporarily, when the accuracy of the Data is contested, when you have objected to the processing, when your Data is no longer necessary for Skeepers but is still necessary for the establishment, exercise or defence of legal claims;
- To unsubscribe or object to the receipt of commercial prospecting messages at any time by following the unsubscribe instructions indicated in the promotional emails you receive;
- Withdraw your consent at any time in the case of consent-based processing;
- To obtain the portability of your Data when the processing is based on consent and the processing is carried out using automated processes;
- Provide guidance on the fate of your Post-Mortem Data.

To exercise your right to delete your Data, your account, or to object, you can send your request to the following address: datadeletion@skeepers.io

To exercise any of your other rights or have any questions about this Privacy Policy, you may send a request to the following address: privacy@skeepers.io.

You can write to us at the address listed below:

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

For any request to exercise your rights, you must, in your message:

- 1) Specify the address (email or postal) where you would like to receive a response from Skeepers. Otherwise, we will choose the same method you used to contact us;
- 2) Include a means by which you can be identified (order number, customer ID, etc. if the means provided does not seem sufficient to prove your identity, a copy of your identity document may be required);
- 3) Specify, if possible:
 - the context in which your data was collected,
 - as well as the Solution concerned (in this case, Influencer Marketing).

This information is valuable so that the Data Protection Officer can respond to you as quickly as possible.



Skeepers informs you that no requests will be processed over the phone.

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.

A two (2) month extension is possible, in the event of a complex application, or if a large number of applications have been received.

Your request, as well as any data relevant to the processing of your request, will be kept for a period of five years from receipt of your request. If you have been asked for a supporting document, or if you have sent it spontaneously, it will be kept for a period of one year.

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