



## Privacy and Cookie Policy

This "Privacy and Cookie Policy" is updated regularly: you are welcome to view it as often as you like in order to stay informed of any recent changes.

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

Skeepers, a simplified joint-stock company with a capital of 9,133,750 euros, listed in the Marseille Trade and Companies Register under number 879 038 990 and with its registered office at 18-20 Avenue Robert Schuman CS 40494, 13002 Marseille, is the owner of the Website <https://www.Skeepers.io/fr/>. It includes Solutions Ratings & Reviews (Verified Reviews), CX-Management (ex-MyFeelBack and Mediatech), Predictive Marketing Activation (ex- Advalo), Influencer Marketing (ex-Hivency and Octoly), Live Shopping (ex-Spockee) and User Generated Videos (ex-Teester).

Skeepers is particularly concerned with issues relating to confidentiality, as well as the protection of the personal data of Users of its Website and/or services, as well as the protection of the personal data of its Customers. It takes this into account in the design of any new solution it offers to its customers to improve their Customer Engagement.

Skeepers thus guarantees the highest level of protection of personal data in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 (known as the "General Data Protection Regulation", hereinafter "GDPR"), French law (Data Protection Act of 1978, known as "LiL") and, in general, with all regulations applicable to this in terms of the protection of said personal data.

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 own behalf or on behalf of its Customers.

### II : Contents of the "Privacy and Cookie Policy" of the Skeepers Group

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### III : Contents of the "Privacy and Cookie Policy" of the Skeepers Group

#### 1 : Definitions

"**Supervisory Authority**" means an independent public authority that is established by a Member State under Article 51 of the GDPR, and to which any data subject may lodge a complaint regarding the protection of his or her personal data, i.e., the French Data Protection Commission (CNIL);

"**Consent**" by the data subject is any free, specific, informed, and unambiguous manifestation of will by which the data subject accepts, by a declaration or by a clear positive act, that personal data relating to them may be processed;

"**Consumer**", a natural person who acts for purposes that are not within the scope of his trade, business, craft or profession;

"**Personal data**" or "**Personal information**": any information relating to an identified or identifiable natural person (hereinafter referred to as the "data subject"); is deemed to be an

"**identifiable natural person**": 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 elements specific to their physical, physiological, genetic, psychological, economic, cultural, or social identity.

In simpler terms: "**personal data**" shall be understood as any kind of "**personal information**" or any information which concerns the Users;

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

"**Controller**", the natural or legal person, public authority, service or other body which, alone or jointly with others, determines the purposes and means of processing; when the purposes and means of this processing are determined by Union law or the law of a Member State, the controller may be appointed or the specific criteria applicable to his appointment may be provided for by the law of the Union or by the law of a Member State;

"**Service(s)**", refers to the service(s) provided by the Skeepers Group (Ratings & Reviews, CX- Management, Predictive Marketing Activation, Influencer Marketing, Live Shopping and User Generated Videos) subscribed by the Customer;

"**Site**" or "**Platform**": website from which the Skeepers Group offers its Ratings & Reviews, CX-Management, Predictive Marketing Activation, Influencer Marketing, Live Shopping and User Generated Videos, accessible from the following domain name: <https://www.Skeepers.io/fr/>;

"**Processor**": the natural or legal person, public authority, department or other body that processes personal data on behalf of the Controller;

"**Processing**" means any operation or set of operations, whether or not carried out by automated means and applied to personal data or sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, limitation, erasure or destruction.

In simpler terms: "**Data processing**" is any form of use of your data;

"**User**", any person browsing the Website <https://www.Skeepers.io/fr/>;



"Breach of personal data", a breach of security resulting, accidentally or unlawfully, in the destruction, loss, alteration, or unauthorized disclosure of personal data transmitted, stored, or otherwise processed, or the unauthorized access to such data.

## 2 : Processing of personal data of the Skeepers Group

### A) Processing of personal data by Skeepers (Controller) on its Website

#### 1. Contact form

For any contact request made via the form available on the <https://www.Skeepers.io/fr/contact/> page, the User gives his consent to Skeepers to process the following personal data via a checkbox:

- Last name and first name;
- Email address;
- Telephone number;
- Company name;
- Job level;
- Post held;
- Sector.

They must be filled in so that we can contact you again to answer your request, but also to offer you additional solutions that may be of interest to you given your needs (Ratings & Reviews, CX-Management, Predictive Marketing Activation, Influencer Marketing, Live Shopping and User Generated 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 will have deliberately chosen to communicate to it during their exchanges.

Your information will be kept for three years, before it is deleted.

#### 2. Cookies

Access and navigation on the Site <https://www.Skeepers.io/fr/> triggers the processing of data collected through cookies, pixels and other similar technology (collectively referred to as "Cookies" in this "Privacy and Cookie Policy"), which are necessary for the Site to function, in order to make your visit to the Site as easy, reliable and useful as possible.

Non-essential cookies require the prior consent of the User before their use.

- **What is a cookie?**

Cookies are basic digital information (text files) regarding the use of the website by Internet users; they do not personally identify the Internet user, but identify the computer that the Internet user is using.

As such, Cookies allow us to recognize an internet user's computer or mobile device each time the user visits the Skeepers site and, therefore, personalize and improve their browsing experience. Cookies contain information that the Site uses to make communication between the user and their browser more efficient.

To find out more about cookies, and in particular 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 advised not to deactivate the so-called "essential" cookies from your browser as you may no longer have access to the Site and be unable to navigate it.

Where applicable, Skeepers declines all responsibility for the consequences related to the degraded behavior of the Site resulting from the inability to use the Cookies necessary for its operation.



- **Why does Skeepers use cookies?**

Skeepers uses **so-called "essential" cookies** ("necessary" is the term used by specialized sites, in particular, on the CNIL site) whose function is to facilitate your access to the Site, while helping you navigate and use all the features of the Site.

These cookies are also used to detect and prevent fraud.

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

Cookie name	Cookie ID	Purpose	Host name	Category	Foundation
OptanonConsent	1e813243-c850-4f59-9738-9fc28e74e5c2	Collect consent, refusal to consent, configuration of cookies from users of the Site.	.www.skeepers.io	Cookies strictly necessary	Legitimate interest
OptanonAlertBoxClosed	8c4e53af-0988-4e75-a5de-ac9fc6f68c7 a	Collect consent, refusal to consent, configuration of cookies from users of the Site.	.www.skeepers.io	Cookies strictly necessary	Legitimate interest

Skeepers also uses **Functional and performance Cookies** which provide it with information on 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;
- in order to measure the performance of and traffic on its Website;
- in order to optimize the experience on its Website.

Cookie name	Cookie ID	Purpose	Host name	Category	Foundation
pll_language	d17d8624-ba68-4190-905d-5cdd3c9fe4bc	Configuration of the language of the Website by the User	www.skeepers.io	Functional cookies	Consent
_gid	dae338ca-6f42-40a5-bd64-115d11422ed4	Anonymous statistics	skeepers.io	Performance measurement cookies	Consent
_ga	80f43923-5f82-4bce-972d-3bce75ed342a	Anonymous statistics	skeepers.io	Performance measurement cookies	Consent
_gat	f665e227-8f34-4a17-a9c5-7cfc6ed3f43d	Anonymous statistics	skeepers.io	Performance measurement cookies	Consent

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In order to find out more, to refuse, or to accept all or part of these functionality and performance Cookies, you can visit our cookie banner at any time.

By visiting the Skeepers Site, "third-party Cookies" may be installed: these are Cookies placed on a User's computer by the server of a domain separate from the Skeepers site. As such, a third-party Cookie "collected" on the Skeepers Site has not been placed there by Skeepers, but by its advertising partners. These companies can use them to establish a profile of your interests and offer you relevant adverts on other websites. They do not store personal data directly, but are based on the unique identification of your browser and the device with which you are accessing the Internet. If you do not allow these cookies, your advertising will be less targeted.

These are cookies stored by the following "hosts":

Display name	Host name	Host ID	Purpose	Retention period	Privacy Policy
zoominfo.com	zoominfo.com	H21	Third-party advertising cookies	Unknown	<a href="https://www.zoominfo.com/about-zoominfo/privacy-policy">https://www.zoominfo.com/about-zoominfo/privacy-policy</a>
youtube.com	youtube.com	H1	Ensure connection and integration with YouTube	Session, 180 days	<a href="https://www.youtube.com/intl/ALL_fr/howyoutubeworks/use-privacy-settings/privacy/">https://www.youtube.com/intl/ALL_fr/howyoutubeworks/use-privacy-settings/privacy/</a>
www.slideshare.net	www.slideshare.net	H30	Third-party advertising cookies	Unknown	<a href="https://www.slideshare.net/privacy">https://www.slideshare.net/privacy</a>
www.netreviews.eu	www.netreviews.eu	H12	Internal cookies	90 days	This Privacy and Cookie Policy
www.linkedin.com	www.linkedin.com	H16	Ensure connection and integration with LinkedIn	731 days	<a href="https://fr.linkedin.com/legal/privacy-policy">https://fr.linkedin.com/legal/privacy-policy</a>
www.facebook.com	www.facebook.com	H18	Ensure connection and integration with Facebook	Session	<a href="https://fr.facebook.com/about/privacy/">https://fr.facebook.com/about/privacy/</a>
www.dailymotion.com	www.dailymotion.com	H4	Ensure connection and integration with Dailymotion	Unknown	<a href="https://legal.dailymotion.com/fr/politique-de-confidentialite/">https://legal.dailymotion.com/fr/politique-de-confidentialite/</a>
ws.zoominfo.com	ws.zoominfo.com	H22	Third-party advertising cookies	Unknown	<a href="https://www.zoominfo.com/about-zoominfo/privacy-policy">https://www.zoominfo.com/about-zoominfo/privacy-policy</a>
skeepers.kinsta.cloud	skeepers.kinsta.cloud	H31	Internal cookies	Unknown	This Privacy and Cookie Policy
s7.addthis.com	s7.addthis.com	H8	Third-party advertising cookies	Unknown	Unknown
room.myfeelback.com	room.myfeelback.com	H28	Internal cookies	360 days	This Privacy and Cookie Policy

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Display name	Host name	Host ID	Purpose	Retention period	Privacy Policy
pi.pardot.com	pi.pardot.com	H11	Third-party advertising cookies	Session, a few seconds, 3,650 days, 3,650 days	<a href="https://www.salesforce.com/company/privacy/">https://www.salesforce.com/company/privacy/</a>
pardot.com	pardot.com	H7	Third-party advertising cookies	Session, a few seconds, 3,650 days, 3,650 days	<a href="https://www.salesforce.com/company/privacy/">https://www.salesforce.com/company/privacy/</a>
netreviews.com	netreviews.com	H33	Internal cookies	3,650 days, 3,650 days	This Privacy and Cookie Policy
myfeelback.com	myfeelback.com	H27	Internal cookies	360 days	This Privacy and Cookie Policy
mister-auto.com	mister-auto.com	H20	Third-party advertising cookies	Unknown	<a href="https://www.mister-auto.com/politique-de-confidentialite/">https://www.mister-auto.com/politique-de-confidentialite/</a>
linkedin.com	linkedin.com	H19	Ensure connection and integration with LinkedIn	Session, 1 day, 731 days, 30 days	<a href="https://fr.linkedin.com/legal/privacy-policy">https://fr.linkedin.com/legal/privacy-policy</a>
kinsta.cloud	kinsta.cloud	H25	Third-party advertising cookies	Unknown	Unknown
js.hs-banner.com	js.hs-banner.com	H29	Third-party advertising cookies	Unknown	Unknown
js.hs-analytics.net	js.hs-analytics.net	H24	for the purpose of learning how you use the Website, widgets; applications and to create a meaningful Website and widgets	Unknown	Unknown
hubspot.com	hubspot.com	H23	CRM	Unknown	<a href="https://legal.hubspot.com/privacy-policy">https://legal.hubspot.com/privacy-policy</a>
google.com	google.com	H10	Third-party advertising cookies	Unknown	<a href="http://www.google.com/policies/privacy">http://www.google.com/policies/privacy</a>
get.skeepers.io	get.skeepers.io	H36	Internal cookies	Unknown	This Privacy and Cookie Policy
get.netreviews.com	get.netreviews.com	H34	Internal cookies	Unknown	This Privacy and Cookie Policy
facebook.com	facebook.com	H15	Ensure connection and integration with Facebook	90 days	<a href="https://fr.facebook.com/about/privacy/">https://fr.facebook.com/about/privacy/</a>

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doubleclick.net	doubleclick.net	H6	Google Marketing Platform brings together your analytics and advertising solutions to help you reach users effectively, gain more detailed insights and drive better marketing results.	Unknown	<a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>
Display name	Host name	Host ID	Purpose	Retention period	Privacy Policy
dmxleo.com	dmxleo.com	H2	Third-party advertising cookies	Unknown	Unknown
dailymotion.com	dailymotion.com	H3	Ensure connection and integration with Dailymotion		<a href="https://legal.dailymotion.com/fr/politique-de-confidentialite/">https://legal.dailymotion.com/fr/politique-de-confidentialite/</a>
cookie-cdn.cookiepro.com	cookie-cdn.cookiepro.com	H32	Non-essential cookie consent management banner	6 months	This Privacy and Cookie Policy
connect.facebook.net	connect.facebook.net	H9	Ensure connection and integration with Facebook	90 days	<a href="https://fr.facebook.com/about/privacy/">https://fr.facebook.com/about/privacy/</a>
avis-verifies.com	avis-verifies.com	H14	Internal cookies	Unknown	This Privacy and Cookie Policy
Verified Reviews	Verified Reviews	H13	Internal cookies	Unknown	This Privacy and Cookie Policy
ads.linkedin.com	ads.linkedin.com	H17	Ensure connection and integration with LinkedIn	Session	<a href="https://fr.linkedin.com/legal/privacy-policy">https://fr.linkedin.com/legal/privacy-policy</a>
addthis.com	addthis.com	H5	Third-party advertising cookies	Unknown	<a href="https://www.addthis.com/privacy/terms-of-service/">https://www.addthis.com/privacy/terms-of-service/</a>

#### 4. Processing of navigation data (trackers)

Whenever you consult the Site and especially when you access the contact form, Skeepers will collect the hardware and software data from your computer. 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).

#### 5. Management of applications and interviews (creation of a CV bank)

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

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

Their processing is justified by the legitimate interest of the Skeepers Group to carry out recruitment as well as to constitute a CV-library. The pre-contractual basis justifies the processing and retention of data when the candidate has been selected to join the Skeepers Group.



You have various rights over your information, including those of access, update, opposition and deletion, the methods for exercising these rights are presented in section "5: Rights relating to personal data and its management".

**B) Processing of personal data by Skeepers (processor) as part of its Ratings & Reviews, CX Management, Influencer Marketing, Predictive Marketing Activation and Live Shopping solutions**

Skeepers is required to process personal data as part of its Ratings & Reviews, CX-Management, Influencer Marketing, Predictive Marketing Activation, and Live Shopping as a Processor on behalf of its Customers.

Its Customers, as Data Controllers, ensure compliance with the Principles relating to Processing of Personal Data (Article 5 of the GDPR), i.e. the lawfulness, fairness and transparency of the personal data collected from Data Subjects, which they subsequently transmit to the Skeepers Group.

**The Skeepers Group requires its Customers to comply with the GDPR and, prior to any collection of their data and in accordance with Articles 12 et seq. of the Regulation, to inform their Consumers, in order to avoid any confusion when their personal data is processed by the SKEEPERS Group.**

Personal data which is communicated to the Skeepers Group must be exact, adequate, relevant, and limited to what is necessary according to the explicit and legitimate purposes determined by the Controllers. Skeepers, under its Ratings & Reviews, CX-Management, Influencer Marketing, Predictive Marketing Activation, and Live Shopping, keeps this personal data securely for a period not exceeding that necessary for the purposes for which it is processed.

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

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

**The table below details the data processing implemented by Skeepers under its Ratings & Reviews solution (Verified Reviews) on behalf of its Customers:**

<p><b>Nature of the operations carried out on personal data</b></p>	<ul style="list-style-type: none"> <li>■ Receipt</li> <li>■ Collection</li> <li>■ Registration</li> <li>■ Retention</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>• 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>• Reception and management of the Consumer reviews of the Customer;</li> <li>• Extraction and analysis of verbatim, key words and verbatim polarity;</li> </ul>
	<ul style="list-style-type: none"> <li>• Allow the Data Controller to answer the questions/needs of his customers in the event of dissatisfaction with said purchase;</li> <li>• Publication of consumer opinions on the Customer's site and on search engines.</li> </ul>



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<b>Categories of personal data processed</b>	<ul style="list-style-type: none"> <li>• Consumer's last name;</li> <li>• Consumer's first name;</li> <li>• First name and first letter of the Consumer's last name on the published Reviews;</li> <li>• Consumer's email;</li> <li>• Order number/reference;</li> <li>• Order date;</li> <li>• IP address;</li> <li>• Verified Reviews Widget cookies;</li> <li>• The date of publication of the Customer Review;</li> <li>• The Product purchased;</li> <li>• The place of Purchase (in case of Purchase in store).</li> <li>• The ratings assigned by the Consumer to his consumer experience;</li> <li>• Their comments and observations on their consumer experience;</li> <li>• The date and time of submitting the Review;</li> <li>• The Consumer's response(s) to the Customer's comment(s) in relation to a Review;</li> <li>• The response(s) from Consumers to questions asked by Internet users on the Customer's site.</li> </ul> <p>No sensitive data shall be accepted/processed.</p>
<b>Categories of data subjects</b> (hereinafter "the Data subjects")	<ul style="list-style-type: none"> <li>■ Customer's employees</li> <li>■ Customer's customers</li> </ul>
<b>Retention period(s)</b>	<p>Personal data shall be stored for 18 months after sending the VERIFIED REVIEWS email, if no review is submitted, or 18 months after submitting the Review, when a consumer has submitted a Review.</p> <p>Personal data attached to each Review shall be deleted by automated anonymization.</p> <p>Anonymized reviews are kept for a period of 5 years from the date of their publication, for statistical purposes only.</p> <p>They are deleted from the database and backups at the end of 5 years from the date of collection. The data deletion process will take place over one (1) month.</p>

The table below details the data processing implemented by Skeepers under its CX-Marketing solution (ex-MyFeelBack and Mediatech) on behalf of its Customers:

<b>Nature of the operations carried out on personal data</b>	<ul style="list-style-type: none"> <li>■ Receipt</li> <li>■ Collection</li> <li>■ Registration</li> <li>■ Retention</li> <li>■ Modification</li> <li>■ Consultation/Access</li> <li>■ Use</li> <li>■ Erasure</li> <li>■ Organization</li> <li>■ Structuring</li> <li>■ Adaptation</li> <li>■ Extraction</li> <li>■ Communication</li> <li>■ Dissemination</li> <li>■ Provision</li> <li>■ Interconnection</li> <li>■ Destruction</li> </ul>
<b>Purposes of personal data processing operations carried out by SKEEPERS on behalf of the Customer</b>	<b>Main purposes:</b> <ul style="list-style-type: none"> <li>• Collection of information relating to the lived experience of customers, prospects, partners, employees... of the CUSTOMER's "customer insights": responses to the collection of information relating to the lived experience of customers, prospects, partners, employees... of the CUSTOMER's "customer insights": responses to surveys, reviews, information on lived experiences, etc.;</li> </ul>

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	<ul style="list-style-type: none"> <li>• Use of questionnaires, display of messages to visitors and users according to their profile, their behavior on the sites published by the CUSTOMER;</li> <li>• Continuous enrichment of the CUSTOMER's database by adding information to the CUSTOMER's CRM tool.</li> </ul> <p><b>Sub-purposes:</b></p> <ul style="list-style-type: none"> <li>• Receipt of Customer data;</li> <li>• Invitation of CUSTOMER contacts to participate in a survey by sending messages;</li> <li>• Improving the usability of customer insights by applying enhancements, transformations, and analyses determined by the CUSTOMER: data recoding, transcription, translation, semantic analysis, etc.;</li> <li>• Allow the CUSTOMER 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>• Re-engagement of CUSTOMER contacts based on collected insights;</li> <li>• Analysis of the insights collected to improve the customer experience, develop customer centricity in their organization, etc.</li> <li>• Communication of summary results of insights analyses, and/or associated raw data.</li> <li>• Management of Solution Users designated by the Customer (assignment of access rights, as well as rules for sharing of documents and results);</li> <li>• Evaluation of the teams and people, internal or external to the CUSTOMER's organization, thanks to associated insights.</li> </ul>
<p><b>Categories of personal data processed;</b></p>	<p>Non-exhaustive list, depending on the requirements of the Controller:</p> <ul style="list-style-type: none"> <li>• Respondent's last name;</li> <li>• Respondent's first name;</li> <li>• Respondent's email;</li> <li>• Account name;</li> <li>• Customer ID;</li> <li>• Logs : <ul style="list-style-type: none"> <li>○ User login,</li> <li>○ Time at which the action was performed,</li> <li>○ Page on which the action was performed,</li> <li>○ Result of the action;</li> </ul> </li> <li>• Customer feedback collected defined by the CUSTOMER (level of satisfaction, comments, etc.) "Raw insights";</li> <li>• Insights to implement the re-engagement actions determined by the CUSTOMER;</li> <li>• Cookies;</li> <li>• Etc.</li> </ul> <p>No sensitive data shall be accepted/processed.</p>
<p><b>Categories of data subjects</b> (hereinafter "the Data subjects")</p>	<ul style="list-style-type: none"> <li>■ Respondents (determined based on the Customer's needs: employees, the Customer's customers, prospects, partners, etc.) ;</li> <li>■ Users.</li> </ul>
<p><b>Retention period(s)</b></p>	<p>Responses to questionnaires and the personal data attached to them shall be active and available on the customer's account for a period of 24 months. This retention period is justified in order to complete the relevant statistical studies for the Customer.</p> <p>At the end of the 24 months, the answers to the questionnaires and the personal data attached to them are kept for a further 12 months. These cannot be viewed by the Customer, their retention is only justified by the activation of the reversibility clause which could occur during this period and will allow their extraction.</p>

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Beyond these 36 months, personal data will be anonymized.

The data is kept according to the following policy: SFTP servers:  
30 days

User logins: 6 months

Database snapshots: 15 days backup retention

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The table below details the data processing implemented by Skeepers under its Influencer Marketing solution (ex-Hivency and Octoly) on behalf of its Customers:

<p><b>Nature of the operations carried out on personal data</b></p>	<ul style="list-style-type: none"> <li>■ Receipt</li> <li>■ Collection</li> <li>■ Registration</li> <li>■ Retention</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>■ Reconciliation</li> <li>■ Interconnection</li> <li>■ Destruction</li> </ul>
<p><b>Purposes of the personal data processing operations carried out by Skeepers</b></p>	<p><b>Main purpose:</b> Connect the Customer with influencers and consumers, users of the platform, in order for the latter to create content presenting and/or mentioning the Customer's products/services on social networks and/or on the Customer's websites, according to the campaigns chosen by the latter.</p> <p><b>Sub-purpose:</b></p> <ul style="list-style-type: none"> <li>• Creation and management of influencers' and consumers' review campaigns;</li> <li>• Access to the community of Skeepers influencers for its Customers (United States only);</li> <li>• Targeting of influencers and consumers, based on their interests, their profile and the social media settings (profiling);</li> <li>• Creation and management of influencer and consumer accounts (password changes, etc.) ;</li> <li>• Acceptance or rejection of influencers and consumers;</li> <li>• Delivery of products;</li> <li>• Transmission to the Customer of the postal address and e-mail address of the influencers and consumers in the event that the Customer handles the delivery of the products;</li> <li>• Connecting influencers/consumers with Skeepers' external business partners, in relation to an offer likely to interest the influencer/consumer. : Transmission of email address, name, postal address and phone number to third parties. All additional information is subject to the prior agreement of the influencer/consumer;</li> <li>• Influencer and Consumer Rating;</li> </ul>

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	<ul style="list-style-type: none"> <li>• Messaging on the platform;</li> <li>• Sending the Newsletter (after collecting the consent of the influencers/consumers): the latest campaigns, including those that match the profile of the influencer/consumer, commercial and promotional offers, new features of the platform, etc.;</li> <li>• Reporting dashboard integrated in the platform;</li> <li>• Integration and training session;</li> <li>• Continued account management:             <ul style="list-style-type: none"> <li>○ Email and telephone assistance</li> <li>○ Assistance in the campaign strategy and best practices.</li> </ul> </li> </ul>
<p><b>Categories of personal data processed</b></p>	<ul style="list-style-type: none"> <li>• <b>Obligatory:</b> <ul style="list-style-type: none"> <li>○ Last name and first name;</li> <li>○ E-mail;</li> <li>○ Address/location;</li> <li>○ Telephone number;</li> <li>○ Age;</li> <li>○ Gender;</li> <li>○ If the Instagram API: Data posted by Influencers/consumers on Instagram ("Instagram Data" present on the Instagram account such as the Instagram account title, username/identifier, date and country of creation, images, descriptions, stories, number of views, number of photographs, number of comments, and number of followers);</li> <li>○ If YouTube API: Data posted by influencers/consumers on YouTube ("YouTube Data" present on the YouTube account, such as, but not limited to, YouTube channel title, date and country of creation, images and description, number of views, number of videos, number of comments and number of subscribers);</li> <li>○ Any information or content that the influencer/consumer has agreed to share with Skeepers via his/her social networks, such as his/her profile picture, email address or list of friends, and generally speaking, any information that he/she has made public via these social networks;</li> <li>○ Video (image and audio).</li> </ul> </li> <li>• <b>Non-obligatory:</b> <ul style="list-style-type: none"> <li>○ Skin color (consent required);</li> <li>○ Relationship status;</li> <li>○ Parenthood status;</li> <li>○ Number of children;</li> <li>○ Date of birth;</li> <li>○ Pets;</li> <li>○ Shopping habits;</li> <li>○ Skin type/tone and concerns;</li> <li>○ Beauty regime;</li> <li>○ Hair color/type;</li> <li>○ Household income;</li> <li>○ Diet;</li> <li>○ Eyebrow color;</li> <li>○ Glasses;</li> <li>○ Sizes;</li> <li>○ Lifestyle;</li> <li>○ Skin problems (consent required);</li> <li>○ Cookies.</li> </ul> </li> </ul>
<p><b>Categories of data subjects</b> (hereinafter "the Data subjects")</p>	<ul style="list-style-type: none"> <li>■ Influencers meeting the criteria determined by Influencer Marketing and the Customer;</li> <li>■ Consumers meeting the criteria determined by the Customer.</li> </ul>

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<b>Retention period(s)</b>	The personal data of influencers and consumers are kept for the duration of their activity on their Creator space. It will be anonymized 6 months after closure of their account.
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The table below details the data processing implemented by Skeepers under its Predictive Marketing Activation solution (ex-Advalo) on behalf of its Customers:

<b>Nature of the operations carried out on personal data</b>	<ul style="list-style-type: none"> <li>■ Receipt</li> <li>■ Collection</li> <li>■ Registration</li> <li>■ Retention</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>■ Reconciliation</li> <li>■ Interconnection</li> <li>■ Destruction</li> </ul>
<b>Purposes of the personal data processing operations carried out by Skeepers</b>	<p><b>Main purpose:</b> Allow the Customer to follow the online and offline path of its consumers.</p> <p><b>Sub-purposes:</b></p> <ul style="list-style-type: none"> <li>• Collect and clean consumer data from a brand;</li> <li>• Measure site traffic and have a complete view of all consumer interactions in a single unified database (the One-to-One Marketing Platform, hereafter the "PULSE Platform");</li> <li>• Reconcile web data with data from transactional systems in order to reconcile identities;</li> <li>• Facilitate Customer knowledge by enriching customer data with qualifications;</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 which consumers are most likely to receive a communication based on an objective (statistical or probabilistic models);</li> <li>• Implement a marketing campaign for a list of eligible consumers;</li> <li>• Personalize consumer content when sending out a marketing campaign;</li> <li>• Measure the performance of marketing campaigns;</li> <li>• Automate marketing campaigns for eligible consumers;</li> <li>• Commercial prospecting operations;</li> <li>• Send the campaign data to partners selected by the end customer.</li> </ul>
<b>Categories of personal data processed</b>	<p>Within the scope of the implementation of the PULSE Platform, the Customer may collect:</p> <ul style="list-style-type: none"> <li>• Data identifying persons: last name, first name, date of birth;</li> </ul>

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	<ul style="list-style-type: none"> <li>• Data relating to personal life: email, telephone number, postal address, town/city, number of children, spouse's name;</li> <li>• Data relating to transactions of products and services purchased: date of purchase, purchase amount, list of products purchased;</li> <li>• Data related to browsing: cookies and tracers via the Tag;</li> <li>• Interaction data from social networks: traceability of clicks on publications, for example.</li> <li>• Other types of data: Customer identifiers.</li> </ul>
<b>Categories of data subjects</b> (hereinafter "the Data subjects")	■ Consumers
<b>Retention period(s)</b>	Unless otherwise instructed by the Customer, the data is kept by Skeepers for the duration of the contractual relationship.

Within the scope of the proposed services, the Customer is entitled to utilize applications developed by third parties. These entities may be recipients of personal data when an ADVALO Customer uses them.

The various connectors and potential data recipients are:

- Xandr (AppNexus)
- Adwords (Google)
- Splio
- Mailchimp
- Mailjet
- Facebook
- Salesforce
- Digiteo
- ... [see partners page](#)

**The table below details the data processing implemented by Skeepers under its Live Shopping solution (ex-Spokee) on behalf of its Customers:**

<b>Nature of the operations carried out on personal data</b>	<p><b>Processing specific to the "Shopping Party Video" service:</b></p> <ul style="list-style-type: none"> <li>■ Receipt</li> <li>■ Collection</li> <li>■ Registration</li> <li>■ Retention</li> <li>■ Consultation/Access</li> <li>■ Use</li> <li>■ Erasure</li> <li>■ Communication</li> <li>■ Dissemination</li> <li>■ Provision</li> <li>■ Destruction</li> </ul> <p><b>Processing specific to the "Connexions One to One" service:</b></p> <ul style="list-style-type: none"> <li>■ Receipt</li> <li>■ Collection</li> <li>■ Registration</li> <li>■ Retention</li> <li>■ Modification</li> <li>■ Consultation/Access</li> <li>■ Use</li> <li>■ Erasure</li> <li>■ Organization</li> <li>■ Communication</li> <li>■ Dissemination</li> <li>■ Provision</li> <li>■ Destruction</li> </ul>
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<p><b>Purposes of personal data processing operations carried out by Skeepers on behalf of the Customer</b></p>	<p><b>Purposes shared by the "Connexions One to One" and "Shopping Party Video" services:</b>  <b>Principal purpose:</b> Provision of tools for the Customer for the purpose of linking potential buyers with sellers and/or the advisors of the Customer, with the aim of triggering purchases on their online sales platform.  <b>Sub-purposes:</b></p> <ul style="list-style-type: none"> <li>• Connecting potential buyers on the Customer's online sales platform with sellers and/or advisors of the Customer;</li> <li>• Creation of a virtual shopping cart, called "pre-purchase process", to allow the finalization of the purchase on the Customer's online sales platform, according to the purchase process offered by the Customer.</li> <li>• Provision of a function allowing the Customer's employees to block people who are ill-intentioned or who have behaved inappropriately or written offensive material or material of a racist or sexist nature and which is generally considered illegal in the countries concerned ("moderation" function in the chat).</li> </ul> <p><b>Processing specific to the "Shopping Party Video" service:</b></p> <ul style="list-style-type: none"> <li>• Measurement of the performance of the services, generation of statistics for the Customer via the Tag;</li> <li>• Registration, housing and conservation of videos, to allow them to be replayed on the websites and pages identified by the Customer;</li> <li>• Broadcast of the replay on the channels chosen by the Customer;</li> <li>• Management of subscriptions of potential buyers who would like to be notified of the Customer's Live Shopping via the Customer's form;</li> <li>• Transfer of potential buyers' information (telephone number or email address) to the notification management partner by email or SMS;</li> <li>• Automated sending of SMS and emails to data subjects by our service provider to remind them of the Live Shopping option.</li> </ul> <p><b>Processing specific to the "Connexions One to One" service:</b></p> <ul style="list-style-type: none"> <li>• Receipt of the list of Customer employees in charge of video meeting requests;</li> <li>• Management of Live Video appointments via the Spockee application calendar on the webpage of the Customer's platform;</li> <li>• Transfer of potential buyers' information (telephone number or email address) to the notification management partner by email or SMS;</li> <li>• Automated sending of SMS and emails to data subjects by our service provider to remind them of the meeting.</li> </ul>
<p><b>Categories of personal data processed</b></p>	<p><b>For processing common to "Connexions One to One" and "Shopping Party Video":</b></p> <ul style="list-style-type: none"> <li>• Session ID;</li> <li>• Username and password of the Customer's employees for logging into the back office;</li> </ul> <p><b>For processing specific to the "Shopping Party Video" service:</b></p> <ul style="list-style-type: none"> <li>• Video: image and audio of the Customer's employees;</li> <li>• The telephone numbers OR email addresses of potential buyers who would like to be notified of the Customer's Live Shopping via the Customer's form.</li> </ul>





	<p><b>For processing specific to the "Connexions One to One" service:</b></p> <ul style="list-style-type: none"> <li>• The list of employees who will respond to the video appointment requests sent by the Customer, containing their first names and a photo (a pseudonym and an avatar are recommended for data minimization);</li> <li>• Telephone numbers OR email addresses of potential buyers requested via the calendar to schedule appointments and to be able to notify appointment reminders to potential buyers and employees chosen by the customer to respond to appointment requests (module accessible on the Customer's online sales platform).</li> </ul>
<p><b>Categories of data subjects</b> (hereinafter "the Data subjects")</p>	<ul style="list-style-type: none"> <li>• The Customer's sellers and/or advisors (Customer's employees);</li> <li>• the potential buyers.</li> </ul>
<p><b>Retention period(s)</b></p>	<p><b>For processing common to "Connexions One to One" and "Shopping Party Video":</b></p> <ul style="list-style-type: none"> <li>• Session ID "Customer ID": assigned to each user during a visit to the Customer's site, it is kept for the entire duration of the Contract in order to carry out performance metrics (examples of data: number of viewers, products put in the shopping cart, type of audience, number of messages, number of hearts, average duration of viewing per viewer, duration of the event, etc.) ;</li> <li>• Applications logs: 6 months;</li> <li>• Username and password for logging into the back office: Duration of Contract</li> </ul> <p><b>For processing specific to the "Shopping Party Video" service:</b></p> <ul style="list-style-type: none"> <li>• Spokee stores and retains videos allowing them to be replayed on the websites and pages identified by the Customer for the full Duration of the Contract;</li> <li>• The information collected to notify potential buyers of the Live Shopping, to which they have subscribed, shall be deleted 24 hours after the Live Shopping date and time.</li> </ul> <p><b>For processing specific to the "Connexions One to One" service:</b></p> <ul style="list-style-type: none"> <li>• Information about the meeting will be deleted 24 hours after the date and time of the meeting;</li> <li>• The videos are not recorded/stored.</li> </ul>

**C) Processing of personal data by Skeepers and its Customers (Joint Controllers) as part of the User Generated Videos and Influence solution**

Customers using Skeepers' User Generated Videos (ex-Teester) and Influence (ex-Hivency) solution acknowledge that they are acting as Joint Controllers as defined in Article 26 of the General Data Protection Regulation ("GDPR"). By way of exception, they may also be qualified as separate Data Controllers. They must, in any event, comply with their legal obligations and have a common interest in maintaining the confidentiality and security of the Data they share (hereinafter "Shared Data").

The Joint Data Controllers have decided to formalize an Agreement on the specific conditions under which each of them will act as joint/separate Data Controller for processing Shared Data. According to Article 26 of the GDPR, the outline of this agreement must be made available to data subjects within, for example, the privacy policies or other relevant documents of the Joint Controllers, in order to comply with their duty to inform, which they undertake to do.

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From then, the joint/separate Data Controllers particularly undertake 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 for the processing of data by Skeepers under its User Generated Videos and Influence solutions is the contractual basis (Article 6 §1 b) of the GDPR);
- comply, in advance and throughout the duration of the processing, with the laws and regulations applicable to the protection of personal data and in particular the GDPR;
- implement organizational, technical, software and physical measures aimed at protecting the Data against alteration, destruction and unauthorized access;
- ensure that the persons authorized to process the Data undertake to respect confidentiality or are subject to an obligation of confidentiality;
- guarantee Users the effectiveness of the exercise of all the rights available to them under the GDPR;
- not to use personal data for any purposes other than those expressly determined between them;
- to never transfer personal data and files or make these available to any third parties for any purpose whatsoever and in particular for commercial prospecting purposes without the prior consent of the User;
- keep personal data only for a period strictly necessary.

For the complete list of Customers with which the Skeepers Group is joint/separate Controller, please write to [privacy@skeepers.io](mailto:privacy@skeepers.io).

**The table below details the data processing implemented by Skeepers under the User Generated Videos solution (ex-Teester)**

<b>Nature of the operations carried out on personal data</b>	<ul style="list-style-type: none"> <li>■ Receipt</li> <li>■ Collection</li> <li>■ Registration</li> <li>■ Retention</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</b>	<p><b>Main purpose:</b> 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 User Generated Videos platform;</li> <li>• Sending of communications to Users;</li> <li>• Processing of information from Users of the User Generated Videos platform for the management of applications;</li> </ul>

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	<ul style="list-style-type: none"> <li>• Transfer of personal data to the Customer for the selection of Users;</li> <li>• Management of the order and distribution of the Products sent to the selected Users (unless otherwise requested by the Customer who wishes to deliver the products himself, in this case, the email address, the postal address, and the telephone number of the Users will be communicated to the Customer);</li> <li>• Reminder for Users who have not produced Videos by any means (email, telephone, mail);</li> <li>• Processing of information from Users of the User Generated Videos platform for the production of videos;</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 User Generated Videos platform linked to the Customer;</li> <li>• Management of image rights;</li> <li>• Distribution of videos;</li> <li>• Data analysis, identification of usage trends;</li> <li>• Marketing and statistical analyses.</li> </ul>
<b>Categories of personal data processed</b>	<ul style="list-style-type: none"> <li>• Last name;</li> <li>• First name;</li> <li>• Photo;</li> <li>• Video;</li> <li>• Date of birth;</li> <li>• Email;</li> <li>• Telephone number;</li> <li>• Postal address;</li> <li>• Areas of interest;</li> <li>• Information published on social networks;</li> <li>• IP address;</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 the Videos.</li> </ul>
<b>Categories of data subjects</b> (hereinafter "the Data subjects")	<ul style="list-style-type: none"> <li>■ Users of the User Generated Videos platform;</li> <li>■ End customers/consumers or prospects of the Customer;</li> <li>■ Contacts and business partners of the Customer;</li> <li>■ Employees or external employees hired by the Customer.</li> </ul>
<b>Retention period(s)</b>	<p>The retention period will be that necessary for:</p> <ul style="list-style-type: none"> <li>• The performance of the Services as defined in the main Contract;</li> <li>• Respect of the applicable laws and regulations;</li> <li>• Any other purpose stipulated in the main Contract and the Contract.</li> </ul> <p>It is 18 months for platform user data, except for the transfer of their images, in which case it is 20 years.</p>

**The table below details the data processing implemented by Skeepers' Customers under the User Generated Videos solution (ex-Teester)**

Nature and purpose of the Processing	<ul style="list-style-type: none"> <li>• Selection of the winning Users of the Campaigns;</li> <li>• Distribution and downloading of videos;</li> <li>• At the Customer's discretion: Management of the order and distribution of Products sent to the selected Users;</li> <li>• At the Customer's discretion: Publication of videos on the Customer's website, application and social media;</li> </ul>
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	<ul style="list-style-type: none"> <li>Marketing and statistical analyses.</li> </ul>
Categories of personal data processed,	<ul style="list-style-type: none"> <li>Last name;</li> <li>First name;</li> <li>Video;</li> <li>Email;</li> <li>Telephone number;</li> <li>Postal address.</li> </ul>
Categories of data subjects	<ul style="list-style-type: none"> <li>Users of the User Generated Videos platform;</li> <li>Skeepers' employees.</li> </ul>

The table below details the data processing implemented by Skeepers under the Influence solution (ex-Hivency)

<b>Nature of the operations carried out on personal data</b>	<ul style="list-style-type: none"> <li>■ Receipt</li> <li>■ Collection</li> <li>■ Registration</li> <li>■ Retention</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>■ Reconciliation</li> <li>■ Interconnection</li> <li>■ Destruction</li> </ul>
<b>Purposes of the personal data processing operations carried out by SKEEPERS</b>	<p><b>Main purpose:</b> Connect the Customer with influencers, users of the platform, in order for the latter to create content presenting and/or mentioning the Customer's products/services on social networks and/or on the Customer's websites, according to the campaigns chosen by the latter.</p> <p><b>Sub-purposes:</b></p> <ul style="list-style-type: none"> <li>• Creation and management of influencer review campaigns;</li> <li>• Targeting of influencers based on their interests, their profile and the social media settings (profiling);</li> <li>• Creation and management of influencer accounts (password changes, etc.) ;</li> <li>• Display of influencers' profiles on the Platform (name, age, gender);</li> <li>• Acceptance or rejection of influencers;</li> <li>• Delivery of products;</li> <li>• Transmission to the Customer of the postal address and email address of the influencers where the Customer handles the delivery of the products;</li> <li>• Influencer's rating;</li> <li>• Messaging on the platform;</li> <li>• Sending the Newsletter (after collecting the consent of the influencers): the latest campaigns, including those that match the profile of the influencer; commercial and promotional offers; new features of the platform, etc.;</li> <li>• Reporting dashboard integrated in the platform;</li> </ul>

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	<ul style="list-style-type: none"> <li>• Integration and training session;</li> <li>• Continued account management:             <ul style="list-style-type: none"> <li>○ Email and telephone assistance</li> <li>○ Assistance in the campaign strategy and best practices.</li> </ul> </li> </ul>
<b>Categories of personal data processed</b>	<ul style="list-style-type: none"> <li>• <b>Obligatory:</b> <ul style="list-style-type: none"> <li>○ Last name and first name;</li> <li>○ E-mail;</li> <li>○ Password;</li> <li>○ Address/location;</li> <li>○ Telephone number;</li> <li>○ Age;</li> <li>○ Gender;</li> <li>○ If the Instagram API: Data posted by Influencers on Instagram ("Instagram Data" present on the Instagram account, such as Instagram account title, username/identifier, date and country of creation, images, descriptions, stories, number of views, number of photographs, number of comments, and number of followers);</li> <li>○ If YouTube API: Data posted by influencers on YouTube ("YouTube Data" present on the YouTube account, such as, but not limited to, YouTube channel title, date and country of creation, images and description, number of views, number of videos, number of comments and number of subscribers);</li> <li>○ Any information or content that the influencer has agreed to share with Skeepers via his social networks, such as his profile picture, his email address or the list of his friends, and in general, any information that he has made public via these social networks;</li> <li>○ Video (image and audio).</li> </ul> </li> <li>• <b>Non-obligatory:</b> <ul style="list-style-type: none"> <li>○ Skin color (consent required);</li> <li>○ Relationship status;</li> <li>○ Parenthood status;</li> <li>○ Number of children;</li> <li>○ Date of birth;</li> <li>○ Pets;</li> <li>○ Shopping habits;</li> <li>○ Skin type/tone and concerns;</li> <li>○ Beauty regime;</li> <li>○ Hair color/type;</li> <li>○ Household income;</li> <li>○ Diet;</li> <li>○ Eyebrow color;</li> <li>○ Glasses;</li> <li>○ Sizes;</li> <li>○ Lifestyle;</li> <li>○ Skin problems (consent required).</li> </ul> </li> </ul>
<b>Categories of data subjects</b> (hereinafter "the Data subjects")	<ul style="list-style-type: none"> <li>■ Influencers fulfilling the criteria determined by Skeepers and the Customer.</li> </ul>
<b>Retention period(s)</b>	Influencers' personal data is kept for the duration of their activity on their Creator space. They will be anonymized 6 months after closure of their account.



**D) Processing of personal data by Skeepers (Contoller) with regard to its Customers**

As part of the subscription to one or more solutions of the Skeepers Group, then 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 with regard to its relationships with its Customers:**

<p><b>Nature of the operations carried out on personal data</b></p>	<ul style="list-style-type: none"> <li>■ Receipt</li> <li>■ Collection</li> <li>■ Registration</li> <li>■ Retention</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 the personal data processing operations carried out by Skeepers with regard to its relationships with its Customers</b></p>	<ul style="list-style-type: none"> <li>• Listening and recording telephone conversations and videos 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/business relationship;</li> <li>• Create and manage the Customer's Back Office;</li> <li>• Allow access 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 execution of the Services or for information purposes in the event of changes to the General Conditions;</li> <li>• Provide support service;</li> <li>• Conduct marketing and statistical analyses;</li> <li>• Analyze the data, type of audience and usage trends;</li> <li>• Conduct statistics in order to improve functionality 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>• Send commercial information in relation to the Services subscribed;</li> <li>• Request payment for the subscribed Services;</li> <li>• Manage unpaid debts, disputes and disagreements;</li> <li>• Detect, prevent, and combat fraud and cybercrime;</li> <li>• Maintain general and auxiliary accounts;</li> <li>• Responses to official requests from public or legal authorities, duly authorized for these purposes;</li> </ul>
	<ul style="list-style-type: none"> <li>• Acquisition audit by potential buyers.</li> </ul>

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<b>Categories of personal data processed</b>	<ul style="list-style-type: none"> <li>• Last name;</li> <li>• First name;</li> <li>• Professional email address;</li> <li>• Professional telephone number;</li> <li>• Image (if video interview);</li> <li>• Voice (if video/audio interview);</li> <li>• Username;</li> <li>• Password;</li> <li>• Connection logs;</li> <li>• Bank details.</li> </ul>
<b>Categories of data subjects</b> (hereinafter "the Data subjects")	<ul style="list-style-type: none"> <li>• Employees, assimilated or externally hired by the Customer</li> </ul>
<b>Legal bases (according to the intended purpose)</b>	<ul style="list-style-type: none"> <li>• Precontractual/contractual</li> <li>• Skeepers' legitimate interest</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 years (3) from the last contact in the context of commercial prospecting.</p> <p>Retention for a maximum of 6 months from the recording of the audio or video interview. Data from analysis documents (reports and analysis grids) are kept for one (1) year from the time of their collection.</p> <p>Conservation for the duration of the litigation, deletion of the data once all remedies have been exhausted, and the decision or prescription of legal action has become enforceable. In the event of an amicable settlement of the dispute, deletion on settlement.</p> <p>Retention during the current accounting year, increased by ten (10) years from the closing date.</p>

Personal data is only processed within the Skeepers Group by the competent departments, which need to know the information for the proper execution of their tasks. They are subject to a Non-disclosure Agreement.

### 3 : Sharing of collected personal data

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

However, it is important that you know that Skeepers shares your personal data with third parties and wants you to be fully informed of this. Skeepers indeed uses third-party companies to:

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

These processors and partners may have limited access to some of your personal data, within the strict context 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 is committed to verifying that all of its processors and partners scrupulously comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 (GDPR) and to entering into contracts with them that include 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 applicable technical and organizational security measures for the protection of personal data have been taken (Article 32 of the GDPR).

If you would like to have a complete and up-to-date list of processors and service providers, you can contact the Skeepers' Data Protection Officer by email at the address: [privacy@skeepers.io](mailto:privacy@skeepers.io).

The Skeepers Group may also be required to share your information if it considers that its disclosure is necessary:

- To follow up on any claims made against the Skeepers Group and to comply with administrative and legal procedures (e.g. legal authorities);
- To comply with a legal obligation (e.g. public bodies such as URSSAF);
- Due to a merger, acquisition, disposal of assets or court-supervised receivership proceedings.

**Skeepers is committed to processing and hosting your data within the European Union and within the European Economic Area.** However, with the express written consent of its Customers, who wish to benefit from certain specific Skeepers' services operated outside the territory of the European Union and the European Economic Area, a limited amount of your personal data may be shared with service providers in countries that are outside the European Union and which are 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 providers, and that additional technical measures are implemented in order to be able to present a sufficient level of protection in the sense 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, Influence, User Generated Videos) to connect your account on our Platforms to other third-party accounts.** When you connect your account to other third-party accounts, you acknowledge and accept the continuous communication of your information to other parties (in accordance with the confidentiality settings that you have defined on these 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 the information page on your Account.

In the event of merger/acquisition or merger/absorption, Skeepers will inform you prior to the operation, and of the transmission of your personal data to the new entity.





#### **4 : Security and confidentiality of personal data**

**The SKEEPERS Group only retains and stores your personal data for the period that is strictly necessary for the purposes defined in the section "2: Processing of Personal Data of the Skeepers Group".**

In any event, the Skeepers Group 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) as well as in its Secure Assurance Plan (SAP): these aim to protect your Data against alteration, destruction and unauthorized access in compliance with Article 32 of the GDPR.

More specifically, it consists of the following measures:

- Regular backup of personal data with regularly validated restoration processes, in technically and physically separate backups;
- Limited and controlled access to data (authentication and authorization control), subject to confidentiality;
- Secure hosting (certified ISO 27001 for technical measures, ISO 27017 for security in the cloud, ISO 27018 for privacy in the cloud, SOC 1, SOC 2 and SOC 3, PCI DSS level 1, Common Cloud Computing Controls Catalog (C5) of the BSI, ENS High.);
- Data encryption (KMS encrypt) in transit and at rest;
- A thorough security analysis to evaluate its level. It should be noted that if the required level is not reached, a new design phase is initiated in order to reach the level required by the Skeepers Group.

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

The Skeepers' information system includes centralized and protected logging devices for the use of services making it possible to detect any intrusion or fraudulent use, to attempt to identify the causes and origins and to further avoid any contamination of other sites and finally to restore the system.

The level of security of the Skeepers Group's information systems is tested every 6 months to ensure that no inherent security breach is accessible.

In accordance with Article 33 of the GDPR, the Skeepers Group undertakes to notify the CNIL, as soon as possible, of any data breach likely to create a risk for the rights and freedoms of the Users. The Skeepers Group undertakes to notify the Data Subjects, as soon as possible, of any breach of Data likely to give rise to a high risk for their rights and freedoms.

#### **6: Rights relating to personal data and their implementation**

In accordance with the regulations applicable to the Skeepers Group regarding the protection of personal data, you have, at any time and for any reason, various rights with regard to the processing of the data of which you are the data subject.

These include the right of access, rectification, erasure and objection, the right to limitation of processing, the right to data portability, the right not to be subject to an automated individual decision (including profiling), the right to define guidelines regarding the retention, erasure and communication of your personal data after your death.

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



**The Skeepers Group 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 April 27, 2016 (GDPR) and the Data Protection Act (LIL).**

For the processing of personal data based on your consent, you have the right to withdraw this at any time, without it affecting the lawfulness of the processing, which was based on your consent prior to its withdrawal.

We do not voluntarily collect personal data from minors under the age of 15, however, if you are a parent or legal guardian of a minor and you believe that we are holding data specific to that minor, you may request the deletion of that data upon proving your identity and parental authority over that minor.

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

**1) Specify the address (email or postal) at which you wish to receive a response from Skeepers;**

**2) Include a means of identifying yourself** (order number, customer identifier, etc. if the means communicated do not seem sufficient to prove your identity, a copy of your identity document may be required);

**3) Specify, if possible:**

- **the context in which the collection of your data was carried out,**
- **and the relevant Solution** (Ratings & Reviews, CX-Management, Predictive Marketing Activation, Influencer Marketing, Live Shopping and/or User Generated Videos).

**This information is important so that the Data Protection Officer can respond to you as quickly 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) or by post, to the address given below:

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

Skeepers would like to inform you that no request 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.

A two (2) month extension is possible, in the event of a complex request, or if a large number of requests 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 where the right of opposition applies) from receipt of your request. If you have been asked to provide a supporting document, or if you have sent one spontaneously, it will be kept for a period of one year.

If you believe, after having contacted the Data Protection Officer, and after a period of one month has elapsed, that your GDPR rights have not been respected, send a complaint to the CNIL.