

SCOPE AND PURPOSE OF THE CHARTER

Proov Group, simplified stock company, which registered office is located at 20 B Rue Louis Philippe 92200 Neuilly-sur-Seine France (hereunder referred to as “Proov Group”), is responsible for the processing of your personal information as part of its daily management activities.

Proov Group also acts as a subcontractor when the Company processes personal information on behalf of its customers, in relation to the provision of WeProov Services.

The overall objective of this Privacy Charter, which is part of the General Privacy Policy of Proov Group and the General Terms and Conditions of WeProov Services, is to provide you information on :

- The collection and use of your personal identifying information;
- Your rights in relation with the processing of your personal information by Proov Group, and the procedures for exercising these rights;
- All the measures implemented by Proov Group to ensure the security of your personal information.

The Privacy Charter applies to all WeProov services, including the Application Platform, and the website available via the link <https://www.weproov.com/en/>.

The Privacy Charter shall be updated in accordance with changes to the legislation, or with the further developments of Proov Group’s activities, goals and policies. We therefore suggest you to check this page from time to time to take notice of any changes we make.

COLLECTION AND USE OF YOUR DATA

Under this Charter, the term “data” refers to any personal identifying information associated to the visitors of the Website <https://www.weproov.com/> , as well as to the sales leads, customers or users of WeProov services.

Your personal information is collected and processed by Proov Group for the purposes described below.

➤ **Business Development and Marketing**

When you visit our website and fill the contact form or tchat form, we may collect and process the following categories of data :

- Personal identification data: name and surname, telephone number;
- Electronic identification data: Email;
- Information relating to working life: business line, organization (employer), Job position/role.

We may also collect these data from your business cards gathered by our sales representatives during trade shows.

These data are brought together in an automated file, and processed by Proov Group for its marketing and business development purposes only.

We may precisely use this information to contact you with offers of interests for you.

You can choose to not receive our offers, or to unsubscribe from our mailing list by clicking on the link contained within the email for this express purpose.

These data shall be kept for 3 years from the date of the last contact with you.

➤ **Subscription to the services**

When you purchase WeProov Services, you may be required to provide the following categories of personal information:

- Personal identification data: name and surname, telephone number;
- Electronic identification data: Email;
- Information relating to professional life: business line, organization (employer), Job position/role;
- Financial information: according to the chosen payment method, your bank account details;
- Account password and login (encrypted).

This information enables us to: (i) manage the deployment of WeProov solution for you; (ii) send you quotes and invoices; (iii) create accounts (customer account, user account and administrator account); (iv) identify/authenticate you when you connect to the WeProov Solution; (v) provide you with information relating to the developments of, and updates to, our Services.

These data shall be kept for the duration of the contract and for a maximum period of three years from the contract termination, except if specific provisions in national law provide for a longer or shorter retention period, for all or part of the information.

➤ **Creation of a WeProov report**

Depending on the form chosen for the WeProov report, the following categories of data may be collected and processed during the WeProov process:

- Personal identification data: name and surname, telephone number, personal or professional address, electronic handwritten signature;
- Identification data issued by public services: references of identity documents, driving license, vehicle registration document;
- Electronic identification data: Email, IP address, device identifiers;
- Information relating to professional life: business line, organization (employer), Job position/role;
- Assets information: vehicles and real property description and characteristics, photos...;
- Means of travel/geolocation: geolocation is operated for the sole purpose of locating the inspected asset during the inspection process.

The gathered information is processed for the creation of WeProov reports that can be linked to the signing parties.

The inspection reports shall be kept by Proov Group during a period defined by the customer, to the extent permitted by the contract duration.

Furthermore, you may import data relating to third parties during the inspection process, particularly from your contact list, only when such third parties are personally involved in one way or another, in the inspection process.

This third parties' personal information shall not be saved in our systems and shall be exclusively used for the above described purpose.

When you connect to WeProov Application to create a WeProov report, we log all your actions from the moment you connect till the end of the process, into a log file, in order to reinforce the probative value of WeProov report and prevent fraud and security breaches.

These logs are kept in conditions that guarantee their confidentiality and integrity, for a maximum period of one year.

➤ **Support and Assistance**

If you face some difficulties when accessing/using our services and request for help by phone or email, the authorized personnel of Proov Group may need to access your account and WeProov report's information details, in order to find an appropriate answer or solution to your problem.

LOCATION OF DATA

The WeProov Website and the entire Platform of the Services are hosted in data centers located in the European Union.

Your data may be transferred outside EU (In the United States of America) by our vendors and subcontractors, specifically by the subcontractors in charge of notifications to the users by email or SMS.

The exported data are telephone numbers and electronic addresses of the users.

This data is kept by our vendor for a maximum period of forty-five days from the notification's date.

In case of transfer of your personally identifiable information outside the European Union, we make sure that this transfer is based on one of the suitable specific safeguards provided by the General Data Protection Regulation (standard contractual clauses of the European Commission).

TRANSMISSION OF DATA TO A THIRD PARTY

Proov Group may transmit your data to : (i) its partners/vendors/subcontractors, in relation to the provision of WeProov Services ; (ii) comply with legal, regulatory, judicial or other request from an authority enabled to compel it ; (iii) ensure and preserve the security of persons or public safety in the event of an emergency, or to protect vital interests of individuals or of the society.

Outside that framework, Proov Group will not share your personal identifying information with any other third parties for any purpose whatsoever and in particular, for commercial and advertising purpose, without your prior express autorisation.

DATA SECURITY

We are responsible for the security of your data that we collect and process and as such, Proov Group shall implement all the necessary measures to maintain the confidentiality, integrity and availability of these data.

Proov Group's security policy gives more details about all the technical and organisational security measures put in place in order to ensure the highest level of information security.

For instance, access to customer's and user's data is strictly regulated by a strict policy of access to ensure that only those authorised to access personal data can have access to such data, in accordance with the principles of « least privilege » and « need-to-know ».

The staff members that are granted access to customers and users data are subject to an obligation of confidentiality and undertake in writing, during the hiring process, to comply with this obligation.

Your Data are encrypted during transfer and storage.

EXERCICE OF DATA SUBJECT RIGHTS

➤ Your rights regarding the processing of your data by Proov Group

In accordance with the current regulation, you have the following rights regarding the processing of your personal identifying information by Proov Group:

- Right of access;
- Right to rectification;
- Right to erasure;
- Right to portability;
- Right to restrict processing;
- Right to object.

➤ Modalities of exercising your rights

You can, as a client and/or user of WeProov Services, directly exercise some of your rights on your WeProov account: you can access it at any time, view and download your WeProov reports, modify specific personal information on your account (name and surname...)

However, the modification of some data (email, phone number) is subject to a prior verification of your identity by our data protection service, for this information is directly linked to your WeProov account enabling the creation of WeProov reports.

Likewise, account deletion is subject to the prior verification of the account holder's identity.



PRIVACY CHARTER

In order to facilitate the exercise of your rights, you can get into direct contact with our Data Protection Officer (DPO) using the contact information below, or fill the form request available here <https://zfrmz.com/6BsWDtwykCw8bBh9tY5m> and return it to the DPO electronically or by postal mail, with a copy of your valid identity card, where applicable.

DPO Contact:

- Adress : DPO Proov Group 20 B rue Louis-Philippe 92200 Neuilly-sur-Seine ;
- Email : data-protection@weproov.com;
- Telephone number : 0184808081.