

# Data Protection Policy

Last updated 3 February 2021

The protection and security of your Data, as defined in the Terms and Conditions of Use, are particularly important to GOOMEO.

This Data Protection Policy is an integral part of the Terms and Conditions of Use and is intended to govern the collection of, use of and access to your Data when you use the Website and/or the Verticals Service.

## Clause 1. Lawfulness of processing – Access to the Website, Products and Services

The Data Protection Policy must be accepted by any User wishing to access the Website and/or the Verticals Service, and each time the Data Protection Policy is amended.

If Users do not accept the Data Protection Policy, then they should renounce access to the services offered by the Website and, where applicable, to the Verticals Service.

As the processing of Data is necessary for use of the Verticals Service, Users expressly authorise GOOMEO to proceed with this processing as described in this Data Protection Policy as soon as they register for the Verticals Service.

## Clause 2. Data controller

The data controller for the verticals.eco website is: GOOMEO, a simplified joint-stock company with share capital of EUR 259,900, with registered office at 12 rue Bernard Lathière, 87000 Limoges, France, entered in the Limoges Trade and Companies Register under number 523698215, represented by its Chairman, FLAM, a simplified joint-stock company with share capital of EUR 473,744, with registered office at 7 Roussingéas, 87800 Burgnac, France, entered in the Limoges Trade and Companies Register under number 819109935, represented by its Chairman, Mr Franck Auzanneau.

It should be noted that GOOMEO acts as the data controller for personal data processing, as defined by applicable legislation, for the management of the online services offered by the Website and/or Verticals Service.

## Clause 3. Contact

To exercise any of the rights referred to in Clause 9 of the Data Protection Policy or for any questions, Users may contact:

GOOMEO

12 rue Bernard Lathière

87000 Limoges,

GOOMEO SAS with share capital of EUR 259,900 - Limoges

France

E-mail: [privacy@goomeo.com](mailto:privacy@goomeo.com)

## Clause 4. Data collected on Administrators and Managers

Purpose	Data collected	Legal basis
Creating and managing your Verticals Account	<ul style="list-style-type: none"> <li>- Account information: username, password, last name, first name, e-mail address, social network profiles, comments, feedback, questions, contributions during an online event, images of an individual recorded during an online event (videos).</li> <li>- Identifying data: last name, first name, telephone number and postal address enabling a legal entity to be identified, billing information, IP address, country of connection.</li> <li>- Professional data: business sector, owner, seller, buyer.</li> <li>- Bank data: method of payment used for billing.</li> </ul>	Required to carry out our contract with you for access to and use of an Account on our Website and application.
Improving GOOMEO services and audience measurement	<ul style="list-style-type: none"> <li>- Connection data: times, country, Internet service provider, proxies, IP address, UDID, URL, OS, resolution.</li> </ul>	<ul style="list-style-type: none"> <li>- We have a legitimate interest in analysing our services in order to provide you with the best possible user experience.</li> <li>- Your consent for using location.</li> </ul>

	<ul style="list-style-type: none"> <li>- Public professional data: LinkedIn profiles, other information made public.</li> <li>- Location.</li> <li>- Usage and browsing data (e.g. number of chats made and features used).</li> </ul>	
Responding to requests from administrative and legal authorities	- Technical data.	The legal obligation imposed on stakeholders defined in Article L.34-1, II, paragraph 3 of the French Post and Electronic Communications Code.
Offering new services adapted to your needs and direct marketing purposes	<ul style="list-style-type: none"> <li>- Cookies.</li> <li>- Interests and preferences.</li> </ul>	Your consent.

## Clause 5. Personal data collected on Users

The User is informed about and expressly consents to the collection of the following personal data:

- Last name, first name
- Employer's name
- Account name (login)
- E-mail address
- Postal address
- Telephone number
- Photograph
- Video

- Comments, feedback, questions, contributions during online discussions
- Other Data that you voluntarily share with other Users on line.

The User is informed about and expressly consents that this personal data is shared with the following recipients:

- The Customer of GOOMEO, a company using the Verticals Service for online connection, in its capacity as data controller.
- GOOMEO, in its capacity as data controller and processor.

Authorised third parties, subject to the French Data Protection Law and the Regulation, undertake to process this Data in accordance with this Data Protection Policy.

The Data will only be disclosed by GOOMEO with a view to offering or improving its services. It will not be disclosed to third parties for use in their marketing activities.

Please note that content created via the Verticals Service (videos, comments, surveys, etc.) may be downloaded by the Administrator.

## **Clause 6. Data processors**

Furthermore, GOOMEO uses third-party solutions for marketing, statistical and functional purposes. All of our service providers comply with applicable data protection regulations in accordance with the personal data protection agreements we have signed with them.

You can, at any time, object to your personal data being processed for the purpose of providing Verticals Services, by writing to the Data Protection Officer (DPO). However, this will result in termination of the contract that allows you to access Verticals Services, as the solution cannot work without processing your Data.

As part of its business, GOOMEO is required to transfer Data to service providers located outside the European Union. In this case, GOOMEO ensures that the User is informed about this and that the transfer is carried out in accordance with applicable regulations, ensuring a sufficient level of protection of the privacy and fundamental rights of individuals in compliance with the Regulation (in particular with European Commission standard contractual clauses).

## **Clause 7. Data Protection Officer (DPO)**

We have appointed a Data Protection Officer (DPO). The DPO is in charge of training GOOMEO's internal teams and making them aware of the importance of maintaining the standards required by the General Data Protection Regulation (GDPR) in terms of security and confidentiality. The DPO is also required to report any activity that does not comply with applicable regulations to the competent persons.

You can contact our DPO at [privacy@goomeo.com](mailto:privacy@goomeo.com) for any questions or requests to create/update/delete your data.

## **Clause 8. User data rights**

In accordance with applicable legal and regulatory provisions, Users have the right to access, rectify or erase their Data and to restrict or object to its processing, the right to define guidelines for the retention, erasure and communication of their Data after their death, and the right to data portability.

- Right of access: you have the right to obtain confirmation that your personal data is being processed, to obtain a copy of your personal data, and to obtain certain information relating to its processing.
- Right to rectification: you can request that any inaccurate personal data be rectified, as well as have any incomplete data completed. You can also change your personal information at any time from your Account.
- Right to erasure: you can, in certain cases, get your personal data deleted. This right applies in particular when your personal data is no longer necessary in relation to the purposes for which it was collected.
- Right to object: you can object, for reasons relating to your particular situation, to your personal data being processed, and you have the right to object to direct marketing purposes in accordance with the clause 'Your direct marketing choices' above.

- Right to restriction of processing: in certain circumstances, you have the right to restrict the processing of your personal data.
- Right to data portability: in some cases, you may request to receive the personal data that you have provided us with in a structured, commonly used, machine-readable format or, where possible, to have us send it directly to another data controller.
- Right to withdraw your consent: for processing that requires your consent, you have the right to withdraw your consent at any time. Exercise of this right shall not affect the lawfulness of processing based on consent given before its withdrawal.
- Right to define guidelines for what happens to your personal data after death: you have the right to define guidelines regarding the retention, erasure and communication of your personal data after your death.

To exercise any of the above rights or if you have any questions, you can contact GOOMEO. In accordance with applicable legislation, requests to exercise rights must provide sufficient information for GOOMEO to be able to verify the identity of the data subject, to ensure that those making the requests are the data subjects themselves or those authorised by them. On receipt of the request, GOOMEO will ensure that it is admissible in accordance with applicable regulations.

You also have the option to register on the BLOCTEL cold-calling opt-out list by going to the website [www.bloctel.gouv.fr](http://www.bloctel.gouv.fr).

You have the right to lodge a complaint with the competent control authority (CNIL – *Commission nationale de l'informatique et des libertés* – French data protection agency) or to obtain redress from the competent courts if you consider that we have not respected your rights.

## **Clause 9. Data security and confidentiality**

Data collected by GOOMEO is kept in a secure environment.

To ensure the security of Data, GOOMEO uses, in particular, the following measures:

- Access management – authorised person
- Access management – data subject
- Network monitoring software
- Computer back-up
- Digital certificate development
- Login/password
- Firewalls.



Persons working for GOOMEO are required to respect the confidentiality of this Data.

GOOMEO undertakes to ensure that suitable levels of protection are in place in accordance with applicable legal and regulatory requirements. However, as no mechanism offers absolute security, some risk remains when the Internet is used to transmit personal data and information.

GOOMEO will notify CNIL, the data controller and the data subject of any data breaches covered by the Regulation.

## **Clause 10. GOOMEO data retention period**

The length of time that GOOMEO keeps Data is limited to the duration that the User uses the Verticals Service, subject to compliance with applicable legal provisions. However, necessary Data may be kept for direct marketing and/or archiving purposes for a maximum of three (3) years from the end of use of the Verticals Service.

Browsing data simply collected when the User visits the Website will be kept for a maximum period of thirty-six (36) months.

## **Clause 11. Cookies.**

GOOMEO uses cookies and other services to analyse traffic on the Website in order to make the Website easy for Users to navigate and optimise technical management, to offer Users targeted advertising tailored to their preferences and interests, and to produce visit statistics.

A cookie is a small information file stored by a website on the User's computer. This cookie can be re-used on a future visit to the same website. A cookie cannot be read by any other website than the one that created it. Most cookies are only valid for the duration of a session or visit.

No cookie can contain information allowing the User to be contacted by telephone, e-mail or post.

Most browsers are set to automatically accept cookies.

However, it is possible for Users to configure their browser so that they are informed each time a cookie is created or to stop them being placed.

### **Type of cookies used**

GOOMEO may use one or more of the following types of cookies:

- Cookies needed for operation of the Website, for example, allowing Users to stay connected to their account.

- Cookies monitoring use of the Website in order to generate statistical reports on the use of the Website, without identifying individual Users of the Website.
- Cookies needed for the Website to work properly and effectively, including cookies allowing the Website to save User preferences.
- Cookies monitoring the behaviour of Users in order to send them offers or promotions.

## **What if you don't want cookies?**

If you do not want the Website to store cookies on your computer, you have the choice to block cookies (in other words, by configuring your browser to refuse all cookies) and/or to remove cookies that have already been placed on your computer:

- In Internet Explorer: you can block cookies using the settings to change how cookies are managed, by clicking on 'Tools', 'Internet options', 'Privacy' and then on the 'Advanced' button.
- In Firefox: you can block all cookies by clicking on 'Tools', 'Options', 'Privacy & Security', selecting 'Use custom settings for history' from the drop-down menu and deselecting 'Accept third-party cookies'.
- In Chrome: you can block all cookies by clicking on 'Customise and control', then on 'Settings', then go to 'Show advanced settings', 'Content settings' and 'Cookies and other site data' under the heading 'Cookies'.

However, please note that when you disable certain cookies, a number of features may no longer be available on the Website.