

Personal data protection policy and cookie management

WINDDLE, a Société par Actions Simplifiée [simplified joint-stock company] with a registered share capital of 20,000 euros, registered at the Trades and Companies Register of Paris under number 811 521 491, whose registered office is located at 15 Rue De Siam - 75116 Paris, (hereinafter 'WINDDLE') is concerned about protecting the personal data of each user of its platform www.winddle.com (hereinafter the 'Platform') and undertakes to protect them in compliance with applicable regulations, i.e the General Data Protection Regulation or GDPR and the Act no 78-17 of 6 January 1978 as amended, known as the French Personal Data Protection Act.

It is specified that a user (hereinafter 'User') means any natural person who creates a Client Account and/or a Partner Account, but also any natural person who simply comes to browse and view the Platform.

When it collects User's personal data, WINDDLE processes such data as a 'controller' within the meaning of the above-mentioned legislation. As such, WINDDLE undertakes at all times to comply with the requirements of the applicable data protection regulation and only process Users' personal data in the conditions provided for below.

1. Collected Personal Data

WINDDLE collects the following personal data from Users:

- When opening a User account:
 - o surname; first name:
 - o telephone number, and business email address
 - o business postal address
 - o user names and passwords
- When browsing and using the Platform:
 - o IP address, connection data

2. Purposes of processing personal data

WINDDLE collects the personal data of Users for the following purposes:

- enable User to access and use the Platform;
- Operate and optimise the Platform;
- Technical User support; communicating with User when asking for information via his/her account;
- Checking, identifying and authenticating User's connection settings;
- Preventing and detecting fraud, malware (malicious software) and managing security incidents;
- Managing any disputes with Client;
- Compiling statistics.

3. Storage period for User's personal data

User's personal data collected when he/she opens an Account shall be held by WINDDLE for the duration of the contractual and commercial relations with WINDDLE.

User's personal data collected in order to send out newsletters are held for three (3) years as from the time of collection.

After this, personal data is archived by WINDDLE in a secure environment for the statutory limitation period as proof to establish, exercise or defend a legal right.

Any User is entitled to ask for their personal data to be deleted at any time by sending an email to the following address (.)

4. Recipients of User's personal data

User's personal data is strictly confidential and for WINDDLE's exclusive use.

Excepting a legal or judicial obligation to do so, WINDDLE shall never disclose, assign, rent or transfer the personal data of User to third parties other than:

- the host of the Platform, as mentioned in the legal notices, available at the following address www.winddle.com in order to provide technical hosting and database management services
- Service providers and subcontractors of WINDDLE whenever they act in accordance with the provisions of the applicable personal data protection regulations, on WINDDLE's instructions and when contractually bound to WINDDLE. Recipients are technical service providers for the operational needs of the Platform and analytical solution providers:
 - o The Rocket Science Group LLC d/b/a Mailchimp: Mailchimp emailing service which enables WINDDLE to both notify Users, and process responses to its emails.
 - o Zendesk: customer support request management service.
 - o Sentry: service to catalogue and analyse application errors that may occur when using the platform.

5. Transferring personal data outside of the European Union

User acknowledges that he/she has been informed and accept that his/her Personal Data be hosted on the servers of Amazon Web Services (AWS) located in the AWS 'Singapore' region. User is informed that AWS 'undertakes to' provide a suitable level of protection by complying with standard contractual clauses approved by the European Commission.

User acknowledges that he/she has been informed that his/her Personal Data is sent to subcontractors located outside the European Union:

- The Rocket Science Group LLC d/b/a Mailchimp stores Personal Data on its servers located in the United States. The Rocket Science Group LLC is Privacy Shield certified: <https://mailchimp.com/legal/>
- Zendesk stores Personal Data outside the European Union. Zendesk is Privacy Shield certified and undertakes to provide a suitable level of protection by complying with standard contractual clauses approved by the European Commission: <https://www.zendesk.fr/company/customers-partners/privacy-policy/>
- Sentry stores Personal Data on its servers located in the United States: Sentry is Privacy Shield certified: <https://sentry.io/privacy/>

6. Security measures implemented

WINDDLE undertakes to provide the security & integrity of User's personal data. As such, WINDDLE implements and maintains technical and organisational security measures for the Platform, User accounts and, more generally its computer system which are adapted to the personal data processed and the processing risks involved. These measures aim to (i) protect personal data from being destroyed, lost, damaged, disclosed to unauthorised third parties (ii) ensure that the personal data is restore and available within an appropriate period in the event of a physical or technical incident.

7. User rights over his/her personal data

User has the following rights over his/her personal data, which he/she may exercise at any time by writing to the following address: contact@winddle.com

- **Right of Access:** know what personal data is held;
- **Right to update and rectify:** get the controller to rectify or update personal data when it is incorrect or incomplete, either by logging into his/her User Accounts and configuring the account settings, or by asking to update his/her personal data.
- **Right to erasure:** ask to erase his/her personal data when it is no longer needed for the purposes for which it was collected or when User objects to the processing of his/her personal data.
- **Right to restrict the processing:** ask to restrict the processing of his/her personal data when User disputes the accuracy of the data, in case the User still need his/her personal data to be stored after

the expiration of the storage period, in order to establish, exercise or defend a legal right, or if the User objects to it being processed;

- **Right to data portability:** recover the personal data that User sent to WINDDLE in a legible format, or ask WINDDLE to send the personal data to another data controller.
- **Right to object:** at any time, object to the processing of his/her personal data for personal reasons, including when the objection is about commercial prospecting purposes, including profiling;
- **Withdrawal of consent:** withdraw consent to WINDDLE processing User's personal data in the future, when such processing is based on consent;
- **Right to file a complaint:** file a complaint with the French Data Protection Authority (Commission Nationale de l'Informatique et des Libertés), if User considers that WINDDLE's processing constitutes a violation of his/her personal data.

Before implementing one of these rights, WINDDLE may ask User to present a proof of identity in order to check for accuracy.

In the event of problems exercising his/her rights, User may file an online claim with CNIL, at the address: <https://www.cnil.fr/fr/plaintes> or by post at the following address: CNIL - 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07.

8. Managing cookies

WINDDLE uses cookies to ensure its Platform operates correctly and to monitor and analyse visitor traffic on its Platform. A 'cookie' is a small data file sent to User's browser by a web server and stored on the hard drive of his/her computer. They will not damage computers in any way.

Data collected via cookies is only and strictly intended for WINDDLE, in compliance with the applicable personal data protection regulations. It is never sent to third parties.

Some cookies used by WINDDLE are strictly necessary for the Platform to operate correctly. They are generally only created in response to the actions of User on the Platform, which involve requesting services, such as to connect to the User Account (`_leankeo_session`). User may define the settings in his/her internet browsers in order to block the use of these cookies, but some features on the Platform will no longer be available. These cookies do not collect any data which makes it possible to identify User.

In order to track the performance of the User experience, WINDDLE uses Newrelics cookies (`nr_*`, `ajs_*`, `login_idle_session_timeout`, `login_service_newrelic_com_tokens`, `nr-growth`, etc.). User may configure his/her browsers to automatically accept or deactivate these cookies.

In order to track and analyse visitor traffic on the Platform, WINDDLE uses the Google Analytics cookie. This cookie makes possible to differentiate between visitors and to produce statistics on how visitors use the Platform, such as the number of pages visited, the frequency, duration and recurrence of visits. The use of this cookie is limited to the duration of the session and is automatically deleted when User leaves the Platform. User may configure his/her browser to automatically accept or deactivate these cookies.

Cookie instructions for the most commonly used browsers can be found at the following links:

- Windows Internet Explorer® : <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>
- Mozilla Firefox® <https://www.cookiesandyou.com/disable-cookies/windows/firefox/>
- Google Chrome® <https://support.google.com/chrome/answer/95647?hl=en>
- Apple Safari® (iPhone; iPad): <https://support.apple.com/en-gb/HT201265>
- Apple Safari® (Mac) : <https://support.apple.com/en-gb/guide/safari/sfri11471/mac>
- Disabling Google Analytics <https://tools.google.com/dlpage/gaoptout?hl=en>

Cookies are stored in User's browser for a maximum period of thirteen (13) months after they are first stored in the terminal device.

In accordance with the applicable regulations on personal data protection, User may object to such cookies being saved onto their devices at any time. User may exercise this right by contacting WINDDLE at the following email address: contact@winddle.com.

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APPENDIX - GLOSSARY

The words and expressions used in this Data Protection Policy have the meaning given to them by the GDPR and the French Data Protection Act:

- **Recipient** means a natural person, legal entity or public authority, agency or another body, to which personal data is disclosed, whether a third party or not.
- **Personal data** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or by one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **Controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and methods of processing
- **Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller or the initial processor;
- **Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collecting, recording, organising, structuring, storing, adapting or altering, retrieving, consulting, using, sending by transmission, dissemination or otherwise making it available, merging or interconnecting, restricting, erasing or destroying;