

SOPRISM PRIVACY POLICY

SoPRISM is committed to privacy. This Privacy Policy describes the way SoPRISM collects, uses and shares personal data in the course of providing our websites and services. The Privacy Policy addresses the personal data concerning users of our services, including corporate users acting on behalf or under the instructions of their employer (“Customers”), as well as personal data concerning individuals who generated content that is publicly available on the Internet (“Web Users”).

1. WHO ARE WE?

We are SoPRISM S.A. (“we”, “us”, “our” or “SoPRISM”), a provider of “social audience profiling solution” and marketing intelligence services, through our proprietary platform.

To provide our Services, we crawl the Facebook advertising API and collect publicly available information. All the data coming from the Facebook API are anonymized and aggregated in order to not be able to find out personal attribute. Then, we analyze and index such information and save the results. We only use information published or made publicly available by the Facebook API. Please note that SOPRISM does not collect nor process information which access is private or technically restricted, i.e. that is not generally publicly available on the Internet, regardless of the source.

This Privacy Policy only governs the collection and use of your personal data by SoPRISM. Any third-party service or site you may use (e.g. Facebook, Instagram) process your personal data in accordance with their own privacy practices. Please refer to the privacy policy provided by any third-party service or site before you use them.

2. HOW WE COLLECT DATA

When Licensee creates an Account in order to use the SoPRISM platform and/or download marketing content (such as business case, free reporting,...) we ask to provide contact information such as name, first name, email address, company name, phone number. When Licensee acquires Services, additional information will be requested from licensee by SoPRISM such as billing information and address.

In this Privacy Policy, the personal data as mentioned above are referred to as “Licensee’s Personal data” or “Its personal data”. SoPRISM may also collect personal data of users surfing on SoPRISM websites such as these users’IP addresses.

3. FOR WHICH PURPOSES DO WE USE DATA?

SoPRISM uses the personal data collected for the following purposes:

- Identification and authentication of Licensee when accesses its account;
- Providing the Services to Licensee;
- Billing purposes;
- Market research purposes
- Marketing and advertising purposes in the conditions set out in the article 6 below

We process data about Web Users and Customers/Licensee on the basis of our legitimate interest for purposes of providing our Services and improving our Services and the way we

provide them, including the accuracy of our market intelligence as well as our technical capabilities.

Of course, we also process personal data in order to comply with the legal and regulatory requirements bearing on us, for instance to comply with our accounting obligations or answer requests we may receive from judicial or administrative authorities.

We send service communications to our Customers via email, or directly via the Services, e.g. to confirm the implementation of a feature you requested or informing you of a scheduled maintenance on the Services. We may also send you commercial communications pertaining to our Services. Furthermore, we may send commercial communications on your corporate email address even if you or your employer is not one of our customers. In any event, you can opt out of receiving commercial communications on your corporate email address using the link provided in any such commercial communication we send. However, please note that you cannot opt out of receiving service communications, as these are necessary to provide our Services.

Third-Party Platforms may collect personal data concerning Licensee if Licensee connects to such Platforms via the Services. SoPRISM is not responsible for the manner in which these third-party websites handle any personal data that may be disclosed to them.

4. TRANSFERS OF DATA

Licensee's Personal data will not be shared with third parties.

SoPRISM uses cookies in order to better understand how its applications and websites work and to optimize the online and mobile experience for the customer.

5. HOW WE HANDLE DATA

SoPRISM is committed to protecting the privacy of all our Customers and of Web Users. We implement and maintain organizational and technological to protect personal data to ensure that personal data is not retained any longer than necessary to provide our Services and comply with legal requirements.

5.1 Accuracy

We do our best to collect and process data that is accurate and keep it up-to-date.

5.2 Retention

We will retain data about you for as long as it is necessary for us to provide the Services, or to comply with our legal obligations.

We delete data about Customers after a five-year period starting from the moment your employer ceases to use the Services.

5.3 Security

We have implemented and maintain appropriate administrative, technical and physical controls that are designed to safeguard any information we process, including industry-standard encryption technology.

6. MARKETING PREFERENCES

SoPRISM may use Licensee's Personal data to contact Licensee to discuss the Services it has subscribed to or to send Licensee information concerning SoPRISM and/ or the Services and /or Promotional activities via newsletters, messages, calls and letters to the e-mail address, telephone number or postal address provided by Licensee. By accepting this Privacy Policy, Licensee expressly accepts that SoPRISM uses the e-mail address, telephone number or postal address provided by Licensee in order to contact Licensee for the purpose above.

Licensee's may opt out of being contacted by SoPRISM at any time by using the opt-out link provided in any newsletter sent to Licensee or by contacting SoPRISM in this regard at the following email address: contact@soprism.com.

7. YOUR RIGHTS

Pursuant to applicable data protection and privacy laws, you have a number of rights that you may exercise upon personal data concerning you. Some restrictions may apply to Customers' data. Generally, you may:

- Ask if we hold personal data concerning you,
- Request access to the personal data concerning you that we hold and, as the case may be, request that we update, rectify or erase such personal data;
- Request that we refrain from using personal data concerning you in the future;
- If you reside within the European Union, you have the right to ask for a copy of your personal information. Please note that such a request is limited to the only personal information you provided us with and that we hold at that given time and subject to any relevant legal requirements and exemptions.

In respect of the above rights, in order to comply with legal requirements pertaining to privacy, we will verify your identity and may require that you provide additional information before we enforce your rights.

Please note that we may be required by law to retain data, and therefore will not erase or rectify such data. For instance, we are required by applicable law to retain certain data for accounting and financial compliance reasons.

If you are a Customer (which means your employer is a customer of SoPRISM Services): please first request access to your personal data with your employer. Your employer will then be in touch with us with respect to your request.

8. QUESTIONS OR COMPLAINTS

Should you have any question or concern relating to this Privacy Policy or should you wish to initiate a complaint regarding our privacy practices, please contact us in one of the following ways:

SOPRISM
Email: contact@soprism.com
Phone: +32 470920196
Mail: SoPRISM
45/2, rue de Baume
7100 La Louvière
Belgium

If you are not satisfied with our answer or the way SoPRISM manages your personal data, you have the right to lodge a complaint with a data protection supervisory authority. If you reside within the European Union, you may lodge a complaint with your local data protection authority. The appropriate data protection authority is the authority having jurisdiction over data protection and privacy in the country in which you live. A list of national data protection

authorities can be found here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm

9. GOVERNING LAW AND JURISDICTION

This Privacy Policy is governed by Belgium law.

10. REVISION OF THIS POLICY

This Privacy Policy is effective as of the date provided in the title section of this document. We may revise this Privacy Policy to comply with our legal or regulatory obligations or to reflect changes in our Services. Please visit this page regularly and review this policy. In the event we make material changes, we will identify them for your consideration.