#### **PRIVACY POLICY**





This Privacy Policy is edited by ARTTIC, a legal entity having its registered office at 37 rue des Mathurins, 75008 Paris, France and registered with the Trade and Companies Register under the number 344 112 396 (hereafter, the "Company").

The Company provides the iPOP Community platform (hereafter, the "Platform") to its users which have registered on the Platform and as such have a user account (hereafter, the "Users"). The Platform is available at the following url address <a href="https://iprocurenet.hivebrite.com/">https://iprocurenet.hivebrite.com/</a>

The Company uses a solution called "Hivebrite", which enables the import and export of user lists and data, the management of content and events, the organization of emailing campaigns and opportunity research and sharing as well as the management of funds and contributions of any kind.

In this regard, as data controller, the company pays particular attention to the respect of its Users privacy and personal data protection. The Company is committed to ensure the compliance of its data handling as data controller with the applicable provisions of the "Loi n°78-17 dated January 6, 1978, relative à l'informatique, aux fichiers et aux libertés" and the EU Regulation EU 2016/679 regarding data protection dated April 27, 2016.

In order to do so, the Company has put in place an appropriate privacy policy which guarantees an optimal level of protection of its Users' data.

This privacy policy is intended for the Users of the Platform of the Company.

The Company informs the User that no personal data as defined by applicable laws and regulations shall be collected without the prior explicit consent of the User. The User expresses his or her consent upon when registering to the Platform, and after consulting this privacy policy. collects and processes User's personal data in accordance with the Privacy and Cookie policy.

Date of last update: 13 March 2023

#### 1 Contact details

ARTTIC is the data controller and is located at 37 rue des Mathurins, 75008 Paris, France. By telephone, you can reach us on +33 (0)1 53 94 54 60, by e-mail at <a href="mailto:iprocurenet-arttic@eurtd.com">iprocurenet-arttic@eurtd.com</a>.

### 2 Who is this Privacy Statement applicable to?

This Privacy Statement applies to all persons who ARTTIC processes personal data via iPOP platform (<a href="https://iprocurenet.hivebrite.com/">https://iprocurenet.hivebrite.com/</a>). Personal data are all data that contains information about persons with which those persons are identifiable.

#### 3 Which personal data do we process?

ARTTIC respects your personal data and ensures that the personal information provided to us or otherwise obtained is treated confidentially. Personal data is all information about a person. Data that indirectly says something about someone is also personal data.



By processing personal data we mean: collecting, recording, organising, storing, updating, modifying, retrieving, consulting, using, providing by means of forwarding, distribution or any other form of posting, bringing together, linking together, and to protect, erase or destroy your personal data.

We process personal data that you have provided to us, personal data generated during your visit to the iPOP platform and reading campaigns and newsletters.

When registering to the Platform, the User is informed that his or her personal data is collected. They include:

- Personal identification information necessary for the management of your involvement in the iProcureNet community (name, email, organisation, job title, etc.);
- Information regarding professional background, expertise and interests

The User commits himself or herself to only provide accurate, exhaustive, and regularly updated data regarding his or her identity and any information he or she posts on the Platform. Under no circumstances shall the Company be liable for any data that is illegal and contrary to public order provisions. In case the User was not consenting to the collection of the above-mentioned data, he or she shall be informed that he or she cannot have access to the Platform.

During the use of the Platform the User may validly publish, at his or her own initiative, any content on the Platform which shall be kept by the Company:

• For maintaining and advancing the community for the foreseen purposes

The User consents that, following the publication of the content, the information he or she provides will become public on the Platform and that as such, same information will be published, modified, translated, reproduced in any form and accessible, saved and reproduced by other Users and the Company.

In most cases, Users post contents without previous moderation from the Company. The Company does not alter the content or information provided by the User, except under exceptional circumstances. The Company reserves its right to freely delete or amend the content or information of the User, without prejudice to the Users.

If some content posted on the Platform was to contravene the present privacy policy, applicable laws or the rights of third parties, any person can alert the Company of the existence of such Content at the following address: <a href="mailto:iprocurenet-arttic@eurtd.com">iprocurenet-arttic@eurtd.com</a>.

The User is informed that the Company does not collect any particularly sensitive data as defined by applicable laws and regulations.

The Company informs the User that Hivebrite, as well as its subcontractors, uses a tracking technology on its terminal such as cookies whenever the User navigates on the Platform.

A cookie is a message that, subject to the User settings, is sent to its terminal when the User navigates on a website. The aim is to collect data regarding the internet navigation of the User to send tailor-made services to its terminal (computer, mobile phone or tablet). The cookies that are sent to the User's terminal are detailed in the cookie statement here.

The iPOP platform may contain hyperlinks to websites of other parties and social media buttons. We are not responsible for the content of those websites or the services of relevant social media platforms. Nor is ARTTIC responsible for the privacy policy and the use of cookies on those websites and social media platforms.

Commented [SC1]: Add link when document is uploaded



# 4 What are we using your personal data for?

The Company and its subcontractors collect, process and host personal data that are freely transferred by the User when accessing the services proposed by the Platform.

Collected Data	Purpose of the processing  Access to the Platform; Creation of a user account; Access for the User to relevant functionalities of the Platform Management of requests to access, amend, delete, limit and oppose.	
When registering to the iPOP Platform:  • Personal identification information (first name, last name, email, LinkedIn profile link if desired);  • Information regarding professional activity, expertise and interest (current organisation and its location, job title, industries, motivation for joining the community, groups of interest, .).		
When using the Platform:  • Content and contributions to the community	The use and feeding of the Platform;  Sending invitations for events organized by the Company or other Users, if the User has accepted to receive such invitations;  Sending offers from the Company or its partners if the User has accepted to	
Cookies, trackers:  Add to calendar  Keep active session  The user/admin ID  User first connexion  Identify the user session  Admin ID  User search  Google analytics #1, #2, #3	partners if the User has accepted to receive such offers.  Improve the quality of the services proposed by the Platform;  Improve the usage functionalities of the Platform;  Create statistics regarding the effective use of the Platform;  Enable the User not to have to reconnect to the Platform for every new navigation on the Platform;  Invite the User to events organized by the Platform;  Create statistics regarding the different levels of activity on the Platform. The cookies cannot allow to identify the User;  Enable the synchronization of the User's LinkedIn profile;	

The Company collects and processes the User's personal data for the sole purpose that the platform can be optimally set up and used.



Your contact details can be used for sending newsletters, updates, invitations to events and seminars and sending information that you have requested from us.

• Improving our product and service information and carrying out targeted marketing campaigns.

We find it important to approach you with information that is relevant to you. To make this possible, we combine and analyse the personal data available with us. On that basis we determine which information and channels are relevant and which moments are most suitable for providing information or establishing contact. In marketing campaigns we do not process any special personal data and also no confidential data. If we would like to create a personal, individual customer profile, we will ask for your prior permission. If you would like to withdraw this consent later, this is always possible.

We analyse the following data:

- Interaction data: Personal data obtained from contact between ARTTIC and you. For example about your use of our website or supported applications. This also applies to offline interactions, such as how often and when there is contact between ARTTIC and vou.
- Behavioural data: Personal data that ARTTIC processes about your behaviour, such as your preferences, opinions, wishes and needs. We can derive this data from your surfing behaviour on our website, reading our newsletters or because you have requested information. But also through contact, incoming telephone calls and e-mail contact with our employees. Information obtained through tracking cookies, we collect and use only with your permission, which you can always withdraw. See our cookie statement
- Performing and analysing research into client satisfaction. Sometimes we ask clients to cooperate in a client satisfaction survey. This is done through an online questionnaire. Participation in this is voluntary. Prior to each client satisfaction survey you will receive further information about the working method and the way we deal with the information obtained.
- Improving and securing our website www.iprocurenet.Hivebrite.com
- Creating user statistics. The user statistics of the website enable us to get a picture of the number of visitors, the duration of the visit, which parts of the website are being viewed and the click-behaviour. It concerns generic reports, without information about individuals. We use the information obtained to improve the website.

#### 5 Security level

We protect personal data, taking into account the state of the art, using appropriate technical and administrative security measures to minimize the risk of loss, misuse, unauthorized access, disclosure and modification. You can think of security software such as a virus scanner and firewalls, a secure internet connection, encryption of data and physical and administrative access controls to data and servers.

#### Security level

We do not store your personal data for longer than is strictly necessary for the execution of the purposes. If legal regulations apply to the storage, the personal data will not be kept longer than prescribed by law.



#### 7 Security level

We process personal data on the basis of one of the following legal grounds:

- Obtained permission
- On the basis of an agreement or in the run up to the conclusion of an agreement
- Legal obligation
- In connection with a legitimate interest.

A controller may only process personal data if this can be based on one of the limitative enumerated legal grounds in the General Data Protection Regulation (GDPR). The four legal grounds on which ARTTIC relies are:

- Permission: If we have requested your permission to process your personal data and you have given this permission, then you also have the right to withdraw this consent.
- Agreement or in the run up to the conclusion of an agreement: If you give us an assignment
  to provide innovation or financing consultancy services, we process personal data if and
  insofar as this is necessary for the execution of the assignment.
- Legal obligation: We only provide personal data to supervisors of investigative authorities if
  this is legally required. We will take measures in such cases that are reasonably necessary to
  ensure that your personal data is protected as well as possible.
- Justified interest: We may also process personal data if we have a legitimate interest and do
  not therefore disproportionately infringe your privacy. For example, we use your contact
  information to invite you for seminars and events.

# 8 RECIPIENT AND PERSONS AUTHORIZED TO ACCESS THE USERS' DATA

Only authorized persons working for the Data Controller, can access your personal data. The Data Controller makes its best effort to ensure that these groups of people remain as small as possible and maintain the confidentiality and security of User's personal data.

The Data Controller also uses **trusted service providers** to carry out a set of operations on his behalf for hosting. The Data Controller can also use service providers in the tech industry, editors of specific tools integrated in the Platform for technical purposes.

The Data Controller only provides service providers with the information they need to perform the service and ask them not to use your personal data for any other purpose. The Data Controller does his best to ensure that all these trusted service providers only process the personal data on our documented instructions and provide sufficient guarantees, in particular in terms of confidentiality, expert knowledge, reliability and resources, to implement technical and organizational measures which will meet the requirements of the applicable legislation, including for the security of processing.

The Data Controller may be required to disclose or share your personal data to comply with a legal obligation, or to enforce or apply our terms of use/sale or any other conditions you have accepted; or to protect the rights, safety or property of ARTTIC, its customers, project partners or employees.

List of the service providers:



Service Provider	Service	You can consult the privacy policy by clicking on the following link:
KIT UNITED	HIVEBRITE solution	https://hivebrite.com/privacy- policy
44 rue la fayette		
75009 Paris		
France		
Google Cloud Platform Gordon House, 4 Barrow St, Dublin, Ireland	Hosting of all data and content produced / provided by the User, as well as images, profile	https://cloud.google.com/securi ty/privacy/
Amazon AWS 38 avenue John F. Kennedy, L-1855, Luxembourg	pictures and backups	https://aws.amazon.com/compliance/gdpr-center/
Sentry 132 Hawthorne Street San Francisco, CA 94107 USA	Production and storage of error logs enabling our developers to correct the code	https://sentry.io/privacy/
Sendgrid 375 Beale Street, Suite 300, San Francisco, CA 94105 USA	Sending of emails from the Platform	https://api.sendgrid.com/privac y.html
Hivebrite, Inc.	Customer support for	https://hivebrite.com/privacy-
16 Nassau St,	the Platform	policy
New York, NY 10038,		
USA		

# 9 Privacy Rights of users

You can send a request for inspection, correction, restriction, resistance, transferability of data, deletion of your personal data or withdrawal of previously given permission via the contact details below. You will receive further notice from us within four weeks of receipt of your request.

In order to ensure that we provide the relevant personal information to the right person on the basis of your request, we can ask you to provide a copy of a valid passport, driver's license or identity card for verification purposes. ARTTIC will only process requests that relate to your



own personal data. For all these questions, please contact us on +33 (0)1 53 94 54 60, by e-mail at <a href="mailto:iprocurenet-arttic@eurtd.com">iprocurenet-arttic@eurtd.com</a>.

## 10 Complaints

If you have complaints about how we handle your personal data, you can contact us by sending an email to <a href="mailto:iprocurenet-arttic@eurtd.com">iprocurenet-arttic@eurtd.com</a> or by calling +33 (0)1 53 94 54 60. We are happy to help you with finding a solution within a period of four weeks after receiving your request. If that does not work, you can always contact the French Data Protection Authority.

#### 11 Changes

Developments are fast and as a result, there may also be some changes in the personal data we request from you and the way in which we use your personal data. Regulations can also change. In that case, we will adjust this Privacy Statement. We therefore invite you to regularly check the Privacy Statement so that you are kept informed. In the event of major changes, we will also make you aware of this via the iPOP Platform.