# **Privacy Policy**

We make it a matter of pride to respect the privacy of our users and to treat their personal data in the strictest confidentiality and in accordance with the legislation in force.

The privacy policy is intended to inform you, in a transparent manner, about the data we collect, the purpose for collecting it, the way we use it, how long we store it, it and the rights you have regarding the processing of such data.

On this page, we provide you with a simplified version of our privacy policy in the form of questions and answers. We invite you to also read the detailed version available <u>here</u>.

We draw your attention to the need to read this privacy policy carefully. If you have any other questions, do not hesitate to contact us at the following address: legal@neareo.com or by calling us on Skype (Flagworlds).

### **1. WHO IS RESPONSIBLE FOR PROCESSING YOUR DATA?**

Flagworlds sprl (hereinafter "**NEAREO**") is the controller of your personal data.

Here is our complete contact information:

Flagworlds sprl

Avenue Louise 523,

1050 Bruxelles, Belgium

Belgian business registry (BCE) number: 0637.969.790

Email: legal@neareo.com

#### 2. WHAT DATA DO WE COLLECT?

We collect your data - personal or otherwise - for various reasons which are defined in the following point (see point 3). It includes the following data:

• your identifying information (surname, first name, e-mail address, telephone number, postal address, date of birth and country);

- our communications (by email or other);
- the type of domain with which you connect to the Internet;
- the IP address assigned to you;
- the date and time of your access to our Website and Chatbot ;
- location data or other data relating to the communication ;
- the pages you viewed on our Website and Chatbot ;
- the type of browser, platform and/or operating system you are using;
- the search engine and the keywords used to find the Website ;
- the operating system you use to view our Chatbot ;
- your browsing preferences;
- the pictures you take ;
- the barcodes you scan ;
- any other data that you would communicate to us.

Sensitive personal data will not be collected by NEAREO. Please do not provide us with sensitive personal data and if you learn that someone has provided us with their sensitive personal data, contact us at the following address: legal@neareo.com.

# **3. WHY DO WE COLLECT YOUR DATA?**

We collect your data mainly to respond to your inquiry about NEAREO, to enable you to register to the platform, provide you with information regarding NEAREO and, more generally, to develop our business and build a better understanding of what our users' needs are. Finally, your data also allow us to improve and facilitate your navigation on our Website and Chatbot. The legal bases for processing your data are listed in the full version of the <u>Privacy Policy</u>.

# 4. HOW DO WE COLLECT YOUR DATA?

Most of your data is communicated to us by your active intervention. Other data, such as the date and time of your access to our Website and Chatbot, the pages you have viewed, or your location data, are collected automatically through servers consulted and "cookies" placed on our Website and Chatbot. For more information on what a cookie is, how it is used and the exact data it collects, visit our page concerning our <u>Cookie Policy</u>.

# **5. IS/ARE YOUR DATA PROTECTED?**

We take pride in respecting the privacy of our users. We maintain a strict privacy policy and take all appropriate measures to ensure that our servers prevent, to the extent possible, any unauthorized leak, destruction, loss, disclosure, use, access or modification of your data.

# 6. HOW LONG DO WE STORE YOUR DATA?

We keep your data for the time necessary to accomplish the objectives pursued (see point 3). Once this goal is achieved, we delete them or anonymize them.

# 7. WHAT ARE YOUR RIGHTS AND HOW CAN THEY BE EXERCISED?

You may, at any time, request to verify, access, rectify, delete, transfer and object to the use of your data, as well as request the limitation of such use of your data. To do so, simply send us an email at the following address: legal@neareo.com. We will then make every effort to

# 8. WHO HAS ACCESS TO YOUR DATA AND TO WHOM ARE THEY COMMUNICATED?

Our employees have access to your data only to the extent necessary for fulfilling the objectives pursued (see point 3). Each of them is subject to a strict obligation of confidentiality. The categories of recipients are listed in the full version of the Privacy Policy.

### 9. DO WE TRANSFER YOUR DATA ABROAD?

We only transfer your data to a non-EU country if it provides a level of protection equivalent to what you can find in your country of residence (for more information, please check: https://goo.gl/1eWt1V).

When sharing information outside Neareo, we ensure that your data is protected as far as reasonably possible.

### **10. HOW TO RECEIVE INFORMATION ON US ?**

We only use your email address to send you information about NEAREO and our activities.

With your consent or based on our legitimate interest based on our existing relationship, we will subscribe you to our newsletter and provide you with information that may interest you. You can unsubscribe and withdraw your consent to these communications at any time by sending an email to the following address: legal@neareo.com.

#### **11. WHAT IS OUR POLICY ON DATA CONCERNING** MINORS?

Our Website and Chatbot are not targeted to children under the age of 18. If you learn that your minor child has provided us with their personal data without your consent, contact us at the following address:

legal@neareo.com.

# **12. WHAT HAPPENS IN THE EVENT OF A CHANGE TO THE PRIVACY POLICY?**

If we had to make any changes to this privacy policy, you would be notified through our Website and Chatbot.

#### **13. WHAT TO DO IN THE EVENT OF A DISPUTE?**

Lengthy trials do not benefit anyone. In the event of a dispute between us, we commit to give priority to dialogue and openness in search of an amicable solution. You can also contact the Data Protection Authority.