

DOCUMENT REGARDING THE PROTECTION OF YOUR PERSONAL DATA

Version applicable from May 25, 2018

Sarbacane Software attaches great importance to the protection of your personal data.

This charter applies to all services offered by Sarbacane Software ("We"). For any product or service offered by Sarbacane Software additional rules may apply.

This charter can be modified at any time to meet legal, regulatory and technical changes.

With this document, we wish to inform our customers and prospects ("You") of the means implemented and the purposes pursued in relation to the collection of personal data when we act as the controller, in accordance with the regulations in force. In particular this applies to when We process the contact details of a person in your company, when You contact us for support or assistance, when You browse our Websites, or when You use our forms to contact us.

When we process personal data for your account and under your instructions, we act as a subcontractor. This is particularly the case when we are processing your campaign recipient databases. This relationship is governed by this Agreement in compliance with GDPR Article 28.3:

link to be added to the DATA PROCESSING AGREEMENT ONCE READY

1. Definitions

For the purpose of this document, the following terms are defined as:

Personal data

Personal data, or data of personal nature, is any information that directly or indirectly identifies a natural person, that is treated by Sarbacane Software in its capacity as Processing Manager.

Data controller

Refers to Sarbacane Software SAS. The person responsible for the data as the 'data controller', is anyone who determines the purposes and means of processing of the personal data.

Data processor

The 'data processor' is a subcontractor processing the data on behalf of a data controller and acting under their instructions. The data processor must be in a position to provide sufficient technical and organizational guarantees to ensure the protection of personal data.

Processing

Processing is any transaction (or set of transactions) involving personal data, regardless of the processing method applied. In particular this includes the collection, recording, organization, preservation, adaptation or modification, extraction, consultation, use,

communication by transmission, broadcast or any other form of provision, reconciliation or interconnection, and the locking, erasure or destruction of data.

2. Security measures for protection of personal data

Identity of the controller

The controller is:

Sarbacane Software SAS. 3 Avenue Antoine Pinay, Parc d'activités des 4 vents, 59510 HEM, RCS Lille Métropole 509 568 598, represented by SASU KALOMA CAPITAL as Chairman.

The collection and processing of Personal Data by Sarbacane Software is governed by the GDPR and by Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free circulation of such data.

- We are transparent:

All Personal Data about you is collected directly from You.

"The legal grounds for the collection of your Personal Data are:

- The execution of our contractual relations. The non-provision of these would result in impossibility or difficulty of carrying out the Services;
- Our legitimate interest in ensuring the best possible quality of service;
- When necessary, your consent is requested. This consent can be withdrawn at any time and easily."

Objectives

We are required to process your Personal Data for the following purposes:

- the creation of your customer account;
- the management of your orders and the payment;
- the management of your subscriptions and services;
- monitoring of the customer relationship such as satisfaction surveys, claims management and technical support;
- evaluate and improve the quality of our products, services and websites including the development of sales statistics
- management of technical direct marketing operations (which includes technical operations such as standardization, enrichment and deduplication);
- carry out operations relating to direct marketing;
- the performance of requested operations; Send You newsletters, informative messages and promotional offers by email or SMS, to keep You informed of news;

- the organization of contests;
- the management of the exercise of your rights with regard to the rules on the protection of Personal Data
- management of unpaid bills and litigation;
- assert our rights;
- assert our rights; ensure compliance with the terms and conditions, the anti-spam policy, and laws and regulations;
- comply with the legal requirements.

Type of Personal Data

The mandatory or optional nature of the Personal Data requested and the possible consequences of a lack of response are specified to you during the collection.

We may collect your following Personal Data and other data: - your contact information (name, surname, function, address, telephone number, email address); - transaction history, orders, payment IP address; - bank details (within the framework provided by law); - machine identifiers when using our software, connection IP address, log of activities; - information collected via cookies; - the performance data of our products and the information on how You use them; - your exchanges with Us; - the data collected as part of our affiliate program.

- We only keep your data for the necessary amount of time:

We retain your personal data as long as necessary to fulfill the purposes for which it was collected. We also keep your personal data during the retention period required by law, particularly in civil and commercial matters.

The data necessary for commercial prospection, notamment nom, prénom, adresse postale, adresse électronique, téléphones is kept for a period of three years from the end of the commercial relationship. If You are a prospect, your data is kept for a maximum of 3 years from the collection or last contact with You.

- Your personal data is confidential:

Your personal data, including your databases and campaign content, is not sold, rented or disclosed to third parties.

Sarbacane Software commits to maintain the confidentiality of Personal Data, not to disclose it, in whatever form, except (i) for the purposes of the Services and performance of it; (ii) pursuant to a legal or regulatory provision; (iii) to respond to communication requests from judicial and/or administrative authorities; (iv) to enforce our rights or those of our partners and third parties; (iv) with your prior agreement or at your request.

We use services provided by specialized companies, including our subcontractors, the list of which can be communicated to you by contacting our DPO. When these companies use

servers outside the EU, we have taken care to conclude contracts with them on the protection of personal data, and in particular the standard clauses of the European Commission, to regulate the transfer of personal data. This is for example the case with the company Freshworks Inc. - USA, a tool that we use within our support department (i.e. support request form by email and live chat).

In all cases, Sarbacane Software ensures that the persons authorized to process your Personal Data (personnel, partners, subcontractors, etc.) guarantees to respect the confidentiality of the Personal Data or are subject to an appropriate legal obligation to confidentiality.

-Your Personal Data is secure:

As part of our obligation of means, We inform you that appropriate organizational and technical measures are taken to preserve the security, the integrity and the confidentiality of your Personal Data and in particular, to prevent that they are distorted, damaged or accessible to unauthorized third parties.

-We respect your rights:

In accordance with the GDPR and other rules, You have the following rights:

"- the right of access to your Personal Data (article 15 of the GDPR);

- the right to rectify your Personal Data in the event that it is inaccurate (Article 16 of the GDPR);

- the right to have your Personal Data erased (Article 17 GDPR) in some cases;

- the right to a limitation of the Processing of Your Personal Data (article 18 of the GDPR) and the right to the portability of your Data (article 20 of the GDPR), within the limits fixed by the applicable regulations;

- the right to withdraw Your consent at any time when the Processing is based on it (Article 13 of the GDPR);

- the right of opposition to the Processing of your Personal Data (article 21 of the GDPR);

- the right to define the guidelines regarding the fate of your Personal Data after your death. In the absence of this, your heirs may exercise their rights to your Personal Data.

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These rights can be exercised, in support of a valid identification document, by contacting us at the following email address: privacy@jackmail.com

You can contact us at any time - Contact details of our DPO:

You can contact us at the following email address: privacy@jackmail.com

Or contact our Data Protection Officer directly at hey@jackmail.com