

# Data Privacy Policy

andzup

## Privacy Policy

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## Privacy Policy

### 1. Purpose and scope of the Policy

TBS Group attaches the greatest importance and the greatest care to the protection of privacy and personal data, as well as to compliance with the provisions of the applicable legislation.

Regulation (EU) 2016/679 of April 27, 2016 on the protection of natural persons with regard to the Processing of Personal Data and on the free movement of such Data (hereinafter "GDPR") states that Personal Data of a personal nature must be processed lawfully, fairly and transparently. Thus, this privacy policy (hereinafter the "Policy") aims to provide you with simple, clear information on the Processing of Personal Data concerning you, in the context of your browsing and the operations carried out on our site. Internet.

### 2. Data Controller

As part of its activity, TBS Belgium, a company incorporated under Belgian law registered under company number 0445.324.822, whose registered office is located at 231 avenue Louise, 1050 Ixelles, (hereinafter referred to as "TBS"), carries out processing of personal data through the constitution and provision of the actors of the Communication (hereinafter "Customers") of the andzup database.

As such, TBS acts as Data Controller for processing in connection with the creation, hosting, enrichment, updating and provision of the database within the meaning of the Regulations relating to Personal Data, and in particular Regulation (EU) 2016/679 on the protection of natural persons with regard to the Processing of Personal Data and on the free movement of such Data, while its Clients act as Responsible for processing for all processing related to the use of the database (extraction, commercial communication, etc.).

### 3. What data do we process, how and who are the data subjects?

andzup lists the marketing and communication decision-makers at the main advertisers and advertising agencies present in France, Belgium/Luxembourg, the Netherlands, Germany, Italy and Spain, hereinafter referred to as "Decision-makers". As indicated above, the platform is made available to Communication players, TBS Clients.

Thus, there are two categories of persons concerned: the Decision Makers appearing in the andzup database, then the users of the platform at the Clients:

#### ➤ ***With regard to Decision Makers who appear in the andzup database***

For the constitution of the andzup database, TBS carries out an indirect collection, in particular via the internet, of data from professionals only (Decision-makers). As such, and in accordance with the GDPR and the recommendations of the CNIL, it is not necessary to obtain the consent of the persons concerned. The legal basis for the processing is therefore the legitimate interest.

Once the data has been collected, TBS contacts the decision-makers concerned or their company (by telephone) to confirm the data thus collected on the one hand and to provide them with the information required under Article 14 of the GDPR as well as their right to object to their integration into the database on the other hand. Then, as soon as the Decision Makers who have not expressed any opposition are integrated into the database, TBS gives them back in writing the information previously provided by telephone as well as a means to enable them to refuse their integration into the database.

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In addition, in order to allow Decision-Makers to control their data, we send them a newsletter every two months informing them of their presence in the database with in particular the possibility of consulting their data, modifying them, supplementing them or deleting them. .

The categories of Decision Maker data collected and integrated into the andzup database are as follows:

- **Identification data:** such as your surname, first name, email address, telephone number
- **Professional data:** such as the name of the Decision Maker's company and its position

➤ ***With regard to users of the andzup platform at Customers***

By using andzup, you send us a certain amount of information about you, some of which is likely to identify you ("Personal data"). This is the case when you browse the andzup site, when you fill out online forms, etc.

The main categories of data collected are as follows:

- **Identification data:** this includes all the information that would allow us to identify you, such as your surname, first name, email address, telephone number in the context of the creation and management of your user account.
- **Professional data:** As part of creating an account, we collect your position, the name of your company and the sector of activity.
- **Connection data:** this is all the information we need to access your personal account, such as the password, and other information necessary for authentication and access to an account.
- **Browsing data:** by browsing the platform, you interact with it. Consequently, certain information relating to your browsing is collected, such as your IP address.
- **Financial data:** this corresponds to bank data such as your bank card details, your purchases, when you place an order for an andzup subscription or your bank details, for example.

#### 4. Why do we collect your Personal Data and for how long?

We collect your personal data for specific purposes and on different legal grounds.

As part of the creation and provision of the andzup database, TBS uses personal data in particular as follows:

Purposes	Personal data collected	Legal bases for processing	Storage periods
We use this data for the purposes of creating, hosting, enriching and updating the andzup database.	-Identification data -Professional data	Legitimate interest	The Decision Makers appear in the andzup database as long as they have not expressed their opposition to appearing there and

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			in any case for 3 years from the last contact of TBS with them.
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As part of the management of the use by andzup customers, TBS uses personal data in particular as follows:

Purposes	Personal data collected	Legal bases for processing	Storage periods
We use this data for the purposes of: - Creation of user account - Payment management - Customer relationship management	- Identification data - Professional data - Financial datas - Login data - Navigation data	Performance of the contract	The data collected as part of our relationship is kept for <b>5 years</b> from the end of the relationship.
We use this data for the purposes of: - Take into account your demo requests - Take into account your request to subscribe to our news	- Identification data - Location data - Professional data	Consent	The data is kept for the time necessary to process your demo request and at the latest <b>3 years</b> from the last contact.
We use this data for the purposes of: - Monitor and improve our platform and applications; - Secure our websites / applications and ensure our and your protection against fraud.	- Identification data - Login data - Browsing data	Legitimate interest	Your browsing data on our website is kept for a maximum of <b>13 months</b> .

### 5. Do we share your Personal Data?

Your Data is intended for TBS employees authorized in charge of the management and execution of contracts and legal obligations, depending on the purposes of the collection and within the limits of their respective attributions.

They are possibly transmitted for certain tasks related to the purposes, and within the limits of their respective missions and authorizations, to the following recipients:

- TBS Group entities;
- Our service providers, suppliers, agents and representatives, including but not limited to payment processors, contractors, customer service, email service providers, IT service providers, in order to process necessary data based on our instructions and in accordance with this Privacy Policy and any other applicable privacy and security measures.
- Duly authorized public authorities (judicial, control, etc.), within the framework of our legal and regulatory obligations ;
- Regulated professions (lawyers, bailiffs, etc.) who may intervene in the context of the implementation of guarantees, recovery or litigation;
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When your Data is communicated to our service providers and subcontractors, they are also asked not to use the Data for purposes other than those initially intended. We make every effort to ensure that these Third Parties maintain the confidentiality and security of your Data.

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In any case, only the necessary Data is provided. We make every effort to guarantee secure communication or transmission of your Data.

### 6. Are your Personal Data transferred to Third countries?

TBS endeavors to store Personal Data in France, or at least within the European Economic Area (EEA).

However, it is possible that when creating and updating the andzup database, your Data may be transferred to other countries. This is the case, for example, if some of our service providers are located outside the European Economic Area.

In the event of a Transfer of this type, we guarantee that it is carried out:

- To a country providing an adequate level of protection, i.e. a level of protection equivalent to what European Regulations require;
- Within the framework of standard contractual clauses;

### 7. How long do we keep your Personal Data?

- We keep your Personal Data only for the time necessary to achieve the purpose for which we hold this Data, in order to meet your needs or to fulfill our legal obligations (see Article 4).
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- Storage times vary depending on several factors, such as:
  - The needs of TBS activities;
  - Contractual requirements;
  - Legal obligations;
  - The recommendations of the supervisory authorities.

### 8. How do we ensure the security of your Personal Data?

TBS is committed to protecting the Personal Data we collect, or what we process, against loss, destruction, alteration, unauthorized access or disclosure.

Thus, we implement all appropriate technical and organizational measures, depending on the nature of the Data and the risks that their Processing entails. These measures must make it possible to preserve the security and confidentiality of your Personal Data. They may include practices such as limited access to Personal Data by authorized persons, due to their functions, pseudonymization or encryption.

In addition, our practices and policies and/or physical and/or logical security measures (secure access, authentication process, backup copy, software, etc.) are regularly checked and updated if necessary.

### 9. What cookies do we use on our site?

#### 9.1 What is a cookie?

Cookies are computer files that are automatically placed on the hard drive of your computer, tablet or mobile when you browse our Website. They are managed by your internet browser (Internet Explorer, Firefox, Safari or Google Chrome).

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### 9.2 Are cookies placed when you browse the TBS Websites?

During your first visit to the TBS Websites, if cookies requiring your consent can be placed, a banner informs you of the presence of these cookies and invites you to indicate your choice. Cookies requiring your consent in accordance with the regulations are only deposited if you accept them. You can inform yourself at any time and set your cookies to accept or refuse them by clicking on "set my cookies" at the bottom of each page of the Site or by configuring your browser.

### 9.3 What data are collected through cookies?

All data relating to a terminal at a given time can be collected via cookies, in particular:

Cookie name	Editor	Categories	The duration of the conversation

## 10. What are your rights?

On the personal data that we collect/process, you can exercise the following rights:

- **A right of access** (*article 15 of the GDPR*): you have the right to request access to the personal data we hold about you, and you can request a copy ([find out more](#));
- **A right of rectification**: you can request a rectification of any inaccurate data concerning you;
- **A right of deletion** (*article 17 of the GDPR*): you can request the deletion of your personal data in certain circumstances ([find out more](#));
- **A right to portability** (*article 20 of the GDPR*): under certain conditions you can receive all the personal data concerning you that you have provided to us, in a structured format. You also have the right to require that we pass it on, where possible, to another controller ([find out more](#));
- **A right to oppose the processing by invoking legitimate interests** (*article 21 of the GDPR – find out more*);
- **A right to withdraw consent at any time** (*article 7-3 of the GDPR – find out more*);
- **A right to limit processing** (*Article 18 of the GDPR*): you have the right to restrict the processing of your data if:
  - o You dispute the accuracy of your data, until we verify its accuracy;
  - o The processing is unlawful but you do not want us to delete your data;

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- o We no longer need your personal data for the purposes of the processing but you need their data in order to bring, assert or defend yourself against legal claims;
- o You objected to the processing based on related grounds pending verification whether our compelling legitimate grounds for continuing the processing override those interests; If such personal data is subject to such limitations, we will only process your data with your consent, or for the purpose of establishing, asserting or defending against legal claims ([find out more](#));

- **A right to define the fate of your data after your death** and to choose whether or not we communicate your data to a third party that you have previously designated (Law for a Digital Republic – find out more).

**You can exercise all of these rights by simple request to the Data Protection Officer (DPO) at the following address [privacy@andzup.com](mailto:privacy@andzup.com).**

When you send us a request to exercise your right, you are asked to specify as much as possible the scope of the request, the type of right exercised, the processing of personal data concerned, and any other useful element, in order to facilitate the examination of your request. In addition, in case of reasonable doubt about your identity, proof of identity may be requested.

If you believe, after contacting us, that your rights to your data have not been respected, you can file a complaint with the National Commission for Computing and Liberties (CNIL).

### 11. Update of this Policy

This Policy may be regularly updated to take into account changes in the Regulations relating to Personal Data.

Date of last update 30/12/2022.