



## PRIVACY POLICY

Last updated: March 30, 2021

The website [www.miraklsummit2021.com](http://www.miraklsummit2021.com) (hereinafter the “**Website**”), published by the company Mirakl (hereinafter “**Mirakl**” or “**us**”), is the Website set up by Mirakl to facilitate the organization of the Platform Pioneer Summit US 2021 and Platform Pioneer Summit EMEA 2021 (each, an “**Event**”).

While you are accessing, browsing, navigating and using the Website and the services it provides, you communicate personal data related to you to Mirakl.

These personal data are protected by law, and thus, **Mirakl, as data controller, has implemented appropriate security measures in order to protect your personal data.**

Please **read this privacy policy carefully** as it explains how **Mirakl uses your personal data**. This privacy policy supplements any documents or notices that may refer to this privacy policy.

**Should you have any questions, you may directly contact Mirakl** by sending an email to [gdpr@mirakl.com](mailto:gdpr@mirakl.com).

### 1. WHAT KIND OF PERSONAL DATA ARE PROCESSED BY MIRAKL?

All personal data provided by you through the Website or when you communicate with us are processed by Mirakl, namely:

Type of data	Examples of data
<b>Identification data for your attendance to the Event.</b>	First name, last name, business email address, job title, company and country, state of residence (if you apply for the US Event), industry, job function, date of the Event
<b>Contact details</b>	Name, email address, company name, phone number
<b>Professional data</b>	Company, job title, company name, phone number
<b>Data related to your access to the Website’s resources</b>	Downloadable resources, date and hour of the downloads
<b>Browsing data</b>	IP address, device, region, browser type, internet service provider, the pages you viewed, your searches, your operating system and system configuration data and the date and time of your visit.
<b>Data related to your attendance as a speaker</b>	First name, last name, job title, country, company, photography, short biography, LinkedIn account.

Also, the Website automatically collects the following data *via* cookies:

Type of data	Examples of data	Purposes
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<b>Internet or other electronic network activity information</b>	Date and time of the visit, IP address, device type, browser type, operating system, system configuration data, viewed pages and files	These data are necessary for the proper functioning of the Website and the services provided on the Website, as well as internal business analytics purposes such as audience measurement.
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**The provision of certain types of personal data may be necessary or optional**, depending on the services you wish to receive. Mandatory data will be marked as such at the moment of collection of your personal data. **If you refuse to provide mandatory data, Mirakl may not be able to process your request** (such as your request to participate to an Event, or your request for help regarding your ticket).

## 2. FOR WHAT PURPOSES DOES MIRAKL USE YOUR PERSONAL DATA?

Mirakl processes your personal data for the following purposes only:

Purposes	Examples of use of your personal data	Legal bases
<b>Examination of your attendance application</b>	<ul style="list-style-type: none"> <li>to assess your request for attendance;</li> <li>to contact you</li> </ul>	<b>Legitimate interest</b> of Mirakl to develop its business activities
<b>Managing your information request / contact request / request for help regarding your ticket</b>	<ul style="list-style-type: none"> <li>to contact you ;</li> <li>to answer your questions</li> </ul>	<b>Legitimate interest</b> of Mirakl to develop its business activities
<b>Organization of the Event</b>	<ul style="list-style-type: none"> <li>to allow you to participate in events organized by Mirakl</li> </ul>	<b>Legitimate interest</b> of Mirakl to develop its business activities
<b>Publication of your profile on the Website</b>	<ul style="list-style-type: none"> <li>to publish on the Website your profile as a speaker</li> </ul>	<b>Your consent</b>
<b>Marketing activities directed at attendees</b>	<ul style="list-style-type: none"> <li>to send you marketing communications regarding Mirakl products, services and events</li> <li>to send you the latest marketplace news published on Mirakl blog</li> </ul>	<b>Legitimate interest</b> of Mirakl to develop its business activities

<p><b>Customizing your experience</b></p>	<ul style="list-style-type: none"> <li>to customize the Website contents and your navigation on the Website</li> </ul>	<p><b>Your consent</b></p>
<p><b>Improving the Website and its services, as well as your user experience on the Website</b></p>	<ul style="list-style-type: none"> <li>to evaluate and improve the Website and the services it provides</li> <li>to facilitate your navigation of the Website</li> <li>to take steps designed to protect the security of the Website</li> </ul>	<p><b>Legitimate interest</b> of Mirakl to improve the Website and its services, as well as your user experience on the Website</p>
<p><b>Pre-litigation or litigation management</b></p>	<ul style="list-style-type: none"> <li>to take action against any identified breach</li> <li>to manage any dispute or litigation</li> </ul>	<p><b>Legitimate interest</b> of Mirakl in defending its rights and interests</p>
<p><b>Compliance with legal and regulatory obligations</b></p>	<ul style="list-style-type: none"> <li>to comply with legal and regulatory obligations</li> <li>to process your requests to exercise your rights</li> </ul>	<p><b>Legal and regulatory obligations</b> to which Mirakl is subject</p>

### 3. WHO CAN ACCESS YOUR PERSONAL DATA?

Your personal data may be transmitted to the following recipients when you access, browse, navigate and use the Website and the services it provides:

Recipients	Purposes
<p><b>Mirakl and its duly authorized employees</b></p>	<p>Organization of the Event and management of the Website</p>
<p><b>Companies of the Mirakl Group and their duly authorized employees</b></p>	<p>Organization of the Event</p>
<p><b>Bizzabo, Inc.</b></p>	<p>Organization of the Event (Bizzabo, Inc. provides the platform where the Event is hosted.)</p>
<p><b>Typeform S.L.</b></p>	<p>Organization of the Event (Typeform provides the tool to submit an application for an Award)</p>
<p><b>Mirakl subcontractors</b> (hosting provider, IT service providers, etc.)</p>	<p>Exclusively for technical or logistical purposes</p>

<b>Administrative or judiciary authorities</b>	Exclusively in the case of an express and justified request or in case of an alleged violation of legal or regulatory provisions
<b>Lawyers and all interested parties</b>	Exclusively in the case of the management of possible disputes and other legal matters where appropriate.
<b>Other third parties</b>	Following or during a restructuring, reconstitution, acquisition, debt financing, merger, sale of assets of Mirakl or a similar transaction, as well as in case of insolvency, bankruptcy or receivership where personal data are transferred to one or more third parties as assets of Mirakl

#### 4. (FOR EU RESIDENTS) WILL YOUR PERSONAL DATA BE TRANSFERRED OUTSIDE OF THE EUROPEAN ECONOMIC AREA?

If you are a EU resident, as far as possible, your personal data will be processed within the European Economic Area (EEA) by employees of Mirakl SAS, Mirakl Inc's French mother company. However, notably for the organization of the US Event, and as some of other companies of the Mirakl Group, as well as our services providers being located outside of the EEA, your personal information may therefore be processed in those countries.

When your personal data are transferred outside the EEA, Mirakl will, in the absence of an adequacy decision and after having carried out an assessment of the level of protection of your rights on the territory of the third country where the recipient of your personal data is established, implement all necessary measures through the adoption of appropriate safeguards (such as standard contractual clauses). A copy of such safeguards can be obtained by sending an email directly to Mirakl at [gdpr@mirakl.com](mailto:gdpr@mirakl.com).

Name of the recipient	Third country	Adopted safeguards
Bizzabo, Inc.	United States	Standard Contractual Clauses of the European Commission
Mirakl Ltd	United Kingdom	Standard Contractual Clauses of the European Commission

#### 5. HOW DOES MIRAKL PROTECT YOUR PERSONAL DATA?

Mirakl has implemented technical and organizational measures in order to protect your personal data, in particular against potential data breaches likely to cause, either by accident or unlawfully, the destruction, loss, modification, unauthorized access or divulgence of your personal data. These measures will guarantee a level of security adapted to the data and will take into account the state of the art and the cost of implementation in relation to the risks and nature of the data to be protected.

Mirakl uses SSL certificates to encrypt the Website and only a limited number of staff have access to the data.

Mirakl guarantees that all members of its personnel and any other person processing your personal data will respect the internal rules and procedures related to the processing of personal data, including the technical and organizational security measures put in place to protect your personal data. In this context,



Mirakl reviews and updates its practices regularly to enhance your privacy and ensure that its internal policies are followed.

**If you have found a vulnerability or would like to report a security incident**, you may send an email to [security@mirakl.com](mailto:security@mirakl.com).

## 6. FOR HOW LONG ARE YOUR PERSONAL DATA STORED?

As a general rule, your personal data will only be retained for the period necessary for the accomplishment of the purposes for which said data was collected, or as necessary to fulfill legal or regulatory obligations.

In the absence of applicable exceptions:

- the **data collected via the collection forms on the Website** (contact request, request regarding your ticket, etc.) will be kept **until the complete processing of your request**;
- the **data collected for your subscription to the Events** will be kept **until the end of the Events**;
- your **traffic data** will be kept for a period of **thirteen (13) months from the connection date**.

In addition to this, Mirakl will keep your personal data for:

- **three (3) years** for data processed for **marketing purposes**;
- **five (5) years** for **evidence purposes** relating to legal claims;
- **ten (10) years** from the end of the relevant fiscal year for personal data retained **for accounting purposes** as well as for **commercial documents**.

## 7. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?

If you are based in the EU, EEA, or UK, you have the following rights over your personal data:

- you can **request the access** to your personal data in order to obtain **clear, transparent and understandable information** on how Mirakl processes your personal data and on your rights (as provided in this policy), as well as **a copy of your personal data**.
- you can request the **rectification** of your personal data in order to obtain the modification of your personal data if they are **obsolete, inaccurate or incomplete** ;
- you can **object to the processing of your personal data** when the processing is based on Mirakl's legitimate interest. Mirakl **will no longer process your personal data unless Mirakl demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms**, such as the respect of a legal obligation (e.g. legal obligation involving the retention of documents), or for the establishment, exercise or defense of legal claims.
- you can request the **restriction of the processing during a limited period of time**, in particular in order to carry out some verifications, where one of the following applies:
  - you contest the accuracy of your personal data, the processing of which is thus restricted for the period necessary for Mirakl to verify the accuracy of such personal data;
  - the processing is unlawful and, rather than requesting their deletion, you prefer to restrict their use;
  - Mirakl no longer needs your personal data for the purposes of the processing, but you need them for the establishment, exercise or defense of legal claims;

- you have objected to the processing, which is thus restricted pending the verification of whether the compelling legitimate grounds of Mirakl may override your interests, rights and freedoms.
- you can **withdraw your consent** when it has been obtained, without this withdrawal affecting the lawfulness of the processing operations previously carried out.
- you can ask to **receive your personal data in a structured, commonly used and machine-readable format** and also can request **their transmission to another controller** where technically feasible. **This right is not exercised in all circumstances, it applies only if it fulfils all the following conditions:**
  - your request is only related to your personal data (excluding anonymous or third party data);
  - your request does not adversely affect the rights or freedoms of others, in particular those of Mirakl (including trade secrets or intellectual property);
  - the processing is carried out by automated means (paper files are therefore not included);
  - the processing is based on consent or the performance of a contract (to check if it is the case, you can see the article 2 of this policy).
- you can request the **deletion of your personal data (or right to be forgotten)**, where one of the following legal grounds applies:
  - you object to the processing of your personal data and there are no overriding legitimate reasons justifying to maintain the processing of your personal data (such as an obligation for Mirakl to keep certain personal data);
  - you object to marketing activities;
  - you decide to withdraw your consent on which the processing is based;
  - your personal data are no longer useful for the original purposes for which they were collected or for any other type of processing;
  - the use that is made of your data does not comply with the applicable legal or regulatory provisions.
- You can **define either general or specific guidelines regarding your personal data in the event of your death** (for example, their deletion or transmission to any person of your choice). You may revoke your instructions at any time.

It is specified that the exercise of these rights is based on the legal basis of the processing as indicated in article 2 of this policy, as follows:

	Access	Rectification	Erasure	Restriction	Data portability	Objection
<b>Consent</b>	Yes	Yes	Yes	Yes	Yes	Withdrawal of consent
<b>Steps prior to entering into a contract</b>			Yes		No	
<b>Contract</b>			Yes		No	
<b>Legitimate interest</b>			Yes		Yes	
<b>Legal obligation</b>			No		No	

Under certain circumstances, **Mirakl may ask you for specific information in order to confirm your identity and ensure the exercise of your rights**. This is another appropriate security measure to ensure that personal data is not disclosed to an individual who does not have the right to receive it.

**If you have any questions or wish to exercise your rights**, you may directly contact Mirakl by sending an email to [gdpr@mirakl.com](mailto:gdpr@mirakl.com).



If needed, you may also **lodge a complaint with your national data protection authority**. This right may be exercised at any time and free of charge, at the exclusion of potential postal fees or expenses related to legal representation or assistance should you choose to engage third party assistance for the procedure.

## **8. CHANGES TO THIS POLICY**

This privacy policy may be amended from time to time, in particular to reflect the changes in the services provided by the Website or the applicable regulations. Therefore, we recommend you to review this privacy policy each time you visit the Website.

Please note that a French translation is available on request at [legal@mirakl.com](mailto:legal@mirakl.com).