

SHOPPINGFEED PRIVACY POLICY

Version 03/04/2024

This Privacy Policy describes how we collect, handle and protect your personal data and the choices available to you regarding collection, process, access, and how to update, correct and delete your personal data.

Additional information on our personal data practices may be provided in product settings, contractual terms, or notices provided prior to or at the time of data collection.

Shoppingfeed (the "Company") is committed to maintaining robust privacy protections for its users. For purposes of this Agreement, "Site" refers to the Company's website, which can be accessed at www.shoppingfeed.com.

"Service" refers to the Company's services accessed a software-as-a-service, or SaaS, in which users can integrate, manage and optimize their merchandise sales across hundreds of online channels accessed through a standard web browser, which provides clients with a single, integrated user interface to manage product listings, inventory availability, pricing optimization, search terms, data analytics and other critical functions across these channels via the Company's software available on shopping-fee.com

The terms "we," "us," and "our" refer to the Company.

"You" refers to you, as a user of our Site or our Service.

By accessing our Site or our Service, you accept our Privacy Policy and Terms of Use (found here: https://content.shoppingfeed.com/hubfs/Legal/CGA-EN.pdf), and you consent to our collection, storage, use and disclosure of your Personal Information as described in this Privacy Policy.

I. SCOPE

This Privacy Policy governs all personal information collected by and provided to us and must be adhered to by all persons who access, use, process, control or otherwise deal



with personal information on our behalf. This policy applies to independent contractors and job applicants, as well as individuals who provide us with personal information.

II. LAWFUL BASES

Under GDPR, Shoppingfeed may only process the Personal Data of a Data Subject lawfully if Shoppingfeed has at least one of the following legal bases:

- In order to perform pursuant to one or more legal agreements (contracts) with you,
- With your consent or,
- Pursuant to a Legitimate Interest, in which Shoppingfeed considers the purpose it has for processing your Personal Data, whether the Processing is necessary for that Purpose, and whether your own personal interests as a Data Subject outweigh Shoppingfeed's purpose in processing your Personal Data.

III. INFORMATION WE COLLECT

We collect "Non-Personal Information" and "Personal Information" and we limit the collection and retention of this data to what is adequate, relevant and necessary for our legitimate purposes ("data minimisation").

Non-Personal Information includes information that cannot be used to personally identify you, such as anonymous usage data, general demographic information we may collect, referring/exit pages and URLs, platform types, preferences you submit and preferences that are generated based on the data you submit and number of clicks. **Personal Information** includes your email (most of the time, a professional one) you provided us to open your account, and address for invoicing. which you submit to us through the registration process at the software.

1. Information collected via Technology

To activate the Service you do not need to submit any Personal or Professional Information other than your email address. To use the Service thereafter, you do need to submit further Personal Information which may include First and Last name, address and number of employees in your company. However, in an effort to improve the quality of the Service, we track information provided to us by your browser or by our software application when you view or use the Service, such as the page you visit on our website and on our software (known as the "referring URL"), the type of browser you use, the device from which you connected to the Service, the time and date of access, and other information that does not personally identify you. We track this information using cookies, or small text files which include an anonymous unique identifier. Cookies are sent to a user's browser from our servers



and are stored on the user's computer hard drive. Sending a cookie to a user's browser enables us to collect Non-Personal information about that user and keep a record of the user's preferences when utilizing our services, both on an individual and aggregate basis. For example, the Company may use cookies to collect the following information: your login, date of your last connection (for the use of our TimeLine feature), which emails you opened or not (via software like AutopilotHQ and Intercom) etc. We may share Personal and Professional Information (like a range of your revenue on channels, your number of products, your Ecommerce CMS technology) with our partners in the case we would like to recommend you to them. In general, this is on the aim to grow your business.

The Company may use both persistent and session cookies; persistent cookies remain on your computer after you close your session and until you delete them, while session cookies expire when you close your browser.

2. Information you provide us by registering for an account

In addition to the information provided automatically by your browser when you visit the Site, to become a subscriber to the Service you will need to create a professional profile. You can create a profile by registering with the Service and entering your email address, and creating a user name and a password. By registering, you are authorizing us to collect, store and use your email address in accordance with this Privacy Policy.

3. Children's Privacy

The Service is not directed to anyone under the age of 13. The Software does not knowingly collect or solicit information from anyone under the age of 13, or allow anyone under the age of 13 to sign up for the Service. In the event that we learn that we have gathered personal information from anyone under the age of 13 without the consent of a parent or guardian, we will delete that information as soon as possible. If you believe we have collected such information, please contact us at dpo@shoppingfeed.com.

We use your personal data for the purpose for which we obtained it which include the following:

- <u>Perform operations relating to customer management</u> (execution of a contract for the management of customers including the creation of online accounts; the management of contracts, payments and returns).
- <u>Prospecting and Newsletter registration Management</u>: on the basis of your consent: to carry out operations relating to prospecting; management of technical prospecting operations; monitoring of newsletter subscriptions and unsubscriptions; selection of persons to carry out prospecting actions.
- <u>Site audience measurements, improving the content and the Site</u> based on the Company's legitimate interest in promoting the Company: monitoring the visitor's path and experience on the Site and the frequency of visits; ensuring that the content of Our Site, our pages on social networks and our emails are presented in the most



effective way and adapted to the needs of our visitors; improving the quality of the Site and/or our software.

IV. HOW WE USE AND SHARE INFORMATION

Personal Information:

Except as otherwise stated in this Privacy Policy, we do not sell, trade, rent or otherwise share for marketing purposes your Personal Information with third parties without your consent. We do share Personal Information with vendors who are performing services for the Company, such as the servers for our email communications who are provided access to the user's email address for purposes of sending emails from us. Those vendors use your Personal Information only at our direction and in accordance with our Privacy Policy. In general, the Personal Information you provide to us is used to help us communicate with you. For example, we use Personal Information to contact users in response to questions, solicit feedback from users, provide technical support, and inform users about promotional offers.

We may share Personal et Professional Information (like a range of your revenue on channels, your number of products, your Ecommerce CMS technology) with outside parties if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to meet any applicable legal process or enforceable governmental request; to enforce applicable Terms of Service, including investigation of potential violations; address fraud, security or technical concerns; or to protect against harm to the rights, property, or safety of our users or the public as required or permitted by law.

Non-Personal Information

In general, we use Non-Personal Information to help us improve the Service and customize the user experience. We also aggregate Non-Personal Information in order to track trends and analyze use patterns on the Site. This Privacy Policy does not limit in any way our use or disclosure of Non-Personal Information and we reserve the right to use and disclose such Non-Personal Information to our partners, advertisers and other third parties at our discretion.

In the event we undergo a business transaction such as a merger, acquisition by another company, or sale of all or a portion of our assets, your Personal Information may be among the assets transferred. You acknowledge and consent that such transfers may occur and are permitted by this Privacy Policy, and that any acquirer of our assets may continue to process your Personal Information as set forth in this Privacy Policy. If our information practices change at any time in the future, we will post the policy changes to the Site so that you may opt out of the new information practices. We suggest that you check the Site periodically if you are concerned about how your information is used.

Aggregation of non-personal data

We may publish, disclose and use aggregated information (information relating to all



of our Users or to specific groups or categories of Users that we combine in such a way that an individual User can no longer be identified or mentioned) and information non personal for industry and market analysis in order to provide you with suggestions.

Transfer of personal data to third countries

Shoppingfeed strives to keep Personal Data in France, or at least within the European Economic Area (EEA). However, it is possible that the data we collect when you use our platform or services may be transferred to other countries, for example if some of our service providers are located outside the European Union.

In the event of such a transfer, we guarantee that the transfer is made:

- Either to a country that ensures an adequate level of protection, i.e. a level of protection equivalent to that required by European regulations;
- Or that it is governed by standard contractual clauses;
- Or that it is governed by internal company rules.

V. HOW WE PROTECT INFORMATION

We implement security measures designed to protect your information from unauthorized access. Your account is protected by your account password and we urge you to take steps to keep your personal information safe by not disclosing your password and by logging out of your account after each use. We further protect your information from potential security breaches by implementing certain technological security measures including encryption, firewalls and secure socket layer technology. However, these measures do not guarantee that your information will not be accessed, disclosed, altered or destroyed by breach of such firewalls and secure server software. By using our Service, you acknowledge that you understand and agree to assume these risks.

Shoppingfeed is committed to providing the appropriate level of protection for the personal data it processes. To ensure that the principles defined in this Privacy Statement are effectively taken into account when Shoppingfeed processes personal data, business units must identify and address any data protection constraints at the beginning of a new project so that the principles of privacy by design and privacy by default, contained herein, are reflected in the design of the project and are appropriately implemented.

Notification of A Data Breach

The Company shall take the appropriate technical and organizational measures to adequately protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data. Such measures include but are not limited to physical and IT measures, and organizational measures and processes.



In the event of the Company aware of any breach of security that results in the accidental, unauthorized or unlawful destruction or unauthorized disclosure of or access to Personal Data the Company shall to the best of its ability, notify the Customer thereof with undue delay. The Company will endeavour that the furnished information is complete, correct and accurate.

If required by law and/or regulation, the Company shall cooperate in notifying the relevant authorities and/or Data subjects.

As part of this policy, we actively monitor the Dark Web to detect any leakage of our customers' and/or users' personal data. The results of this monitoring are sent to our teams in real time.

The verification procedure involves the following steps:

- Continuous monitoring of the Dark Web: We use specialized tools to monitor forums, underground marketplaces and Dark Web sites for sensitive information about our customers.
- <u>Analysis of results</u>: Our security team regularly reviews the results of monitoring. If any of our customers' personal data is detected, we take immediate action to protect this information.
- <u>Real-time notification</u>: When a data leak is identified, we send a real-time notification to the specified security e-mail address (<u>security@shopping-feed.com</u>). This enables us to react quickly and take appropriate action.
- Quarterly audit: We conduct a thorough audit of our monitoring and notification process on a quarterly basis. This ensures that our procedures are up-to-date and effective.

VI. YOUR RIGHTS REGARDING THE USE OF YOUR PERSONAL INFORMATION

You have the right at any time to prevent us from contacting you for marketing purposes. When we send a promotional communication to a user, the user can opt out of further promotional communications by following the unsubscribe instructions provided in each promotional email. You can also indicate that you do not wish to receive marketing communications from us in the software. Please note that notwithstanding the promotional preferences you indicate by either unsubscribing or opting out in the software, we may continue to send you administrative emails including, for example, periodic updates to our Privacy Policy, technical changes or invoices.

Every user is entitled to the following:

1. Right to information: the right to have clear, precise and complete information about Shoppingfeed's use of their Personal Data.



- 2. Right of access: the right to obtain a copy of the Personal Data that the Controller holds on the requester.
- 3. Right of rectification: the right to have their Personal Data rectified if they are inaccurate or obsolete and/or to complete them if they are incomplete.
- 4. Right to erasure / right to be forgotten: the right, under certain conditions, to have the Data erased or deleted, unless Shoppingfeed has a legitimate interest in keeping them.
- 5. Right to object: the right to object to the Processing of Personal Data by Shoppingfeed for reasons related to the particular situation of the requester (under conditions).
- 6. Right to withdraw Consent: the right at any time to withdraw Consent when the Processing is based on Consent.
- 7. Right to restriction of Processing: the right, subject to specific conditions, to request that the Processing of Personal Data be temporarily suspended.
- 8. Right to Data portability: subject to specific conditions, right to receive from the Controller Personal Data concerning him/her, which he or she has provided to the Controller, in a structured, commonly used and machine-readable format.
- 9. Right not to be the subject to an automated decision: subject to specific conditions, right not to be subject to a decision based solely on an automated Data Processing activity, including profiling, which produces legal effects concerning the Data Subject or similarly significantly affects him or her.
- 10. Right to define post-mortem instructions: the right for the Data Subject to leave instructions regarding the fate of his/her Personal Data after death.

VII. LINKS TO OTHER WEBSITES

As part of the Service, we may provide links to or compatibility with other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information or content they contain. This Privacy Policy applies solely to information collected by us through the Site and the Service. Therefore, this Privacy Policy does not apply to your use of a third party website accessed by selecting a link on our Site or via our Service. To the extent that you access or use the Service through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage our users to read the privacy statements of other websites before proceeding to use them.



VIII. CHANGES TO OUR PRIVACY POLICY

The Company reserves the right to change this policy and our Terms of Service at any time. We will notify you of significant changes to our Privacy Policy by sending a notice to the primary email address specified in your account or by placing a prominent notice on our site. Significant changes will go into effect 30 days following such notification. Non-material changes or clarifications will take effect immediately. You should periodically check the Site and this privacy page for updates.

IX. CONTACT US

The DPO assists the controller or the processor in all issues relating to the protection of personal data.

If you have any questions regarding this Privacy Policy or the practices of this Site, please submit a request to the Data Protection Officer (DPO) by sending an email to dpo@shoppingfeed.com.