

Privacy and cookie policy

The Social Homebook platform helps you – the User digitally connect with other Users and, additionally, share their diary online with the Community. The platform is being managed by us – The Social homebook registered in the Netherlands. (the **'Social Homebook'**, **'we'** or **'us'**).

Social Homebook is committed to doing business with the highest ethical standards. We want to deliver a high quality Service to our Users. We are committed to handle information regarding our business responsibly. In this Privacy Policy we describe how we handle different types of your Personal Data we gather.

GENERAL INFORMATION

1. This Privacy Policy comprises all information related to any operation or set of operations which is performed on your Personal Data or on sets of such data such as collection, organization, structuring, storage, adaptation or alteration,

retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction by Social Homebook.

2. Social Homebook declares that this Privacy Policy is drafted in accordance with: (a) (as far as still applicable after May 25th) the Belgian Privacy Law of 8 December 1992 on privacy protection in relation to the processing of personal data and/or (b) the EU Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regards to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (the 'GDPR').

3. The declaration above includes information about the type of personal data collected by Social Homebook via the Service, as well as the manner in which Social Homebook uses and processes this data.

4. Accessing and/or using (creation of the Account included) the Service implies the User's informed consent (through disclosure of the User's Personal Data or opt-in) to the Privacy Policy and

consequently to how Social Homebook collects, uses and processes the Personal Data.

5. Social Homebook takes responsibility for the processing of your Personal Data as the Processor and the Controller. Taking into account the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for the rights and freedoms of natural persons, Social Homebook declares to implement appropriate technical and organizational measures for ensuring that, by default, only the Personal Data which are necessary for each specific purpose of the processing are processed and to be able to demonstrate that such processing is performed in accordance with the GDPR.

6. Social Homebook declares that a relevant notification has been made to the Belgian Commission for the Protection of Privacy with regard to the processing of your Personal Data, as required by the law.

7. This Privacy Policy is applicable to the Service and any other relations between Social Homebook and you.

This Privacy Policy may be revised or updated by Social Homebook anytime. You will be notified about any modification, no later than at the date of the revision or the update, by posting appropriate notice on the following website: <https://www.socialhomebook.com>. The User is obliged to get acquainted with the revision or the update and accept the new terms of the Privacy Policy by giving the User's informed consent by checking a checkbox placed on the login page in the Service. In case of a lack of the User's consent for the new version of the Privacy Policy, the User shall delete the User's Account.

DEFINITIONS

8. The following terms used in this Privacy Policy shall have the meaning ascribed to them below:

- **Account:** refers to a set of resources and rights within a given computer system assigned to you as the User for the purpose of accessing and/or using the Service.
- **Community:** refers to a group of Users. Access to the Community is granted by the Community Manager after

the User's acceptance of an invitation. Every User can be a member of an unlimited amount of Communities.

- **Community Manager:** refers to the User who has the right to manage the Community – e.g. browse all networking profiles and see statistics like number of meetings.
- **Controller:** refers to an entity (here us - Social Homebook) which determines the purposes and means of the processing of the Personal Data.
- **Social Homebook:** refers to Social Homebook BV with its headquarters in the Netherlands
- **Cookies:** refers to a small text file sent from a website and stored on your (User's) device while you are using the Service.
- **Event:** refers to any conference and/or corporate event created for a limited period of time by Social Homebook on behalf of the Organizer on the basis of an agreement between these parties.
- **GDPR:** refers to the Regulation 2016/679 of The European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regards to the

processing of personal data and on the free movement of such data and repealing Directive 95/46/EC.

- **Organizer:** refers to the User who has the right to manage the Event – e.g. browse all networking profiles and see statistics like number of meetings. The Organizer acts on behalf of a company who entered into an agreement with Social Homebook to organize an Event.
- **Personal Data:** refers to data mentioned in point 7 (section Collection Of Personal Data).
- **Privacy Policy:** refers to this document concerning provisions related to Privacy and Cookies Policy.
- **Privacy Rights:** refers to your rights concerning your Personal Data.
- **Processor:** refers to an entity (here us - Social Homebook) which processes the Personal Data on behalf of the Controller
- **Service:** refers to a platform that helps you as the User digitally connect with other Users and, additionally, plan meetings related to the Event and/or the Community.

- **Terms of Use:** refers to the document Terms of Use contained terms of use of the Service.
- **User:** refers to a person who was invited for the Event and/or the Community and who has created the Account.
- **User Content:** refers to text messages exchanged between the Users, , videos, photographs and/or short description of the User added to the Account by the User, whether it is publicly or privately transmitted.

9. The headlines of sections have been placed only for convenience and will not affect the interpretation of the relevant provisions of this Privacy Policy.

10. Unless it is clear from the context, expressions in the singular form shall include the plural form and vice versa.

11. All references to legal provisions refer to the content of the applicable law (including all amendments, supplements and amendments adopted at that time).

COLLECTION OF PERSONAL DATA

12. The purpose of collecting the Personal Data by Social Homebook is to provide full functionality of the Service.

13. The Personal Data are provided to Social Homebook therefore expressly and voluntarily by you.

14. Social Homebook collects and processes several types of Personal Data:

- data provided by the Organizer or the Community Manager in the guest list attached to the Event and/or the Community:
 - your first name,
 - your last name (optional),
 - your email address,
 - your job title (optional),
 - name of the company/organization you work for (optional),
 - name of the Event or the Community you are invited to.
- data provided by you while creating your Account:
 - your first and last name,

- your email address,
- your job title,
- name of the company/organization you work for,
- your phone number(optional),
- your picture uploaded by you as the profile photo (optional),
- your encrypted password.
- data provided by accessing and/or using the Service:
 - date of creating your Account,
 - date of your last login to the Service,
 - history of the events you took part in,
 - history of exchanged requests and offers,
 - history of exchanged messages,
 - history of your planned meetings,
 - information about your device and operating system version,
 - web behavior information such as information related to how you use the Service (i.e. which browser you use, page views, visited domains etc.)

15. The Personal Data can be obtained by:

- accessing the Service, and/or
- using Cookies.

16. Data obtained by Social Homebook by placing Cookies in your device are not used to identify you as the User through these data, but to allow Social Homebook to draw up statistics regarding the use of the Service.

17. General purposes of the Personal Data collection and processing:

- access to the Service,
- use of the Service;
- draw up of statistics regarding the use of the Service;
- send you reminders, technical notices, updates, security alerts and provide you with support when needed or requested;
- enforcement of our Terms of Use and Privacy Policy;
- improvement of the Service;
- direct marketing - we may contact you to further discuss your interest in our Service as well as to inform you about future Events of the Organizers or the Social Homebook

and new products and services offered by the Social Homebook – you can always opt out of receiving email correspondence from us for direct marketing purposes by clicking the unsubscribe link in email newsletters. You can always opt out of receiving email notifications by following the instructions in the received e-mail.

18. You are responsible for ensuring the accuracy of the Personal Data submitted to us. Inaccurate information will affect your ability to access the Service and our ability to contact you as described in this Privacy Policy.

STORAGE AND PROCESSING OF PERSONAL DATA

19. Social Homebook declares to storage and process the Personal Data within the European Union.

20. Social Homebook stores and processes the Personal Data during the period necessary depending on the purposes of the processing of the Personal Data described in this Privacy Policy. It means your Personal Data will be kept by Social Homebook as long as it is reasonably necessary taking into consideration our

need to answer queries or resolve problems, provide improved and new services and comply with legal requirements under applicable law(s). This means that we may retain your Personal Data for a reasonable period after you stop using the Service provided by Social Homebook. After this period, your personal information will be deleted from all systems within Social Homebook.

21. Any transfer of the Personal Data outside the European Economic Area (EEA) to a recipient whose domicile or registered office is in a country which does not fall under the adequacy decision enacted by the European Commission, shall be governed by the provisions of a data transfer agreement, which shall contain (i) the standard contractual clauses, as referred to in the 'European Commission decision of 5 February 2010 (Decision 2010/87/EC)', or (ii) any other mechanism pursuant to privacy legislation, or any other regulations pertaining to the processing of personal data.

22. The processing of the Personal Data may include profiling.

DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

23. Social Homebook has the right to disclose some of the Personal Data to:

- Mailchimp service to send you email with an invitation for the Event and/or the Community- this purpose requires disclosure of your email address, your first and last name, your job title, the name of a company/organization you work for, your call-to-action URL with token that signs you in for the Event and/or the Community (such token works only for two days from the moment of its creation);
- MongoDB Atlas database hosting service;
- Amazon Web Services to host your (User's) files - this purpose requires disclosure of your profile picture, logo of the Event and/or the Community you take/took part in, pictures of meeting points of the Event and/or the Community you take/took part in;
- Nexmo, Inc. - this cooperation requires disclosure of your (User's) phone number, list of meetings, call-to-action URL with token that works only for two days from the moment of its creation - thanks to it you will be able to receive a text

message (SMS) with an overview of the meetings and URL to the web app;

- Mixpanel, Inc. to analyse your (User's) behavior (your actions are tracked anonymously);

24. Except of the situation described in the point 16 above, Social Homebook shall not disclose any of your Personal Data to third parties unless it is necessary in the context of providing proper functionality of the Service and optimizing it. If it is necessary that Social Homebook discloses your Personal Data to third parties in this context, the third party is required to use the Personal Data according to the provisions of this Privacy Policy.

25. Notwithstanding the foregoing, it is however possible that Social Homebook discloses the Personal Data:

- to the competent authorities (i) if Social Homebook is obliged to do so under the law or under legal or future legal proceedings and (ii) to safeguard and defend Social Homebook rights;

- if Social Homebook, or the majority of its assets, are taken over by a third party, in which case the Personal Data shall be one of the transferred assets;
- in all other cases, Social Homebook will not sell, hire out or pass on the Personal Data to third parties, except when it (i) has obtained permission of a data subject and (ii) has completed a data processing agreement with the third party in question, which contains the necessary guarantees regarding confidentiality and privacy compliance of the Personal Data.

SAFETY OF PERSONAL DATA

26. Social Homebook declares to take all appropriate technical and organizational measures to protect the confidentiality and security of your Personal Data. These efforts include, but are not necessarily limited to: (i) storing your personal information in secure operating environments that are not available to the public and that are only accessible by persons authorized by Social Homebook and, (ii) verifying the identities of registered

Users before they can access the Personal Data we maintain about them.

27. In accordance with the paragraph 26 above:

- every User is allowed to maximum 5 login attempts per hour (failed login attempts are registered);
- the User's password have to consist of minimum 8 characters;
- the User's password is stored encrypted in a database connected with the Service;
- role - based access to the Service ensures that every User can access only these data the role allows to;
- the Service requires the use of HTTPS protocol;
- all management accounts of third party services are protected with two-factor authentication.

28. In the event of and following discovery or notification of a breach of the security of the Personal Data, or access by an unauthorized person, Social Homebook will notify you if the breach is likely to affect your privacy.

29. You as the User are obliged to comply with safety standards, for instance by avoiding all non-authorized access to the your devices and the Account. You as the User are solely responsible for the use of the Service on the your devices, IP-address and identification data, as well as for its confidentiality.

30. Notwithstanding the security measures and policy adopted by Social Homebook, an infallible level of security cannot be guaranteed. Since no method of transmission or forwarding over the Internet, or any method of electronic storage is secure in 100%, Social Homebook does not guarantee absolute security.

YOURS PRIVACY RIGHTS

31. To exercise the your Privacy Rights, you shall contact Social Homebook via our email: info@socialhomebook.com.

32. In connection with the Personal Data, you have following Privacy Rights:

- **right to be informed** - you have the right to know (i) the identity and the contact details of the Controller and,

where applicable, of the Controller's representative, (ii) the contact details of the data protection officer, (iii) the purposes of the processing for which the Personal Data are intended as well as the legal basis for the processing, the recipients or categories of recipients of the Personal Data, (iv) the period for which the Personal Data will be stored and (v) whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data;

- **right to access** - you have the right to access your Personal Data and to know the source of such Personal Data, to obtain a copy of your Personal Data, to receive confirmation of your Personal Data processing and/or profiling, to obtain information on processing of your Personal Data, to envision consequences of the processing of your Personal Data;

- **right to rectify, erasure or restrict your Personal Data.**

Please note that we will keep your name and e-mail

address in a list to proof that we complied with your request. This list shall be kept within our records for five (5) years, after which period you shall no longer have the right to request proof of the exercise of such right;

- **right to object** – you have the right to object to the processing of your Personal Data when a serious and legitimate reason arises;
- **right to withdraw the consent** - you have the right to withdraw your consent to process the Personal Data;
- **right to data portability** - you have the right to obtain your Personal Data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from Social Homebook;
- **right to lodge a complaint with a supervisory authority**

e-mail: info@socialhomebook.com.

33. Exercising of the Privacy Rights is free of charge.

34. You as the User are always allowed, via the User's Account, to update, modify and/or verify your Personal Data.

USE OF COOKIES

35. Social Homebook informs to use Cookies to distinguish the Users' preferences and to offer better functionality of the Service.

36. At the moment of the first access to the Service, the User accepts different kinds of Cookies used by the Service, Otherwise (in case of the lack of such acceptance), the User shall delete his/her Account The User can block Cookies by activating the User's browser settings which allows the User to refuse the Cookies. The rejection of these Cookies may have the effect of not allowing the User to use some functionalities of the Service.

More information on Cookies can be found via the following link:
<http://www.allaboutcookies.org>.

Social Homebook uses session cookies (which expire once the you log out from the Account) and persistent cookies (which stay on the your device for a set period of time or until you delete them). The following types of cookies are used by Social Homebook for the purposes explained in this chart:

- Strictly necessary Cookies: Providing a possibility to use the Service or providing certain functions the User requested.
- Functionality Cookies: Improvement of the functionality of the Service. The Service uses Cookies created by Social Homebook.
- Performance Cookies: Improvement of the functionality of the Service.

The Service uses Cookies connected with Google Analytics and Mixpanel to help Social Homebook to analyze how the Users use the Service. It records the number of visitors and it provides Social Homebook with information on their overall behavior – such as the typical duration of a visit to the Service or the number of pages a user views on average.

- Third party Cookies: The Service uses facebook Cookies to support the communication with Facebook and its partners. The User is obliged to learn more about these cookies.

CONTACT

39. If you have questions about our Privacy Policy and how it relates to your use of the Service, contact us by:

- email: info@socialhomebook.com

FINAL PROVISIONS

40. The Service can be used only by the Organizer and/or the Community Manager and the User who has been invited to the Event and/or the Community and has created the Account.

41. Social Homebook is not liable for any User Content.

42. Social Homebook is not liable for any links that may be found in the Service, which lead and/or allow you as the User to directly enter any third party websites, nor for any potential Personal Data protection infringements that could occur in

connection with browsing such websites. Because of that you shall acknowledge any privacy provisions which may be found on such third party websites.

43. This Privacy Policy shall be managed, interpreted and executed in accordance with Belgian law which exclusively applies to every potential dispute.

44. This Privacy Policy enters into force on March 19, 2021