

## Privacy Policy

*Last updated in June 2021*

### 1. General provisions

The following Privacy Policy applies to the processing of data by NEVEO, a public limited liability company incorporated under the laws of Belgium, with registered offices at 1000 Brussels (Belgium), rue Auguste Orts 2, at the Crossroads Bank for Enterprises under number BCE 0568.484.039 (Register of Legal Entities of Brussels) (hereinafter “NEVEO”, “we” or “our”).

The purpose of this Privacy Policy is to specify the categories of personal data that NEVEO collects via its website [www.neveo.io](http://www.neveo.io), and other related domains in their respective languages (such as [www.neveo.es](http://www.neveo.es), [...]), its subdomains, directories, services (hereinafter the “**Platform**”) and any other means relating to information and communication technologies. The Privacy Policy also describes how such data may be processed and disclosed to third parties. The Privacy Policy further sets out the various measures NEVEO has implemented to safeguard the security and confidentiality of the personal data it collects.

NEVEO cares about the privacy of all visitors to its Platform whose personal data may be collected by using the Platform (hereafter “**Users**”) and will therefore only collect and process personal data in accordance with the provisions of this Privacy Policy. This Privacy Policy also governs the collection and processing of personal data in the context of contacting influencers (hereinafter “**Influencers**”). The Users and Influencers are hereinafter each separately and / or jointly referred to as “**you**”, whenever applicable.

NEVEO is to be considered the data controller for the processing of personal data and will act in accordance with the provisions of the Belgian Act of 30 July 2018 regarding the protection of natural persons in relation to the processing of personal data, the Act of 13 June 2005 on electronic communications, as well as the General Data Protection Regulation (Regulation (EU) 2016/679 of 27 April 2016, “**GDPR**”), including future adaptations and revisions of the previous (hereinafter collectively referred to as the “**Applicable Data Protection Legislation**”), and in accordance with the provisions of this Privacy Policy.

Any questions, comments or complaints related to the processing of personal data may be sent by e-mail to [privacy@neveo.io](mailto:privacy@neveo.io).

NEVEO reserves the right to modify this Privacy Policy at any time and, to the extent permitted by law, without prior notice, in order to comply with (new) legal obligations and / or to improve the services provided to you. Therefore, we advise you to regularly consult the Privacy Policy as found on the Platform.

Please note that the Platform may contain links to other digital platforms or internet resources which may also collect personal data either voluntarily, through cookies and/ or other technologies. NEVEO has no responsibility, liability for, or control over those other websites or internet resources or their collection, use and disclosure of your personal data. NEVEO recommends that you review the privacy policies of these other websites and internet resources to understand how they collect and use personal data.

## **2. Personal data collected by NEVEO and the use of this personal data**

### **a. Data collected relating to Platform Users**

The User acknowledges and agrees that the personal data communicated on the Platform is processed in accordance with this Privacy Policy.

The categories of personal data that can be collected during a visit to the Platform or by contacting NEVEO, and the related purposes for their treatment, are as follows:

- (a)** The first name, the nickname, email address and password are provided by the User by completing the online form upon registration. This information is required to create a user account;
- (b)** The payment information (banking details and the detail and history of transactions) provided in order to subscribe to the NEVEO services;
- (c)** The name, language, profile picture, telephone number and gender are used to ensure optimal after-sales follow-up and in order to improve the aesthetics of the journal;
- (d)** The birthday of the recipient of the journal is used in order to personalize the services;
- (e)** The name, first name and postal address of the recipient are necessary to carry out the delivery of the journal;
- (f)** The data communicated via Facebook (including the profile picture, email address and name) will only be collected if the User opts for the connection to the Platform via Facebook;
- (g)** Additional information might have to be provided to NEVEO for the purpose of carrying out maintenance and / or online assistance;
- (h)** Information relating to the User's equipment and use of the Platform, such as IP addresses, geographical location, device type, unique device IDs, type of operating system and version, duration and date of the visit, the network connection type and provider, the network performance of the device, the type of browser, data from the sensors of mobile terminals (accelerometer or gyroscope), the selected language, the information activating digital rights management, etc. whose processing is necessary to provide certain functionalities of the Platform and to use certain cookies, it being understood that the use of cookies and internet beacons by NEVEO is specified in the Cookie Policy, which the User is invited to consult;
- (i)** Photographs and text messages are sent to the Platform in order to enable NEVEO to produce and print the journals, part of the services provided on the Platform.

The required provision of the data under points (a), (b), (e), (f), (g), (h) and (i), is a prerequisite for the conclusion of the contract, given that NEVEO will not be able to provide the services as described in the ToU if these data are not processed. Personal data under (c) and (d) are collected and processed on the basis of the consent of the User. The User is never obligated to provide the data under (c) and (d). However, in the absence of the data under (c) and (d), the User may not receive access to certain features of the Platform and services. The data under (h) may, according to the circumstances, be collected and processed based on our legitimate interest.

The Users may not disclose personal data relating to another person to NEVEO, except to the extent that such person has consented to it in accordance with this Privacy Policy. The User who took out the subscription for a beneficiary or invited a third party to join the Platform by inserting her/his email address and/or her/his telephone number, declares having obtained the authorization of the latter to communicate her/his personal information.

NEVEO will not collect sensitive data. This includes data such as race, ethnicity, religious beliefs, criminal records, physical or mental health and the sexual orientation of the User. NEVEO will, if necessary, obtain the explicit and separate consent of the User to collect such data.

The User undertakes to communicate accurate personal data to NEVEO. The User may at any time modify this information in the section “Edit the profile of the beneficiary”, and “Edit my profile”. NEVEO cannot be held responsible for any failure of its services related to the provision of incorrect information provided by the User.

#### **b. Data collected relating to Influencers**

NEVEO might collect and process personal data rendered public by Influencers on their Business profiles found on the Instagram platform. These profiles are profiles subject to special rules on the Instagram platform allowing the Instagram users to publicly state additional information, where this function is not available to standard Instagram accounts. The personal data collected therefrom is limited to the nick name and the email address of those Influencers linked to the profile on a certain date.

The collection of this personal data is performed based on the legitimate interest of NEVEO. The goal of the processing is to propose to collaborate with NEVEO for our campaigns.

In accordance with article 14 GDPR, NEVEO will contact the Influencers by their email addresses found on their respective Instagram page. The first contact will always state:

- the fact that the personal information will be processed and a link to the Privacy Policy where all the information relating to such processing can be found,
- a request to the Influencer asking for an affirmative action stating that he/she wishes to receive further information and / or to collaborate.

In the absence of a response of the Influencer, or a negative response the personal data will be deleted in accordance with article 6 hereinafter.

If the influencer agrees to the collaboration, further personal data might be processed, particularly in the manner disclosed under point 2.a. of this Privacy Policy.

### c. General provisions

NEVEO ensures that its direct marketing activities comply with the applicable legislation. NEVEO does not sell or rent personal data to marketing agencies or third parties.

NEVEO may disclose personal data to any company with which NEVEO may merge or be acquired by as part of a reorganization. NEVEO nevertheless undertakes to inform you if it deems it necessary.

### 3. The data subject's rights

Under the Applicable Data Protection Legislation, you are entitled to exercise certain rights in relation to your personal data collected and processed by NEVEO.

Each data subject has the right to access, modify, correct, and delete their data free of charge. Each data subject also has a right to restrict the processing, as well as a right to data portability. The data subject can also, free of charge, oppose certain data processing activities by simple request. In the event that the legal basis for the processing is consent, the data subject may at any time withdraw their consent for the processing of the data.

Please find a brief overview of the rights you can exercise in relation to your personal data below:

- Withdrawal of consent: You have the right to withdraw your consent in relation to all processing activities for which you have previously given us your consent.
- Right of access: You are entitled to request a copy of the data we process and hold on you.
- Right of rectification: You have the right to ask us to correct, modify or complete your personal data.
- Right of erasure: You have the right to request the deletion of the personal data we process or hold on you.
- Right to restrict the processing: Under certain circumstances, you have the right to ask us to restrict our processing of your personal data. In exercising this right, the relevant personal data will remain stored in our possession, but we will not be able to further process it;
- Right to object to the processing: In those instances where we process and collect your personal data based on our legitimate interest, you have the right to object to our processing of such data.
- Right to data portability: implies that NEVEO can supply (at their request) their data to the data subjects and / or to a third party in a structured and machine-readable form.

If you would like to be supplied with further information on your rights or wish to exercise them, subject to compliance with the legal conditions, please write to NEVEO at the following email address [privacy@neveo.io](mailto:privacy@neveo.io). We ask of you to properly identify yourself when exercising your data protection rights in order to enable us to execute your request within the hereunder provided delays.

The exercise of your rights is free and will be executed within one (1) month of the receipt of your request to exercise your rights. We may extend this delay with an additional two (2) months for a total delay of three (3) months, should your request prove to be particularly complex. If we decide to extend the initial delay, we will always inform you of this decision in due time.

In those cases where we deem your request to exercise your rights manifestly unfounded or excessive, we reserve the right to charge you an administrative fee for the execution of your request, or even to refuse to act on your request. You will always be informed within the abovementioned timeframes of our decision.

#### **4. Security of your personal data**

NEVEO shall take all reasonable security measures against the loss, misuse and alteration of the data entrusted to it by the data subject, as well as to guarantee the confidentiality of the personal data transmitted by it.

However, each data subject recognizes that the disclosure of personal data via the internet is not without risk. The data subject therefore acknowledges that NEVEO cannot be held responsible or liable for any direct or indirect damage she/he may suffer as a consequence of illegal or illegitimate use of her/his personal data by third parties who do not have the authorization to use the data.

However, NEVEO reminds you that it is your responsibility to take all appropriate measures to ensure the security of your equipment, data or software, especially against computer viruses circulating on the network.

#### **5. Disclosure of personal data**

In order to provide our services to you and in order to make our Platform and social media pages available to you, NEVEO may transfer your personal data to service providers who use the data on its behalf. NEVEO has identified the following main categories of third-party recipients with whom your data may be shared:

- third-party registration and authentication service providers, granting us access to your account information on these third-party websites:
  - Facebook ([privacy policy](#));
  - Google ([privacy policy](#));
- third-party service providers who assist us with client insights and analytics:
  - Google Analytics ([privacy policy](#) and [opting out](#));
  - Fire Analytics ([privacy policy](#));
  - Hotjar Heatmaps ([privacy policy](#) and [opting out](#));
- third-party service providers who allow us to manage contacts and send messages, such as Sendinblue ([privacy policy](#));

- third-party service providers who allow us to customize our services to provide you with the best assistance, such as Zendesk ([privacy policy](#));
- third-party service providers who help us get more visibility towards our customers:
  - Facebook Remarketing and Facebook Custom Audience ([privacy policy](#) and [opting out](#));
  - Google Ads Remarketing ([privacy policy](#) and [opting out](#));
- third-party service providers for the purposes of payment transaction management, such as Stripe ([privacy policy](#));
- third-party service providers for the purposes of providing after-sales services;
- third-parties to whom we outsource certain services, such as our printer (to print journals), IT support service providers (design, development, and maintenance) and information storage providers;
- third-party hosting and backend service providers, such as Amazon Web Services ([privacy policy](#));
- third-party postal or courier providers who assist us in delivering our journals and our postal marketing campaigns to you;
- third-party application monitoring service providers:
  - Crashlytics ([privacy policy](#)) ;
  - Rollbar ([privacy policy](#)) ;
  - Sentry ([privacy policy](#)).

NEVEO will not communicate any data to third parties for purposes secondary or unrelated from those mentioned above, unless otherwise explicitly stated when collecting these data. Thereto, NEVEO takes all necessary precautions in order to preserve its confidentiality and declares to be connected with trusted hosting providers and technology providers, renowned for the reliability of their services and the high degree of protection they grant to the confidentiality of personal data. We have put the necessary documentation and obligations in place in order to guarantee that your personal data is securely processed by our data processors.

The personal data may however be communicated by NEVEO to the judicial authorities, the administrative authorities or other bodies, or to third parties if required or desirable to meet the legal or regulatory requirements or for the purposes mentioned above.

## **6. Duration of data retention**

NEVEO does not store the collected data longer than the period provided by law and, in any case, no longer than necessary for the above-mentioned purposes.

- For the Users: the personal data will be kept as long as the User is active. The User is considered inactive after 12 months following her/his last login.

- For the Influencer: the personal data will be deleted one (1) month after their collection on Instagram in the absence of, or a negative response by the Influencer to the first message as stated in article 2.b. If the Influencer gives its consent of the collaboration its data will be processed in the same manner as the Users.

## **7. International data transfers**

Our offices are registered in Belgium only. As a principle, your personal data will be stored and processed in Belgium. However, for the purposes set out in article 2 of this Privacy Policy, we may have to transfer personal data to other jurisdictions outside the European Economic Area (EEA), and therefore not bound by the GDPR. Your data may also be hosted on servers outside the EEA.

When we transfer your personal data to third parties residing in such jurisdictions, we implement appropriate safeguards in our agreement with those third parties in order provide your personal data the benefit of an adequate level of data protection and at least a level of data protection equivalent to the level to which you are entitled under the GDPR. For this purpose, we assess the level of data protection in the country of transit or destination, among others taking into account the adequacy decisions taken by the European Commission. Additionally, we may make use of the Standard Contractual Clauses approved by the European Commission and any other appropriate solutions as required or permitted by the Applicable Data Protection Legislation.

Feel free to contact us as set out under article 9 of the Privacy Policy, should you have any questions regarding the international transfers of your personal data and the safeguards we have implemented in that regard.

## **8. Statistical processing**

The data subject acknowledges that NEVEO has the right to use its data for statistical purposes, and to transfer or assign the corresponding statistical results to any third party, as soon as it has been made anonymous.

## **9. Questions from data subjects**

This Privacy Policy shall be governed by – and construed in accordance with – the Belgian legislation.

You have the right to file a complaint with the competent data protection authority, being the authority in the Member State of your habitual residence, your place of work, or the place of the alleged infringement of the Applicable Data Protection Legislation. Notwithstanding the previous, the lead data protection authority is the Belgian Data Protection Authority (“*Autorité de protection des données*” or “*Gegevensbeschermingsautoriteit*”), which can be reached via the following means of communication:

- by following the instructions and filling in the form accessible via this [link](#);
- by sending a letter to Drukpersstraat 35, 1000 Brussels, Belgium;
- by calling the following number +32 (0)2 274 48 00;

- by faxing to +32 (0)2 274 48 35; or
- by sending an email to [contact@apd-gba.be](mailto:contact@apd-gba.be).