

This Policy explains how ForePaaS SAS and its affiliates and subsidiaries (“ForePaaS”, “We”, “Our” or “Us”) collect, store, use, disclose and otherwise process information about you (“You” or “Your”) in the course of Our business, including through the administration of Our SaaS-based data analytics platform (the “Platform”) as well as on Our websites that link to this Policy (such as, www.forepaas.com) (the “Websites”). It also sets out more information about Your privacy rights.

We may change this Policy from time to time. In the event there are material changes to Our information practices, We will change the “Last Updated” date above and in some cases send a notification of changes via email.

Foreword

ForePaaS provide its Platform to its customers under an agreement with them (“ForePaaS Terms and Conditions”) and solely for their benefit and the benefit of their personnel and other personnel authorized by them as users of the Platform (“Authorized Users”).

Because the Platform is SaaS based, Authorized Users may access and use the Platform from all over the world, subject to ForePaaS Terms and Conditions and any applicable laws.

This Policy does not apply to the content that ForePaaS customers and their Authorized Users upload and store in the Platform (“Customer Content”). In those circumstances, ForePaaS is processing Customer Content on behalf of its customer and that customer is responsible for the collection and use of Your data, as stated out in Our Terms of Use.

If personal information pertaining to You as an individual has been submitted to the Platform by or on behalf of one of Our customer and You wish to exercise any data protection rights You may have in respect of that data under applicable law, please inquire with the relevant ForePaaS customer directly. If You wish to make Your request directly to Forepaas, please provide the name of the ForePaaS customer who submitted Your data to the Platform. ForePaaS will refer Your request to that ForePaaS customer and will support them as needed in responding to Your request within a reasonable timeframe.

1. Information provided by You

The personal information We collect when You use Our Websites, including when You sign up to the Platform through Our Websites self-service portal (“Self-Service”), and the reasons why You are asked to provide it, will be made clear to You at the point we ask You to provide Your personal information.

i. When using Our Websites

We may collect Your name, email, postal address, company name, job title, phone number and other information You provide via the Websites when, for example, You submit inquiries, request more information about Our services and products, complete surveys or download collateral, provide feedback about Our services and products or register for sales events or marketing activities.

ii. When You register to use Our Platform

When You register to use Our Platform, we may collect Your personal information (like name and contact details), and credit card information in case of online payment.

iii. When You meet Us during an event or meeting

We may collect Your name, email, employer name, job title, phone number and other information You may provide in person during an event or meeting.

2. Information automatically collected by Us

i. When using Our Websites

- We automatically collect certain information when You visit or use Our Websites, including Our Self-Service. This information may reveal Your identity and may include information about the

specific computer or device You are using, such as Your computer's operating system, browser type, language and Internet Protocol (IP) address.

- We also automatically collect and store information about Your activities on Our Websites, such as information about how You came to and used Our Websites, event information (such as access times) and data collected through cookies and other similar technologies that uniquely identify Your browser, computer and/or other device.

ii. When using Our Platform

We automatically collect certain data relating to the performance and configuration of Our Platform and Our Customers' and Authorized Users' consumption, use of, and interaction with the Platform (collectively, "**Platform Data**"). Whilst Platform Data usually does not involve personal information, it may include such data in the following instances:

- data and metadata about an Authorized Users, such as user ID, email, IP address, other data about the user's computer or other device, browser and connecting software (e.g., OS and software versions); and
- data and metadata about an Authorized Users' activities and behavior within Our Platform, such as click-patterns and feature utilization.

More generally, Platform Data may be used by ForePaaS for (a) providing, supporting and operating Our products and services, (b) network and information security and (c) to analyze, develop and improve Our products and services.

3. Information provided by third parties

From time to time, We may obtain information about You from third party sources, such as public databases and websites, resellers and distributors, joint marketing or business partners, security and fraud detection firms and social media platforms. Examples of the information We may receive from other sources include: account information; page-view information; contact information from business partners with whom We operate co-branded events, services and marketing campaigns or joint offerings; search results and links, including paid listings (such as sponsored links); and credit history information from credit bureaus.

With Your consent, We may link to certain third-party websites and applications in Our Platform or on Our Websites, such as Microsoft or Google. In those circumstances, the data we collect, use and share via the Websites or the Platform will be subject to this Privacy Policy.

For the sake of clarity, Your use of the third-party websites, applications and any information You instruct Us to send to the third-party will be subject solely to the third-party's terms and conditions and privacy notice, and will not be subject to any agreements You have with us or this Policy.

4. Use of Your personal information

We use personal information collected via the Websites, Our Platform and through other means (e.g., in person) for purposes described in this Policy, including using Your information to:

- operate, audit and improve Our Websites, products and services;
- provide customer service and support;
- send You related information, including confirmations, invoices, technical notices, updates, security alerts, training and support and administrative messages;
- maintain Your account;
- enhance security, monitor and verify identity or service access;
- detect bugs, report errors and perform activities to maintain the quality or safety of Our products and services;
- conduct research and development;
- understand You and Your preferences to enhance and personalize Your experience and enjoyment when using Our Websites, products and services;

- develop and send You marketing, sales and promotional communications (where this is in accordance with Your marketing preferences);
- communicate with You about one of Our events or Our partner events, including webinars and demos;
- respond to Your comments or questions or provide information requested by You;
- process and deliver contest entries and rewards;
- display and measure engagement with advertisements across different devices and Websites;
- maintain legal and regulatory compliance;
- short-term, transient use, such as customizing content that We or Our service providers display on the Platform; and
- process Your information for other legitimate business purposes, such as customer surveys, customer engagement, data analysis, audits, collecting and assessing feedback, identifying usage trends, determining the effectiveness of Our marketing campaigns and to evaluate and improve Our products, services, marketing and customer relationships.

We may store and process personal information in the European Union, the United States or Canada.

5. Restrictions on the sharing of Your personal information

We do not share Your personal information with third parties other than as follows:

- when You instruct us to do so;
- with Your consent, for example, when You agree to Our sharing Your information with other third parties for their own marketing purposes subject to their separate privacy policies;
- with Our affiliates, in such case the information will be processed as otherwise described in this Policy;
- with third party vendors, consultants and other service providers who work for us and need access to Your information to do that work on Our behalf, such as service providers. who provide assistance with marketing, billing, credit card payments, data analysis, fraud prevention, network security, technical support or customer service; and
- to comply with laws or to respond to lawful requests and legal process, to protect Our rights and property and that of Our agents, customers, members and others including to enforce Our agreements, policies and terms of use or in an emergency to protect the personal safety of any person.

6. Specific regulations that may apply to Your personal data

A. Personal data regulation in the European Economic Area

i. Legal basis for processing Your personal information

If You are a visitor or user based in the European Economic Area (“EEA”), ForePaaS SAS is the data controller of Your personal information unless the data is collected in circumstances where one of Our affiliates is running a local event, training session or survey, for example, and they collect and control that information. In such circumstances, we will endeavor to make this clear to You in a context specific notification at the point we collect Your personal information.

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information only where we have Your consent to do so, where we need the personal information to perform a contract with You or where the processing is in Our legitimate interests and not overridden by Your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from You.

ii. Your privacy rights

If You are a resident of the EEA, You have the following data protection rights:

- if You wish to access, correct, update or request deletion of Your personal information, You can do so at any time by contacting us as further explained in section 11 of this Policy;
- You can object to processing of Your personal information, ask Us to restrict processing of Your personal information or request portability of Your personal information by contacting us as further explained in section 11 of this Policy; and
- You can withdraw Your consent at any time by contacting us as further explained in section 11 of this Policy. Withdrawing Your consent will not affect the lawfulness of any processing we conducted prior to Your withdrawal, nor will it affect processing of Your personal information conducted in reliance on lawful processing grounds other than consent. If you withdraw Your consent, We may be unable to continue to provide or support Our products or services.

B. Personal data regulation in California

The California Consumer Privacy Act of 2018 (“CCPA”) requires businesses that collect personal information of California residents to make certain disclosures regarding how they collect, use and disclose such information. This section addresses those requirements. For a description of all of Our data collection, use and disclosure practices, please read this Privacy Notice in its entirety.

i. Collection and sharing of Your personal information

We do not sell personal information as We understand sale to be defined by the CCPA and its implementing regulations.

The categories of personal information We collect about You and the third parties with whom we share that personal information for a business purpose are as follows:

Categories of Personal Information We Collect	Categories of Third Parties with Which We Share Information for Business Purposes
Identifiers (such as name, address, email address)	Corporate affiliates, vendors, service providers and third-party business partners
Any categories of personal information described in subdivision (e) of Section 1798.80 (such as address, telephone number, financial information)	Vendors, service providers, and third-party business partners
Legally Protected Classifications (such as gender)	Vendors and service providers
Commercial Information (such as transaction data)	Vendors, service providers, and third-party business partners
Internet or Other Network or Device Activity (such as browsing history or app usage)	Vendors and service providers
Approximate Location Information (such as location inferred from Your IP address, city, country)	Vendors and service providers
Professional or Employment-Related Data (such as the name of Your employer)	Vendors, service providers, and third-party business partners

ii. Sources of Personal Information

The sources from which We may collect Your personal information are described in Sections 1, 2 and 3 above.

iii. Purposes for Collecting Personal Information

We may collect personal information identified in the lists above to communicate with You, for marketing and promotional purposes, to provide and improve Our products or services and other purposes set forth in Section 4 above.

iv. California Consumer Rights

California law gives California residents the right to make the following requests with regard to certain information we collect about them, at no charge, two times every 12 months:

- the right to request a copy of personal information We collected or disclosed for a business purpose in the past 12 months.;
- the right to request deletion of Your personal information We collected, subject to certain exemptions (for example, where the information is used by us to detect security incidents, debugging or to comply with a legal obligation); and
- the right to request that We disclose Your personal information We collect, use and disclose.

You can submit a copy, deletion or right-to-know request online by contacting us as further explained in section 11 of this Policy.

If you ask Us to delete Your personal information, We may be unable to continue to provide or support Our products or services.

We do not discriminate against You for exercising Your rights or offer You financial incentives related to the use of Your personal information.

7. Security of Your personal information

We take all reasonable and appropriate steps to protect Your personal information in an effort to prevent loss, misuse, and unauthorized access, disclosure, alteration and destruction.

We use appropriate technical and organizational measures to protect Your personal information which may include: physical access controls, encryption, internet firewalls, intrusion detection and network monitoring depending on the nature of the information and the scope of processing.

Our staff who may have access to Your information are contractually required to keep that information confidential.

8. International data transfer of Your personal information

Your personal information may be transferred to, and processed in, countries other than the country in which You are resident. These countries may have data protection laws that are different to the laws of Your country, and in some cases, may not be as protective.

Specifically, Our Website servers are located in the EEA and in Canada and We may process Your information in jurisdictions where Our affiliates and third-party service providers are located. However, when We transfer Your personal information, we will take appropriate steps to ensure Your privacy rights continue to be protected in accordance with this Policy.

9. Your information choices and changes

You may opt out of receiving promotional emails from us by following the instructions in those emails. If You opt out, we may still send You non-promotional emails, such as emails about Your accounts, Our legal terms or Our ongoing business relations.

10. Retention and deletion of Your personal information

We retain personal information We collect from You where We have an ongoing legitimate business need to do so (for example, to manage Your use of Our Platform or Our Website, comply with applicable legal, tax or accounting requirements, to enforce Our agreements or comply with Our legal obligations).

When we have no ongoing legitimate business need to process Your personal information, we will either delete or anonymize Your personal information or, if this is not possible (for example, because Your personal information has been stored in backup archives), then we will securely store Your personal information and isolate it from any further processing, until deletion is possible.

11. How to contact Us

If You have any questions about this Policy, please contact us:

- By email at privacy@forepaas.com.
- By mail:
 - if You reside in the USA, at ForePaaS Inc., 2415 3rd St, San Francisco CA94107, USA,
 - otherwise, at ForePaaS SAS, 8 rue des Graviers, Neuilly-sur-Seine, France.