

# **Privacy Policy**

Welcome to bolddigitalvision.com. This privacy policy ("Privacy Policy") applies to the to bolddigitalvision.com website (the "Website"). The Website is provided and controlled by Bold Digital Vision SAS ("we" or "us").

Aside of the Website, this Privacy Policy does not apply to any products or services from Bold Digital Vision SAS, its subsidiaries or affiliated entities, which may display or reference their own privacy policies. If you submit an application or sign into the jobs section of this Website, your Information is subject to the Privacy Policy for Job Applicants.

If you are located in the EU and have any questions about how we use your Information, please contact our EU representative or our Data Protection Officer at privacy@bolddigitalvision.com.

#### What Information do we collect?

We collect certain information when you visit the Website or choose to interact with us. More information about the categories and sources of information is provided below. In this Privacy Policy, "Information" means any information relating to an identified or identifiable individual.

### Information we collect automatically

- **Device Information.** When you visit the Website, our web servers automatically log Information about your device such as your Internet Protocol (IP) address, device identifiers, device type, device's operating system, browser and other software including type, version, language, settings, and configuration.
- **Usage Information.** We collect Information regarding your use of the Website, including the URL of the website from which you came to our sites, pages you viewed, how long you spent on a page, access times, and other details about your use of and actions on the Website.
- **Location Information.** When you use our Services, we may infer your general location information (such as city, state, and country), for example, by using your internet protocol (IP) address.

We may use cookies and other similar technologies to collect this information. For more information about the types of cookies we use, please see the Cookies section below.

#### Information you choose to provide

**Communications with us.** If you contact us directly, we may receive additional information about you. For example, when you contact us for support, we may receive your name, email address, the contents of a message that you may send to us, and other information you choose to provide.



# How we use your information

We use the categories of information listed above to operate, administer, and improve the Website and for other legitimate business purposes, including:

- **Providing the Website.** To provide and administer the Website, including securing, troubleshooting, improving, and personalizing the site.
- **Business Operations.** To operate our business, such as improving our operations, securing our systems, detecting fraudulent or illegal activity, and meeting our legal obligations.
- **Website Improvement, Development, and Research.** To improve our Website, develop new Website or features, and conduct research.
- **Personalization**. To understand you and your preferences to enhance your experience and enjoyment using our Website.
- **Customer Support.** To provide customer support and respond to your questions.
- **Communications**. To send you information, including support and administrative messages. the reasons set out in the **Cookies** section below.

We may aggregate or de-identify the Information we collect. This personal information is aggregated or de-identified in such a way that it is no longer Information within the meaning of this Privacy Policy.

### Legal bases (for users in the EU/EFTA/UK)

If you are located in a Member State part of the European Union (EU)/ European Free Trade Association (EFTA) or in the United-Kingdom (UK), we only process your Information when one of the following legal bases can be relied on:

- **Consent.** You have consented to the use of your Information, for example to send you direct marketing.
- **Contractual necessity.** We need your Information to provide you with the Website, for example to respond to your inquiries.
- **Compliance with a legal obligation.** We have a legal obligation to use your Information, for example to comply with tax and accounting obligations.
- Legitimate interests. We or a third party have a legitimate interest in using your Information. In particular, we have a legitimate interest in using your Information for product development and internal analytics purposes, and otherwise to improve the safety, security, and performance of the Website. We only rely on our or a third party's legitimate interests to process your Information when these interests are not overridden by your rights and interests.

# How we share your information

We do not sell any Information collected from the Website. However, there are some limited circumstances in which we may share the categories of Information we collect for legitimate business purposes, as described below.

**Service Providers.** We share Information with service providers acting as agents on our behalf, as necessary for them to help us with our business operations. For example, these may include web hosting, customer support or auditing vendors.



Within Our Corporate Group. We may share Information with a parent, subsidiary, or other affiliate of our corporate group.

In Connection with a Sale, Merger, or Other Business Transfer. We may share Information in connection with a substantial corporate transaction, such as the sale, a merger, consolidation, or in the unlikely event of bankruptcy.

For Legal Reasons. We may disclose Information to comply with the law and respond to subpoenas, court orders, legal process, law enforcement requests, legal claims, or government inquiries, and to protect and defend our rights, interests, safety, and security and that of our users and the public.

With Your Consent. We may share Information for other purposes with your consent or at your direction.

### Your choices and rights

There are several ways you can control the collection and use of Information. For example, you may be able to use operating system and web browser controls to prevent certain types of automatic data collection and to limit the information shared with the websites you visit. You can also configure your web browser to block or delete cookies.

If you receive promotional email or SMS messages from us and would like to stop, you can do so by following the directions in that message. Note that these choices do not apply to replies to communications you send us or to any mandatory service communications we may send.

# **European data protection rights**

If the processing of Information about you is subject to European Union data protection law, you have certain rights as a data subject in relation to your information. While some of these rights are general and unrestricted, other rights only apply in certain circumstances.

#### Your rights include:

- Access: you can request a copy of the Information which we hold about you and certain additional details regarding how we process your Information.
- Rectification: you can request rectification of your Information if it is inaccurate or incomplete. Restriction: you can request that we restrict our use of your Information.
- Deletion: you can request that we erase your Information.
- Objection: you can object to the processing of your Information where our legal basis for processing your data is our legitimate interests.
- Portability: you can request a copy of Information you provided to us to be transferred.
- Consent: you can withdraw your consent where we relied upon it in a particular respect (though that does not affect the lawfulness of what we do up until that point).

Before we can respond to a request to exercise one or more of the rights listed above, you may be required to verify your identity and/or your account details.



To make such requests, contact us at the email address provided at the bottom of this policy. You also have the right to lodge a complaint with a supervisory authority, but we encourage you to first contact us with any questions or concerns.

### California privacy rights

If you are a California resident, you have certain rights with respect to the Information we collect. You have a right to request access to or deletion of the Information we have collected about you, and to receive additional information about our collection, use, disclosure, or sale of such Information. To provide or delete specific pieces of Information we will need to verify your identity to the degree of certainty required by law. Because we do not authenticate users on the Website, for much of the Information we collect, such as the device information and usage information described above, there is no reasonable method by which we can verify your identity as the person to whom that data relates.

To make requests, please contact us at the email address provided at the bottom of this policy. You may designate, in writing or through a power of attorney, an authorized agent to make requests on your behalf to exercise your rights under the CCPA. Before accepting such a request from an agent, we will require the agent to provide proof you have authorized it to act on your behalf, and we may need you to verify your identity directly with us.

You also have a right to opt-out from sales of Information. However, as noted above, we do not sell Information collected from this Website and have not done so in the past 12 months. Finally, you have a right to not be discriminated against for exercising these rights set out in the CCPA.

# Where we Store your Data

The Information that we collect from you will be transferred to, and stored at, a destination outside of the European Economic Area ("EEA"). Where we transfer your Information to countries outside the EEA, we use standard contractual clauses approved by the European Commission, or other alternative mechanisms which are permitted under EU law.

#### Security

We use reasonable measures to help protect information from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction. However, please be aware that no data storage or transmission system can be guaranteed to be completely secure.

#### **Data Retention**

We retain Information for as long as necessary to provide the operate the Website, respond to your inquiries, comply with our legal obligations, resolve disputes, enforce our agreements, and other legitimate and lawful business purposes. When determining the specific retention period, we take into account various criteria, such as the type of service provided to you, the nature and length of our relationship with you, and mandatory retention periods provided by law. If data is no longer needed in an identifiable form, we may retain certain information in an aggregated and anonymized form.

#### **Cookies**



### Types of Cookies we use

We use strictly **necessary cookies** on this Website. These tracking technologies are essential to provide you with the Website and the features you have requested, such as to allow you to log into secure areas of the Website. Because these technologies are essential for the Website and the features you have requested to work, you cannot decline these tracking technologies.

We use first-party tracking technologies (set by Bold Digital Vision) for the following essential purposes:

- Optimizing and improving access to the Website
- Preventing fraud and detecting non-human (bot) traffic User authentication and secure logins
- Traffic scheduling and network distribution

# **Changes**

When we update the Privacy Policy, we will notify you by updating the "Last Updated" date at the top of this policy and posting the new Privacy Policy and providing any other notice required by applicable law. We recommend that you regularly review the Privacy Policy to stay informed of our privacy practices.

#### **Contact**

Questions, comments and requests regarding this policy may be sent to <a href="mailto:privacy@bolddigitalvision.com">privacy@bolddigitalvision.com</a>.