

#### Artrade.App

#### **Privacy and Data Protection Policy**

Last updated: January 27, 2022

Your privacy is important to us and we pay special attention to it. This Personal Data Protection Policy ('the Data Protection Policy') describes the information we collect about you through or through, in whole or in part, our website or one of our social media pages, but also more generally in the context of your dealings with us, and how we process it (see information on how your personal data is collected, processed and used).

This Data Protection Policy also specifies the rights that you have over your personal data pursuant to applicable legal and regulatory provisions.

If you have any questions, comments or concerns about this policy, you may of course direct them to us at the contact information *below* under "What are your rights and how do you exercise them?"

#### 1. Definitions

In addition to the terms defined elsewhere in this policy, the following terms, the first letter of which is in capital letters, whether used in the singular or plural in this policy, shall be defined as follows:

- 1.1. 'Consignee': means the natural or legal person, public authority, service or any other body that receives communication of Personal Data, whether or not it is a third party.
- 1.2. 'Personal data' means: means any information relating to an identified or identifiable natural person ('the data subject'); 'identifiable natural person' means a natural person who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier, or to one or more specific elements specific to his physical, physiological, genetic, mental, economic, cultural or social identity.
- 1.3. 'Controller' means: means the natural or legal person, public authority, service or other body which, alone or together with others, determines the purposes and means of the Treatment.
- 1.4. 'Subcontractor' means: means the natural or legal person, public authority, service or other body that processes Personal Data on behalf of the Controller.
- 1.5 'Treatment': means any operation or set of operations carried out or not carried out using automated processes and applied to data or sets of Personal Data, such as collection, recording, organization, structuring, preservation, adaptation or modification, retrieval, consultation, use, communication by transmission, dissemination or any other form of making available, reconciliation or interconnection, limitation, erasure or destruction.

#### 2. Who are we and what is our role in the processing of personal data?

2.1. ARTRADE.APP (also referred to as the 'Company' or 'we' in this policy) a *société par actions simplifiée* incorporated in France within the company registry of Paris under number 902 799 212 and a registered office at 39, rue de la Gare de Reuilly - BP 20006 75560 Paris cedex 12, France, contact email address: <a href="mailto:support@artrade.app">support@artrade.app</a>

Its main activity is the creation, development, marketing, operation of applications, software and secure platforms for mobile phones, smartphones, tablets, computers and derivatives, in particular in the field of new technologies and online sales, as well as the acquisition, subscription, ownership, management and disposal, in any form, of all shares and securities in all companies or legal entities.

To learn more about our company, <a href="https://artrade.app/legal/LN-en.pdf">https://artrade.app/legal/LN-en.pdf</a>

- 2.2. The Company operates the publicly accessible websites at the following URLs: <a href="https://artrade.app">https://artrade.app</a> and <a href="https://artrade.sale">https://artrade.sale</a> ("the Site"). This Site is intended for:
  - make available to users information enabling them to discover the activity and services offered by the Company, as well as its news (events, publications, etc.);
  - offer features and/or information that enable users to contact the Company and present the services offered by the Company, the projects carried out by the Company and to come, or the team working on these projects;
  - provide users with an online account and access to a platform and various related services as detailed in our terms and conditions <a href="https://artrade.app/legal/TC-en.pdf">https://artrade.app/legal/TC-en.pdf</a>;

The Company also administers pages presenting its activity and allowing it to publish content on social networks and to interact with Internet users (notably on Facebook, Instagram, Twitter, YouTube, Pinterest, Telegram, Discord, Reddit, or LinkedIn).

During your browsing and interactions on the Site, on the pages administered by the Company on social networks or, in general, during your interactions or exchanges with the Company, the latter may collect and process Personal Data concerning you, for the management of the activities it carries out and on its own behalf, as Data Controller, whether you are a customer, prospect, contact, Internet user, candidate, supplier, provider or partner, potential or actual (also referred to as "you" or "the person(s) concerned" or "the user(s)" in this policy).

In this context, the Company applies the principles defined by the legal and regulatory provisions on the protection of personal data, in particular in Regulation (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data ("GDPR") or Law 78-17 of 6 January 1978 on data processing, files and freedoms ("Data Protection Act") and its implementing decrees.

## 3. How do you collect your Personal Data?

- 3.1. Your Personal Data are collected directly from you, or indirectly from third parties.
- 3.1.1. In particular, your Personal Data are collected or processed in whole or in part during your browsing on the Site, your interactions with the Site, and your entering of information in the data collection forms that may appear on the Site, but also more generally in the context of requests that

you may have to send to the Company by any means at your convenience, your relationship and your exchanges with the Company, as well as when you share content on the Site by means of sharing "buttons" on social networks that may be offered on our Site, or when you browse on one of the Company's pages on the Site social networks.

In general, your Personal Data are therefore collected directly from you in the above-mentioned cases.

3.1.2. However, your Personal Data may also be collected through third parties (see indirect collection from third parties).

The Personal Data we collect and process about you may be collected or enriched by us, in particular for the purpose of conducting commercial operations, communication, solicitation, marketing or marketing, by means of other sources of information (social networks, so-called "public" information, websites, file rentals, etc.).

Similarly, your Personal Data may be transmitted to us by other staff members/contacts within your company or through third parties in certain situations.

Furthermore, in particular with regard to the Personal Data processed in the context of our recruitment operations (for a job or for an internship), we use the information you provide us (e.g.: form completed for this purpose or more generally information mentioned in your CV) that we integrate into our candidate file (CVthèque). However, we may also have to approach third parties (for example, recruitment agencies, previous employers, trainees or clients with whom you have worked in the context of previous missions) or use other sources of information (in particular professional social networks, recruitment firms or sites specialized in recruitment) in order to collect information about you with a view to studying your application or your professional profile. In addition, and even in the absence of your application, we may, in particular in the context of our monitoring and active search of professional profiles that may correspond to our job offers to be filled, collect Personal Data from third parties (for example recruitment agencies or 'headhunters') or use other sources of information (including professional social networks or websites specialized in recruitment) in order to collect information about you with a view to proposing to you to apply for one of our job offers.

- 3.2. In addition, you are generally informed that as a matter of principle:
  - if the Processing of your Personal Data is necessary for the fulfillment of our legal or regulatory obligations, the collection of such Data is mandatory;
  - if the Processing of your Personal Data is subject to your consent, the communication to us of said Data is entirely optional (it being specified that their absence of communication could however have the consequence of preventing us from implementing the Processing concerned to *a minimum* in certain cases);
  - if the Processing of your Personal Data is necessary for the performance of a contract or precontractual measures taken at your request, the communication of such Data is necessary for
    the pursuit of this purpose and the Company could, in the absence of communication of such
    Data, be prevented from performing its contractual obligations or the above-mentioned precontractual measures;
  - if the Processing of your Personal Data is based on the pursuit of our legitimate interests, the communication of such Data is necessary for the pursuit of this purpose, and the absence of communication of your Data may not allow us to implement or impede the Processing concerned. For example, in the absence of information that would be necessary to respond to a request from you (request for information, etc.), your request related to this collection of Personal Data may not be able to be processed or its processing delayed.

Special case: If personal data collection forms (for example, forms integrated on the Site or within our pages on social networks, or any form of collection in any format that we may have to make available to you to collect information about you) involve the entry of personal data required for the implementation of the associated processing, the fields concerned will include an asterisk and you will be informed of the possible consequences of a failure to communicate this information. If there is no asterisk, the information requested is optional. In the absence of a specific form, the data required for the purposes pursued will be indicated to you, with the proviso that data not indicated as mandatory are of course optional.

- 3.3. Except for specific legal obligations, or otherwise specified in this policy, we do not collect any "specific" Personal Data, i.e., which would reveal racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic or biometric data for the purpose of uniquely identifying a natural person, or data concerning the health or sexual life or sexual orientation of a natural person.
- 3.4. Personal data of minors or protected adults: we only offer our services to adults with legal capacity. Therefore, in general, the use of the Site and the dedicated pages of the Company on social networks is reserved to persons of full age with legal capacity, the Company cannot under any circumstances be held responsible for the use of the Site or its pages on social networks by minors or incapacitated persons, and therefore for the consequences that may result in particular in relation to the Processing of their Personal Data.

By way of exception, we may have to process Personal Data of minors aged at least fifteen years when they come into contact with the Company with a view to applying for a job or internship offer.

# 4. What Data is collected, for what purposes of Processing, on what basis and for what duration?

- 4.1. As Data Controller, we may implement Processing of your Personal Data for the following purposes:
  - a. Management, processing and follow-up of requests for information and exchanges with users, initiated via or by means of the Site or the Company's pages on social networks, or by any other means, and more generally the Company's relations with its contacts in the broad sense:
    - Purpose of Treatment: we process your Personal Data in order to ensure the processing, management and follow-up of any request for contact or information addressed by you, by any means and in particular via the Site or via interactions on our social network pages (including in particular the management, processing, follow-up and possible moderation of your messages or comments), and to ensure the processing, management and follow-up of such requests and the responses to them, and more generally for the purposes of managing our relations with our contacts in the broad sense.
    - <u>Data processed</u>: identity (courtesy, name, first name), user name or pseudonym/alias, contact details (including postal address, telephone number or e-mail address), function and home company if applicable, request for contact, information or documentation and correspondence exchanged.
    - <u>Legal basis of the Treatment</u>: the Processing of your Personal Data in this context is necessary for the pursuit of the legitimate interests of the Company to respond to your requests, to make you benefit from the functionalities offered on the Site and more generally to ensure the management and the follow-up of its relations with its contacts.
    - <u>Data retention time</u>: for the period necessary to respond to your request or to manage your relationship with the Company and then, if applicable, for a period of three years following the end of your relationship with the Company or from the date of your last

contact with us, for the purpose of managing our relationship with our contacts in the broad sense, in particular for the purposes of prospecting under the conditions and arrangements set out below in g. and h. of this paragraph.

# b. Managing our relationships with our clients (pre-contractual, contractual and post-contractual relationships):

Purpose of Treatment: in order to manage our pre-contractual, contractual and post-contractual relations with our customers, we collect Personal Data from our customers and/or from our contacts with our customers to ensure the provision, management and monitoring of your online account, the management and monitoring of the services provided, the conclusion and execution of contracts, payments and transactions, the related billing/accounting, the customer relationship in the broad sense, and in particular the management and monitoring of customer accounts, claims, litigation and unpaid claims, as well as for the conduct and preparation of studies, analyzes, reports and trade statistics.

#### - <u>Data processed</u>:

- o identity (civility, name, first name, identifier, date of birth),
- o contact information (e-mail address, postal address, telephone number, etc.),
- o login and password (encrypted) for your online account as well as data related to the connections to that account (including information collected / used in the context of double authentication) and the operation of the account,
- o nationality.
- Legal basis of the Treatment: as regards the personal data of customers, such processing is in principle necessary for the performance of pre-contractual measures taken at the request of the customer or of a contract concluded with the latter. Moreover, the subpurposes of this Processing relating to the management and monitoring of our relations with our clients in the broad sense (including in particular the management and monitoring of accounts receivable, claims, or the conduct and preparation of studies, analyzes, reports and statistics, etc.) are necessary to the pursuit of our legitimate interests to ensure its proper management. As regards Personal Data of contacts with our customers, the Processing is based on our legitimate interests in managing and monitoring our relations with our customers in the broad sense, in particular with a view to the organization and proper execution of the tasks or services entrusted to us by them. Finally, as regards, in particular, the management of the invoicing and the keeping of the associated accounts, such Processing may result from legal obligations of the Company.
- <u>Data retention time:</u> retention for the duration of our relationship\* and, if applicable, for a period of three years following the end of your relationship with the Company or from the date of your last contact with us, for the purpose of managing our customer relationships in the broad sense, in particular for the purposes of prospecting under the conditions and arrangements set out below in g. and h. of this paragraph.
  - \*Special case: In the absence of a user's connection to his online account for a period of two years, and provided that no assets are held in that account, the Company shall close and delete that account, and the Associated Data, without prejudice to the Company's ability to retain some of such Data for other purposes under the terms and conditions set forth in this paragraph.
- Other Processing Managers: Users are informed that, in the context of the use of the services accessible through the Website, in particular services enabling transactions on digital assets, their Personal Data may be processed by third parties intervening in the context of those services. These third parties are independent entities of the Company, and implement their own respective Personal Data Processing, for which they are solely responsible for processing, the Company having no power to determine such Processing or to control such Processing. Users are also invited to consult the personal data protection policies of these entities and other documentation that could be made available by these entities with regard to the processing of personal data they implement

- (see in particular paragraph "Who are the Recipients of your Personal Data? How do we share your Data?").
- Caution: as a result of the use of the services accessible through the Site, the Personal Data of users may be processed and stored within the blockchains used in the management, monitoring and processing of transactions in digital assets as they are necessary for the functioning of those blockchains. Therefore, it is made clear to the user that such Processing is in any event not the responsibility of the Company, which does not manage or control such blockchains, and therefore has no power of determination or control over the Processing of Personal Data that may be implemented in the context of such blockchains.

# c. Managing our relationships with our partners, including our current and potential suppliers and suppliers:

- Purpose of Treatment: in order to manage our relationships with our partners, we collect Personal Data concerning our current and/or potential partners, and/or their staff members, and/or more generally our contacts with our partners (e.g. partner staff, contractors/consultants at the partner, etc.). The purpose of this Processing is to search for new partners, to manage, monitor and respond to requests from partners, quotes or proposals for services, as well as to manage partners and/or our relations with them, including in particular the management and monitoring of the execution of contracts, orders/deliveries entrusted, deliveries, invoices, payments and transactions, of associated accounting, and in particular the management and monitoring of partner accounts, of the partner relationship in the broad sense and of any claims or prelitigation/litigation.
- <u>Data processed</u>: identity (courtesy, name, first name), contact details (e-mail address, postal address, telephone number, etc.), home company and function, information on requests for partnerships, quotes and proposals for services, details of orders/services/contracts, data on payments and means of payment, data on transactions, data on monitoring of contracts and the relationship, data on invoices.
- Legal basis of the Treatment: as regards the personal data of the natural partners, such processing is in principle necessary for the performance of pre-contractual measures taken at their request or of a contract concluded by the latter with the Company. With regard to the Personal Data of contacts with partners, the Processing is based on the legitimate interests of the Company to ensure the management and monitoring of its relations with its partners, in particular with a view to the organization and proper execution of the missions or services entrusted to them. In any event, the sub-purposes of this Processing relating to the search for new partners and to the management and monitoring of the Company's relations with its partners in the broad sense (including in particular the management and monitoring of the partner accounts, or of any claims or pre-litigation/litigation, etc.) are necessary for the pursuit of the legitimate interests of the Company in the context of the search for new partners and the monitoring of the proper execution of the contracts concluded with the partners. As regards the Personal Data of other data subjects (staff members/contacts with our partners), the Processing is based on our legitimate interests in managing and monitoring our relations with our partners, in particular with a view to the organization and proper execution of the tasks or services entrusted to them. Finally, as regards, in particular, the management of invoices and the keeping of associated accounts, such processing operations may result from legal obligations of the Company.
- <u>Data retention time</u>: the duration of the pre-contractual (for potential partners), contractual or commercial (for current partners) relationship with the Company.

#### d. Organization, management and follow-up of events:

- <u>Purpose of Treatment</u>: We may process Personal Data about you in the context of the management and follow-up of the events we offer (organization of interventions, management, processing and follow-up of registrations, responses to inquiries, etc.).
- <u>Data processed</u>: identity, contact information, job title and home company, registration information and event participation information.
- <u>Legal basis of the Treatment</u>: In general, the Processing of your Personal Data in this case is necessary for the organization and management of events, and therefore based on the performance of a contract to which you are a party (see contract of registration to the event).
- Data retention time: for the period necessary for the organization and follow-up of the event, and then, where appropriate, for a period of three years following the end of your relationship with the Company or from the date of your last contact with us, for the purpose of managing our relationship with our contacts in the broad sense, in particular for the purposes of prospecting under the conditions and arrangements set out below in g. and h. of this paragraph.

#### e. Prospecting/soliciting by mail or telephone:

- Purpose of Treatment: we may process the Personal Data of our customers, prospects, and more generally contacts for the purpose of carrying out our commercial operations, communication, solicitation, marketing, loyalty or marketing (including technical operations of segmentation, targeting, etc.) by post or telephone, in particular with a view to sending them certain information for this purpose by this means (namely: email, sms, mms): products and services that may be of interest to them, information on our news and/or activities, other information or prospecting documents, or studies, surveys, promotions or satisfaction surveys.
- <u>Data processed</u>: identity, contact information.
- <u>Legal basis of the Treatment</u>: such processing is carried out on the basis of the pursuit of our legitimate interests to make our products and services known on the market, and more generally to carry out communication operations, knowing that <u>the recipient of such surveys has in any event the right to object at any time without having to provide any reason or explanation in the manner and under the conditions set out below in the paragraph "What are your rights and how to exercise them?"</u>
- Data retention time: three years from the date of the collection of Personal Data or the end of our relationship, or the last contact from the Data Subject to us (for example, for a customer, from the date of a transaction or the use/performance of a service, the end of a service contract or the terms and conditions binding us or the last contact from the customer and, for a prospect, from the date of the last contact from the customer (online request, e-mail or postal mail, telephone call, or click in an e-mail addressed to him by the Company, etc.)).

#### f. Prospecting e-mail solicitation:

- Purpose of Treatment: we may process the Personal Data of our customers, prospects, and more generally contacts for the purpose of carrying out our commercial operations, communication, solicitation, marketing, loyalty or marketing (including technical segmentation operations, targeting, etc.) by e-mail, in particular with a view to sending them certain information for this purpose by this means (namely: email, sms, mms): products and services that may be of interest to them, information on our news and/or activities (e.g. newsletter), other information or prospecting documents, or surveys, surveys, promotions or satisfaction surveys. We may also need to analyze the performance of our marketing campaigns by means of so-called tracking information relating to your actions with regard to the emails we send.
- <u>Data processed</u>: identity, e-mail address, data about actions performed in e-mails (opening, clicking, etc.).
- <u>Legal basis of the Treatment</u>:

- where such transactions are not subject to the prior consent of the persons concerned, that is to say in the cases where they are (i) for the attention of professionals, on a professional email address and in relation to the profession of the person to whom they are addressed, or (ii) for customers and relate to products or services offered by us which are analogous to those already provided by us to that customer, then such processing is carried out on the basis of our legitimate interests in making our products and services known on the market, and more generally to carry out prospecting and solicitation operations in the broad sense, it being specified that the recipient of such prospecting has everything in the right to object at any time without having to provide a reason or explanation in the manner and under the conditions set out below in paragraph 'What are your rights and how to exercise them?';
- o in other cases, such Processing is based on the consent of the Data Subject, which means that the Data Subject has the possibility of not consenting to it or, if he consents to it, of subsequently withdrawing his consent at any time, and without having to provide any reason or explanation in the manner and under the conditions set out below in the paragraph 'What are your rights and how to exercise them?'.
- <u>Data retention time</u>: three years from the collection of Personal Data or the end of our relationship, or the last contact from the Data Subject to us (e.g. for a customer, from a transaction or use/performance of a service, from the end of a service contract or the terms and conditions binding us, or from the last contact from the customer and, for a prospect, from the last contact from the customer (online request, e-mail or postal mail, telephone call, or click in an e-mail addressed to him by the Company, etc.).algorithm
- g. Use of cookies or other similar technologies for the purpose of monitoring navigation, including the conduct and development of studies, analyzes, reports and statistics, the management and monitoring of the proper functioning of the Site, the improvement of the user experience, the provision of certain services or certain functionalities on the Site, the monitoring and measurement of the audience and performance of the Site, and the display of advertisements, possibly targeted (excluding social networks or functionalities related to social networks):
  - Purpose of Treatment: In the context of your use of the Site and more generally of our digital media (excluding social networks or functionalities related to social networks), we process Personal Data concerning you in particular for the purposes of monitoring navigation, including the conduct and development of studies, analyzes, reports and statistics, management and monitoring of the proper functioning and in particular the security of our Site and the improvement of the user experience, the provision of certain services or functionalities on the Site, and monitoring and measuring the audience and performance of the Site. Personal Data relating to you may also be collected and processed in order to allow the display to your attention on the Site or on the websites of third parties of advertisements, possibly targeted (or behavioral or programmatic advertisements) according to your profile, your navigation, your location (see geolocated advertising) and your interactions with the websites you visit. This Personal Data is collected by means of cookies or other similar technologies whose use is subject to your consent and is therefore optional.
  - <u>Data processed</u>: session, connection and Internet browsing data, including information about your browser or terminal and their configuration (e.g. device fingerprinting, unique device identifier, display resolution, operating system, IP address, internet browser, type of terminal, etc.), history and more generally traffic and navigation information on the Site, information relating to the traceability of actions on and interactions with the Site, information of the "identifiers" type related to your terminal, your hardware or your operating system, or information of the "scoring" type (e.g.: score bot to ensure that the user is not a robot), information about your preferences for

- browsing and using the Site or third-party websites, location data (e.g. IP address and geographical area), information about the network, your language, or personal data (age, gender, interests, etc.) that are not personal (i.e. specific to the user's identifier).
- Legal basis of the Treatment: where the Processing of your Data is for the exclusive purpose of enabling or facilitating communication by electronic means, or is strictly necessary for the provision of an online communication service at your express request, that is to say in general if this Processing is strictly necessary for the purposes of enabling you to browse our Site and benefit from the features offered, it is based on our legitimate interest in facilitating your browsing on our Site. In other cases, such Processing is in principle subject to your prior consent to the use of cookies and other similar technologies for the purposes mentioned above, which means that you have the possibility of not consenting to it or, if you consent, of subsequently withdrawing your consent at any time, and without having to provide any reason or explanation. To learn more about cookies, tracers and other similar technologies used by us and our partners on our Site, and how to set them, refer to our "cookie management policy" https://artrade.app/legal/CP-en.pdf
- Maximum lifetime of cookies and storage of Personal Data collected by this means: six months from the deposit of cookies in your browser or terminal (depending on the type of cookie or tracer concerned on this point, see our "cookie management policy" <a href="https://artrade.app/legal/CP-en.pdf">https://artrade.app/legal/CP-en.pdf</a>
- h. Use of cookies or other similar technologies for the purpose of tracking browsing, including the conduct and development of studies, analyzes, reports and statistics, making available and monitoring the functionalities of interactivity with social networks, improving the user experience, monitoring and measuring the audience and performance of the Company's pages on social networks, and displaying advertisements, possibly targeted (social networks and functionalities related to social networks):
  - <u>Purpose of Treatment</u>: for the purpose of providing functionalities for interactivity between our Site and the social networks, and for monitoring, understanding and studying the use of our social network pages and the interactions between our Site and the social networks, we may offer you on our Site links to our social network pages, set up said social network pages as an administrator or offer you to use on these networks the tools created/offered by these social networks. In this case, we process Personal Data relating to you in particular to make available to you the aforementioned interactivity functionalities (for example, buttons for accessing pages on social networks, etc.), but also to improve your user experience, measure the audience and performance of our pages on social networks and the interactions between our Site and said networks, and establish statistics in particular for navigation. Personal Data about you may also be collected and processed in order to allow the display to your attention on social networks of advertisements, possibly targeted (or behavioral or programmatic advertisements) according to your profile, your navigation, your location (see geolocated advertising) and your interactions with our pages on social networks and also with our Site or with the other websites you visit. This Personal Data is collected by means of cookies or other similar technologies whose use is subject to your consent and is therefore optional.
  - <u>Data processed</u>: session, connection and Internet browsing data, including information about your browser or terminal and their configuration (e.g. device fingerprinting), the history of traffic and navigation on our pages on social networks, information relating to the traceability of actions on and interactions with our pages on social networks or between our Site and social networks, information of the "identifiers" type linked to your terminal, your equipment, social networks or to your system of exploitation of the location data (IP address and geographical area for example), information relating to the network, to your language, or even personal data (age, gender, centers of interest...) not nominative (that is to say specific to the identifier of the Internet user).

- Legal basis of the Treatment: such Processing is subject to your prior consent to the use of cookies and other similar technologies for the purposes mentioned above, which means that you have the possibility of not consenting to it or, if you consent, of subsequently withdrawing your consent at any time, and without having to provide any reason or explanation. To learn more about cookies, tracers and other similar technologies used by us, click here to access our "cookie policy" <a href="https://artrade.app/legal/CP-en.pdf">https://artrade.app/legal/CP-en.pdf</a>
- Joint Processing Managers: When the setting we make of a social networking tool affects the nature of the Personal Data processed or the characteristics of this Processing, and more specifically when it can be considered that the Company contributes to determining jointly the purposes and/or means of processing Personal Data, we may be jointly responsible for the Processing of your Personal Data with the relevant social network. In this case, the social network, which primarily determines the purpose and means of processing, as well as the nature and manner of deposit of cookies, has the primary responsibility for the Processing and we recommend that you consult the privacy policies and the "cookie" policies of these third parties for detailed information on their practices for collecting and processing your Personal Data. This includes social media sites such as Instagram, Facebook, Pinterest, Youtube, Twitter and LinkedIn. You are informed that, with regard to these social networks, our joint controllers may be:
  - o regarding Facebook and Instagram: Facebook Ireland Limited, 4 Grand Canal Square, Grand Canal Harbor Dublin 2, Ireland. For more information on how Facebook processes your Personal Data when you use the Facebook or Instagram social network, please refer to the <u>Facebook Ireland Limited Data Use Policy</u> as well as the <u>Instagram Data Use Policy</u>, but also to the <u>Facebook and Instagram Cookies Policy</u>;
  - Regarding Twitter: Twitter International Company, One Cumberland Place, Fenian Street Dublin 2, D02 AX07 Ireland. For more information on how Twitter handles your Personal Data, please refer to Twitter's <u>Privacy Policy</u> and <u>Cookies Policy</u>;
  - with regard to LinkedIn: LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland. For more information on how LinkedIn processes your Personal Data, please refer to the LinkedIn <u>Privacy Policy</u> and <u>Cookies Policy</u>;
  - o with respect to YouTube: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. For more information on how Google processes your Personal Data when you use the YouTube social network, please refer to Google's <a href="Privacy Rules">Privacy Rules</a> as well as <a href="elements related to the use of "Cookies"</a> by Google;
  - with regard to Pinterest: Pinterest Europe Ltd, Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland. For more information on how Pinterest processes your Personal Data, we invite you to refer to Pinterest's <u>Privacy Policy</u> and <u>Cookies Policy</u>.
  - With regard to Discord: For information on how Discord processes your Personal Data, we invite you to refer to Discord's <u>privacy policy</u>.
  - As regards Reddit: For information on how Reddit processes your Personal Data, we invite you to refer to Reddit's <u>privacy policy</u>.
- Maximum lifetime of cookies and storage of Personal Data collected by this means: six months from the deposit of cookies in your browser or terminal (depending on the type of cookie or tracer concerned on this point, see our "cookie management policy" <a href="https://artrade.app/legal/CP-en.pdf">https://artrade.app/legal/CP-en.pdf</a>

#### i. Management of applications and recruitment process:

- Purpose of Treatment: the Company may need to process your Personal Data for the purpose of managing and monitoring applications, in response to job or internship offers or which are sent to us spontaneously, and operations relating to the recruitment process, including in particular the monitoring and active search of professional profiles corresponding to positions in power within the Company, the reception and study of applications, the evaluation and selection of applications and professional profiles, the creation of a candidate file (or CVthèque), the use of methods and techniques to assist recruitment (including psychotechnical tests, psychological tests, graphological analyzes or even graphic analyzes employment situations), the convening of candidates and the conduct of recruitment interviews, as well as the resulting decision-making (rejection of the application or recruitment of the candidate)
- <u>Data processed</u>: identity (courtesy, name, first name), contact details (e-mail address, telephone number, postal address, etc.), data relating to your professional life, information relating to your training (studies, diplomas, etc.), your experience and career path, your professional skills/references and the job you hold, information of an economic and financial nature, and all information contained in your CV (including your interests where applicable), and more generally in your application (including a letter of motivation, book, etc.).
- <u>Legal basis of the Treatment</u>: Such Processing is necessary for the pursuit of our legitimate interests in seeking and recruiting new collaborators.
- Data retention time: Your Personal Data are retained for the period necessary for the processing of your application, and may, unless you object, be retained until the expiry of a period of two years from the date of receipt of your application, for example to allow us to contact you during this period if a position related to your profile becomes available.

# j. Management by the Company of requests for the exercise of the rights of data subjects with regard to the protection of Personal Data, in accordance with its legal and regulatory obligations:

- Purpose of Treatment: to enable us to comply with our various legal and regulatory obligations regarding the protection of Personal Data (e.g. responding to requests for exercise of their rights by the data subjects, taking into account the consequences resulting in particular management of objections to prospecting, etc.), we may have to process Personal Data concerning you in connection with this purpose.
- <u>Data processed</u>: identity (civility, name, first name), contact details (e-mail address, telephone number, postal address, etc. depending on the information provided by the applicant), content and content of the application, exchanges and reply, additional information or copy of an identity document but only when the situation so requires (see reasonable doubts as to the identity of the applicant).
- <u>Legal basis of the Treatment</u>: such processing is necessary for the fulfillment of our aforementioned legal and regulatory obligations.
- Data retention time: time required for processing the request and possibly storage of the Data necessary to take account of the exercise of these rights for a period of three years from the request made by the Data Subject to the Company (it being specified that in the case of a request for opposition to prospecting, your data will be kept for this purpose in an opposition list for a period of three years and that when the copy of an identity document is collected as part of a request for the exercise of your rights, this is:
  - immediately deleted if it has been communicated to you, where the application does not require the transmission of such an identity document;
  - deleted as soon as the identity of the person making the request has been verified where the situation requires such verification.

#### k. Management and follow-up of pre-litigation and litigation

<u>Purpose of Treatment</u>: Such processing of personal data concerning you is carried out with a view to:

- the management and monitoring of pre-litigation and litigation (in particular commercial litigation / with customers, with partners / suppliers, with contacts in the broad sense, ...), including in particular the preparation, the exercise and the monitoring of litigation as well as the execution of decisions rendered:
- o the management and follow-up of actions for the purpose of establishing, exercising or defending a right in court (including, where appropriate, the enforcement of the judgment delivered).
- Data processed: identity (civility, first name, surname), civil status, economic and financial information, information on the persons involved, victims, witnesses, court officials mandated in the dispute/procedure (surname, first name, contact details, date of birth, etc.), history of exchanges with the Company (e.g. reminder letters, notices, pleadings and documents of the proceedings, etc.), information on the financial situation, but also economic and financial information relating to the dispute and to the persons involved, so-called 'specific' data, etc., and more generally all information if this is necessary in the light of the subject-matter of the dispute, including, where appropriate, data relating to criminal convictions or offenses or security measures, the facts at issue at the origin of the proceedings, the information, documents and documents collected with a view to establishing or refuting facts liable to be reproached (statement, testimony, attestation, formal notice, report, 'logs' extracts from a tool for securing computer resources, fact sheet, filing of complaints, medical certificate), the characteristics and details of pre-litigation but also of litigation (e.g.: date of commencement and closure of the dispute, court seised, date of summons, date of hearing, status of proceedings, nature and subject-matter of applications, grievances, arguments, observations and opinions of legal representatives, date of judgment), date, nature, reasons, amounts and possible staggering of convictions, comments on the description and follow-up of proceedings, etc.
- Legal basis of the Treatment: Such Processing of your Personal Data by the Company is based on the legitimate interests pursued by the Company to preserve/assert its interests and rights in legal proceedings, in particular in the execution of relations with its customers (actual or potential), partners (actual or potential), contacts, candidates, etc. Moreover, in the context of this Processing, so-called "specific" Personal Data may be processed for the above purposes if they are strictly necessary for these purposes and for the establishment, exercise or defense of a legal right. Similarly, data relating to offenses, convictions or security measures may be processed for the purpose of enabling us to prepare and, where appropriate, to pursue and follow legal proceedings as a victim, accused, or on behalf of a victim or accused, and to enforce the judgment.
- <u>Data retention time</u>: storage beyond the periods referred to above for each of the other purposes, in the form of archives, during statutory limitation periods, in particular for evidential purposes (see, in general, five years for the limitation period under ordinary law in civil matters, six years for the limitation period under ordinary law in criminal matters or two to five years for labor law).
  - In the event of pre-litigation initiated before the end of the periods above and which would require the retention of the Personal Data in particular for the purpose of the establishment, exercise or defense of the rights of the Company, the latter will be retained until the amicable settlement of the dispute (including its execution if necessary), or, failing that, will be deleted as soon as the relevant legal action has been statute-barred.
  - o In the event of litigation/proceedings, in particular judicial proceedings, initiated before the end of the periods above and which would require the retention of the Personal Data, in particular for the purpose of establishing, exercising or defending the Company's rights, these rights will be retained for the duration of the said proceedings and until ordinary and extraordinary remedies are no longer possible against the decision rendered. The decisions

pronounced may be kept by the Company until the complete execution of the decision, or even as a final record.

- 4.2. It is specified that your Personal Data may, however, be stored for longer than the periods mentioned above:
  - after obtaining your consent; or
  - in the form of an archive, to meet any legal and regulatory obligations imposed on the Company (e.g. ten years for the retention of accounting documents and supporting documents or the retention of contracts concluded by electronic means, five years for the Company's obligations in the fight against money laundering and terrorist financing, etc.) or during statutory limitation periods, in particular for evidential purposes (see generally five years for the limitation period under ordinary civil law, six years for the limitation period under ordinary criminal law or two to five years for labor law).
- 4.3. Furthermore, users are informed that, despite being deleted by the Company within its own information systems or databases, in accordance with the foregoing, certain Personal Data are not erasable, and therefore not deleted, within the blockchains used in the management, monitoring and processing of transactions in digital assets, as they are necessary for the functioning of those blockchains. Their storage is in any event not the responsibility of the Company, which does not manage or control these blockchains, and therefore has no power of determination or control over the Processing of Personal Data that may be implemented in the context of these blockchains, nor of deletion of Data within these blockchains.

# 5. Who are the Recipients of your Personal Data? How do we share your Data?

- 5.1. We ensure that only authorized persons within the Company may access your Personal Data where such access is, depending on the purposes pursued, necessary for the exercise of their functions and/or tasks, namely in particular:
  - authorized personnel (including employees, trainees, agency employees, etc.) of the Company, in particular in charge of marketing and communication, commercial, recruitment and human resources, customer relations and prospects, administrative, financial and legal, development, IT, projects, etc.
- 5.2. External Recipients may also receive your Personal Data, including:
  - the staff of the departments responsible for controlling our Company (auditors, departments responsible for internal or external control procedures, bodies authorized to carry out controls, etc.);
  - the staff of our legal, financial, etc. boards;
  - the personnel of our partners, including our suppliers and suppliers, who are subject to a contract specifying their obligations;
  - the staff of our partners, contractual or commercial, and of third-party companies, including in particular social network publishers, publishers of third-party websites or even cookie publishers used on our Site, for example for the performance of prospecting operations, communication operations, etc., or in the context of the management of our digital marketing, or even for the operation of our Site in the broad sense (e.g. availability and proper functioning of the features offered therein, performance, security, etc.). In this regard, it is also stated for the record that if you post content disclosing your Personal Data on the Internet, and in particular on our Site or on the pages of the Company's social networks, this content may of course be accessible to any Internet user;
  - staff of technical or other providers involved in activities or tasks for which access to Personal Data is strictly necessary and/or justified. This category of recipients may also include any application, computer program or tool publisher or any payment or verification service

provider (including identity service provider) that would be used in the course of our activities or for the purpose of providing you with the services accessible through the Site, or any computer or maintenance service provider of the applications, computer programs and/or tools that we use and in which your Personal Data may be processed;

- the Company's customers (potentially including their employees) for certain Personal Data;
- the staff of the social and tax bodies authorized to receive, in certain cases, the Personal Data;
- the staff of the bodies, court officers and ministerial officers, acting in particular in the context of their task of collecting debts;
- where appropriate, the staff of the body responsible for the management of the list of objections to telephone solicitation;
- judicial officers, ministerial officers and, where appropriate, staff of the courts or authorities competent to enable the sale or transfer of all or part of our activities or assets, or in the context of the management and follow-up of pre-litigation and/or litigation;
- our insurers and/or insurance brokers (including their staff).
- 5.3. Some partners or third parties (including their staff) are also Recipients of your Personal Data when you use the services accessible through the Site.

In this regard, it is specified that the Company is not responsible for the processing of personal data which could be implemented by these partners and third parties (or by any addressee), the latter implementing their own processing of personal data, for which they are respectively solely responsible for processing, the Company not having any power to determine such processing or to control such processing. For information purposes, the user is invited to consult the personal data protection policies of these entities and other documentation that could be made available by these entities with regard to the processing of personal data that they implement.

- 5.4. Furthermore, given the nature of the services offered and/or accessible through our Site, your Personal Data may naturally be communicated, stored, recorded within the various blockchains used in the management, monitoring and processing of the transactions you carry out, as they are necessary for the operation of said blockchains, it being recalled that the Company does not manage or control said blockchains, and therefore has no power of determination or control over the Processing of Personal Data that may be implemented within the framework of said blockchains, and that such Processing is in no way the responsibility of the Company.
- 5.5 We may also be required to disclose your Personal Data in the event of legitimate requests from public or authorized authorities, in particular in order to meet requirements relating to compliance with the law on Personal Data, national security, the fight against fraud, money laundering and terrorist financing or, more broadly, the application of legal or regulatory provisions. Your Personal Data may therefore in particular be communicated to any authority entitled to know it, in particular in the event of requisition from judicial, police or administrative authorities. In these cases, we will consider the applicable provisions, the nature of the request, as well as its legitimacy and the proportionality of the information requested. Finally, we reserve the right to report to public authorities activities that we consider in good faith to be illegal and alleged abuses.
- 5.6. It is specified that the above-mentioned Recipients are not necessarily or necessarily Recipients of all your Personal Data, but only those necessary for the purpose involving such communication.

# 6. What are your rights and how do you exercise them?

- 6.1. You have the following rights with respect to your Data, under the terms and conditions and within the limits defined by the legal and regulatory provisions on the protection of Personal Data:
  - Right of access: you may obtain confirmation that Personal Data relating to you are or are not being processed by the Company and, where they are, access to such Personal Data, as well as

- certain information relating to the Processing of your Personal Data and the characteristics of such Processing;
- Right of rectification: you may request the correction of your Personal Data which you consider incomplete or inaccurate;
- Right to erasure: you may, in certain circumstances, request the erasure of your Personal Data (unless, for example, it is necessary for the performance of your contractual relations with the Company, where applicable, or it is necessary for the Company to comply with its legal or regulatory obligations or to establish or exercise its rights);
- Right to Limitation of Treatment: you may request the limitation of the Processing of your Personal Data, allowing you to request in certain cases the marking of your Personal Data in order to limit its future Processing;
- Right to the portability of your Personal Data: you have the right, in certain circumstances and under certain conditions, to request to receive the Personal Data relating to you that you have provided to us or, where technically possible, to have them transferred to a third party, in a machine-readable form (provided that this right to data portability applies only to Processing based on the consent of the Data subjects or on the performance of contractual relationships, and this provided that the Processing of the Data is carried out using automated processes);
- Right to withdraw consent: you may withdraw your consent if the Treatment is implemented on the basis of your consent, without prejudice to the lawfulness of the Consent Treatment performed prior to the withdrawal of such consent;
- Right to set guidelines for the storage, erasure or communication of your Personal Data after your death. In this respect, in the event of death that is brought to our attention, know that your Personal Data will in principle be deleted (unless it is necessary to keep it for a fixed period for reasons relating to our legal and regulatory obligations and/or to the statutory limitation periods and/or retention periods referred to *above* in paragraph 4 in detail of the characteristics of the treatments), after if necessary having been communicated to a third party possibly designated by you.

Furthermore, you have, in certain cases and under certain conditions provided for by the applicable provisions, a <u>Right of objection</u> by which you can object to the Processing of your Personal Data for reasons relating to your particular situation, that being specified that, in the case of prospecting operations, including profiling operations which would be linked to such a prospecting, you have an absolute right of objection, which can be exercised at any time, without having to provide any reason or justification.

<u>Caution</u>: the exercise of these rights is, however, limited, as regards the Personal Data which would be necessary for the functioning of those blockchains (see in particular the Data stored/stored within blockchains used in the context of the management, monitoring and processing of transactions). This is because these Data necessary for the functioning of blockchains are neither modifiable nor erasable during the lifetime of the blockchain concerned. In addition, the retention/storage of such Data in such blockchains is not the responsibility of the Company, which does not manage or control such blockchains, and which therefore has no power of determination or control over the Processing of Personal Data that may be implemented in the context of such blockchains, nor to pass on the exercise by the Persons concerned of their rights to such blockchains.

6.2. As regards the Processing of your Personal Data implemented by the Company, these rights are exercised (i) by email to the following email address: <a href="mailto:dpo@artrade.app">dpo@artrade.app</a> or (ii) by post at 542 Chemin de Fontcuberte, 13770 Venelles. In all cases, in the event of a reasonable doubt as to the identity of the person making such a request for the exercise of his rights, the Company may always request that he be provided with additional information necessary to confirm the identity of the Person concerned and for this purpose, when the situation so requires, request a photocopy of an identity document bearing the signature of the holder. In such a case, the aforementioned response periods will be suspended pending receipt of the additional information necessary to identify the Person concerned.

If such a request is received, it shall be replied to as soon as possible and in any event within a maximum period of one month from receipt of the request. If necessary, this period may be extended by two months, taking into account the complexity and number of applications received, in which case the applicant will be informed.

The request may be made by the Person concerned or by a person specially authorized for that purpose by the Person concerned, provided that the authorized person proves his identity and the identity of the principal, his mandate and the precise duration and purpose of the mandate. The mandate must also specify whether the representative may be made the addressee of the reply.

- 6.3. In addition and for the record, we may in certain cases be considered jointly responsible for the Processing of your Personal Data with the social networks in which we have dedicated pages or with which we offer you interactions (see details of the purposes above). Depending on the social network, our joint controllers may be:
  - regarding Facebook and Instagram: Facebook Ireland Limited, 4 Grand Canal Square, Grand Canal Harbor Dublin 2, Ireland. For more information on how Facebook processes your Personal Data when you use the Facebook or Instagram social network, we invite you to refer to the <u>Facebook Ireland Limited Data Use Policy</u> as well as the <u>Instagram Data Use Policy</u>, but also to the <u>Facebook</u> and <u>Instagram</u> Cookies Policy where appropriate to set the cookies used on the pages of these social networks;
  - Regarding Twitter: Twitter International Company, One Cumberland Place, Fenian Street Dublin 2, D02 AX07 Ireland. For more information on how Twitter handles your Personal Data, we invite you to refer to the <u>Privacy Policy</u> and the <u>Cookies Policy</u> of Twitter where applicable to set the cookies used on the pages of this social network;
  - with regard to LinkedIn: LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland. For more information on how LinkedIn processes your Personal Data, we invite you to refer to the <u>Privacy Policy</u> and the <u>Cookies Policy</u> of LinkedIn where applicable to set up the cookies used on the pages of this social network;
  - with respect to YouTube: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. For more information on how Google processes your Personal Data when you use the YouTube social network, please refer to Google's <u>Privacy Rules</u> as well as <u>elements related to the use of "Cookies"</u> by Google;
  - with regard to Pinterest: Pinterest Europe Ltd, Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland. For more information on how Pinterest processes your Personal Data, we invite you to refer to Pinterest's <u>Privacy Policy</u> and <u>Cookies Policy</u>.
  - With regard to Discord: For information on how Discord processes your Personal Data, we invite you to refer to Discord's privacy policy.
  - As regards Reddit: For information on how Reddit processes your Personal Data, we invite you to refer to Reddit's privacy policy.

In these cases, you can also, for the exercise of your rights mentioned above, consult your account parameters on the abovementioned social networks and contact you:

- regarding Facebook and Instagram: the Data Protection Officer of Facebook Ireland Limited by email, including using the dedicated contact form;
- Regarding Twitter: the Data Protection Officer of Twitter by email, in particular using the dedicated contact form;
- in the case of Linkedin: the Data Protection Officer of LinkedIn by email, in particular using the <u>dedicated contact form</u>;
- with respect to YouTube: the Data Protection Officer of Google Ireland Limited by email, in particular using the <u>dedicated contact form</u>;
- with regard to Pinterest: the Pinterest Europe Ltd Support Center using the <u>dedicated</u> contact form;
- With regard to Discord: to the following email address: <a href="mailto:privacy@discord.com">privacy@discord.com</a>;
- As regards Reddit: to the following email address: eurepresentative@reddit.com.

6.4. In any case, you also have the right to lodge a complaint with the competent supervisory authority (in France, the Commission Nationale de l'Informatique et des Libertés, known as the "Cnil"): 3 place de Fontenoy - TSA 80715 - 75334 Paris cedex 07; tel. :: 01 53 73 22 22) if you consider that the Processing of your Personal Data is not carried out in accordance with legal and regulatory provisions on the protection of Personal Data.

To understand your rights, you can also refer to the explanations provided by the Cnil here: <a href="https://www.cnil.fr/fr/les-droits-pour-maitriser-vos-donnees-personnelles">https://www.cnil.fr/fr/les-droits-pour-maitriser-vos-donnees-personnelles</a>

6.5 We would like to point out that, in accordance with Articles L.223-1 et seq. of the Consumer Code, if you are a consumer, you may object at any time to being contacted by telephone, by registering for free on the site "www.bloctel.gouv.fr".

## 7. How are your Personal Data secured?

7.1. The Company shall put in place appropriate organizational and technical security measures, in particular with regard to the categories of Personal Data processed, the state of knowledge, the implementation costs and the nature, scope, context and purposes of the Processing, as well as the risks, the degree of which varies in probability and severity, to the rights and freedoms of natural persons, to protect your Personal Data against any malicious intrusion, loss, alteration or disclosure to unauthorized third parties, and more generally to preserve the security and confidentiality of said Personal Data and to guarantee a level of security appropriate to the risk.

Due to the difficulties inherent in carrying out an activity on the Internet and the risks, which you are aware of, resulting from the transmission of data by electronic means, the Company cannot, however, be bound by an obligation of result.

In the event of difficulties, the Company will make its best efforts to identify the risks and will take all appropriate measures, in accordance with its legal and regulatory obligations (corrective actions, informing the CNIL and, where appropriate, the persons concerned, etc.).

- 7.2. When designing, designing, selecting and using our services offered on the Site that are based on the Processing of Personal Data, the Company takes into account the right to the protection of Personal Data by default and from the moment of their conception (see the so-called Privacy by design and by default principles).
- 7.3. Access to your Personal Data is limited to our collaborators or partners, and more generally to the Recipients referred to *above*, who are authorized and who need to know them in the context of the execution of their missions and/or activities.
- 7.4. In the event of the subcontracting of all or part of a Personal Data Processing, the Company contractually imposes security and, in particular, confidentiality guarantees on its subcontractors with regard to the Personal Data to which they may have access (appropriate technical and organizational measures for the protection of such Data).

## 8. Are your Personal Data transferred outside the European Union?

- 8.1 Your Personal Data is processed preferentially in the European Union.
- 8.2 However, for the purposes stated above, some of your Personal Data may be transferred to third parties established in countries outside the European Union (e.g.: Subcontractors of the Company involved in the above treatments, etc.).

Some of these entities to which your Personal Data is addressed are considered to ensure a sufficient level of protection of Personal Data by being established in a country whose personal data protection legislation has been recognized as ensuring an adequate level of protection of such Data (see European Commission adequacy decisions <a href="https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions">https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions</a> en).

In addition, if the country of the entity to which your Personal Data is sent does not provide an adequate level of protection for such Data, we ensure that appropriate security and confidentiality measures are taken to ensure that your Data remains protected.

Therefore, in such cases, you are informed that transfers of your Personal Data to other entities outside the European Union are governed by the conclusion, with the Recipients of such Data, of contractual clauses in accordance with the recommendations of the European Commission to ensure that appropriate safeguards are taken regarding the protection of such Data.

We further inform you that transfers of Personal Data outside the European Union are lawful if the transfer is necessary for the performance of a contract between the Data Subject and the Controller or for the implementation of pre-contractual measures taken at the request of the Data Subject, if the transfer is necessary for the conclusion or performance of a contract concluded in the interests of the Data Subject between the Controller and another natural or legal person, or if the Data Subject has given its explicit consent to the intended transfer, after having been informed of the risks that such transfer may entail for it due to the absence of a decision adequacy and appropriate safeguards.

A copy of the reference documents referred to in this paragraph may be obtained (free of any commercial information considered sensitive or confidential or covered by business secrecy) from the contact mentioned in the paragraph above "What are your rights and how to exercise them?"

## 9. What are the links of our Site to third party sites?

- 9.1. Please note that our digital media (including our Site or our social media pages) may provide or contain links to third party sites, including social media sites. We have no control over the activity of these sites and the policies they apply to the protection of your Personal Data and your rights, and we cannot have control over them. We invite you to review the warranties offered by these sites before any interaction with them. In this regard, you are reminded that the Personal Data Protection Policy of these sites may be different from that of the Company and that it is your responsibility to read them.
- 9.2 If you post content that discloses your Personal Data on the Internet, and in particular on social networks, including the pages of the Company's social networks, such content may be accessible to any Internet user, and collected or used by third parties, for purposes that are not within our responsibility. In any event, the Company's liability cannot be sought in the event that the Processing of Personal Data implemented via one of these third party sites contravenes the applicable legal and regulatory provisions.

## 10. Can this Data Protection Policy be amended?

- 10.1 This Data Protection Policy may be amended at any time, effective from the date of publication of the corresponding update.
- 10.2 In the event of a change, the new Data Protection Policy will be posted on the Website in the dedicated section. In addition, all forms for the collection of Personal Data that may appear on our Site provide a link to this policy.
- 10.3 We invite you to consult it regularly.

# 11. What is the Site's policy on cookie management?

- 11.1 Cookies and other tracers or similar technologies may be installed and/or read in your browser or terminal when you visit the Site.
- 11.2 <a href="https://artrade.app/legal/CP-en.pdf">https://artrade.app/legal/CP-en.pdf</a> to access our "cookie management policy", which is also accessible via an integrated footer link (see *footer*) of all pages of the Site.