

# Privacy Policy

Last updated: February 6, 2019.

Arkadin (hereinafter referred to "Arkadin", "we", "us" or "our") commits to protect the privacy of (i) individuals who visit Spoka website (hereinafter referred to "the visitor(s)"); (ii) individuals who have a Spoka registered account and who use Spoka Services (hereinafter referred to "the Client(s)"); (iii) individuals who participate to any conferences or calls (hereinafter referred to "the Participant(s)"); (iv) individuals who participate to trade exhibitions where Arkadin is an exhibitor or sponsor (hereinafter referred to "trade exhibition visitor(s)") and (v) individuals identified as Arkadin prospects (hereinafter referred to "Prospect(s)"), collectively named "the User(s)".

This policy describes Arkadin privacy statement related to (i) the use of Spoka website, the related applications and services provided by Arkadin (collectively referred to "Spoka Services") and (ii) any situation in which Arkadin collects and processes personal information of Users.

BY USING SPOKA SERVICES, USERS ACCEPT THE TERMS AND CONDITIONS MENTIONED WITHIN THIS POLICY.

## PERSONAL DATA COLLECTION AND USE

"Personal data" means any information relating to an identified or identifiable natural person. An identifiable natural person is one 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 factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (Article 4 of the EU General Data Protection Regulation (GDPR)).

Required Personal data:

1. Sign up to the newsletter: Should Users navigate on Spoka website and sign up to the newsletter, Arkadin may require Users to provide Personal data such as first name/ last name, job title, e-mail address, phone number and country in order to send Users information about Spoka Services.
2. Access to the administration portal (login access): Should Clients access the administration portal, Arkadin may require Clients to provide Personal data such as login and password.
3. Download of documentation: Should Users navigate on Spoka website and require downloading any documentation or learning more information, Arkadin may require Users to provide Personal data such as first and last name, business phone, e-mail address, job title and country.
4. Contact, chat & web form: Should Users navigate on Spoka website and express their interests in obtaining information about Spoka Services (Sales team); and/or contact Arkadin in order to obtain support (Customer service team), Arkadin may require Users to provide mandatory data such as first and last name, e-mail address and phone number, job title and country.
5. Spoka online sign up: Should Users navigate on Spoka website and register to spoka Services, Arkadin may require Users to provide Personal data such as name and first name, email address, phone number, company name, additional Spoka users names and e-mail address, billing and shipping postal address, Credit card information (credit card number, name on the credit card, expiration date and CVV number)

Additional information:

1. Complementary information: Arkadin may also require additional information to allow us to know User better, such as company size, state location, contact preference and reasons of interest.
2. Website navigation information: Should Users navigate on Spoka website, Arkadin may collect data through the use of tracking tools such as Cookies. Web site navigation information may include information from Users' browser (browser type and language), Users' Internet Protocol address (IP address) and information derived from Users IP address such as geographic location, device and application identification numbers, Internet service provider, the pages and the files viewed by the Users, operating system, date/time stamps associated to the usage.
3. Trade exhibitions: Should Users participate to a trade exhibition where Arkadin is an exhibitor or sponsor at the event, Users acknowledge that by allowing their badge to be scanned by Arkadin or Arkadin partner such as an event organiser, Arkadin may process Users (i) identification data such as User name, surname; (ii) contact details such as phone number, email or postal address; or (iii) professional situation data such as company name and job title.
4. Business to Business contact with Prospects: Should an individual (identified as a Prospect by Arkadin), provide to Arkadin his/her business information, this individual acknowledges and agrees that Arkadin may process on its Customer Relationship Management tool (i) Prospect identification data such as first and last name; (ii) contact details such as phone number, email or postal address; or (iii) professional situation data such as company name and job title.

Required and additional information are named collectively "User Personal data".

Special categories of Personal data:

Arkadin does not process any special category of Personal data through the use of the Arkadin website. In this regard, Arkadin requests Users to not share with us any special categories of Personal data through web forms or contact forms such as (i) Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; and/or (ii) genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

Variety of sources:

Arkadin may collect Users Personal data from a variety of sources:

1. Direct contact such as access to the website/application (desktop or mobile application) or the submission of a web form;
2. Publicly available data or data provided by third parties such as social media posts and information or data aggregators;
3. Automated activities such as analytics tools, widgets and cookies.

Lawful bases of the processing:

Lawful bases include consent (where you have given consent), contract (where processing is necessary for the performance of a contract with Client (e.g. for example to deliver Spoka Services)) and legitimate interests.

1. Consent: By ticking an "opt in" box or moving a toggle available on each web form, Users consent that Arkadin processes Users Personal data for one or more specific purposes as mentioned in this privacy policy.
2. Contract: Processing is necessary for the performance of a contract to which the Client is party.
3. Legitimate interests: Processing is necessary for the purposes of the legitimate interests pursued by Arkadin. This lawful basis is used by Arkadin for "Business to Business contact with Prospects" purpose and regarding the processing of Participant personal data.

#### Use of Personal data:

1. Performance of the services: Arkadin uses Users' Personal data to perform Spoka Services.
2. Provide support or answer to Users requests: Arkadin may use the Personal data of Users to provide support or others services ordered by the Users or to answer directly to User information requests and enquiries.
3. Direct Marketing and Business to Business contact: Arkadin may use Personal data of Users for direct marketing and/or Business to Business contact. If Users participate to a trade exhibition where Arkadin is an exhibitor or sponsor at the event, Users acknowledge that by allowing their badge to be scanned by Arkadin or Arkadin partner such as an event organiser, Arkadin processes Users Personal data to Direct Marketing and Business to Business contact. If Prospects provide to Arkadin business information, Prospects acknowledge and agree that Arkadin may process these information on its Customer Relationship Management tool to allow business to business contact. If Users download a guide on the Spoka website, Users acknowledge and agree that by ticking the opt in box, Users consent that Arkadin processes the Personal data collected to contact Users in order to discuss about Arkadin services and send them information pertaining to Arkadin and Arkadin's services.
4. Operate and improve Arkadin's web site and services: Arkadin may use Spoka website navigation information to (i) analyse overall website trends, (ii) track and aggregate non-personal information and (iii) help us to operate and improve Spoka website and Arkadin's Services. Arkadin may receive information about Users from third party and combine this information with data that Arkadin may already have about Users in order to analyse our records, improve Users online experience, identify new prospects and customize information.

#### Personal data retention:

Arkadin retains and uses Personal data of Users as needed to fulfil the purposes for which these data were collected and as necessary to (i) comply with Arkadin business requirements; (ii) comply with legal obligations; (iii) resolve disputes and/or (iv) enforce a contract with Clients.

#### Confidentiality statement:

Arkadin assigns to Users confidential account access details such as a login and password. Clients and Users are responsible for maintaining the confidentiality of their login name, password and for restricting access to their account. Clients and Users are responsible for (a) the use of their Personal data or access to the account by any individual with whom Clients (i) share their login name and/or password, or (ii)

authorize to use their account, and/or (b) any unauthorized use or access that results in whole or in part from Clients failure to protect the confidentiality of their login name, password and/or pin code.

## CLIENT TESTIMONIAL

Arkadin may post lists of Clients names and testimonials on Spoka website that may contain Personal data such as a Client name and title, photo and video. Arkadin always obtains the prior consent of any of its Clients before publishing their testimonials and Personal data in print or via digital channels such as Social Media.

## WEB SITE NAVIGATION INFORMATION

### COOKIES

Arkadin enables Users, through its cookie privacy preference center, to opt in/opt out of various categories of cookies [strictly necessary cookies – performance cookies – functional cookies - targeting cookies]. Arkadin uses an external cookie preference tool to process Internet advertising and tracking preferences, but does not respond any other Do Not Track signals sent by Users browsers. If Users wish to restrict or block cookies, Users may set their internet browser.

What are cookies?

Cookies are text files containing small amounts of information which are downloaded to a Users' device when Users visit Arkadin's website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are widely used because they allow a website to recognise User's devices and therefore allow enhanced functionality.

How does Arkadin use cookies?

Arkadin uses cookies for the following purposes:

- to compile statistical data on the use and performance of Arkadin website, so that Arkadin may monitor and improve it;
- to facilitate Users' ability to navigate through Arkadin website, including to allow registered Users to access secure parts of Arkadin website; and
- to allow Arkadin to share Arkadin web pages via social media platforms.

Which cookies does Arkadin use?

A full list of cookies located on Arkadin website is available in [Arkadin cookie privacy preference center](#).

How to control cookies

If Users do not wish to receive cookies Users can set their web browser to restrict or block them. All modern browsers allow Users to change their cookie settings, typically be found in the 'options' or 'preferences' menu of browser. If Users disable cookies Users may not be able to use all the interactive features of our website.

Definitions

- First Party/ Third party cookies: these cookies refer to the web domain placing the cookie. First-party cookies are those set by a website that is being visited by Users at the time – the website displayed in the URL window. Third party cookies are cookies that are set by a domain other than that of the website being visited by Users. If a User visits a website and another entity sets the cookie through that website, this would be a third-party cookie.
- Persistent cookies: these cookies remain on a User’s device for the period of time specified in the cookie policy. They are activated each time that the User visits the website that created that particular cookie.
- Session cookies: these cookies allow website operators to link the actions of a User during a browser session. A browser session starts when a User opens the browser window and finishes when they close the browser window. Session cookies are created temporarily. Once Users close the browser, all session cookies are deleted.

#### WIDGETS, BUTTONS AND TOOLS

Arkadin uses widgets tools which are interactive mini programs that run on the Arkadin website and link to other websites. These programs do not collect Personal data.

Arkadin also allows Users to login to certain proprietary Websites and Services using sign-in services or submit web forms through tools. These services will authenticate Users identity and provide Users the option to share certain Personal data with Arkadin such as name and email address to pre-populate the sign-up form.

#### SHARING AND TRANSFER OF PERSONAL DATA COLLECTED

The Personal data that Users submit to Arkadin remains their property. Arkadin does not share, sell or rent personal information to unrelated third parties nor transfer Personal data within Arkadin without proper purpose.

Arkadin may share Personal data collected on its web site to the following companies:

- Arkadin Affiliates: Arkadin may share Users’ Personal data with Arkadin Affiliates for Client support, marketing and account management purposes. “Affiliate” refers to, now or in the future, any other entity that (i) directly controls; (ii) is under common Control with; or (iii) is controlled by Arkadin. An entity shall be considered as controlling another entity if it owns, or controls, at least fifty (50) percent of the voting stock or other ownership interest of the other entity.
- Arkadin service providers: Arkadin may share limited Users’ Personal data with service providers which provide services on behalf of Arkadin. To learn more about the list of Arkadin services providers, please visit our website: <https://www.arkadin.com/en-gb/data-subprocessors>

If Arkadin discloses Personal data to third parties, such third parties will be required to comply with the Arkadin Privacy white paper available [here](#).

- Legal disclosure: Arkadin may disclose Personal data if required by law or if Arkadin reasonably believes that disclosure is necessary to protect Arkadin’s rights or to comply with a legal process.

Arkadin has implemented appropriate safeguards for transfers of Personal data originating from the European Economic Area (“EEA”) to Arkadin affiliates and unaffiliated third parties located outside the EEA.

## **DATA PROCESSING AGREEMENT (DPA)**

Arkadin provides a [pre-signed DPA](#) for its Clients. Arkadin’s DPA has been drafted to comply with all GDPR requirements and describes how Arkadin processes Client’s personal data.

The European Commission Standard Contractual clause attached to the DPA cover the transfer of Client’s personal data done by the Client to Arkadin’s affiliates for the Services implementation.

## **PRIVACY WHITE PAPER**

Arkadin makes available to its Clients [Arkadin white paper](#). This document explains how Arkadin has implemented the EU General Data Protection Regulation (GDPR) effective on May 25<sup>th</sup> 2018.

## **SPOKA COMMUNICATION PREFERENCE CENTER**

Arkadin enables Users who provide contact information to opt out of marketing and non-transactional communications. Each User may manage its receipt communications (i) by clicking on the “unsubscribe” link located on the bottom of Arkadin marketing emails; and/or (ii) by modifying its online profile on Arkadin communication preference center available here: <https://www.spoka.com/preferencecenter>

## **USERS RIGHTS EXERCISE**

Users may request to access, rectify, restrict, delete or otherwise modify any of their Personal data provided to Arkadin (through Arkadin’s Services or during business prospection) and processed by Arkadin.

Where we rely on Users consent to process Personal data, Users have the right to withdraw or decline their consent at any time and where we rely on legitimate interests, Users have the right to object.

- Clients requests shall be sent directly to the Client account representative or to the Clients service team.
- Visitors and Participants request shall be sent to the communications preference center available on the following link: <https://www.spoka.com/preferencecenter>
- Any request will be addressed with care within a reasonable timeframe.

## **ADMINISTRATION AND SECURITY MEASURES**

Arkadin may collect Users Personal data such as Internet Protocol (IP) addresses in order to (i) help diagnose technical problems; (ii) administer Arkadin web site and (iii) improve the quality of Spoka Services. Arkadin may also track and analyse non-identifying and aggregate use and volume of statistical information from Users and provide third parties with such information.

The security of Users' Personal data is very important for Arkadin. Arkadin uses physical, electronic, and administrative safeguards that are designed to protect Users' Personal data from loss, misuse and unauthorized access, disclosure, alteration and destruction.

## **SPOKA MOBILE APPLICATION**

Spoka mobile application collects information from, or accesses data stored on, Users' devices to provide services related to the relevant mobile application. For example, Arkadin mobile application may access to device functionalities such as (i) the camera and micro to allow video and audio conference access; (ii) the calendar information to scan it, find Arkadin meetings and allow notification and/or (iii) access contact information to enable dial Participant from a meeting. Arkadin mobile application may also send Users push notifications to allow Users to manage their conference meetings. The information accessed or obtained by the mobile application may be affected by the User mobile configuration. For example, Users may opt-out of receiving notifications directly on their devices at any time by editing these settings.

Mobile applications may transmit to Arkadin information from Users' devices to provide the Mobile Application services such as the Participant name.

By installing Spoka mobile application on User mobile device, User consents to the downloading and updating of that mobile application in accordance with Spoka End User Licence Agreement.

## **PRIVACY POLICY UPDATES**

Arkadin may change this privacy policy. In this case, Arkadin will provide notification of the material changes through its website at least thirty (30) days prior the changes taking effect.

## **CHILDREN'S PRIVACY**

Arkadin's Services are not developed for or directed to children and Arkadin website is not designed to attract children under the age of eighteen (18). We do not knowingly solicit or collect Personal data from any person that is under the age of eighteen. Visitors under eighteen years of age are not eligible to do business with Arkadin.

## **INFORMATION ABOUT ARKADIN**

Any enquiries about this privacy policy may be sent to [privacy@arkadin.com](mailto:privacy@arkadin.com)

Arkadin SAS is Arkadin's data protection representative within the European Economic Area and Switzerland. The lead authority is CNIL (<https://www.cnil.fr>). The Data Protection Officer of Arkadin may be contacted at the following address: Arkadin SAS – Data Protection Officer – 32 rue guersant, 75017 Paris, France or at [privacy@arkadin.com](mailto:privacy@arkadin.com)