

Data Protection Policy

1. General

INFOS France S.a.S. (whose registered office is located at 333, avenue Georges Clemenceau, 92000 Nanterre, France), in its capacity as data controller, attaches great importance to the protection and respect of your privacy. The purpose of this policy is to inform you of our practices regarding the collection, use and sharing of information that you are required to provide to us through our platform (the "Platform") accessible from the business.mturn.io website or our mobile applications.

This policy (as well as our "General Conditions of Use" and any document referred to therein describes how we process the personal data that we collect and that you provide to us. We invite you to read this document carefully for know and understand our practices regarding the processing of your personal data that we implement.

2. The information we collect

We may collect and process the following data:

2.1. The information you send us directly

By using our Platforms, you are required to send us information, some of which is likely to identify you (" Personal Data "). This is particularly the case when you fill out forms (such as the registration form), when you contact us - whether by telephone, email or any other means of communication - or when you inform us of a problem.

This information contains in particular the following data:

- 2.1.1 The data necessary for registering for the service we provide on our Platforms or for accessing any other service provided by us. These data include your first and last name, e-mail address, telephone number. This information is obligatory. Otherwise, INFOS France will not be able to provide you with the services offered by our Platforms and you will not be authorized to create an account on our Platform;
- 2.1.2. The data necessary for the provision of the service. These data include the address of the operating point of the service, the opening hours of the operating point of the service, e-mail address, telephone number and password of the person in charge of the service. This information is obligatory. Otherwise, INFOS France will not be able to provide you with the services offered by our Platforms and you will not be authorized to operate the service;

2.2. The data we collect automatically

2.2.1. In the event that you connect to our services using the social networking features available to you, INFOS France will have access to some of the data (in particular, your first name, last name, photograph, e-mail address and number of Facebook friends) of your account on said social network in accordance with the general conditions of use of the social network concerned. We are also likely to collect some of your Personal Data when you interact with functionalities of these social networks, such as "I like".



- 2.2.2. Whenever a consumer uses the reservation service, we may collect, in accordance with applicable law and with the agreement of the service user, where applicable, information relating to the devices on which it uses our services or networks from which it accesses our services, such as including the IP addresses, login data types and versions of browsers used, types and versions of plugins u browser, operating systems and platforms, data on the navigation route on our platforms, including the courses on different URL pages of our platforms, the content to which it accesses or it consults, the search terms used, errors in downloading, the consultation period of some pages the advertising identifier of his device, the interactions with the page as well as any telephone number used for n ou contact. Among the technologies used to collect this information, we notably use cookies.
- **2.2.3.** We also collect information about the use of our Platform (such as the number of reservations made, the actual rate of use of reservations, etc.)

2.3. Storage period of your data

- **2.3.1.** With the exception of the categories of Personal Data referred to in articles 2.3.2. e t 2.3.3. below, your Personal Data is archived at the end of the following periods:
 - 5 years after your last use of our Platforms, if you have not closed your account;
 - 1 year after the closure of your account, unless you have received a negative opinion or a notification, in which case your data will be kept for 2 years following the last negative opinion or notification received if this duration is longer.

3. How do we use the data we collect?

Data	Purpose
Contact point address and times	Geographically locate the point where it will be possible to book an appointment and its availability times for end users of the service
Personal data of the contact point manager	Communicate the instructions for use and manage the quality of the reservation service
Personal data of the service user	Connection of the service user with the reservation contact point (store, office, administration)
Booking data	Manage and administer the reservation service

4. Who are the recipients of the information we collect and why do we pass it on to them?



- **4.1.** We may share information about you and the end users of the booking service, including Personal Data, with other entities of the INFOS group within the framework provided by this policy.
- **4.2.** We also work closely with third-party companies that may have access to your Personal Data, and in particular with:
 - The social networking platforms that can offer features that allow you to integrate your profile mTurn and the end users of the booking service information from s account s on their own platform;
 - Our business partners platforms, where we can possibly do advertise our services;
 - The subcontractors we use in terms of technical services, payment services, identity verification or even suppliers of analytical solutions.
- **4. 3.** We do not share your data with the third parties mentioned in 4.2. except for the following reasons:
 - **4.3.1** When we use a service provider to perform any contract between you and us or to provide or improve our services;
 - **4.3.2.** As part of the booking process, we are required, in order to provide the services requested, to display on our Platforms or to transmit to another member some of your Personal Data as well as that of the end users of the service, such as surname, first name, email address;
 - **4.4.3.** We publish the reviews that you write as part of our review system on our Platforms. These notices are visible to all visitors to our Platforms;
 - **4.3.4.** When we use search engine and analytical solutions providers to improve and optimize our Platforms;
 - **4.3.5.** The hen you make of the specific request (eg when using the authentication methods provided by social networks), subscribe to a service provided by one of our partners, ask to receive an offer or a good plan from one of our partners);
 - **4.3.6.** When we distribute, on the websites of our business partners, certain parts of our Platforms via APIs or widgets;
 - **4.3.7.** When we have a legal obligation to do so or if we believe in good faith that this is necessary to (i) respond to any complaint against mTurn, (ii) comply with any legal request, (iii) do execute any contract concluded with our members, such as the General Conditions of Use and this Privacy Policy (iv) in the event of an emergency involving the public health or physical integrity of a person, (v) in the framework of investigations and investigations, or (vi) in order to guarantee the rights, property and safety of mTurn, its members and more generally any third party;
 - **4.3.8.** In the event that we sell or acquire a business or assets, in which case we reserve the possibility of sharing your Personal Data with the potential seller or buyer of this business or these assets.
 - **4.3.9.** If INFOS or all or part of its assets are bought by a third party, the data in our possession will, if necessary, be transferred to the new owner.
 - **4.4.10.** In accordance with applicable law and with your consent when required, we may aggregate data that concerns you and that we receive or send to our business partners, including all or part of your Personal Data and the information collected



through cookies. This aggregated information will only be used for the purposes described above.

4.4.11. We draw your attention to the fact that if you decide to let us access to some of your information, including the Personal Data, through connection services provided by our business partners, their privacy policies is you also enforceable. We have no control over the collection or processing of your data implemented by our business partners on their own platform.

5. Targeted advertising, emails and text messages we send to you

In accordance with applicable law and with your consent when required, we may use the data you provide to us on our Platforms for commercial prospecting purposes (for example to (i) send you our newsletters, (ii) send you invitations to our events or any other communication likely to interest you and (iii) display targeted advertisements on social media platforms or third-party sites).

Regarding promotional emails: You can withdraw your consent at any time by (i) unchecking the relevant box in your account, (ii) clicking on the unsubscribe link provided in each of our communications or (iii) by contacting us according to the procedures described in article 13 below.

Regarding targeted advertising:

On social media platforms (for example Facebook, Twitter): you can object to this processing at any time by configuring the parameters relating to the advertising of your account;

6. How and where are your data transferred?

Generally, we keep your Personal Data within the European Union. However, insofar as, for example, some of our service providers are located in countries outside the European Union ("Third Countries"), we transfer some of your Personal Data to Third Countries. This may in particular be the case towards Third Countries for which the European Commission has not taken an "adequate protection" decision. In such a case, we ensure that this transfer is carried out in accordance with the applicable regulations and guarantees a level of protection an adequate level of protection of the privacy and fundamental rights of the people (in particular by the standard contractual clauses of the Commission European).

Upon a simple request made to our Data Protection Officer (infos@mturn.io), we can provide you with more information regarding these transfers (in particular the standard contractual clauses of the European Commission).

7. What are your rights over your personal data?

- **7.1.** You have the right to receive a copy of your Personal Data in our possession ("right of access").
- 7 .2. You can also request the erasure of your Personal Data as well as the rectification of erroneous or obsolete Personal Data ("right of erasure and right of rectification"). Please note that we may retain certain information about you when required by law or when we have a legitimate reason to do so. This is for example the case if we believe that you have committed fraud or violated our General



- Conditions of Use and that we wish to avoid that you circumvent the rules applicable to our service.
- 7.3. You also have the right to object at any time for reasons relating to its particular situation, (i) to the processing of your Personal Data for direct marketing purposes or to processing carried out on the basis of our legitimate interest (" right to 'opposition').
- 7 .4. You have the right to limit the processing carried out on your Personal Data (" right to limitation "). Please note that this right only applies if (i) you dispute the accuracy of your Personal Data during the period that allows us to verify the accuracy of the latter; (ii) in the event of unlawful processing on our part and you require a limitation of their use rather than an erasure, (iii) we no longer need the personal data for the purposes of the processing but these are provided to you still necessary for the establishment, exercise or defence of legal claims; iv) in the event of the exercise of your right of opposition during the period of verification relating to the question whether the legitimate grounds which we are pursuing prevail over yours.
- 7.5. You have the right to lodge a complaint with the competent supervisory authority or to obtain compensation from the competent courts if you consider that we have not respected your rights.
- 7.6. You also have the right to the portability of your data, i.e. the right to receive the Personal Data that you have provided to us in a structured, commonly used and machine-readable format and the right to transmit this data to another controller (" right to portability").
- **7.7.** You also have the right to define directives relating to the fate of your Personal Data after your death.
- **7.8**. To exercise these rights, you can contact our Personal Data Protection Officer according to the methods defined in article 11 below.

8. Confidentiality of your password

You are responsible for the confidentiality of the password we have chosen for you to access your account on our Platforms.

You agree to keep this password secret and not to communicate it to anyone.

9. Links to other websites and social networks

Our Platforms may occasionally contain links to the websites of our partners or third-party companies. Please note that these websites have their own privacy policies and that we do not accept any responsibility for the use made by these sites of the information collected when you click on these links. We invite you to read the privacy policies of these sites before transmitting your Personal Data to them.

10. Modification of our privacy policy



We may occasionally modify this privacy policy. When necessary, we will notify you and / or seek your agreement. We advise you to regularly consult this page to be aware of any changes or updates to our privacy policy.

11. Contact

For any question relating to this privacy policy or for any request relating to your personal data, you can contact us by:

- Addressing an email to our data protection officer at infos@mturn.io;
- Or by sending us a letter to the following address: Infos France Sas For the attention of the Data Protection Officer, 333, Avenue Georges Clemenceau -92000 Nanterre - France

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