



PRIVACY POLICY

[Last updated : May 24th, 2018]

1. WHO WE ARE.

1.1 MCO CONGRÈS SERVICES.

We are a ticketing and registration platform dedicated to bringing the world together through live experiences. Through our platform, mobile apps and services, we enable people all over the world to create, discover, share and register for events.

MCO Congrès's products, features and offerings are available (a) online through our web platform ("Site"); (b) off platform, including without limitation, entry management, sponsorship and marketing or distribution services; and (c) through mobile applications, webpages, application programming interfaces, and subdomains ("Applications"). (a), (b), and (c) are collectively referred to as "myCO's Properties" or our "Services".

1.2 WHO'S WHO.

When this Privacy Policy uses the term "Organiser" we mean event organisers, professional associations, scientific or not, who use the Services to manage events for consumers using our Services (a) to consume information about, or attend, events ("Consumers"), or (b) for any other reason. Organisers, Consumers and third parties using our Services are all referred to in these Terms collectively as "Users", "you" or "your".

MCO Congrès is a French company with its principal place of business at 285, Corniche Kennedy, Villa Gaby, 13007 Marseille, France, SIRET 383 730 181 000 54 – APE 8230Z ("MCO Congrès," "us," "we" or "our"). If you are resident in the EEA or Switzerland, MCO Congrès is the responsible party with respect to Personal Data (defined below) collected through the Services.

If you have any questions or concerns at any time, please do not hesitate to contact us at the address above or by contacting us at <u>data@mcocongres.com</u>.

2. OUR PRIVACY STATEMENT.

2.1 APPLICATION.

This Privacy Policy sets forth our policy with respect to information that can be associated with or which relates to a person and/or could be used to identify a person ("Personal Data") that is collected from Users on or through the Services. We take the privacy of your Personal Data seriously. Because of that, we have created





this Privacy Policy. Please read this Privacy Policy as it includes important information regarding your Personal Data and other information.

"Non-Personal Data" as used in this Privacy Policy is therefore any information that does not relate to a person and/or cannot be used to identify a person. When you interact with the Services, we may collect Non-Personal Data. The limitations and requirements in this Privacy Policy on our collection, use, disclosure, transfer and storage/retention of Personal Data do not apply to Non-Personal Data.

3. PERSONAL DATA THAT WE COLLECT.

When you use or interact with us through the Services, we may collect Personal Data. Sometimes this will be on our own behalf and other times this will be on behalf of an Organiser using our Services to run an event. This is an important distinction for EU data protection law purposes and is explained in more detail in Section 16 below.

3.1 ALL USERS.

Information you provide to us: For all Users we collect Personal Data when you voluntarily provide such information to the Services, such as when you register for access to the Services, contact us with inquiries, respond to one of our surveys or browse or use certain parts of the Services. The Personal Data we may collect includes without limitation your name, address, email address and other information that enables Users to be personally identified.

Information we automatically collect: We also automatically collect certain technical data that is sent to us from the computer, mobile device and/or browser through which you access the Services ("Automatic Data"). Automatic Data, includes without limitation, the data collected through Google Analytics, hence a unique identifier associated with your access device and/or browser (including, for example, your Internet Protocol (IP) address) characteristics about your access device and/or browser, statistics on your activities on the Services, information about how you came to the Services and data collected through Cookies, Web Storage and other similar technologies. You can find out more information about how we use Cookies and other similar tracking technologies in our Cookie Statement below.

When you register for the Services or otherwise submit Personal Data to us, we may associate other Non-Personal Data (including Non-Personal Data we collect from third parties) with your Personal Data. At such instance, we will treat any such combined data as your Personal Data until such time as it can no longer be associated with you or used to identify you.

3.2 ORGANISERS.

As an Organiser we will collect additional Personal Data from you.

Information you provide to us: In some cases, we may collect some data which may constitute Personal Data, to secure certain payments. In addition, if you use our payment processing services as a lecturer, speaker or invited guest, we will collect financial information from you (e.g., your bank account information or an address to send checks) as necessary to facilitate payments and information required for tax purposes.





Information we obtain from other sources: We may also collect or receive Personal Data from third party sources, such as third party websites, your bank, our payment processing partners and credit reporting agencies.

Our Services do not save any information about your credit card or bank account numbers since all payments are processed through external banking partners like Paybox, Mercanet, etc.

3.3 CONSUMERS.

As a Consumer we will collect additional Personal Data from you, sometimes for our own purposes and other times on behalf of an Organiser (see Section 16 below for more information).

Information you provide via MCO Congrès Properties or Applications: we can set up event registration pages to collect virtually any information from Consumers in connection with registration for an Organiser's event listed on the Services. MCO Congrès does not control an Organiser's registration process nor the Personal Data that they want to collect. Personal Data collected on behalf of Organisers is provided to the Organiser of the applicable event in accordance with "How We Disclose and Transfer Your Personal Data: Organisers" below.

Information we obtain from other sources: We may also collect or receive Personal Data from third party sources, such as Organisers, other Consumers, our payment processing partners or other third parties.

4. HOW WE USE YOUR PERSONAL DATA.

We collect and use the Personal Data we collect in a manner that is consistent with this Privacy Policy. We may use the Personal Data as follows:

4.1 SPECIFIC REASON.

If you provide Personal Data for a certain purpose, we may use the Personal Data in connection with the purpose for which it was provided. For instance, if you contact us by e-mail, we will use the Personal Data you provide to answer your question or resolve your problem and will respond to the email address from which the contact came.

4.2 ACCESS AND USE.

If you provide Personal Data in order to obtain access to or use of the Services or any functionality thereof, we will use your Personal Data to provide you with access to or use of the Services or functionality and to analyse your use of such Services or functionality. For instance, if you supply Personal Data relating to your identity or qualifications to use certain portions of the Services, we will use that information to make a decision as to granting you access to use such Services and to assess your ongoing qualification to use such Services.

4.3 INTERNAL BUSINESS PURPOSES.

We may use your Personal Data for internal business purposes, including without limitation, to help us improve the content and functionality of the Services, to better understand our Users, to improve the Services, to





protect against, identify or address wrongdoing, to enforce our Terms of Service, to manage your account and provide you with customer service, and to generally manage the Services and our business.

4.4 MCO CONGRÈS MARKETING COMMUNICATIONS.

Where it is in accordance with your marketing preferences, we may use your Personal Data to contact you in the future for our marketing and advertising purposes, including without limitation, to inform you about services or events we believe might be of interest to you (similar topics as the events you already registered to). See "Opt Out from Electronic Communications" below on how to opt out of MCO Congrès Marketing Communications.

4.5 ORGANISER EMAILS.

Upon request from the Organisers (scientific societies, professional associations), we may use email tools to contact Consumers for their current and past events, so you may receive emails from our system that originate with such Organisers and that we send on their behalf. If you registered for an event on the Services, your email address is available to that Organiser. However, Organisers may also import the email addresses they have from external sources and send communications through the Services to those email addresses, and we will deliver those communications to those email addresses on the Organiser's behalf. The Organiser and not MCO Congrès is responsible for sending these emails. See "Opt Out from Electronic Communications" below on how to opt out of Organiser initiated communications.

4.6 OTHER PURPOSES.

If we intend to use any Personal Data in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time the Personal Data is collected or we will obtain your consent subsequent to such collection but prior to such use.

4.7 AGGREGATED PERSONAL DATA.

In an ongoing effort to understand and serve our Users better, we often conduct research on our customer demographics, interests and behavior based on Personal Data and other information that we have collected. This research is typically conducted on an aggregate basis only that does not identify you. Once Personal Data is in an aggregated form, for purposes of this Privacy Policy, it becomes Non-Personal Data.

5. HOW WE DISCLOSE AND TRANSFER YOUR PERSONAL DATA.

5.1 NO SALE.

We are not in the business of selling your Personal Data. We consider this information to be a vital part of our relationship with you. Therefore, we will not sell your Personal Data to third parties, including third party advertisers. There are, however, certain circumstances in which we may disclose, transfer or share your Personal Data with certain third parties without further notice to you, as set forth below.





5.2 BUSINESS TRANSFERS.

As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganisation, dissolution or similar event, Personal Data may be part of the transferred assets. You acknowledge and agree that any successor to or acquirer of MCO Congrès (or its assets) will continue to have the right to use your Personal Data and other information in accordance with the terms of this Privacy Policy.

5.3 PARENT COMPANIES, SUBSIDIARIES AND AFFILIATES.

We may also share your Personal Data with our subsidiaries and/or affiliates for purposes consistent with this Privacy Policy. Our subsidiaries and affiliates will be bound to maintain that Personal Data in accordance with this Privacy Policy.

5.4 AGENTS, CONSULTANTS AND SERVICE PROVIDERS.

We may share your Personal Data with our contractors and service providers who process Personal Data on behalf of MCO Congrès to perform certain business-related functions. These companies include our database service providers, backup and disaster recovery service providers, email service providers, electronic badge management suppliers, and others. When we engage another company to perform such functions, we may provide them with information, including Personal Data, in connection with their performance of such functions.

5.5 ORGANISERS.

When you register for an event through the event page, we provide the Personal Data entered on the applicable event to the Organisers of such event.

5.6 LEGAL REQUIREMENTS.

We may disclose your Personal Data if required to do so by law in order to (for example) respond to a subpoena or request from law enforcement, a court or a government agency (including in response to public authorities to meet national security or law enforcement requirements), or in the good faith belief that such action is necessary to (a) comply with a legal obligation, (b) protect or defend our rights, interests or property or that of third parties, (c) prevent or investigate possible wrongdoing in connection with the Services, (d) act in urgent circumstances to protect the personal safety of Users of the Services or the public, or (e) protect against legal liability.

6. HOW WE STORE YOUR PERSONAL DATA.

We may store Personal Data itself or such information may be stored by third parties to whom we have transferred it in accordance with this Privacy Policy. We take what we believe to be reasonable steps to protect the Personal Data collected via the Services from loss, misuse, unauthorised use, access, inadvertent disclosure, alteration and destruction. However, no network, server, database or Internet or e-mail transmission is ever





fully secure or error free. Therefore, you should take special care in deciding what information you send to us electronically. Please keep this in mind when disclosing any Personal Data.

7. HOW YOU CAN ACCESS, UPDATE, CORRECT OR DELETE YOUR PERSONAL DATA.

You can request access to some of your Personal Data being stored by us. You can also ask us to correct, update or delete any inaccurate Personal Data that we process about them.

If you are a registered User, you can exercise these rights by <u>logging in</u> and visiting the "My Account" page. Both registered and unregistered Users may also exercise these rights by <u>contacting us</u> directly by email or at the address specified below.

If a Consumer initiates a data deletion request, MCO Congrès is authorised to delete or anonymise Personal Data of the requesting Consumer from the Services even if that means removing its availability to the Organiser through the Services. However, if you are a Consumer, you understand that even if you MCO Congrès deletes or anonymises your Personal Data upon your request or pursuant to this Policy, your Personal Data may still be available in the Organiser's own databases if transmitted to the Organiser prior to MCO Congrès receiving or taking action on any deletion or anonymization activity.

We will consider and respond to all requests in accordance with applicable law.

8. HOW LONG WE RETAIN YOUR PERSONAL DATA.

We may retain your Personal Data as long as you are registered to use the Services. You may close your account by <u>contacting us</u>. However, we may retain Personal Data for an additional period as is permitted or required under applicable laws. Even if we delete your Personal Data it may persist on backup or archival media for an additional period of time for legal, tax or regulatory reasons or for legitimate and lawful business purposes.

9. COOKIES, PIXELS TAGS, LOCAL SHARED OBJECTS, WEB STORAGE AND SIMILAR TECHNOLOGIES.

WHAT ARE COOKIES?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by website owners in order to make their websites work, or to work more efficiently, as well as to provide reporting information.

Cookies set by the website owner (in this case, MCO Congrès) are called "first party cookies". Cookies set by parties other than the website owner are called "third party cookies". Third party cookies enable third party features or functionality to be provided on or through the website (e.g. analytics). The parties that set these





third party cookies can recognise your computer both when it visits the website in question and also when it visits certain other websites.

WHY DO WE USE COOKIES?

MCO Congrès uses first and third party cookies for several reasons. Some cookies are required for technical reasons in order for our Online Properties to operate, and we refer to these as "essential" or "strictly necessary" cookies. Other cookies enable us to track and target the interests of our Users to enhance the experience on our Online Properties. Third parties serve cookies through our Online Properties for advertising, analytics and other purposes. This is described in more detail below.

The specific types of first and third party cookies served through our Online Properties and the purposes they perform are described under "Essential 1st party cookies" and "Analytics and customisation cookies" below (please note that the specific cookies served may vary depending on the specific MCO Congrès Property you visit).

ESSENTIAL 1ST PARTY COOKIES

These cookies are strictly necessary to provide you with Services and to use some of the Site or Application, such as access to secure areas.

Who serves these cookies: mycongressonline and its subdomains.

How to refuse: Because these cookies are strictly necessary to deliver the Online Properties to you, you cannot refuse them.

You may block or delete them by changing your browser settings, as described below under the heading "How can I control cookies?", but you may not be able to use every Site or Application features, and in some cases the MCO Congrès Property simply will not perform.

ANALYTICS AND CUSTOMISATION COOKIES

These cookies collect information that is used either in identifiable or aggregate form to help us understand how our Online Properties are being used, the effectiveness of our marketing campaigns, or to help us customise our Online Properties for you.

HOW CAN I CONTROL COOKIES?

You have the right to decide whether to accept or reject cookies. You can exercise your cookie preferences by clicking on the appropriate opt-out links provided in the cookie table above, or you can set or amend your web browser controls to accept or refuse cookies. If you choose to reject cookies via your browser, you may still use our Online Properties through your access to some functionality may be restricted. As the means by which you can refuse cookies through your web browser controls vary from browser-to-browser, you should visit your browser's help menu for more information.





DOES MCO CONGRÈS ALLOW FOR SOCIAL NETWORKING COOKIES?

No

10. YOUR CHOICES.

You have several choices available when it comes to your Personal Data:

10.1 LIMIT THE PERSONAL DATA YOU PROVIDE.

You can browse the Services without providing any Personal Data (other than Automatic Data to the extent it is considered Personal Data under applicable laws) or with limiting the Personal Data you provide. If you choose not to provide any Personal Data or limit the Personal Data you provide, you may not be able to use certain functionality of the Services. For instance, in order to register to an event as a Consumer, you need to create a personal account. To create an account, you need to provide an email address since the email address is the main login ID.

10.2 OPT OUT FROM ELECTRONIC COMMUNICATIONS.

(A) MCO CONGRÈS MARKETING COMMUNICATIONS.

Where it is in accordance with your marketing preferences, MCO Congrès may send you electronic communications marketing or advertising the events on the Services, to the extent you have registered for the Services or to an event listed on the Services. You can also "opt out" of receiving these electronic communications by clicking on the "Unsubscribe" link at the bottom of any such electronic communication. In addition, you may also <u>manage your email preferences</u> at any time by logging in, clicking on "My Account" and then go to the "Notification Preferences" section.

(B) ORGANISER INITIATED COMMUNICATIONS.

Organisers may request us to send electronic communications to those on their email subscription lists, including Consumers who have registered for their events on the Services in the past. Although these electronic communications are sent through an email service providers, MCO Congrès does not determine the content or the recipients of these electronic communications. Organisers are required to provide the list of contacts in accordance with all applicable laws. MCO Congrès provides an "Unsubscribe" link on each of these emails, which allows recipients to "opt out" of electronic communications from the particular Organiser.

(C) TRANSACTIONAL OR RESPONSIVE COMMUNICATIONS.

Certain electronic communications from MCO Congrès are responsive to your requests. For instance, if you are a Consumer, we must email you your confirmation of registration or your QR-Pass (electronic badge) on behalf of the Organiser when you register. As a further example, if you email our customer support department, we will return your email. Notwithstanding any unsubscribe election that you have made, you will still receive





these transactional or responsive emails. You can stop receiving these types of emails only by <u>contacting us</u>. We do not recommend that you do this unless you plan to no longer use the Services, are not currently registered for an event and will have no need to receive further communications from us or through our system.

(D) RETENTION.

It may take up to forty-eight (48) hours for us to process an unsubscribe request. Even after you opt out of all electronic communications, we will retain your Personal Data in accordance with this Privacy Policy, however, we will no longer use it to contact you. However, Organisers who have received your Personal Data in accordance with this Privacy Policy may still use that Personal Data to contact you in accordance with their own privacy policies, but they may not use our system to do so.

10.3 DO NOT TRACK.

We currently do not participate in any "Do Not Track" frameworks that would allow us to respond to signals or other mechanisms from you regarding the collection of your Personal Data.

11. EXCLUSIONS.

11.1 PERSONAL DATA PROVIDED TO OTHERS.

This Privacy Policy does not apply to any Personal Data that you provide to another User or visitor through the Services or through any other means, including to Organisers on event pages or information posted by you to any public areas of the Services.

11.2 THIRD PARTY LINKS.

This Privacy Policy applies only to the Services. The Services may contain links to other websites not operated or controlled by us (the "Third Party Sites"). The policies and procedures we described here do not apply to the Third Party Sites. The links from the Services do not imply that we endorse or have reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

12. CHILDREN - CHILDREN'S ONLINE PRIVACY PROTECTION ACT

We do not knowingly collect Personal Data from children under the age of thirteen (13). If you are under the age of thirteen (13), please do not submit any Personal Data through the Services. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children never to provide Personal Data through the Services without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Data to us through the Services, please <u>contact us</u> and we will endeavor to delete that information from our databases.





13. INTERNATIONAL PRIVACY LAWS.

Please be aware that you are sending information (including Personal Data) that, in certain cases (organisation of an event in a foreign country, organisers and suppliers based in foreign countries), may be transferred within the United States or back out of the United States to other countries outside of your country of residence, depending on the type of information and how it is stored by us. These countries (including the United States) may not necessarily have data protection laws as comprehensive or protective as those in your country of residence; however, our collection, storage and use of your Personal Data will at all times continue to be governed by this Privacy Policy.

EU - US PRIVACY SHIELD

For Personal Data we receive from the EEA, MCO Congrès is compliant regarding the collection, use, and retention of personal data from the European Union countries. We attest that we adhere to the Privacy Shield principles of Notice, Choice, Accountability for Onward Transfers, Security, Data Integrity & Purpose Limitation, Access and Recourse, Enforcement & Liability when processing Personal Data from the EEA.

14. CHANGES TO THIS PRIVACY POLICY.

The Services and our business may change from time to time. As a result, at times it may be necessary for us to make changes to this Privacy Policy. We reserve the right, in our sole discretion, to update or modify this Privacy Policy at any time (collectively, "Modifications"). Modifications to this Privacy Policy will be posted to the Site with a change to the "Updated" date at the top of this Privacy Policy. In certain circumstances MCO Congrès may, but need not, provide you with additional notice of such Modifications, such as via email or with in-Service notifications. Modifications will be effective thirty (30) days following the "Updated" date or such other date as communicated in any other notice to you.

Please review this policy periodically, and especially before you provide any Personal Data. This Privacy Policy was updated on the date indicated above. Your continued use of the Services following the effectiveness of any Modifications to this Privacy Policy constitutes acceptance of those Modifications. If any Modification to this Privacy Policy is not acceptable to you, you should cease accessing, browsing and otherwise using the Services.

15. DISPUTE RESOLUTION.

If you have a complaint about MCO Congrès's privacy practises you should write to us at:

MCO Congrès, Villa Gaby - 285, Corniche Kennedy, 13007 Marseille, France, or by <u>email</u>. We will take reasonable steps to work with you to attempt to resolve your complaint.





16. EEA, SWITZERLAND AND UK ONLY

THE EU GENERAL DATA PROTECTION REGULATION (GDPR)

In May 2018, a new data privacy law known as the EU General Data Protection Regulation (or the "GDPR") becomes effective. The GDPR requires MCO Congrès and Organisers using the Service to provide Users with more information about the processing of their Personal Data.

Here is what you need to know:

LEGAL GROUNDS FOR PROCESSING YOUR PERSONAL DATA

The GDPR requires us to tell you about the legal ground we're relying on to process any Personal Data about you. The legal grounds for us processing your Personal Data for the purposes set out in Section 4 above will typically be because:

- you provided your consent;
- it is necessary for our contractual relationship;
- the processing is necessary for us to comply with our legal or regulatory obligations; and/or
- the processing is in our legitimate interest as an event organising and ticketing platform (for example, to protect the security and integrity of our systems and to provide you with customer service, etc.).

TRANSFERS OF PERSONAL DATA

As MCO Congrès is organising events all over the world, we may need to transfer your Personal Data outside of the country from which it was originally provided. This may be intra-group or to third parties that we work with who may be located in jurisdictions outside the EEA, Switzerland and the UK which have no data protection laws or laws that are less strict compared with those in Europe.

Whenever we transfer Personal Data outside of the EEA, Switzerland or the UK (to organisers or suppliers), we take legally required steps to make sure that appropriate safeguards are in place to protect your Personal Data. Feel free to contact us as set forth in Section 15 for more information about the safeguards we have put in place to protect your Personal Data and privacy rights in these circumstances.

PERSONAL DATA RETENTION

We retain your Personal Data for as long as necessary to provide you with our Services, or for other important purposes such as complying with legal obligations, resolving disputes, and enforcing our agreements.

If you have an account with us, we will typically retain your Personal Data for a period of 90 days after you have requested that your account is closed or if it's been inactive for 7 years.

YOUR RIGHTS.





Data protection law provides you with rights in respect of Personal Data that we hold about you, including the right to request a copy of the Personal Data, request that we rectify, restrict or delete your Personal Data, object to profiling and unsubscribe from marketing communications.

For the most part, you can you can exercise these rights by logging in and visiting the "My Account" page or changing the "cookie settings" in your browser (see our Cookie Statement for more information). If you can't find what you're looking for in the "My Account" page, please contact us using the contact information set out in Section 15 above. Please note that requests to exercise data protection rights will be assessed by us on a case-by-case basis. There may be circumstances where we are not legally required to comply with your request because of the laws in your jurisdiction or because of exemptions provided for in data protection legislation.

If you have a complaint about how we handle your Personal Data, please get in touch with us as set forth in Section 15 to explain. If you are not happy with how we have attempted to resolve your complaint, you may contact the relevant data protection authority.

MCO CONGRÈS AS A DATA CONTROLLER AND A DATA PROCESSOR

EU data protection law makes a distinction between organisations that process Personal Data for their own purposes (known as "data controllers") and organisations that process personal data on behalf of other organisations (known as "data processors"). If you have a question or complaint about how your Personal Data is handled, these should always be directed to the relevant data controller since they are the ones with primary responsibility for your Personal Data.

MCO Congrès acts as a data controller in respect of your Personal Data.

If an Organiser request MCO Congrès to organise its event, MCO Congrès will be a data controller in respect of the Personal Data that you provide as part of your account. We will also be a data controller of the Personal Data that we have obtained about the use of the Applications or MCO Congrès Properties, which could relate to Organisers or Consumers. We use this to conduct research and analysis to help better understand and serve Users of the Services as well as to improve our platform and provide you with more targeted recommendations about events we think may be of interest to you.

However, if you register for an event as a Consumer, we will process your Personal Data to help administer that event on behalf of the Organiser (for example, sending confirmation, promotional and feedback emails, processing payments, etc.). In these circumstances, MCO Congrès merely provides the "tools" for Organisers; MCO Congrès does not decide what Personal Data to request on registration forms, nor is it responsible for the continued accuracy any Personal Data provided. Any questions that you may have relating to your Personal Data and your rights under data protection law should be directed to MCO Congrès using the information provided in Section 15 above.