

## Privacy Policy

### 1. General provisions

The following Privacy Policy applies to the processing of data by NEVEO, a public limited liability company incorporated under the laws of Belgium, with registered offices at 1050 Brussels, Rue Van Eyck 11B (Belgium), registered in the Register of Legal Entities of Brussels under number 0568.484.039 (hereinafter “NEVEO”).

The purpose of this Privacy Policy is to specify the categories of personal data that NEVEO collects via the website [www.neveo.io](http://www.neveo.io), its subdomains, services and any other means relating to information and communication technology (hereinafter the “Platform”). It also describes how such data may be processed and disclosed to third parties. The Privacy Policy further sets out the various measures NEVEO has implemented to safeguard the security and confidentiality of the personal data it collects.

NEVEO cares about the privacy of visitors to its Platform and all those whose personal data may be collected (hereafter “Users”) and will only collect and process personal data in accordance with the provisions of this Privacy Policy.

NEVEO is to be considered as data controller for the processing of personal data and will act in accordance with the provisions of the Belgian Act of 8 December 1992 on the protection of privacy in relation to the processing of personal data (hereinafter the “Law on the protection of privacy”) as amended by the Act of December 11th 1998 and the Act of June 13th 2005 on the electronic communication and as further specified in this Privacy Policy, as well as the General Data Protection Regulation (Regulation (EU) 2016/679 of 27 April 2016) as soon as it is applicable.

Any questions related to the processing of personal data may be sent by e-mail to [privacy@neveo.io](mailto:privacy@neveo.io).

NEVEO reserves the right to modify this Privacy Policy at any time and, to the extent permitted by law, without prior notice, in order to comply with (new) legal obligations and / or improve its services to you. Therefore, we advise you to consult the Platform regularly.

Please note that the Platform may contain links to other digital platforms or internet resources which may also collect personal data voluntarily, through cookies or other technologies. NEVEO has no responsibility, liability for, or control over those other websites or internet resources or their collection, use and disclosure of your personal data. NEVEO recommends that you review the privacy policies of these other websites and internet resources to understand how they collect and use personal data.

### 2. Personal data collected by NEVEO and the use of this personal data

The User acknowledges and agrees that the personal data communicated to the Platform is processed in accordance with this Privacy Policy.

The categories of personal data that can be collected during a visit to the Platform or by contacting NEVEO are as follows:

- (a) The first name, email address and password provided by completing the online form upon registration and which is required to create a user account;

- (b)** Payment data (banking details and detail and history of transactions) provided in order to subscribe to NEVEO services;
- (c)** The name, language, profile picture, telephone number and gender, to ensure optimal after-sales follow-up and to improve the aesthetics of the journal;
- (d)** The nickname as well as the birthday of the recipient of the journal, in order to personalize the services;
- (e)** The name, first name and postal address of the recipient, in order to carry out the delivery of the journal;
- (f)** The data communicated by Facebook (profile picture, email address and name), if the User opts for the connection to the Platform via Facebook;
- (g)** The information provided for the purpose of carrying out maintenance and online assistance;
- (h)** Information relating to the User's equipment and use of the Platform, such as IP addresses, geographical location, type of device used, unique device IDs, type of operating system and version, duration and date of the visit, the network connection type and provider, the network performance of the device, the type of browser, data from the sensors of mobile terminals (accelerometer or gyroscope), the selected language, the information activating digital rights management, ... whose processing is necessary to provide certain functionalities of the Platform and to use certain cookies, it being understood that the use of cookies and internet beacons by NEVEO is specified in the Cookie Policy, which the User is invited to consult;
- (i)** Photographs and text messages sent to the Platform in order to enable NEVEO to produce and print the journals.

The required provision of the data A, B, E, F, G, H, I is a prerequisite for the conclusion of the contract, given that NEVEO will not be able to provide the services as described in the TOU if these data are not processed. Personal data C and D are collected and processed on the basis of the consent of the User. The User is not required to provide data C and D. However, in the absence of provision of these data C and D, the User may not have access to certain features of the Platform and services.

The Users may not disclose personal data relating to another person to NEVEO, except to the extent that such person has consented to it in accordance with this Privacy Policy. The User who took out the subscription for a beneficiary, or invited a third party to join the Platform by inserting her/his email address and/or her/his telephone number, declares having obtained the authorization of the latter to communicate her/his personal information.

NEVEO will not collect sensitive data. This includes data such as race, ethnicity, religious beliefs, criminal records, physical or mental health, or sexual orientation of the User. NEVEO will, if necessary, obtain the explicit consent of the User to collect such data.

The User undertakes to communicate accurate personal data to NEVEO. The User may at any time modify this information in the section "Edit the profile of the beneficiary", and "Edit my profile". NEVEO cannot be held responsible for any failure of its services related to incorrect information provided by the User.

NEVEO ensures that its direct marketing activities comply with applicable legislation. NEVEO does not sell or rent personal data to marketing agencies or third parties.

NEVEO may disclose personal data with any company with which NEVEO may merge or be acquired by as part of a reorganization. NEVEO nevertheless undertakes to inform you if necessary.

### **3. The User's rights**

Each User has the right to access, modify, correct and delete their data free of charge. He/she also has a right to data portability, which implies that NEVEO can supply (at their request) their data to them and / or to a third party in a structured and machine-readable form. He/she can also, free of charge, oppose certain data processing by simple request. In the event that the legal basis for the processing is consent, he/she may at any time withdraw her/his consent for the processing of the data.

The aforementioned rights may be exercised, subject to compliance with the legal conditions, by writing NEVEO at the following email address [privacy@neveo.io](mailto:privacy@neveo.io).

### **4. Security of your personal data**

NEVEO shall take all reasonable security measures against the loss, misuse and alteration of the data entrusted to it by the Users, as well as to guarantee the confidentiality of the personal data transmitted by the User.

However, each User recognizes that the disclosure of personal data via the internet is not without risk. The User therefore acknowledges that NEVEO cannot be held responsible or liable for any direct or indirect damage she/he may suffer as a consequence of illegal or illegitimate use of her/his personal data by third parties who do not have the authorization to use the data.

However, NEVEO reminds you that it is your responsibility to take all appropriate measures to ensure the security of your equipment, data or software, especially against computer viruses circulating on the network.

### **5. Disclosure of personal data**

NEVEO will transfer personal data to service providers who use the data on its behalf, namely, Facebook (for marketing purposes), its printer (to print journals), postal services (to deliver journals), SMARTELIA SPRL (for the purpose of providing after-sales services) as well as Amazon web services (for storage purposes).

NEVEO will not communicate any data to third parties for purposes secondary or unrelated from those mentioned above, unless otherwise stated when collecting these data. Thereto, NEVEO takes all necessary precautions in order to preserve its confidentiality and declares to be connected with trusted hosting providers and technology providers, renowned for the reliability of their services and the high degree of protection they grant to the confidentiality of personal data.

The personal data may however be communicated by NEVEO to the judicial authorities, the administrative authorities or other bodies, or to third parties if required or desirable to meet the legal or regulatory requirements or for the purposes mentioned above.

## **6. Duration of data retention**

NEVEO does not store the collected data longer than the period provided by law and, in any case, not longer than necessary for the above-mentioned purposes. The data will be kept as long as the User is active. The User is considered no longer active 12 months following her/his last login.

## **7. International data transfers**

NEVEO will not transfer personal data to countries that do not have data protection legislation equivalent to that in force in the European Economic Area.

## **8. Statistical processing**

The User acknowledges that NEVEO has the right to use its data for statistical purposes, and as soon as it has been made anonymous, and to transfer or assign the corresponding statistical results to any third party.

## **9. Registration with the supervisory authority**

NEVEO has registered its business activities as a data controller with the Belgian Privacy Commission.

This declaration can be consulted in the public register on the following website: [www.privacycommission.be](http://www.privacycommission.be)

## **10. Questions from Users**

If you have any questions regarding this Privacy Policy, or if you feel that your interests are unrepresented or inadequately represented, please direct your questions to NEVEO at [privacy@neveo.io](mailto:privacy@neveo.io).

Each User has the right to lodge a complaint with the Data Protection Authority (<https://www.privacycommission.be/fr/contact>). However, she/he is invited to contact NEVEO in advance.

## Cookie Policy

### 1. General information

NEVEO (hereinafter « NEVEO »), a public limited liability company incorporated under the laws of Belgium, with registered offices at 1050 Brussels (Belgium), Rue Van Eyck 11B, registered in the Register of Legal Entities of Brussels under number 0568.484.039, provides the application, its services and any other means related to information and communication technologies (hereinafter the “Platform”).

Cookies of the Users of the Platform are collected in accordance with the provisions of this Cookie Policy.

### 2. How NEVEO uses cookies

#### 2.1 What are cookies?

Cookies are small text files or small pieces of data stored on the Platform. When the User browses the Platform in the future, the data stored in the cookie can be retrieved by the Platform to notify the Platform of the User’s previous activity. It helps the website to remember information about the use of the User. The User can choose to enable or disable cookies. Cookies do not typically contain any information that personally identifies a User, but personal information that we store about you may be linked to the information stored in and obtained from cookies. Further information on cookies can be found on <http://www.allaboutcookies.org/> or <http://www.aboutcookies.org/>.

#### 2.2 Purposes of the use of cookies

NEVEO uses cookies to improve its services. Cookies are used to enable the User to navigate the Platform and to provide certain features, and in particular to enable connected Users to be recognized from one page to another and thus avoiding having to reconnect. Cookies can also be used to collect signs of fraudulent behavior in order to protect the user. Another use of cookies is to ensure a secure visit to the Platform. NEVEO also uses the cookies necessary for the collection of anonymous statistical information by Google Analytics.

### 3. Which information is being collected?

Cookies may include clicking on particular buttons, logging in or a record of the User’s use of the Platform.

This Cookie Policy is in accordance with the Belgian law (Belgian Act of 10 January 2012 on various provisions for electronic communications, BS 20/9/2012).

### 4. Which types of cookies are being used?

<u>Category of use</u>	<u>Description</u>	<u>Example</u>
<i>Strictly required cookies</i>	These cookies are strictly necessary to enable the User to navigate the Platform or to	

	provide certain requested features.	
<i>Functional cookies</i>	Improve the user experience on the site by retaining their preferences.	Allows the logged-in User to be recognized from one page to another and thus avoid having to reconnect.
<i>Security</i>	Intended to prevent fraud and protect data from unauthorized parties.	For example, we use cookies to collect fraudulent behavior in order to protect Users.
<i>Performance cookies</i>	These cookies help to improve the performance of the Platform, providing a better User experience.	For example, the steps taken during the creation of the account, the (lack of) payments made, the buttons that have been clicked.  Google Analytics helps NEVEO analyze how Users use the Platform. It records the number of Users and gives information about their overall behavior, such as the typical duration of a usage.

5. Managing cookies in your browser

Some people prefer not to allow cookies. That’s why browsers give the ability to manage cookies. Please visit the websites of the different browsers to learn how to block the storage of cookies. It is also possible to delete currently installed cookies on your computer. The quality of the Platform and the services as well as the features can be restricted if cookies are blocked.

6. Third party cookies

Third-party cookies are cookies that do not belong to the Platform and that a third party may place on your browser when you visit our Platform. They provide an additional feature or service to the Platform but we do not always control their use as it depends on these third parties. If you would like to know more about the management of third-party cookies, please consult the website and the privacy policy of the third parties involved (e.g. Google Analytics and Stripe).

7. Changes in the Cookie Policy

NEVEO may update this Cookie Policy at any time by publishing a new version on the Platform. It is recommended that Users check the Cookie Policy regularly.

8. Questions from Users

If you have any questions regarding this Cookie Policy, or if you feel that your interests are unrepresented or inadequately represented, please direct your questions to NEVEO at [privacy@neveo.io](mailto:privacy@neveo.io).