

PRIVACY STATEMENT & CONFIDENTIALITY POLICY

Version 1 of the Privacy Statement, effective 19.12.2016

This Privacy Statement (hereinafter the "Statement") is an integral part of the Agreement.

The Statement sets forth our policy regarding the collection, use and disclosure of information about you under the Agreement in accordance with the Act of 8 December 1992 on the protection of privacy with regard to the processing of personal data.

By accepting the Terms of Use, you consent to the collection and processing of your personal data as described below:

1. BEPHOTO SPRL processes personal data about you (for example: name, date of birth, email address, IP address, personal data that you voluntarily communicate or publish through the User account, etc.).
2. BEPHOTO SPRL and the User are both responsible for processing personal data for their own purposes.
3. BEPHOTO SPRL does not collect sensitive data. If you provide us with or publish sensitive data, you acknowledge that you do so voluntarily and that you consent to our processing of such data in accordance with this Statement.
4. This processing of personal data allows us to (i) ensure the proper functioning of the Site and the Services, (ii) ensure the computer security of your data and the Site, (iii) communicate with you and allow you to communicate with other Users, (iv) execute the Services (v) to compile statistics relating to the consultation and use of the Site and the Services, (vi) to send you promotional communications by email related to the Site and the Services and (vii) to allow commercial partners to send you promotional communications.
5. Your personal data is reserved for the use of BEPHOTO SPRL's internal services and is only communicated to other Users, to service providers linked to the execution of the Services, to IT subcontractors and to BEPHOTO SPRL's commercial partners.
6. The only personal data communicated to other Users are those that you voluntarily communicate through your user account profile.
7. BEPHOTO SPRL takes appropriate physical, technical and organizational measures to ensure the security and confidentiality of your personal data, in particular with a view to protecting it against loss, accidental destruction, alteration and unauthorized access.
8. You can obtain communication and, if necessary, rectification or deletion of your personal data, by writing or emailing BEPHOTO SPRL - Rue Mathy 12 - 1380 Plancenoit - info@BEPHOTO.be - and by producing proof of your identity. As certain data is necessary for the proper functioning and security of the Application, we reserve the right to terminate the Contract and close your User account in case of a deletion request.

9. The Site uses cookies, which are files sent by our server that are stored on your computer's hard drive.
10. These cookies keep track of the site visited and contain a certain amount of information about that visit, in order to (i) operate the Site, (ii) simplify your visit and (iii) improve the Services.
11. You can set your web browser to give you the option of accepting a cookie or refusing to accept a cookie. You can also delete the cookies that have been set. It is however indicated that, if you refuse the insertion of cookies, it is possible that certain web pages of the Site will not be displayed correctly or even be inaccessible and that, if you delete the cookies that have been placed, certain operations cannot be repeated.

PRIVACY POLICY

Addendum to version 1 of the privacy statement that came into effect on 19.12.2016

Within the framework of their activities, the company BEPHOTO sprl whose sites and applications bephoto.be, bebooth.be and Bebooth process personal data of natural persons and are therefore subject to the provisions of the General Regulation on the Protection of Personal Data (abbreviated to RGPD) of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, in application since 25 May 2018.

WHAT TYPES OF PERSONAL DATA DO WE COLLECT?

In the course of performing our duties, we collect and store various types of personal data. The type of data collected may vary depending on the service we provide, but mainly includes the following data:

- your identification data: name, first name, address, date and place of birth,...
- your financial data: bank account and related information,...
- your socio-demographic data: marital status, family situation,...

We do not process any sensitive data relating to your health, political opinions, sexual orientation, religious beliefs, racial or ethnic origin.

If your photo sharing is with minors, we may also need to process certain personal data of those minors, such as the last name, first name and/or date of birth of your child(ren).

HOW IS PERSONAL DATA COLLECTED?

The personal data was provided to us by the person concerned or a relative.

BEBOOTH & API TRUDEPTH

Our Bebooth app uses information gathered automatically using the device's camera and the TrueDepth API provided by Apple. This information is only used to track the user's head and face so that the user can control the augmented reality experience and selfie filters by moving their device and head. None of the information collected by the TrueDepth API ever leaves the user's device or is persistently stored on the device.

We do not collect any personal information through our Bebooth application.

We do not collect, use, store or have access to any of your personal data from our applications. You may be asked to provide access to your photo library, but this is only so that you can store the photos created in the application. We do not process this information at all. Also, if you take a photo, location data is stored in the image, but we do not have access to this data and it is not shared with anyone unless you choose to share the image yourself.

WHAT DO WE USE THIS DATA FOR?

In accordance with the applicable regulation, we process personal data only on the following legal grounds:

- 1) conclude a business relationship: in accordance with the law of September 18, 2017 on the fight against money laundering and terrorist financing: we are required to collect personal data from customers and their agents;
- 2) to carry out a contract or a mission entrusted to us: without the processing of this data, we could not provide a quality service or carry out our mission;
- 3) to serve our legitimate interests: exercise of our rights of defense in criminal and civil cases; The use of this data may vary according to the mission we have been entrusted with and the treatment we give it, in particular:

- for administrative purposes
- for billing
- for legal, tax and social reasons
- to protect our rights and those of our clients

HOW LONG DO WE KEEP YOUR DATA?

Your personal data is kept only for the time necessary to achieve the purposes for which it was collected. In order to meet our legal obligations of conservation, some data may be kept without being processed. In this case, the retention period is determined by the legal provisions. At the end of this period, the data is deleted.

DATA SHARING

We may share personal data with :

- Subcontractors: to whom we only transmit the data necessary for their mission;
- external collaborators linked to any operation necessary for the execution of our mission (lawyers, curators...) and to whom we only transmit the data necessary for their mission;
- a public authority: in the event of an investigation, we are legally obliged to disclose the information requested of us (e.g.: a tax audit, etc.).

In accordance with the General Data Protection Regulation and unless the data subject objects, data may only be shared with a possible subcontractor or external collaborator if a binding contract has been concluded between our company and the subcontractor/external collaborator. In general, we also ensure that our partners are in compliance with our privacy policy.

INFORMATION SECURITY

Technical and organizational measures, such as firewalls and internal access control, are in place to ensure data protection security. These measures are designed to protect personal data against unauthorized access, loss and destruction.

All data we collect is stored on a secure network. The suppliers we use also respect the provisions of the General Data Protection Regulation.

THE RIGHTS OF THE PERSON CONCERNED

The rights of the person concerned are:

- right to information and access: obtain confirmation that the data is being used, request that the data held be communicated to the person concerned, be informed of any communication of data to a third party;
- right of rectification: to request the rectification of erroneous or incomplete personal data;
- right to erasure: to request the deletion of personal data when they are not or no longer used or in case of unlawful use;
- right to object: to limit the processing and use of personal data;
- right to portability: requesting that data be transferred to the data subject or to another controller as part of its service provision;
- right of claim: to claim damages in case of prejudice suffered.

To exercise these rights, the person concerned must submit a written request to rgpd@bepphoto.be or by mail to the following address

BEPHOTO sprl,
Rue Mathy 12
1380 Plancenoit
Belgium

In order to be able to respond to every request, we must be able to identify the person concerned accurately. If there is any doubt about the identity of the applicant, additional information may be requested. All requests will be processed within a reasonable period of time and at the latest within one month of receipt of the request, or within two months for complex requests.

Some requests may result in a charge to the applicant. We also reserve the right to refuse any unfounded or excessive request. In such cases, we will inform the applicant and an offer of service may be issued.

If you are a client, a proxy of one of our clients or a beneficial owner of one of our clients, we draw your attention to Article 65 of the Act of 18 September 2017 on the fight against money laundering and terrorist financing and the restriction of the use of cash.

This article states that "the person affected by the processing of personal data under this Act does not have the right to access and rectify his data, nor the right to forget, to portability of such data, or to object, nor the right not to be profiled or to be notified of security breaches.

If necessary, you should contact the Belgian Privacy Authority to exercise your rights.

COMPLAINT

You can also file a complaint with the competent supervisory authority. To do so, we invite you to consult the website of the Belgian Privacy Protection Authority: <https://www.autoriteprotectiondonnees.be>

CHANGES TO OUR PRIVACY POLICY

In order to comply with applicable privacy laws, we reserve the right to modify this Privacy Policy. Therefore, we invite you to regularly consult our website in order to remain informed about our personal data protection policy.

CONTACT INFORMATION

If you have any questions about our privacy policy, please contact us:

rgpd@bepphoto.be

BEPHOTO sprl ,

Rue Mathy 12

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