



Artrade.App

Privacy and personal data protection policy

Version of: 06 March 2023

Your privacy is important to us and we pay special attention to it. This Privacy Policy describes the information we collect about you through or in part through our website or through one of our social media pages, but also more generally in the context of your relationship with us, and how we process it (see information on how we collect, process and use your personal data).

This Data Protection Policy also specifies the rights that you have over your personal data in accordance with the applicable legal and regulatory provisions.

If you have any questions, comments or concerns about this policy, you can of course send them to us at the contact details *below* in the paragraph “What are your rights and how to exercise them?”.

1. 1. Definitions

In addition to the terms defined elsewhere in this policy, the following terms, the first letter of which is capitalized, whether used singularly or plural in this policy, will have the following definition:

- 1.1 “Recipient”: means the natural or legal person, public authority, agency or any other body that receives the communication of Personal Data, whether or not it is a third party.
- 1.2 “Personal data” means any information relating to an identified or identifiable natural person (hereinafter referred to as “Data Subject”); an “identifiable natural person” means a natural person 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 specific elements specific to his physical, physiological, genetic, mental, economic, cultural or social identity.
- 1.3 “Data Controller”: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Data Processing.
- 1.4 “Processor”: means the natural or legal person, public authority, agency or other body that processes Personal Data on behalf of the Controller.
- 1.5 “Processing”: means any operation or set of operations performed or not performed with the aid of automated processes and applied to personal data or sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or modification, retrieval, consultation, use, communication by transmission, dissemination or any other form of making available, reconciliation or interconnection, limitation, erasure or destruction.

2. Who are we and what is our role in the processing of personal data?

2.1 ARTRADE.APP (also referred to as the “Company” or “we” in this Data Protection Policy), a simplified joint stock company whose registered office is located at 39, rue de la Gare de Reuilly - BP 20006 75560 Paris cedex 12, registered at the RCS de Paris under number 902 799 212 (whose intra-Community VAT number is: FR23902799212 and the SIRET number is: 90279921200029), contact email: support@artrade.app

To learn more about our Company, <https://www.artrade.app/ln.pdf>

2.2 The Company operates the publicly available website at <https://artrade.app> (hereinafter the ‘Site’). This Site is designed to:

- make available to users information enabling them to discover the activity and services offered by the Company, as well as its news (events, publications,...);
- provide features and/or information to allow users to contact the Company and present the services offered by the Company, the projects carried out by the Company and future, or the team working on these projects;
- provide users with an online account and access to a platform and various related services as detailed in our terms and conditions <https://www.artrade.app/ln.pdf>;

The Company also maintains pages that feature its business and allow it to post content on social media and interact with users (including Instagram, Twitter, YouTube, Pinterest, Telegram, Discord, and LinkedIn).

When you browse and interact on the Site, on the pages administered by the Company on social networks or, in general, during your interactions or exchanges with the Company, the Company may collect and process Personal Data concerning you, for the management of the activities it carries out and on its own account, as Data Controller, whether you are a customer, prospect, contact, internet user, candidate, supplier, service provider or partner, potential or current (also referred to as “you” or “the data subject(s)” or “the user(s)” in this policy).

In this context, the Company applies the principles set out in the legal and regulatory provisions on the protection of personal data, in particular in Regulation (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data (“GDPR”) or Law 78-17 of 6 January 1978 on information technology, files and freedoms (known as “computer law and freedoms”) and its implementing decrees.

3. How do you collect your Personal Data?

3.1 Your Personal Data is collected directly from you, or indirectly from third parties.

3.1.1. In fact, your Personal Data are collected or processed in whole or in part in connection with your browsing on the Site, your interactions with the Site, and the entry by you of information in the data collection forms that may appear there, but also more generally in connection with requests that you may be required to address to the Company by any means at your convenience, your relationship and your exchanges with the Company, as well as when you share content of the Site by means of

sharing “buttons” on social networks that may be offered on our Site, or when you browse one of the Company pages on the social networks.

In general, your Personal Data is collected directly from you in the aforementioned situations.

3.1.2. However, your Personal Data may also be collected through third parties (cf. indirect collection from third parties).

The Personal Data that we collect and process concerning you may be collected or enriched by us, in particular for the purposes of carrying out commercial operations, communication, solicitation, prospecting or marketing, by means of other sources of information (social networks, so-called “public” information, websites, file rentals, etc.).

Likewise, your Personal Data may be transmitted to us by other employees/contacts within your company or through third parties in certain situations.

In addition, with regard more specifically to the Personal Data processed in the context of our recruitment operations (for a job or for a traineeship), we use the information you provide to us (e.g. form completed for this purpose or more generally information mentioned in your CV) that we integrate in our candidate file (CVthèque). However, we may also need to reach out to third parties (e.g. recruitment agencies, previous employers, traineeships or clients with whom you have worked on previous assignments) or use other sources of information (e.g. professional social networks, recruitment firms or specialized recruitment sites) to collect information about you for the purpose of reviewing your application or professional profile. In addition, and even if you do not apply, we may, in particular in the context of our monitoring and active search for professional profiles that may correspond to our job vacancies, collect Personal Data from third parties (for example, recruitment agencies or “headhunters”) or use other sources of information (including professional social networks or specialized recruitment sites) to collect information about you in order to propose you to apply for one of our job vacancies.

3.2 Furthermore, in general, you are informed that as a matter of principle:

- if the Processing of your Personal Data is necessary for compliance with our legal or regulatory obligations, the collection of such Data is mandatory;
- if the Processing of your Personal Data is subject to your consent, the communication to us of said Data is entirely optional (it being specified that their non-communication could, however, have the consequence of preventing us *at least* in certain cases from implementing the Processing concerned);
- if the Processing of your Personal Data is necessary for the performance of a contract or pre-contractual measures taken at your request, the communication of such Data is necessary for the pursuit of this purpose and the Company could, in the absence of the communication of such Data, be prevented from performing its contractual obligations or the aforementioned pre-contractual measures;
- if the Processing of your Personal Data is based on the pursuit of our legitimate interests, the communication of such Data is necessary for the pursuit of this purpose, and the failure to communicate your Data may not allow us to implement the Processing concerned or to obstruct it. For example, if you do not provide the information that would be necessary to respond to a request from you (inquiry, etc.), your request related to this collection of Personal Data may not be able to be processed or its processing delayed.

Special case: if personal data collection forms (for example, forms integrated on the Site or within our social media pages, or any form of collection in any format that we may be required to make available

to you to collect information about you) involve the entry of personal data mandatory for the implementation of the Associated Processing, the fields concerned contain an asterisk (or similar information) and you will be informed of the possible consequences of a failure to communicate this information. In the absence of an asterisk, the information requested is optional. In the absence of a specific form, the data required for the purposes pursued will be indicated to you, it being specified that the data not indicated as mandatory are of course optional.

3.3 Except as required by law or otherwise specified in this policy, we do not collect so-called “special” Personal Data, i.e., which would reveal racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, or genetic or biometric data for the purpose of uniquely identifying a natural person, or data concerning the health or data concerning the sexual life or sexual orientation of a natural person.

3.4 Personal data of protected minors or adults: We only offer our services to adults with legal capacity. Thus, in general, the use of the Site and the Company's dedicated pages on social networks is reserved for adults with legal capacity, the Company cannot be held responsible in any case for the use of the Site or its pages on social networks by minors or incapacitated persons, and therefore the consequences that may result in particular in the processing of their Personal Data.

By way of exception, we may process personal data of minors of at least 15 years of age when they contact the Company with a view to applying for a job or traineeship.

4. 4. What Data is collected, for what purposes, on what grounds and for what periods?

4.1 As a Data Controller, we may perform Processing of your Personal Data for the following purposes:

b. Management, processing and follow-up of requests for information and exchanges with users, initiated via or through the Site or the Company's social media pages, or by any other means, and more generally the Company's relations with its contacts in the broad sense:

- Purpose of the Processing: we process your Personal Data in order to process, manage and follow up any request for contact or information sent by you, by any means and in particular via the Site or via interactions on our social media pages (including in particular the management, processing, monitoring and possible moderation of your messages or comments), and to ensure the processing, management and follow-up of such requests and responses to them, and more generally for the purposes of managing our relations with our contacts in the broad sense.
- Data processed: identity (civility, surname, first name), username or pseudonym / alias, contact details (including postal address, telephone number or e-mail address), function and business of attachment if applicable, request for contact, information or documentation and correspondence exchanged.
- Legal basis of the Processing: the Processing of your Personal Data in this context is necessary to pursue the legitimate interests of the Company to respond to your requests, to make you benefit from the functionalities offered on the Site and more generally to ensure the management and follow-up of its relations with its contacts.
- Data retention period: retention for the period necessary to provide you with a response to your request or to manage your relationship with the Company and then, if applicable, for a period of three years following the end of your relationship with the Company or from your last contact with us, for the purpose of managing our relations with our contacts in the broad sense, in particular for the purposes of prospecting under the conditions and modalities provided below in g. and h. of this paragraph.

c. **Management of our customer relationships (pre-contractual, contractual and post-contractual):**

- Purpose of the Processing: in order to manage our pre-contractual, contractual and post-contractual relations with our customers, we collect the Personal Data of our customers and/or our contacts at our customers to ensure the provision, management and monitoring of your online account, the management and monitoring of the services provided, the conclusion and execution of contracts, payments and transactions, invoicing / related accounting, the customer relationship in the broad sense, and in particular the management and monitoring of customer accounts, claims, litigation and unpaid, or for the conduct and development of studies, analyzes, reports and statistics, particularly commercial statistics.
- Processed data:
 - o identity (civility, surname, first name, identifier, date of birth),
 - o contact details (e-mail address, postal address, telephone number, etc.),
 - o the identifier and password (encrypted) for your online account as well as data related to the connections to said account (including information collected / used in the context of double authentication) and the operation of the account,
 - o nationality.
- Legal basis of the Processing: as regards the personal data of the customers, such Processing is in principle necessary for the execution of pre-contractual measures taken at the request of the customer or of a contract concluded with the latter. Furthermore, the sub-purposes of this Processing linked to the management and monitoring of our relations with our customers in the broad sense (including in particular the management and monitoring of accounts receivable, complaints, or the carrying out and development of studies, analyzes, reports and statistics, etc.) are necessary to the pursuit of our legitimate interests in ensuring its proper management. In the case of Personal Data of our customer contacts, the Processing is based on our legitimate interests in managing and monitoring our relations with our customers in the broad sense, in particular for the organization and proper execution of the tasks or services entrusted to us by them. Finally, as regards in particular the management of invoicing and the associated accounting, such Processing may result from the legal obligations of the Company.
- Data retention period: retention for the duration of our relationship*, and then, if applicable, for a period of three years following the end of your relationship with the Company or from your last contact with us, for the purpose of managing our customer relations in the broad sense, in particular for the purposes of prospecting under the conditions and modalities provided below in g. and h. of this paragraph.
**Special case:* if the user does not log in to his online account for a period of two years, and provided that no assets are held in this account, the Company will close and delete this account, and the associated Data, without prejudice to the Company's ability to store some of this Data for other purposes under the conditions and conditions set out in this paragraph.
- Other Data Controllers: Users are informed that, in the context of the use of the services accessible through the Site, in particular services enabling transactions to be carried out on digital assets, their Personal Data may be processed by third parties acting in the context of those services. These third parties are entities independent of the Company, and carry out their own respective Personal Data Processing, for which they are solely responsible for the Processing, the Company having no power to determine the said Processing or to control these Processing operations. Therefore, users are invited to consult the personal data protection policies of these entities and other documentation that could be made available by these entities in relation to the processing of personal data that they implement (see in particular paragraph “Who are the Recipients of your Personal Data? How do we share your Data?”).
- Caution: Due to the use of the services accessible through the Site, users' Personal Data may be processed and stored within blockchains used in the context of the management, tracking and processing of transactions on digital assets because they are necessary for

the functioning of these blockchains. Therefore, it is specified to the user that such a Processing is in any event not the responsibility of the Company, which does not manage or control said blockchains, and therefore has no power of determination or control over the Processing of Personal Data that can be implemented in the context of said blockchains.

d. Management of our relationships with our partners, including also our current or potential providers and suppliers:

- Purpose of the Processing: in order to manage our relationships with our partners, we collect Personal Data concerning our current and/or potential partners, and/or their staff members, and/or more generally our contacts with our partners (e.g. partner staff members, partners' service providers/consultants, etc.). The purpose of this Processing is to search for new partners, to manage, follow up and respond to requests from partners, quotes or proposals for services, as well as to manage the partners and/or to manage our relations with them, including in particular the management and monitoring of the execution of contracts, orders/services entrusted, deliveries, invoices, payments and transactions, the associated accounting, and in particular the management and monitoring of partner accounts, the relationship in the broad sense and any claims or pre-litigation/litigation.
- Processed data: identity (civility, surname, first name), contact details (e-mail address, postal address, telephone number, etc.), connecting company and function, information on requests for partnerships, quotes and proposals for services, details of orders / services / contracts, payment and means of payment data, transaction data, contract and relationship tracking data, invoice data.
- Legal basis of the Processing: as regards the personal data of the natural partners, such Processing is in principle necessary for the execution of pre-contractual measures taken at their request or a contract concluded by the latter with the Company. In the case of personal data relating to contacts with partners, the Processing is based on the legitimate interests of the Company in managing and monitoring its relations with its partners, in particular with a view to the organization and proper performance of the tasks or services entrusted to them. In any event, the sub-purposes of this Processing linked to the search for new partners and to the management and monitoring of the Company's relations with its partners in the broad sense (including in particular the management and monitoring of partner accounts, or even of any claims or pre-litigation/litigation, etc.) are necessary for the pursuit of the legitimate interests of the Company in the context of the search for new partners and the monitoring of the proper execution of contracts concluded with the partners. As regards the Personal Data of other data subjects (staff members/contacts at our partners), the Processing is based on our legitimate interests in managing and monitoring our relations with our partners, in particular with a view to the organization and proper performance of the tasks or services entrusted to them. Finally, as regards in particular the management of invoices and the associated accounting, such Processing may result from the legal obligations of the Company.
- Data retention period: duration of the pre-contractual relationship (for potential partners), contractual or commercial relationship (for current partners) with the Company.

e. Event organization, management and tracking:

- Purpose of the Processing: we may be required to process Personal Data concerning you in the context of the management and follow-up of the events we propose (organization of interventions, management, processing and follow-up of registrations, responses to inquiries, etc.).
- Processed data: identity, contact details, function and company of attachment, information on registrations and participation in events.

- Legal basis of the Processing: in general, the Processing of your Personal Data in this case is necessary for the organization and management of events, and therefore based on the performance of a contract to which you are a party (cf. event registration contract).
- Data retention period: retention for the period necessary for the organization and follow-up of the event, and then, if applicable, for a period of three years following the end of your relationship with the Company or from your last contact with us, for the purpose of managing our relationships with our contacts in the broad sense, in particular for the purposes of prospecting under the conditions and modalities provided below in g. and h. of this paragraph.

f. **Prospecting / solicitation by post or telephone:**

- Purpose of the Processing: we may process the Personal Data of our customers, prospects, and more generally contacts for the purpose of carrying out our commercial operations, communication, solicitation, prospecting, loyalty or marketing (including technical operations of segmentation, targeting, etc.) by post or telephone, in particular with a view to sending them certain information for this purpose by this means (namely: email, sms, mms): proposal of products and services likely to interest them, information about our news and/or activities, other information or prospecting documents, or studies, surveys, promotions or satisfaction surveys.
- Data processed: identity, contact details.
- Legal basis of the Processing: such Processing is carried out on the basis of the pursuit of our legitimate interests to make known our products and services on the market, and more generally to carry out communication operations, knowing that **the recipient of such surveys has in any case the right to oppose it at any time without having to provide reasons or explanations in accordance with the terms and conditions set out below in the paragraph “What are your rights and how to exercise them?”.**
- Data retention period: three years from the collection of the Personal Data or the end of our relationship, or from the last contact from the Data Subject to us (for example, for a customer, from an operation or the use / execution of a service, from the end of a service contract or the general terms and conditions that bind us or from the last contact from the customer and, for a prospect, from the last contact from the latter (online request, email or postal mail, telephone call, or click in an email to his attention sent by the Company, etc.).

g. **E-mail solicitation prospecting:**

- Purpose of the Processing: we may process the Personal Data of our customers, prospects, and more generally contacts for the purpose of carrying out our commercial operations, communication, solicitation, prospecting, loyalty or marketing (including technical operations of segmentation, targeting, etc.) by email, in particular with a view to sending them certain information for this purpose by this means (namely: email, sms, mms): offering products and services likely to interest them, information on our news and/or activities (e.g. newsletters), other information or prospecting documents, or studies, surveys, promotions or satisfaction surveys . . . We may also analyze the performance of our marketing campaigns by means of so-called tracking information relating to your actions in respect of the emails we send.
- Processed data: identity, e-mail address, data relating to actions carried out in e-mails (openings, clicks, etc.).
- Legal basis of the Processing:
 - o where such transactions are not subject to the prior consent of the data subjects, that is to say, where they are (i) for the attention of professionals, on a professional email address and in relation to the profession of the recipient person, or (ii) for the destination of clients and they relate to products or services offered by us which are similar to those already provided by us to that client, then such Processing is implemented on the basis of our legitimate

interests in making known our products and services on the market, and more generally in carrying out prospecting and solicitation operations in the broad sense, it being specified that **the recipient of such prospecting has in any event the right to object at any time without having to provide any reason or explanation in the manner and under the conditions set out below in the paragraph “What are your rights and how do you exercise them?”**;

- o in the other cases, such Processing is based on the consent of the Data Subject, which means that the Data Subject **has the possibility of not consenting to it or, if he consents to it, of subsequently withdrawing his consent at any time, and without having to provide any reason or explanation in accordance with the terms and conditions set out below in the paragraph “What are your rights and how to exercise them?”**.
 - **Data retention period**: three years from the collection of the Personal Data or the end of our relationship, or from the last contact from the Data Subject to us (for example, for a customer, from an operation or the use / execution of a service, from the end of a service contract or the general conditions that bind us or from the last contact from the customer and, for a prospect, from the last contact from the latter (online request, email or postal mail, telephone call, or click in an email to his attention sent by the Company, etc.).algorithm
- h. Use of cookies or other similar technologies for the purposes of monitoring navigation, including the conduct and development of studies, analyzes, reports and statistics, managing and monitoring the proper functioning of the Site, improving the user experience, making certain services or functionalities available on the Site, monitoring and measuring the audience and performance of the Site, and displaying advertisements, possibly targeted (outside social networks or functionalities related to social networks):**
- **Purpose of the Processing**: in the context of your use of the Site and more generally of our digital media (outside social networks or functionalities related to social networks), we process Personal Data concerning you in particular for the purposes of monitoring navigation, including the conduct and development of studies, analyzes, reports and statistics, management and monitoring of the proper functioning and in particular the security of our Site and improvement of the user experience, making available certain services or functionalities on the Site, and monitoring and measuring the audience and performance of the Site. Personal Data about you may also be collected and processed in order to allow the display to your attention on the Site or on the websites of third parties of advertisements, possibly targeted (or behavioral or programmatic advertisements) according to your profile, your navigation, your location (see geolocated advertising) and your interactions with the websites you visit. This Personal Data is collected by means of cookies or other similar technologies, the use of which is subject to your consent and is therefore optional.
 - **Processed data**: session, connection and internet browsing data, including in particular information about your browser or terminal and their configuration (e.g. device fingerprinting, unique device identifier, display resolution, operating system, IP address, internet browser, type of terminal, etc.), the history and more generally information about traffic and navigation on the Site, information relating to the traceability of actions on and interactions with the Site, information of the type “identifiers” related to your terminal, your hardware or your operating system, or information of the type “scoring” (e.g. score bot aimed at ensuring that the user is not a robot), information about your preferences for browsing and using the Site or third-party websites, location data (e.g. IP address and geographical area), information about the network, your language, or non-personal data (e.g. age, gender, interests, etc.) (i.e. specific to the user's identifier).
 - **Legal basis of the Processing**: where the Processing of your Data is either exclusively for the purpose of enabling or facilitating communication by electronic means, or is

strictly necessary for the provision of an online communication service at your express request, that is to say, in general, if this Processing is strictly necessary for the purposes of enabling you to browse our Site and benefit from the functionalities offered, it is based on our legitimate interest in facilitating your navigation on our Site. In other cases, such Processing is in principle subject to your prior consent to the use of cookies and other similar technologies for the aforementioned purposes, which means that **you have the possibility of not consenting to it or, if you consent to it, of subsequently withdrawing your consent at any time, and without having to provide any reason or explanation**. To learn more about the cookies, tracers and other similar technologies used by us and our partners on our Site, and how to set them, please refer to our “cookie management policy” <https://www.artrade.app/cp.pdf>

- **Maximum lifetime of cookies and retention of Personal Data collected by this means:** six months from the deposit of cookies in your browser or terminal (depending on the type of cookie or tracker concerned - on this point, see our “cookie management policy” <https://www.artrade.app/cp.pdf>)
- i. **Use of cookies or other similar technologies for the purpose of tracking browsing, including conducting and developing studies, analyzes, reports and statistics, providing and monitoring social media interactivity features, improving the user experience, monitoring and measuring the audience and performance of the Company's social media pages, and displaying advertisements, which may be targeted (social media and social media features):**
 - **Purpose of the Processing:** for the purpose of providing interactivity functionalities between our Site and social networks, and of monitoring, understanding and studying the use of our social network pages and the interactions between our Site and social networks, we may offer you on our Site links to our social network pages, set up said social network pages as administrator or offer you to use on these networks the tools created/offered by these social networks. In this case, we process Personal Data concerning you in particular to make available to you the aforementioned interactivity functionalities (for example, buttons for accessing pages on social networks, etc.), but also to improve your user experience, to measure the audience and performance of our pages on social networks and the interactions between our Site and said networks, and to establish statistics, in particular navigation statistics. Personal Data about you may also be collected and processed in order to allow the display to your attention on social networks of advertisements, possibly targeted (or behavioral or programmatic advertisements) according to your profile, your navigation, your location (see geolocated advertising) and your interactions with our pages on social networks and also with our Site or with other websites you visit. This Personal Data is collected by means of cookies or other similar technologies, the use of which is subject to your consent and is therefore optional.
 - **Processed data:** session, connection and internet browsing data, including in particular information about your browser or terminal and its configuration (e.g. device fingerprinting), the history of traffic and navigation on our social media pages, information relating to the traceability of actions on and interactions with our social media pages or between our Site and social networks, information such as “identifiers” related to your terminal, your hardware, social networks or your location data operating system (e.g. IP address and geographical area), information relating to the network, your language, or personal data (age, gender, centers) non-nominative interests (i.e. specific to the user’s identifier).
 - **Legal basis of the Processing:** such Processing is subject to your prior consent to the use of cookies and other similar technologies for the aforementioned purposes, which means that **you have the possibility of not consenting to it or, if you consent to it, of subsequently withdrawing your consent at any time, and without having to provide any reason or explanation**. To learn more about cookies, trackers and other similar

technologies used by us, click here to access our “cookie management policy” <https://www.artrade.app/cp.pdf>

- **Joint Data Controllers:** where our setting up of a social networking tool has an impact on the nature of the Personal Data processed or the characteristics of this Processing, and more specifically where it can be considered that the Company contributes to jointly determining the purposes and/or means of the processing of Personal Data, we may be jointly responsible for the Processing of your Personal Data with the social network concerned. In this case, the social network, which primarily determines the purpose and means of the processing, as well as the nature and the methods of placing cookies, has the primary responsibility for the Processing and we recommend that you consult the privacy policies and the “cookie” policies of these third parties for detailed information on their practices of collection and processing of your Personal Data. This includes social networks such as Instagram, Facebook, Pinterest, Youtube, Twitter and LinkedIn. You are hereby informed that, in relation to these social networks, our joint controllers may be:
 - o Facebook Ireland Limited, 4 Grand Canal Square, Grand Canal Harbor Dublin 2, Ireland. For more information on how Facebook processes your Personal Data when you use the Facebook or Instagram social network, please refer to the [Instagram Data Usage Policy](#), but also to the [Instagram “Cookies” Policy](#);
 - o Twitter International Company, One Cumberland Place, Fenian Street Dublin 2, D02 AX07 Ireland. For more information on how Twitter handles your Personal Data, please refer to the Twitter [Privacy Policy](#) and [Cookies Policy](#);
 - o LinkedIn: LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland. For more information on how LinkedIn processes your Personal Data, please refer to the LinkedIn [Privacy Policy](#) and [Cookies Policy](#);
 - o YouTube: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. For more information on how Google processes your Personal Data when you use the YouTube social network, please refer to Google's [Privacy Policy](#) but also to [elements related to the use of “Cookies”](#) by Google;
 - o About Discord: For information on how Discord processes your Personal Data, please refer to the Discord [Privacy Policy](#).

- **Maximum lifetime of cookies and retention of Personal Data collected by this means:** six months from the deposit of cookies in your browser or terminal (depending on the type of cookie or tracker concerned - on this point, see our “cookie management policy” <https://www.artrade.app/cp.pdf>)

j. Managing applications and the recruitment process:

- **Purpose of the Processing:** the Company may process your Personal Data for the purposes of managing and monitoring applications, in response to job or internship offers or which are sent to us spontaneously, and operations relating to the recruitment process, including in particular the monitoring and active search of professional profiles corresponding to positions of power within the Company, the reception and study of applications, the evaluation and selection of applications and professional profiles, the establishment of a file of candidates (or CVthèque), the use of methods and techniques to assist recruitment (in particular psychotechnical or even psychological tests, graphical or graphical analyzes still in professional situations), the calling of candidates and the conduct of recruitment interviews, and the resulting decision-making (rejection of the application or recruitment of the candidate)
- **Data processed:** identity (civility, surname, first name), contact details (e-mail address, telephone number, postal address, etc.), data relating to your professional life, information relating to your education (studies, diplomas, etc.), your professional experience and career path, your professional skills/references and the job you hold, economic and financial information, and any information contained in your CV

(including your interests where applicable), and more generally in your application (including motivation letter, book, etc.).

- Legal basis of the Processing: such Processing is necessary for the pursuit of our legitimate interests with a view to the search and recruitment of new employees.
- Data retention period: Your Personal Data is retained for the period necessary for the processing of your application, and may, unless you object, be retained until the expiration of a period of two years from the receipt of your application, for example to allow us to contact you again during this period if a position related to your profile becomes available.

k. Management by the Company of requests to exercise the rights of data subjects with regard to the protection of Personal Data, in accordance with its legal and regulatory obligations:

- Purpose of the Processing: in order to enable us to comply with our various legal and regulatory obligations regarding the protection of Personal Data (e.g. responses to requests for the exercise of their rights by data subjects, taking into account the consequences resulting therefrom, in particular the management of objections to prospecting, etc.), we may be required to process Personal Data concerning you in connection with this purpose.
- Data processed: identity (civility, surname, first name), contact details (e-mail address, telephone number, postal address, etc. depending on the information provided by the applicant), content and content of the application, exchanges and reply, additional information or copy of an identity document but only when the situation so requires (cf. reasonable doubts as to the identity of the applicant).
- Legal basis of the Processing: such Processing is necessary for compliance with our aforementioned legal and regulatory obligations.
- Data retention period: time required to process the request and then, if necessary, to keep the Data necessary to take account of the exercise of these rights for a period of three years from the request sent by the Data Subject to the Company (it being specified that in the event of a request to object to prospecting, your data will be kept for this purpose in an opposition list for a period of three years and that when the copy of an identity document is collected in the context of a request to exercise your rights, it is:
 - o immediately deleted if it has been communicated by you when the application does not require the transmission of such an identity document;
 - o deleted immediately upon verification of the identity of the person making the request where the situation requires such verification.

l. Management and follow-up of pre-litigation and litigation

- Purpose of the Processing: such Processing of Personal Data concerning you is carried out with a view to:
 - o the management and follow-up of pre-litigation and litigation (in particular commercial litigation / with customers, with partners / suppliers / suppliers, with contacts in the broad sense, ...), including in particular the preparation, exercise and follow-up of litigation and the execution of decisions rendered;
 - o the management and follow-up of actions for the establishment, exercise or defense of legal claims (including, where appropriate, the enforcement of the judgment given).
- Processed data: identity (civility, first name, surname), civil status, economic and financial information, information relating to the defendants, victims, witnesses, court officials mandated in the dispute / in the proceedings (surname, first name, contact details, date of birth, etc.), history of exchanges with the Company (e.g. recovery letters, formal notice, records and documents of the proceedings, etc.), information on the financial situation, and also economic and financial information relating to the dispute and the defendants, so-called “special” data, etc., and more generally all information if this is necessary in the light of the subject-matter of the dispute including, where

applicable, data relating to criminal convictions or offenses or security measures, the facts at issue at the origin of the proceedings, the information, documents and documents collected intended to establish or refute facts liable to be criticized (statement, testimony, attestation, formal notice, report, logs extracted from a tool for securing computer resources, fact-finding sheet, lodging of a complaint, medical certificate), the characteristics and details of the pre-litigation but also of the litigation (e.g. date of commencement and closure of the dispute, court seised, date of summons, date of hearing, state of proceedings) the procedure, nature and subject-matter of the requests, objections, arguments, observations and opinions of the legal representatives, date of judgment), the date, nature, reasons, amounts and possible staggering of sentences, comments on the description and follow-up of the procedure, etc.

- Legal basis of the Processing: such Processing of your Personal Data by the Company is based on the legitimate interests pursued by the latter with the aim of preserving / asserting its interests and rights in legal proceedings, in particular in the performance of relations with its clients (current or potential), partners (current or potential), contacts, candidates, etc. Furthermore, in the context of this Processing, so-called “special” Personal Data may be processed for the aforementioned purposes if they are strictly necessary for these purposes and for the establishment, exercise or defense of a right in legal proceedings. Similarly, data relating to offenses, convictions or security measures may be processed for the purposes of enabling us to prepare and, where appropriate, to pursue and monitor legal proceedings as a victim, defendant, or on behalf of a victim or defendant, and to enforce the judgment rendered.
- Data retention period: retention beyond the periods referred to above for each of the other purposes, in the form of archives, during the statutory limitation periods, in particular for probationary purposes (cf. in general, five years for the limitation period under ordinary law in civil matters, six years for the limitation period under ordinary law in criminal matters or two to five years in labor law matters).
 - o In the event of pre-litigation initiated before the end of the above periods and which would require the retention of the Personal Data in particular for the purpose of establishing, exercising or defending the rights of the Company, these will be retained until the amicable settlement of the dispute (including its execution if applicable), or, failing that, will be deleted as soon as the corresponding legal action is time-barred.
 - o In the event of litigation / proceedings, in particular judicial proceedings, initiated before the end of the above periods and which would require the retention of Personal Data in particular for the purpose of establishing, exercising or defending the rights of the Company, these will be retained for the duration of the said proceedings and until ordinary and extraordinary remedies are no longer possible against the decision rendered. The decisions pronounced may be kept by the Company until the full execution of the decision, or even as a final record.

4.2 It is specified that your Personal Data may however be retained longer than the aforementioned periods:

- either after obtaining your consent;
- or, in the form of archives, to meet any legal and regulatory obligations imposed on the Company (e.g. 10 years for the retention of accounting documents and supporting documents or for the retention of contracts concluded by electronic means, 5 years for the Company’s obligations in the fight against money laundering and terrorist financing, etc.) or during the statutory limitation periods, in particular for evidentiary purposes (cf. in general, 5 years for the limitation period in civil matters, 6 years for the limitation period in ordinary law in criminal matters or 2 to 5 years in the field of labor law).

4.3 Furthermore, users are informed that, despite their deletion by the Company within its own information systems or databases, in accordance with the above, certain Personal Data are not,

however, erasable, and therefore not deleted, within the blockchains used in the context of the management, tracking and processing of transactions on digital assets, because they are necessary for the functioning of those blockchains. Their storage is in any event not the responsibility of the Company, which does not manage or control the said blockchains, and therefore has no power of determination or control over the Processing of Personal Data that may be implemented in the context of the said blockchains, nor of deletion of the Data within these blockchains.

1. 5. Who are the Recipients of your Personal Data? How do we share your Data?

5.1 We ensure that only authorized persons within the Company can access your Personal Data where such access is, depending on the purposes pursued, necessary for the performance of their functions and/or missions, namely in particular:

- the Company's authorized personnel (including employees, trainees, agency workers, etc.), in particular in charge of marketing and communication, sales, recruitment and human resources, customer and prospects relations, administrative, financial and legal, development, IT, projects, etc.

5.2 External recipients may also receive communication of your Personal Data, namely:

- the staff of the departments responsible for the control of our Company (auditors, departments responsible for internal or external control procedures, bodies authorized to carry out controls, etc.);
- the staff of our advisors (legal, financial, etc.);
- the personnel of our partners, including in particular our suppliers and suppliers, who are subject to a contract specifying their obligations;
- the staff of our partners, contractual or commercial, and of third-party companies, including in particular the publishers of social networks, the publishers of third-party websites or the publishers of cookies used on our Site, for example for carrying out prospecting, communication operations, etc. or even in the context of the management of our digital marketing, or even for the functioning of our Site in the broad sense (e.g. provision and proper functioning of the functionalities offered on it, performance, security, etc.). In this regard, it is also pointed out for the record that if you post content disclosing your Personal Data on the Internet, and in particular on our Site or on the social media pages of the Company, these contents may of course be accessible to any Internet user;
- staff of technical or other providers involved in activities or missions for which access to Personal Data is strictly necessary and/or justified. This category of recipients may also include any application, computer program or tool publisher or any payment service or verification service provider (including identity) that would be used in the course of our activities or for the purpose of providing you with the services accessible through the Site, or any computer or maintenance provider of the applications, computer programs and/or tools that we use and in which your Personal Data may be processed;
- the Company's customers (including potentially their staff) for certain Personal Data;
- the staff of the social and fiscal bodies authorized to receive, in certain cases, the Personal Data;
- agency staff, court clerks and ministerial officers, acting in particular in the context of their task of collecting debts;
- where appropriate, the staff of the body responsible for managing the list of objections to telephone solicitation;
- court clerks, ministerial officers and, where appropriate, staff of the courts or competent authorities to enable the sale or transfer of all or part of our activities or assets, or in the context of the management and follow-up of pre-litigation and/or litigation;
- our insurers and/or insurance brokers (including their staff).

5.3 Certain partners or third parties (including their personnel) are also Recipients of your Personal Data when you use the services accessible through the Site.

In this regard, it is specified that the Company is not responsible for the Processing of Personal Data that could be implemented by these partners and third parties (or by any Recipient whatsoever), the latter implementing their own respective Processing of Personal Data, for which they are respectively solely Responsible for Processing, the Company having no power to determine such Processing or to control such Processing. By way of information, the user is invited to consult the personal data protection policies of these entities and other documentation that could be made available by these entities in relation to the processing of personal data that they implement.

5.4 In addition, given the nature of the services offered and/or accessible through our Site, your Personal Data may naturally be communicated, stored, stored and stored within the various blockchains used in the context of the management, monitoring and processing of the operations that you carry out, because they are necessary for the functioning of said blockchains, it being recalled that the Company does not manage or control said blockchains, and therefore has no power of determination or control over the Processing of Personal Data that can be implemented in the context of said blockchains, and that these Processing operations are in no way the responsibility of the Company.

5.5 We may also be required to disclose your Personal Data in the event of legitimate requests from public or authorized authorities, in particular to meet requirements relating to compliance with the law on personal data, national security, the fight against fraud, money laundering and terrorist financing or, more broadly, the application of legal or regulatory provisions. Your Personal Data may therefore in particular be communicated to any authority entitled to know it, in particular in the event of a request from judicial, police or administrative authorities. In such cases, we will consider the applicable provisions, the nature of the request, as well as its legitimacy and the proportionality of the information requested. Finally, we reserve the right to report to public authorities activities that we consider in good faith to be illegal and alleged abuses.

5.6 It is specified that the Recipients referred to above are not necessarily or necessarily Recipients of all your Personal Data, but only those necessary for the purpose involving such communication.

2. 6. What are your rights and how do you exercise them?

6.1 You have the following rights in relation to your Data, subject to the conditions and conditions and within the limits defined by the legal and regulatory provisions on the protection of Personal Data:

- Right of access: You can obtain confirmation that Personal Data concerning you are or are not processed by the Company and, when they are, access to such Personal Data, as well as certain information relating to the Processing of your Personal Data and the characteristics of such Processing;
- Right of rectification: you may request correction of your Personal Data that you consider incomplete or inaccurate;
- Right to erasure: You may, in certain circumstances, request the erasure of your Personal Data (unless, for example, it is necessary for the performance of your contractual relations with the Company if applicable, or it is necessary for the Company to comply with its legal or regulatory obligations or to ascertain or exercise its rights);
- Right to restriction of Processing: you may request restriction of the Processing of your Personal Data, allowing you to request in certain situations the marking of your Personal Data in order to limit the further Processing;
- Right to the portability of your Personal Data: you have the right under certain circumstances and conditions to request to receive the Personal Data concerning you that you have provided to us or, where technically possible, to have it transferred to a third party, in a

machine-readable form (it being specified that this right to the portability of the Data applies only to Processing based on the consent of the Data Subjects or on the performance of contractual relations, provided that the Processing of the Data is carried out using automated processes);

- Right to withdraw consent: You may withdraw consent if the Processing is carried out on the basis of your consent, without the withdrawal of such consent being contrary to the lawfulness of the Processing based on consent carried out before the withdrawal of consent;
- Right to establish guidelines for the retention, erasure or disclosure of your Personal Data after your death. In this regard, in the event of death that is brought to our attention, please be aware that your Personal Data will in principle be deleted (unless it is necessary to keep it for a fixed period for reasons relating to our legal and regulatory obligations and/or the statutory periods of prescription and/or mandatory storage referred to *above* in paragraph 4 in detail the characteristics of the processing), after having been communicated to a third party, if appropriate designated by you.

Furthermore, you enjoy, in certain cases and under certain conditions provided for by the applicable provisions, a **Right of Objection** by which you can object to the Processing of your Personal Data for reasons related to your particular situation, **that it being specified that in the case of prospecting operations, including profiling operations which would be related to such prospecting, you have an absolute right of objection, which can be exercised at any time, without having to provide any reason or justification.**

Attention: the exercise of these rights is nevertheless limited, as regards the Personal Data that would be necessary for the operation of these blockchains (cf. in particular the Data stored / stored within the blockchains used in the management, monitoring and processing of transactions). Indeed, these Data necessary for the operation of blockchains are neither modifiable nor erasable during the lifetime of the blockchain concerned. Furthermore, the storage / storage of these Data in these blockchains is not the responsibility of the Company, which does not manage or control these blockchains, and which therefore has no power of determination or control over the Processing of Personal Data that can be implemented in the context of these blockchains, nor to pass on the exercise by the Data Subjects of their rights to these blockchains.

6.2 As regards the Processing of your Personal Data by the Company, these rights are exercised i) by email to the following email address: dpo@artrade.app or ii) by post to the following address: 542 Chemin de Fontcuberte, 13770 Venelles. In any event, in the event of reasonable doubt as to the identity of the person making such a request for the exercise of his rights, the Company may always request that it be provided with additional information necessary to confirm the identity of the Person concerned and, for this purpose, where the situation so requires, request a photocopy of an identity document bearing the signature of the holder. In such a case, the abovementioned response times shall be suspended pending receipt of the additional information necessary to identify the Data Subject.

If such a request is received, it shall be replied to as soon as possible and in any event within a maximum period of one month from receipt of the request. If necessary, this period may be extended by two months, taking into account the complexity and number of applications received, in which case the applicant shall be informed.

The request may be made by the Data Subject or by a person specially authorized by the Data Subject for this purpose, provided that this authorized person provides proof of his identity and the identity of the principal, his mandate and the precise duration and purpose of the latter. The mandate must also specify whether the representative can be made the recipient of the reply.

6.3 In addition, and for the record, we may in certain circumstances be considered as jointly responsible for the Processing of your Personal Data with the social networks in which we have

dedicated pages or with which we propose interactions (cf. details of the purposes above). Depending on the social network concerned, our joint data controllers may be:

- Facebook Ireland Limited, 4 Grand Canal Square, Grand Canal Harbor Dublin 2, Ireland. For more information on how Facebook processes your Personal Data when you use the Facebook or Instagram social network, please refer to the [Instagram Data Usage Policy](#), but also to the [Instagram](#) “Cookies” Policy if applicable in order to set the cookies used on the pages of these social networks;
- Twitter International Company, One Cumberland Place, Fenian Street Dublin 2, D02 AX07 Ireland. For more information on how Twitter processes your Personal Data, please refer to the [Privacy Policy](#) and the [“Cookies” Policy](#) of Twitter where applicable in order to set the cookies used on the pages of this social network;
- LinkedIn: LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland. For more information on how LinkedIn processes your Personal Data, please refer to the [Privacy Policy](#) and the [“Cookies” Policy](#) of LinkedIn where applicable in order to set the cookies used on the pages of this social network;
- YouTube: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. For more information on how Google processes your Personal Data when you use the YouTube social network, please refer to Google's [Privacy Policy](#) but also to [elements related to the use of “Cookies”](#) by Google;
- About Discord: For information about how Discord processes your Personal Data, please refer to Discord's Privacy Policy.
- Regarding Reddit: For information on how Reddit processes your Personal Data, please refer to Reddit's Privacy Policy.

In these cases, you can also consult your account settings on the social networks mentioned above and address yourself to:

- in relation to Instagram: to the Data Protection Officer of Facebook Ireland Limited by email, including [using the dedicated contact form](#);
- in the case of Twitter: to the Data Protection Officer of Twitter by email, in particular using the [dedicated contact form](#);
- in the case of LinkedIn: to the Data Protection Officer of LinkedIn by email, in particular using the [dedicated contact form](#);
- in the case of YouTube: to the Data Protection Officer of Google Ireland Limited by email, including using the [dedicated contact form](#);
- for Pinterest: at the Pinterest Europe Ltd Support Center using the [dedicated contact form](#);
- In the case of Discord: at privacy@discord.com;

6.4 In any event, you have the right to lodge a complaint with the competent supervisory authority (in France, this is the Commission Nationale de l’Informatique et des Libertés, known as ‘Cnil’: 3 place de Fontenoy - TSA 80715 - 75334 Paris cedex 07; tel. 01 53 73 22 22) if you consider that the Processing of your Personal Data is not carried out in accordance with the legal and regulatory provisions on the protection of Personal Data.

To understand your rights, you can also refer to the explanations provided by the Cnil here: <https://www.cnil.fr/fr/les-droits-pour-maitriser-vos-donnees-personnelles>

6.5 We would like to point out that, pursuant to Articles L.223-1 et seq. of the French Consumer Code, you may, if you are a consumer, object at any time to being contacted by telephone, by registering for free on the website [“www.bloctel.gouv.fr”](http://www.bloctel.gouv.fr).

3. 7. How is your Personal Data secured?

7.1 The Company implements appropriate organizational and technical security measures, in particular with regard to the categories of Personal Data processed, the state of knowledge, the costs of implementation and the nature, scope, context and purposes of the Processing as well as the risks, the degree of probability and severity of which varies, for the rights and freedoms of natural persons, to protect your Personal Data against any malicious intrusion, any loss, alteration or disclosure to unauthorized third parties, and more generally to preserve the security and confidentiality of said Personal Data and to guarantee a level of security adapted to the risk.

However, due to the difficulties inherent in carrying on an activity on the Internet and the risks, which you are aware of, resulting from the transmission of data by electronic means, the Company cannot be bound by an obligation of result.

In the event of difficulties arising, the Company will make its best efforts to limit the risks and take all appropriate measures, in accordance with its legal and regulatory obligations (corrective actions, information of the Cnil and, where appropriate, of the persons concerned, etc.).

7.2 When developing, designing, selecting and using our services offered on the Site based on the Processing of Personal Data, the Company takes into account the right to the protection of Personal Data by default and by design (cf. principles of “Privacy by design and by default”).

7.3 Access to your Personal Data is limited to our employees or partners, and more generally to the Recipients referred to *above*, who are authorized and need to know them in the course of carrying out their tasks and/or activities.

7.4 In the event of the outsourcing of part or all of a Processing of Personal Data, the Company contractually imposes on its Subcontractors guarantees of security and in particular confidentiality with regard to the Personal Data to which they may have access (appropriate technical and organizational measures for the protection of these Data).

4. 8. Is your Personal Data transferred outside the European Union?

8.1 Your Personal Data is processed preferentially in the European Union.

8.2 For the above purposes, however, some of your Personal Data may be transferred to third-party entities established in countries outside the European Union (e.g., the Company's subcontractors involved in the aforementioned Processing, etc.).

Some of these Recipients of your Personal Data are considered to provide a sufficient level of protection of Personal Data because they are established in a country whose personal data protection regulations have been recognized as providing an adequate level of protection of Personal Data (see European Commission adequacy decisions https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en).

In addition, if the country of the recipient of your Personal Data does not provide an adequate level of protection of your Personal Data, we will ensure that appropriate security and confidentiality measures are taken to ensure that the protection of your Data is maintained.

Therefore, in these cases, you are informed that transfers of your Personal Data to other entities outside the European Union are governed by the conclusion, with the Recipients of these Data, of contractual clauses in accordance with the recommendations of the European Commission to ensure that appropriate guarantees are taken regarding the protection of these Data.

We also inform you that transfers of Personal Data outside the European Union are lawful if the transfer is necessary for the performance of a contract between the Data Subject and the Controller or for the implementation of pre-contractual measures taken at the request of the Data Subject, if the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the Data Subject between the Controller and another natural or legal person, or if the Data Subject has given his explicit consent to the envisaged transfer, after having been informed of the risks that this transfer could entail for him because of the absence of a decision adequacy and appropriate safeguards.

A copy of the reference documents referred to in this paragraph may be obtained (free of any commercial information considered sensitive or confidential or covered by business secrecy) from the contact mentioned in the above paragraph “What are your rights and how to exercise them?”.

5. 9. What are the links of our Site with third party sites?

9.1 Please note that our digital media (including our Site or our social media pages) may provide or contain links to third-party sites, including social media sites. We have no control over, and cannot have control over, the activity of these sites and the policies they apply to the protection of your Personal Data and your rights. We encourage you to review the warranties offered by these sites before you interact with them. In this regard, your attention is drawn to the fact that the Policy for the protection of personal data of these sites may be different from that of the Company and that it is up to you to read it.

9.2 If you post content disclosing your Personal Data on the Internet, and in particular on social networks, including the social network pages of the Company, this content may be accessible to any Internet user, and collected or used by third parties, for purposes that are not our responsibility. In any event, the Company cannot be held liable in the event that the Processing of Personal Data carried out via one of these third-party sites contravenes the applicable legal and regulatory provisions.

6. 10. Can this Data Protection Policy be amended?

10.1 This Data Protection Policy may be amended at any time and shall take effect on the date of publication of the corresponding update.

10.2 Indeed, in case of modification, the new Data Protection Policy will be put online on the Site in the dedicated section. In addition, all forms for collecting Personal Data that may appear on our Site provide a link to this policy.

10.3 We therefore invite you to consult it regularly.

7. 11. What is the website's policy on cookie management?

11.1 Cookies and other tracers or similar technologies may be installed and/or read in your browser or terminal during your visit to the Site.

11.2 <https://www.artrade.app/cp.pdf> to access our “cookie management policy”, which is also accessible through a footer link (cf. *footer*) of all the pages of the Site.

These Privacy Policies are written in French. If they are translated into one or more foreign languages, only the French text shall be authentic in the event of a dispute:

<https://www.artrade.app/pp-fr.pdf>