

PRIVACY POLICY

This is the Privacy Policy for the dashboard (the “dashboard”) provided by Streetbees to a corporate client (the “client”) on behalf of which you are accessing our platform, and more generally for the overall commercial relationship between Streetbees, you and the client.

The dashboard is operated by or on behalf of Streetbees.com Limited (“we”, “us” and “our”). Our registered company number is 09177215, and our registered office is located at 2nd Floor 100 Cannon Street, London EC4N 6EU, United Kingdom. Our VAT registration number is GB197-413-384.

Streetbees is a global intelligence platform that reveals how people behave, and why, by analysing real-life moments collected from its worldwide users. Over 1 million users – or ‘bees’ – across 150 countries worldwide use the chat-style Streetbees app to share moments from their daily lives via videos, photos and text, giving as much or as little information as they like. Using the Streetbees platform, world-leading brands are able to make more informed and accurate decisions about consumer behaviour, and predict future trends with confidence.

We are committed to protecting and respecting your privacy online, as well as the privacy of the individuals participating in our surveys. We appreciate that you do not want your personal data distributed indiscriminately and this Privacy Policy (together with our commercial agreement(s) with the client, our Terms and Conditions and any other documents referred to in it) sets out the basis on which any personal data that we collect from you, or that you provide to us, will be collected and processed by us and what controls you have. It also sets out how we expect you to protect the personal data provided by the individuals participating in our surveys.

Please read the following Privacy Policy carefully to understand our views and practices regarding personal data and how we will collect, process, protect and treat it.

For the purpose of the Data Protection Act 1998 (the Act) and the EU General Data Protection Regulation 2016/679 of 27 April 2016 (the GDPR), the data controller is Streetbees.com Limited, a company registered in England and Wales under company number 09177215 and having its registered office located at 2nd Floor, 100 Cannon Street, London EC4N 6EU, United Kingdom.

By using our services and the dashboard, you consent to the collection and use of your personal data in accordance with this Privacy Policy.

You are under no obligation to provide any such personal data. However, should you choose to withhold the requested personal data, we may not be able to provide you with certain services.

We reserve the right to change this Privacy Policy from time to time by changing it on the dashboard.

This Privacy Policy was last updated on 23/05/2018.

1. PERSONAL DATA WE MAY COLLECT FROM YOU

- 1.1 For the purpose of this Privacy Policy, “personal data” shall have the meaning defined by Article 1 of the Act and Article 4 of the GDPR.
- 1.2 Collection of personal data for dashboard login:
 - 1.2.1 In order to be granted login details and be able to access to the dashboard, you will need to provide the following information:
 - - Your professional email address; and
 - - The corporate name of the client on behalf of which you will access the dashboard.

You are free to disable your dashboard account upon request at any time.

However, we may retain information required in order to enforce our contractual rights or obligations, meet our legal or regulatory obligations or resolve a dispute.

- 1.2.2 In order to login to your account, you will need to enter your submitted email address and associated password.
- 1.2.3 For your information, processing of personal data related to your use of the dashboard is based on contract performance under Schedule 2 of the Act and Article 6 of the GDPR.
- 1.3 We may also collect and process the following data about you:
 - Your email address and the name of the client on behalf of which you access the dashboard, as well as any further personal data you would type in the “Add a message” section, when you contact us through the “Contact” section of the dashboard (processing based on contract performance under Schedule 2 of the Act and Article 6 of the GDPR);
 - Your email address and the name of the client on behalf of which you access the dashboard when you subscribe to our newsletter (processing based on your consent under Schedule 2 of the Act and Article 6 of the GDPR);
 - Generally speaking, any data or information that you provide by filling in forms on the dashboard (processing based on contract performance under Schedule 2 of the Act and Article 6 of the GDPR). This includes information provided at the time of registering to use our dashboard, registering for any service provided by us to you through the dashboard, requesting further services, and information provided to us through the feedback system as to your usage of the dashboard; and
 - Generally speaking, any data or information that you provide within the framework of your commercial relationship with Streetbees.
- 1.4 We may also ask you for your first name, surname, email address, phone number and the name of the client on behalf of which you access the dashboard when you report a problem with the dashboard or our service (processing based on contract performance under Schedule 2 of the Act and Article 6 of the GDPR).
- 1.5 If you contact us, we may keep a record of that correspondence, your email address and the name of the client on behalf of which you access the dashboard, as well as any further personal data you would type in the “Add a message” section (processing based on contract performance or our legitimate interest under Schedule 2 of the Act and Article 6 of the GDPR).

- 1.6 We may, by means of cookies (see clause 10 below) and/or other similar technologies, keep details of: the data related to your visits to the dashboard, including the type and version of internet browser you use; the type, manufacturer and model of the computer or mobile device you use; any website from which you have come to the dashboard; your IP address; the operating system of your computer or mobile device; traffic data; location data; weblogs and other communication data, whether this is required for our own billing purposes or otherwise; and the resources that you access.
- 1.7 Finally, we may monitor your use of the dashboard using cookies and/or similar tracking devices. For more information, please refer to clauses 6 and 10 below.

2. WHERE AND HOW WE STORE YOUR PERSONAL DATA

- 2.1 We follow generally accepted industry standards to ensure your personal data is kept secure and protected from accidental loss or unauthorized access, use or alteration, through the following structural and technical measures:
 - Confidentiality clauses in all of our employment and service agreements with natural or legal persons having access to personal data;
 - Computers and email accounts of all of our employees being password protected;
 - Access to dashboard accounts being protected by unique login details and passwords;
 - Encryption of the personal data while in transport through the https protocol;
 - Encryption of the personal data while at rest;
 - Encryption of the backups including personal data;
 - Personal data stored on secured servers and infrastructures;
 - Permissions of access to documents including personal data regularly reviewed and monitored; and
 - Regular monitoring of the usefulness of stored personal data and deletion of all personal data no longer required for the purpose for which it was collected.
- 2.2 Unfortunately, and despite our efforts, the transmission of information via the internet is not completely secure. Although we will take reasonable precautions to protect your personal data, we cannot guarantee the security of your data transmitted to the dashboard or through the Internet in general; please note that any such transmission is at your own risk. Once we have received your personal data, we will use our procedures and security features to try to prevent any unauthorised access.
- 2.3 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to

this transfer, storing and processing. We will take reasonable precautions to ensure that your personal data is treated securely and in accordance with this Privacy Policy by us and, as the case may be, our licensors, agents, freelancers, consultants and contractors.

- 2.4 All personal data you provide to us is stored on our (or, as the case may be, our licensors, agents, freelancers, consultants and contractors') secure servers.
- 2.5 It is advisable to close your browser when you have finished your user session to help ensure others do not access your personal data if you use a shared computer or a computer in a public place.

3. USES MADE OF THE PERSONAL DATA

- 3.1 Please find below a description of the purposes for which we use the personal data you may provide us while using the dashboard.
- 3.2 The personal data provided for the creation of your dashboard account and/or within the framework of your commercial relationship with Streetbees may be used for the following purposes:
 - Authentication and administration of your dashboard account;
 - Password reset;
 - Payment processing (including but not limited to verifying and carrying out financial transactions);
 - Contacting you in relation to your dashboard usage (including but not limited to requests for feedback and notices of abnormal usage);
 - Contacting you in relation to your provided services and to potential new or updated services;
 - Contacting you in relation to future potential business collaborations;
 - Sending you marketing correspondence (including but not limited to newsletters, company updates, information about new products);
 - Management of our client contacts through dedicated tools and software; and
 - Audit and monitoring of the use of the dashboard and of data from the dashboard.
- 3.3 The personal data provided through the "Contact" section of the dashboard may be used for the following purposes:
 - Addressing your request;
 - Tracking issues with the dashboard;
 - Archiving and statistics about our received correspondence.
 - Elaborating statistics about the requests made on the dashboard.
- 3.4 The personal data provided while subscribing to our newsletter may be used for the following purposes:
 - Sending our newsletter;
 - Addressing an unsubscription request.
- 3.5 We may also use the personal information held about you for the following purposes:

- To help us identify you, the client on behalf for which you are working and any account or commercial relationship you may have with us;
 - Marketing communication (from us or one of our business partners);
 - Administration;
 - Research, statistical and behavioural analysis;
 - Fraud prevention and detection;
 - Security vetting;
 - Ensure that content from the dashboard is presented in the most effective manner for you and for your computer and/or mobile device;
 - Allow you to participate in interactive features of our service, when you choose to do so;
 - Identify visitors to the dashboard;
 - Discuss new potential commercial collaborations;
 - Notify you about changes to our service; and
 - Address a problem you may face with the dashboard or our service.
- 3.6 We may contact you by electronic means (e-mail), phone, SMS or post.
 - 3.7 We will retain your personal information for the duration necessary to complete the purpose for which it was collected.

4. DISCLOSURE OF YOUR PERSONAL DATA

- 4.1 We may disclose your personal data to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- 4.2 We may disclose your personal data to third parties:
 - In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
 - If Streetbees.com Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
 - If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions; or to protect the rights, property, or safety of Streetbees.com Limited, our licensors and customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.
- 4.3 We may also disclose your personal data to:
 - Our agents and service providers;
 - Our business partners if you agreed to be contacted by them for marketing purposes.

5. PROTECTION OF THIRD PARTIES' PERSONAL DATA

The persons who participated to our surveys shall also have their personal data secured and protected.

As a result, in case the content of the dashboard or any other service provided by Streetbees includes personal data about third parties, you shall make sure it is kept confidential and secure at all times and it is not extracted from the dashboard or any other similar interface without our express prior consent. Personal data can take the form of text, photographs or videos.

Breach of the above may lead to immediate suspension of your dashboard account or of your access to any other similar interface, termination of our contract with the client as well as to appropriate legal action.

6. MONITORING

We may monitor and/or record our communications with you, on whatever channel, for quality, training, fraud detection and compliance purposes.

In addition and in order to improve our users' experience, we may use dedicated tools in order to monitor how long users spend on the dashboard and which pages are being visited, to track mouse movements on the dashboard and/or to record what users watch while browsing the dashboard. By using the dashboard, you agree to such monitoring of your browsing of the dashboard.

7. YOUR RIGHTS

- 7.1 You have a certain number of rights in relation to our processing of your personal data which are summarized in this clause 7.
- 7.2 Right to be informed: You have the right to be informed about the collection and use of your personal data, which is the purpose of this Privacy Policy.
- 7.3 Right of access: You have the right to request access to the personal data we may hold about you. In order to exercise this right for the personal data not available directly when you login to your dashboard account, you should:
 - put this request in writing;
 - attach a proof of identity and address;
 - specify the personal data to which you want to have access.
- 7.4 Right to rectification: You have the right to have the personal data we hold about you rectified if it is inaccurate or incomplete. In order to exercise this right for the personal data not modifiable directly when you login to your dashboard account, you should:
 - put this request in writing;
 - attach a proof of identity and address;
 - specify the personal data you want us to rectify.
- 7.5 Right to erasure or right to be forgotten: In some instances, you have the right to request the deletion or removal of your personal data where there is no compelling reason for its continued processing.

This right is not absolute and only applies if:

- the personal data is no longer necessary for the purpose for which it was originally collected or processed;
- the personal data was collected and processed relying on your consent and you decide to withdraw such consent;
- the processing is based on legitimate interests and there is no overriding legitimate interest to continue this processing;
- the personal data is being processed for direct marketing purposes and you object to that processing;
- the personal data is being processed unlawfully;
- we have to do it to comply with a legal obligation; or
- the personal data was processed to offer information society services to a child.

Provided it is applicable, you should do the following in order to exercise this right:

- put the request in writing;
 - attach a proof of identity and address;
 - specify the personal data you want us to erase.
- 7.6 Right to restrict processing: You have the right to block or suppress the processing of your personal data for the future, in certain conditions described in Article 18 of the GDPR. In order to exercise this right, you should:
 - put this request in writing;
 - attach a proof of identity and address;
 - specify the personal data or processing you want to restrict.
 - 7.7 Right to data portability: You have the right to obtain and reuse the personal data we process about you, for your own purposes across different services. In order to exercise this right, you should:
 - put this request in writing;
 - attach a proof of identity and address;
 - specify the personal data you want to obtain for porting.
 - 7.8 Right to object: You have the right to object to:
 - processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
 - direct marketing (including profiling); and
 - processing for purposes of scientific/historical research and statistics.

In order to exercise this right, you should:

- put this request in writing;
- attach a proof of identity and address;
- specify the processing to which you want to object.

8. CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by electronic means (e-mail), phone, SMS or post.

You should check our Privacy Policy on a regular basis to ensure you are aware of its most recent version, as it is the latest available version of this Privacy Policy that shall apply each time you access to the dashboard.

9. CONTACT

Please submit any questions you may have about this Privacy Policy or any complaint or concern in relation to any service through the “Contact” section of the dashboard.

10. STREETBEES USE OF COOKIES

- 10.1 When you interact with the dashboard, we try to make that experience simple and meaningful. When you visit the dashboard, a web server sends a cookie or other similar technology to your computer or mobile device (as the case may be). Cookies are small pieces of information which are issued to your computer or mobile device (as the case may be) when you visit a website and which store and sometimes track information. A number of cookies we use last only for the duration of your web session and expire when you close your browser. Other cookies are used to remember you when you return to the site and will last for longer.
- 10.2 We use cookies and/or other similar technologies (including Pixel codes and in-app IDs) for the following purposes:
 - **Strictly necessary cookies**
 - enabling you to navigate round the dashboard, managing your login session so you can move easily from one page to another within the site and your page requests are loaded in smooth and secure manner;
 - **Performance**
 - collecting anonymous statistical information about how you use the dashboard (including how long you spend on the dashboard) and where you have come to the dashboard from, so that we can improve the dashboard and in order to learn which parts and which functions of the dashboard are most popular with users;
 - remembering that you have visited us before. This means we can identify the number of unique visitors we receive. This allows us to make sure we have enough capacity for the number of users that we get.
 - **Functionality**
 - remembering whether you have visited the dashboard before;
 - automatically logging you to the dashboard when you have already logged in before;
 - preventing fraud;
 - customising elements of the promotional layout and/or content of the pages of the dashboard in order to improve your experience of the dashboard.

- **Other**
 - undertaking research and statistical analysis in relation to your browsing of the dashboard.

- 10.3 We may store information about you using cookies which we can access when you visit the dashboard in the future.
- 10.4 Cookies do not usually include personal data, however they may contain the type and version of internet browser you use, the type, manufacturer and model of the computer or mobile device you use, any website from which you have come to the dashboard, your IP address, the operating system of your computer or mobile device and internet log information.
- 10.5 If you want to delete any cookies that are already on your device, please refer to the instructions for your file management software to locate the file or directory that stores cookies.
- 10.6 Information on deleting or controlling cookies is available at www.AboutCookies.org . Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our dashboard.
- 10.7 We work with external suppliers who may also post cookies on the dashboard, such as:
 - Google analytics; and
 - Hotjar.

This list may evolve in the future, in which case this Privacy Policy will be updated accordingly.

These external suppliers are responsible for the cookies they post on the dashboard and, for more information about these cookies, you should refer to their specific privacy policies.