



PRIVACY POLICY

Last updated: 13 November 2023

This Privacy Policy informs the user of the website <https://hemblem.app/en> (hereinafter the 'Website' or the 'Site') and the Hemblem Application about how personal information communicated to Hemblem App is processed, whether through the Website, the Hemblem Application, or by any other means. Hemblem App is committed to processing the personal data of users of the Website and the Hemblem Application in a transparent, confidential, and secure manner

In the context of processing personal data, HEMBLEM APP UK LIMITED acknowledges the importance of ensuring the protection and security of users' privacy and personal data. This Privacy Policy has been established in compliance with the strictest criteria for personal data protection, including all applicable regulations, notably the 'Loi Informatique et Libertés' (Data Protection Act) No. 2018-493 of June 20, 2018, and the General Data Protection Regulation ('GDPR') that came into effect on May 25, 2018.

The way in which your personal data is processed and collected applies to all users of the Website or the Application. We invite you to carefully read its contents. If you disagree with the processing procedures implemented by HEMBLEM APP UK LIMITED, please refrain from providing any personal information about yourself and cease using the Website and the Application. By continuing such communication, you acknowledge being informed about the processing of your personal data and accept it.

This Privacy Policy may be amended by HEMBLEM APP UK LIMITED at any time and without notice, especially due to regulatory changes. The new section will apply from the date of its publication on the Website and the Application. By providing personal information after these changes have been made, you accept the new terms.

1. IDENTITY OF THE DATA CONTROLLER

The data controller is **HEMBLEM APP UK LIMITED**, a company registered in England and Wales under company registration number 15035986. Our registered office is at C/O Irwin Mitchell LLP Riverside East, 2 Millsands, Sheffield, South Yorkshire, United Kingdom, S3 8DT.

HEMBLEM APP UK LIMITED has appointed a Data Protection Officer who can be contacted at the following address: RGPD@hemblem.app.

2. PERSONAL DATA COLLECTED BY HEMBLEM APP COMPANY AND PURPOSES OF PROCESSING

HEMBLEM APP UK LIMITED only collects information that is adequate, relevant, and limited to what is necessary for the purposes for which they are processed ("data minimization"). Users' personal data may be collected on various occasions during browsing on the Hemblem website or the Hemblem Pro application.

This data, which does not allow Hemblem to directly identify users, includes information related to browsing on the Hemblem website or the Hemblem Pro application, such as the pages viewed, dates and times of page views, search results on the website or the Hemblem Pro application, information about users' devices (hardware type, operating system, unique device identifier, IP address used, device configuration, browser used, browser language), and the

address that led to the Hemblem website or the Hemblem Pro application.

The provision of personal data is not required solely for visiting the website.

3. RECIPIENTS OF USER'S PERSONAL DATA

The personal data provided by the User is exclusively accessible to:

- Individuals within the HEMBLEM APP UK LIMITED company who need access as part of their duties.
- Its subcontractors (who may operate outside the European Union), acting in accordance with its instructions solely for the purpose of carrying out specific services.

HEMBLEM APP UK LIMITED does not engage in the commercialization, rental, or disclosure of your personal data to third parties other than companies within its group, its service providers, or an administrative or judicial authority that may have issued an injunction.

HEMBLEM APP UK LIMITED has entered into agreements with carefully selected third parties for online payment processing, hosting, and maintenance of the Site and Application, under which they commit to ensuring the protection and security of all personal data that may be communicated to them.

4. DURATION OF RETENTION OF USER'S PERSONAL DATA

HEMBLEM APP UK LIMITED retains user information only for the strictly necessary duration to achieve the purposes identified in this Privacy Policy. The retention period for personal data varies depending on the purpose of their collection. However, this duration does not exceed the time necessary for the purposes for which the personal data were collected, in particular:

Data collected for newsletter subscription management is retained for a period of three years from their collection or the last contact from the User HEMBLEM APP UK LIMITED. After this period, HEMBLEM APP UK LIMITED will delete the personal data unless the User has agreed to continue receiving newsletters.

Data collected to respond to requests made through the 'Contact' tab is retained for a period not exceeding the time necessary for processing the request you have made.

These retention periods do not prevent the exercise of the User's rights detailed in Article 7 of this Privacy Policy.

5. SECURITY OF USER'S PERSONAL DATA

By providing your personal data, you agree to their collection, transfer, and storage for the purposes mentioned in this Privacy Policy. HEMBLEM APP UK LIMITED employs all technical and organizational security measures to ensure the protection of information about you, in compliance with regulations.

To this end, we have implemented technical measures (such as firewalls) and organizational measures (such as a username/password system, physical protection means, etc.). However, despite all these precautions, no data transmission over the Internet is entirely secure. Consequently, any communication of your data will be at your own risk, and the responsibility of HEMBLEM APP UK LIMITED cannot be held in the event of unauthorized access by third parties to whom your information was not intended

6. COOKIES

HEMBLEM APP UK LIMITED, as the publisher of the website and the application, may place

cookies on the hard drive of your device (computer, tablet, mobile, etc.) when you visit the site or use the application. Cookies are small files stored on your device when you browse the site or use the application.

The use of cookies during visits by users to the website or the use of the Hemblem application is carried out for the purpose of sharing content on social networks, providing advertising offers in line with users' preferences, and understanding the pages visited and the frequency of these visits to make it more user-friendly. It also aims to offer tailored and personalized services during the next visits and/or uses of the website or the Hemblem application.

Specifically, HEMBLEM APP UK LIMITED uses cookies essential for the use of the website or the Hemblem application and their functionalities, performance cookies to optimize the website or the Hemblem application, detect any technical difficulties, and understand how users visit the website or the Hemblem application (number of visits per page, number of error messages displayed, time spent on a page, number of clicks on an area of the website or the Hemblem application, etc.). Additionally, there are customization cookies to remember users' choices and preferences.

HEMBLEM APP UK LIMITED uses the following cookies:

- Google Analytics: To collect and analyze website traffic data.
- Facebook Pixel: To ensure the visibility of Hemblem App's advertisements.

HEMBLEM APP UK LIMITED brings to the attention of users that while it is possible to disable customization cookies, some pages of the website or the Hemblem application may not display correctly. The level of online assistance offered by HEMBLEM APP UK LIMITED will be limited, and user preferences cannot be remembered.

For this purpose, HEMBLEM APP UK LIMITED may collect information related to browsing paths, visit duration on the website or the Hemblem application, the page from which the website or the Hemblem application was exited, the country, region, or city from which access to the website or the Hemblem application occurred, or the recurrence of visits.

Users can refuse the installation of cookies by configuring their browser accordingly (for more information, users can consult the "Help" section of their browser). However, refusing cookies may affect navigation on the website or the Hemblem application. To disable cookies, users can refer to the "Help" section of their browser or consult the information accompanying their browser software. To facilitate these steps, users can refer to the links below for the "Help" sections of the most commonly used browsers:

- Internet Explorer™
- Safari™
- Chrome™
- Firefox™
- Opera™

The information collected through cookies does not in any way allow the identification of users by name.

7. USER RIGHTS

According to the law n°78-17 of January 6, 1978, relating to data processing, files, and freedoms, as amended by the law n°2004-801 of August 6, 2004, and by the European

Regulation n°2016/679, Users have the following rights:

- **Right of access and communication of your personal data:** You have the right to obtain from Hemblem App confirmation as to whether your personal data is being processed and, if so, the right to access your personal data. Upon request, Hemblem App will provide you with a free copy of your personal data being processed. The provision of additional copies may result in administrative fees.
- **Right to data portability:** You have the right to receive your personal data concerning you, which you provided to Hemblem App, in a structured, commonly used, and machine-readable format. You also have the right to transmit this data to another data controller.
- **Right to rectification of your personal data:** You have the right to request Hemblem App to correct your personal data if it is inaccurate.
- **Right to erasure of your personal data - "right to be forgotten":** You have the right to obtain from Hemblem App the deletion of your personal data when one of the following reasons applies :
 - Your personal data is no longer necessary for the purposes for which it was collected or processed.
 - o You withdraw the consent on which the processing of your personal data is based, and there is no other legal basis for such processing.
 - o You object to the processing under the right of objection, and no legitimate interest justifies the processing.
 - o Your personal data is processed unlawfully.

Unless otherwise specified, HEMBLEM APP UK LIMITED is not obligated to delete your personal data to the extent that processing is necessary to fulfill a legal obligation to which HEMBLEM APP UK LIMITED is subject or for the establishment, exercise, or defense of legal claims in the event of any dispute.

Right to object to the collection and processing of your personal data: The exercise of this right is only possible in one of the following two situations:

When the exercise of this right is based on legitimate grounds; or

When the exercise of this right aims to prevent the collected data from being used for commercial prospecting purposes.

These rights can be exercised at any time by contacting the data controller via email at: contact RGPD@hemblem.app or by sending a postal mail to Hemblem App at the address mentioned in Article 1. To facilitate the processing of your request, we invite you to address your email or letter 'Attention: Data Protection Officer.'

Any request related to the disclosure, portability, rectification, deletion, or objection to the processing of personal data must be accompanied by a photocopy of a valid signed identity document and indicate the address at which HEMBLEM APP UK LIMITED can contact the User.

HEMBLEM APP UK LIMITED undertakes to respond to the request for access, rectification, or objection, or any other additional request within a reasonable period not exceeding one (1) month from the receipt of the request.

8. PERSONAL DATA BREACHES

HEMBLEM APP UK LIMITED undertakes to notify Users of any personal data breach, as defined in Article 4.12 of the GDPR, within a maximum period of forty-eight (48) hours after becoming aware of it, using the following means: sending an email.

This notification is accompanied by any documentation in the possession of HEMBLEM APP UK LIMITED that allows Users, if necessary, to report this breach to the relevant supervisory authority. It should, as far as possible, specify the nature and consequences of the data breach, the measures already taken or proposed to remedy it, and the individuals from whom additional information can be obtained. When possible, an estimate of the number of individuals likely to be affected by the breach in question should also be provided.