

# Privacy & Cookie Policy Statement Around Media/Prompto

## Information about your personal data

This Privacy Policy Statement states information with regard to the following matters:

- The collection of Personal Data we collect for you and for which purpose; through our website [www.prompto.com](http://www.prompto.com); [www.around.media](http://www.around.media) (hereby “Website”); the Prompto Platform and the Prompto Platform and Application;
- The measures that were implemented to protect the security of your Personal Data.

Around Media/Prompto confirms that all Personal Data are processed in accordance with the Belgian law of 8 December 1992 and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (“General Data Protection Regulation” or “GDPR”). All capitalized terms not defined in this Privacy Statement will have the meaning as set forth in the GDPR.

### Article 1 - General

Around Media NV, a private limited company incorporated under Belgian law, with registered offices in 9000 Ghent (Belgium), Reigerstraat 8, registered with the Crossroads Bank for Enterprises under company number BE 0598.916.701, including all subsidiaries of Around Media NV.

By using the Website, App or Platform or by providing us with Personal Data, the Customer explicitly agrees with the way of processing and collection by Around Media/Prompto of his/her Personal Data in accordance with this Privacy Statement.

This Privacy Policy may be altered by Around Media/Prompto from time to time and you are therefore invited to review it periodically.

### Article 2 – Collection of Personal Data

2.1 By using the Website, App or the Platform, Around Media/Prompto may collect and process certain personal data relating to you:

- Your first and family name, email address, (professional) telephone number, country, language and other profile details;
- Technical data such as IP-address, access rights and log files;
- HR related data such as job application data (CV or professional details) in order to process your job application and/or get in contact with you regarding the job application;
- interesting, including newsletters, marketing, events or promotional materials and other information on services and products offered by us or third parties;
- Social Media information such as your social media username(s), etc.
- Information about your Use of the Website, such as the sections of the Website you visited, the date and time you have accessed the Website and the materials posted to or downloaded from the Website;

- Information about your Use of the Prompto Platform, Application and or Services, such as your contact details, the sections of the Application and/or Platform you visited, the date and time you have accessed the Application/Platform and the materials posted to or downloaded from the Platform;
- Information about the Use of the Prompto Academy, such as your course enrollments, sessions, quiz results, reviews, all of the processed engagement data, badges and certifications
- Information used for other purposes with your consent (e.g. testimonials, case studies, features customer stories etc. where you have consented thereto.
- Data obtained by placing cookies (see art. 7 of this Policy)

2.2 Around Media Prompto can obtain this personal data through different means:

- By placing cookies;
- During the use of our Website;
- During the use of our Prompto Platform/Application;
- By filling in contact forms;
- By making choices from our integrated Catalogue;
- Subscribing to the newsletter (Website, Platform or other means);
- Via social media (e.g. when you like or contact us via Facebook).

2.3 Your personal data will be stored and processed by Around Media/Prompto on its servers located within the European Economic Area. Steps will be taken to ensure that your personal data is accurate, kept up-to-date and not kept for longer than is necessary. Measures will also be taken to safeguard against unauthorized or unlawful processing and accidental loss or destruction or damage to the data.

2.4 You are not obliged to provide us with your personal data, however you must understand that the delivery of the Prompto Platform/Application and the Around Media services is not possible in case you refuse to provide us with certain personal data.

### Article 3 – Use of Personal Data

3.1 Around Media/Prompto will process your Personal Data for following purposes as Controller of the processing:

- Administration concerning the Around Media/Prompto events, the Platform, the Application and related services;
- Technical support and monitoring of your use of the Website, Platform and Application to enhance your user experience and to improve our Products/Services;
- Reaching out to potential new Around Media/Prompto employees: your personal data will be processed to employ recruitment strategies taking advantage of opportunities to create a fast paced, goal oriented firm;
- Informing you about other services/software that Around Media/Prompto provides, via targeted advertising, promotional offers or updates;
- Capturing your feedback and opinion for statistical purposes to maintain and enhance the software and services
- Creating your account to have access to the Platform/Application, its modules and the thereto related services;

- Organizing (online) training: in this way our Platform/Application can keep track of all courses offered to you and your enrollments of those courses;
- Measuring your engagement to the Platform/Application;

3.2. Your personal data will only be used for direct marketing/lead generation purposes given you agreed to our Privacy Policy.

Furthermore, upon such consent, Around Media/Prompto can transfer your personal data to her partners for marketing purposes. To that end, Around Media/Prompto will create anonymous statistics regarding user demographics and use of Website, Platform and Application and provide those statistical reports to third parties. Yet, none of the information in those statistics is connected to the personal data of individual users.

By giving your consent to this Privacy Policy, you may receive targeted direct marketing with respect to the purchase of goods and services that may be advantageous on the basis of your data (including Personal Data).

3.3. In order to process your personal data, we provide access to our employees.

Around Media/Prompto will not disclose your personal data to third parties, unless it is necessary in the context of providing our services/software and/or optimizing them. To that end, Around Media Prompto will appeal to third parties in order to:

- Sending of newsletters
- Capturing of opinion/feedback on our products and services
- Being easily addressed – e.g. social media channels
- Optimizing of user experiences
- Reaching out to potential new team members.

Around Media/Prompto assumes no responsibility whatsoever for the personal data and privacy practices of Third Party software/services, therefore Around Media/Prompto encourages you to review each Third Party's privacy policy before disclosing any personal data.

## Article 4 – Duration of retention of your Personal Data

4.1 Around Media/Prompto retains your Personal Data as long as your Personal Data is relevant for the purpose, for the duration of any retention period that is required by Law or the end of the period in which litigation or investigations might arise in respect to the Website or Around Media/Prompto Products and Services.

## Article 5 – Your rights as a data subject

5.1 You are entitled to access to your personal data, as collected and processed by Around Media/Prompto, and request the modification or suppression of personal data relating to you if it is incorrect or unnecessary.

You also have the right to ask for the restriction of the processing or to object to the processing as well as the right to data portability (as the case may be). When applicable, you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent made prior to such withdrawal.

To exercise these rights, please send an email to Around Media/Prompto at the address [info@around.media](mailto:info@around.media), together with a copy of your identity card or other identification document.

In addition, you may object to the processing of your personal data for direct marketing purposes, as the case may be, at any time, free of charge and without having to provide a justification by following the abovementioned procedure.

You also have a right to lodge a complaint with a supervisory authority (in particular in the Member State of the European Union of your usual place of residence, place of work or the place where the violation occurred) if you consider that the processing of personal data related to you infringes the data protection legislation.

## Article 6 – Safety and Confidentiality

- 6.1 Around Media/Prompto undertakes all reasonable efforts to prevent (i) unauthorised access to your personal information, and (ii) loss, abuse or alteration of your personal data, by using physical, administrative and technological measures to protect the information maintained.
- 6.2 Unfortunately, no one – including Around Media/Prompto – can guarantee 100% security when it comes to transmission or forwarding over the internet, or any method of electronic storage. In case of particular security concerns about certain personal information, it is up to you to decide not to transmit that information over the Internet.
- 6.3 Nevertheless, you are responsible for the provision of personal data to Around Media/Prompto and can exercise a degree of control thereto. If certain information is incomplete or seemingly incorrect, Around Media/Prompto reserves the right to, temporarily or permanently, postpone certain actions or other services.
- 6.4 Please note that Around Media/Prompto assumes no responsibility regarding the privacy policy of the websites or digital platforms that are hyperlinked with the Website. Moreover, Around Media/Prompto shall not be liable in any way for direct or indirect damages caused by a wrongful or improper use of the personal data by a third party.

## Article 7 – Cookies

- 7.1 A cookie is a small amount of data generated by a website and saved by your web browser. Its purpose is to remember information about you. Cookies make it possible for a website to recognize your browser and to surf quick and easily on a website. If you don't want a website to place cookies on your computer, you can change the settings of your browser accordingly.
- 7.2 By using the Website and Platform certain Personal Data is being processed that is being collected automatically through the use of cookies such as IP-address, your type of browser and operating system, the amount of times you visited the website and the pages you visited.

7.3 Around Media/Prompto uses functional cookies on its Website and in the Platform that are required for the good performance, maintenance and support of the Platform. You may disable the use of cookies through your browser, but this may have an impact on the performance and functioning on the Website and the Platform.

In addition, Around Media/Prompto uses following cookies of third parties on the Website:

- Google Analytics
- Hubspot
- Sales Machine
- LinkedIn
- Facebook
- Youtube
- Wistia
- ...

## Article 8 – Cookies

8.1 This Privacy and Cookie Policy is managed, interpreted and executed in accordance with Belgian law which exclusively applies to every potential dispute.

The competent courts of the registered office of Around Media/Prompto shall have exclusive jurisdiction in relation to any kind of disagreement that could arise from the interpretation or execution of the present Privacy Policy.

## Article 9 – Contact Information

9.1. If you have any questions or concerns regarding the Prompto Platform and/or Application, the Around Media Services and Prodcuts, the Website or this Privacy Policy, please feel free to contact us at [info@around.media](mailto:info@around.media) or at Around Media NV, Reigerstraat 8, 9000 Ghent (Belgium)

Registration No: RPM/RPR Ghent 0598.916.701.