MEERO Privacy Policy

INTRODUCTION

This Privacy Policy applies to how Meero ("us," "we," "our," or "Meero") processes personally identifying information ("Personal Data" or "Data") in connection with Meero.com ("Website" or "Meero.com"), and its visitors and individuals who create accounts on the Website ("User Account(s)"). The purpose of this Privacy Policy is to provide those visitors and account holders ("You") with information regarding how Meero Processes Personal Data, including:

- what Data we collect;
- what we're going to do with it;
- what processes we'll follow;
- and what Your rights are in relation to that Data.

Personal Data will be collected and processed in compliance with the applicable national or state legislation and/or regulation, including but not limited to the European Union Data Protection Regulation 2016/679 (the "GDPR"), the California Consumer Privacy Act of 2018 ("CCPA") and Japan's Act on the Protection of Personal Information ("APPI").

Changes and Updates. We encourage You to regularly review this Personal Data Privacy Policy to keep up to date with any changes. For material updates, we will notify You via the Website and/or the method You choose when signing up or on Your User Account.

DEFINITIONS

This Privacy Policy is part of the <u>Terms of Use for Meero.com</u>. In addition to the capitalized terms from the Terms of Use, there are a couple more terms that are important to this Privacy Policy. You may find the definitions of these terms below:

- "Applicable data protection law and/or regulation" means any law or regulation relating to the processing of Personal Data that applies to Meero's processing of Your Personal Data, including the GDPR, CCPA and the APPI
- "Client" means an individual or legal entity (represented by its legal representative or other duly authorized person), that accesses or creates a User Account on Meero.com for the purposes of ordering services and/or deliverables itself or on behalf of its own customers (which may be individuals or legal entities "End Client(s)").
- "Controller" means a natural person or legal entity, public authority, service or any other organisation that determines the purpose of processing Personal Data.
- "Data" or "Personal Data" means any information relating to a natural person, including any information deemed personal information under the Applicable regulation regarding data protection and/or information through which a person may be identified directly or indirectly (e.g. by reference to a user ID, an identification number, location data, an online username or one or several specific elements related to a person's physical or health status, nationality, cultural or social identity).
- "Deliverable" means the images, videos and/or other media ordered by Client;
- "Photographer" means an independent service provider offering or interested in offering photography, videography and/or other related services on Meero.com;
- "Processing" or "process" means any operation or set of operations carried out by Meero in regards to Personal Data, such as collection, registration, organisation, retention, adaptation or modification, extraction, consultation, use, disclosure by transmission, distribution or any other form of making available, matching or interconnection as well as archiving and/or deletion:
- **"Processor"** means a natural person or legal entity, public authority, service or any other organisation that processes Personal Data pursuant to the instructions of the Controller;
- "Services" means the photography, videography and/or other media-related services ordered by Clients and/or End Clients via Meero.com and provided by the freelance Photographer(s);

1. PERSONAL DATA

Meero collects different Personal Data depending on how You interact with the Website.

1.1. If You visit Meero.com

- 1.1.1. We collect the following Personal Data:
 - Your email address when You subscribe to one of our newsletters or submit a request to Us;
 - Audience measurement information, including region of visitors in aggregate;
 - Information communicated via the chatbot.
- **1.1.2.** This Data is collected for the following purpose(s):
 - To monitor and improve the performance of Meero.com (including A/B testing and similar);
 - To measure the number of visitors;
 - To make Meero.com easy and fun to use;
 - To communicate with You regarding Meero news, products and/or opportunities;
 - To process requests made via the chatbot.
- 1.1.3. We process this Data pursuant to the following legal bases:
 - Your consent;
 - Our legitimate interest in improving our website and services;
 - Our legitimate interest in the functioning on the website;
 - Our legitimate interest in monitoring our website for fraud and/or other illegal or impermissible use.

1.2. If You register as a Photographer on Meero.com

- 1.2.1. We collect the following Personal Data:
 - Your full name;
 - Your email address and phone number;
 - Your address
 - Your professional information, including Your social media websites and/or portfolio.
- **1.2.2.** This Data is collected for the following purpose(s):
 - To create and maintain Your Meero User Account;
 - To allow You to offer Your services as a freelance photographer and/or videographer;
 - To allow You to specify your location, availability, equipment, and area(s) of experience, interest, and expertise in order to perform services for Meero's customers;
 - To allow You to participate in any contests, promotions or similar being offered through the Meero.com;
 - To pair you with a shoot;
 - To communicate with You regarding Your User Account, opportunities, any services or media You are providing and/or have provided, photographer studies and/or contests and promotions or similar.
- **1.2.3.** We process this Data pursuant to the following legal bases:
 - The performance of the contract in place between You and Meero;
 - Our legitimate interest in improving our website and services;
 - Our legitimate interest in monitoring our website for fraud and/or other illegal or impermissible use.
- **1.2.4**. Photographers are paired with shoots using a technology that takes into account the photographer's location, indicated availability, areas of expertise, experience and other factors. In addition to the rights listed in Section 8, Photographers have the right to ask for human intervention in the pairing process. Please refer to Section 10 regarding the rights in connection with this Section.
 - 1.3. If You register as a Client on Meero.com
 - **1.3.1.** We collect the following Personal Data:
 - Your full name;
 - Your email address and phone number;

- Your place of employment.
- 1.3.2. The Data is collected for the following purpose(s):
 - To create and maintain Your Meero.com User Account;
 - To allow You to order Services and Deliverables;
 - To process and fulfil Your order of Services and Deliverables;
 - To manage Your comments and/or feedback concerning the Deliverables.
- 1.3.3. We process this Data pursuant to the following legal bases:
 - The performance of the contract in place between You and Meero;
 - Our legitimate interest in improving our website and services;
 - Our legitimate interest in monitoring our website for fraud and/or other illegal or impermissible use.
- **1.4.** If you **schedule a Service** via a landing page associated with Meero.com
 - **1.4.1.** We collect the following Personal Data:
 - Your full name;
 - Your email address and phone number;
 - Your place of employment.
 - 1.4.2. The Data is collected for the following purpose(s):
 - to contact You in the context of the Service order;
 - to process and fulfil Your order of Services and Deliverables.
 - **1.4.3.** We process this Data pursuant to the following legal bases:
 - The performance of the contract in place between You and Meero.
- 1.5. If you apply for a job at Meero via Meero.com
 - **1.5.1.** We collect the following Personal Data:
 - Your full name:
 - Your location, availability and experience;
 - Any social media profiles you share (e.g. LinkedIn, Github, etc.)
 - **1.5.2.** The Data is collected for the following purpose(s):
 - To allow You to send Your candidacy to Meero;
 - To allow Meero to evaluate Your candidacy and contact You regarding the job opportunity You have expressed interest in.

2. COMPULSORY OR OPTIONAL DATA COLLECTION

Meero will let You know when You are required to provide certain information, or when it's optional. For example, photographers are required to provide their legal name so they can be paid for the service(s) they complete.

If the information requested is mandatory, the fields that You must fill out will be marked as mandatory. For the other fields, it's up to You.

3. COOKIES

Meero uses cookies pursuant to its cookie policy, which is located here.

4. INFORMATION WE SHARE

We will only disclose Personal Data in the following cases:

- To our service providers as part of their services in connection with the purposes listed above;
- If You agree to share information such Data with third parties, such as social networks through share buttons;

- If You are a Client or End Client to Photographers to allow them to perform the Services;
- If You are a Photographer to Clients and End Clients so that You can provide the Services;
- If You are an ambassador to other Meero ambassadors;
- To subsidiaries or entities part of the Meero group.

We may share aggregate, pseudo-anonymised or anonymised information, which does not allow You to be identified, in the context of statistical analyses for commercial objectives; which may include the number of visitors to our Website and the number of clicks generated via email.

5. DATA TRANSFER OUTSIDE OF THE EUROPEAN UNION

Data may be transferred outside of the European Union either to entities of our group situated outside of the European Union or to one of our service providers. Our service providers are located in the European Union, the United States of America, India, Korea, Australia, and Argentina.

When we transfer Data outside the EU, we will take the appropriate measures (such as the signature of standard contractual clauses of the European Commission), except where there is a legal exemption to do so.

6. DATA RETENTION

The length of time we keep Data depends on:

- the nature of the Data;
- why we're processing the data (the purpose);
- any guidelines or recommendations from the relevant data protection authorities;
- any relevant legal obligation(s).

As a general rule, we keep Data for the time needed and for the purpose for which it has been collected. Your Data will then be archived for the statutory limitation period applicable in order to allow MEERO to meet its legal obligations.

7. SOCIAL NETWORKS AND YOUR CONTENT

Our Website sometimes mentions other Meero pages or accounts on social networks. Keep in mind that the content presented on those social platforms may be viewed by the public, and Meero cannot be held liable for actions taken by third parties if you post something (including anything with Personal Data in it) on one of our social media accounts.

8. HOW TO EXERCISE YOUR PERSONAL DATA RIGHTS

In connection with Your Personal Data, You have the right:

- of access;
- of rectification;
- of deletion;
- of portability;
- of limitation in respect of Personal Data processing;
- of opposition;

You also have the right to withdraw consent for any processing activity, at any time.

In some cases, notably in the case you request to access the entirety of Your Personal Data, we may ask You to verify Your identity (copy of national identity card or passport). Your identity document will be kept for the period needed to process your request and then will be erased permanently.

You may exercise Your rights by sending a request to our DPO by email (privacy@meero.com) or by letter to the attention of DPO of MEERO, 18 Rue du Quatre Septembre – 75002 PARIS.

Moreover, you may also file a claim with the CNIL (French information commissioner's office) i.e.:

- directly online;
- by letter: 3 Place Fontenoy TSA 80715 75334 Paris Cedex 07.

9. PROCESSOR INFORMATION

9.1. Identity and contact details of the Processor

Personal Data is collected and processed by:

MEERO SAS ("MEERO")

A company registered with the PARIS Trade and Companies Register under the number 800 523 664

Tel.: +33 (0)1 76 31 00 52

9.2. Contact Details of the Data Protection Officer (DPO)

MEERO has chosen to appoint a DPO whom you may contact at the following email address: privacy@meero.com.

10. CONTACT US

For any additional information on the protection of Your Personal Data, You may contact us:

- via the Website: in the subsite "Need advice?", in the subsite "Contact" or via the chatbot;
- by telephone at: +33 (0)1 76 31 00 52;
- **by post**: MEERO Service Client, 18 Rue du Quatre Septembre 75002 PARIS.

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