

ZOOM.in B.V. EXTERNAL PRIVACY POLICY

Zoom.in B.V., with registered number 34187599 at Danzigerbocht 41F. Zoom.in BV, or any of its affiliates is the data controller in respect of your personal data and is committed to protecting and respecting your privacy and personal integrity when you are browsing through our websites or using our applications and/or when you work with us (our Services). This External Privacy Policy will help you understand what personal data we collect about you, why it is collected and how it is used by us. It will also clarify how you can exercise your rights when you are trusting us to handle your personal data for you. We ask that you take a moment to read this Privacy Policy carefully and familiarize yourself with its content. If you have any questions, you are welcome to contact us by using the contact information provided at the end of this Privacy Policy.

Please note that our Services may contain links to and from websites that can be held by, for instance, our network partners, publishers, advertisers, media agencies and affiliates. If you follow a link to any of these websites or use third party services, you should be aware that they have their own privacy policies and that we do not assume any liability for their processing of your personal data. Therefore, please make sure to read their privacy policies before providing your personal data to them.

MINORS

We take it very seriously to protect the safety and privacy of minors online and we do not knowingly market to or solicit personal data from minors under the age of 16 without obtaining verifiable consent of their legal representative.

WHAT PERSONAL DATA DO WE COLLECT FROM YOU?

When you access, connect to, sign up to, participate in, create an account for, make purchases within or otherwise use our Services, for instance, as an online user and/or the contact person (representative) of a company we work with, we may collect personal data about you. The personal data we collect will depend on the circumstances and the Services you are using, but could consist of the following:

Personal data we might collect or use about you if applicable

- Name, e-mail address, phone number, postal address and location;
- Date of birth;
- Financial data such as payments, PayPal/bank account details and invoice;
- Our agreement(s) with you;
- User identification, user account, password and log in details;
- Your requests/support sent via our communication platforms (email, chat, others);
- Information that you choose to provide for business improvement purposes (for instance, response to surveys);
- Any other information that is provided at the time of registration for the use of our Services, connection to our Services and/or requesting/providing services from/to us.

User generated personal data

- Computer and software information, such as browser type;
- Details of your visits to our Services including but not limited to data traffic;

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- Other.

We may also collect other information regarding your use of our Services through cookies and other similar technologies. You can find out more about this in our Cookies Policy on our website.

Personal data obtained from third parties

We may supplement the information that we collect from you with information that we receive from external third parties, for instance third party cookies or through your use of websites, products or services of other companies within our group, Modern Times Group MTG AB ("MTG").

WHY DO WE COLLECT YOUR PERSONAL DATA?

Our purposes

We process your personal data for the following purposes:

A) For the sake of our contractual relationship:

- For our pre-contractual procedures, such as due diligence procedures, deal memos and proposals to provide you with our Services and/or to enter into a contract with you;
- For the provision of our Services to you, including to fulfil your requests, improve your experience of our Services and to administer our contractual relationship with you;
- To ensure that content from our Services is transmitted to you and your device in the most efficient way;
- With respect and within the limits of our business relationships, to personalise your experience of our Services based on your usage, e.g. recommending content that may be of interest to you;
- To handle payments for your account;
- To provide and receive orders and invoice information;
- To communicate with you regarding your account or the purchase of our Services;
- To send recommendations to you of content which you have requested;
- To notify you about changes of our Services;
- To conduct activities in order to improve your contractual interaction with our Services;
- To provide information, products or services that you request from us.

B) For our legitimate purposes:

- To share your information with other entities within the MTG group when it is necessary for administrative purposes or for the provision of our Services to you;
- To use relevant information necessary to block disruptive use of or Services, for the reason of protecting our Services or otherwise enforcing or applying our Terms and Conditions;
- To provide information for governance structure purposes, such in a merger & acquisition processes, for the reasons of business and strategic management;

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- To manage and administer our Services, including for financial, accounting, legal and sales checks/purposes;
 - To provide you with offers, news, information, products or services that we believe may be of interest to you and relevant and appropriated for our business relationship, including similar services and products that we are already offering you;
 - For analysing and statistical purposes;
 - For the establishment, exercise or defence of legal claims;
 - To conduct surveys in order to manage and measure our performance and define our future strategy and goals. Please note that our surveys are optional and strictly voluntary;
 - To allow user to access our website;
 - To send you our publishing schedule, our newsletter and/or similar information, which may also contain news or information related to our Services and/or other similar products or services which are additional services in our contracts, and we believe may be of interest to you. We only provide this information to individuals with whom we have a business relationship with. Please note that you can unsubscribe at any time from receiving our publishing schedule and/or our newsletter by clicking the “unsubscribe” link in the email you receive from us and/or by sending an email back to us.
- C) Online users’ experience:
- To optimize your experience when you use our Services, for instance we might use performance and advertising cookies or similar technologies. They might store, for instance user’s impressions and browser behaviour. Please note that your consent will be requested prior to any collection and you can withdrawal your consent at any time.
- D) To comply with our legal obligations:
- We may also process your personal data if it is necessary for us to comply with a legal obligation as well as the decisions of the authorities.

What legal ground in GDPR is the processing of your personal data based on?**The processing of personal data for the purposes described under:**

- point (A) is necessary for the performance and conclusion of our contract with you;
- point (B) is necessary for our legitimate interest of developing, administering, protecting our assets as well as from a business and strategic management perspective;
- point (C) will only occur if we have received your prior consent to such processing;
- point (D) is necessary to comply with a legal obligation or authority decision.

Is it mandatory for you to provide your personal data?

Mandatory personal data that we request from you is always marked "mandatory", for example by using the * symbol and/or by using mandatory text boxes defined in the systems and platforms. That information is required for us to perform our contracts (for statutory, contractual, administrative, technical or similar reasons). However, some of

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the personal data, for instance your social media accounts and our surveys are optional and strictly voluntary. You do not need to provide personal data when it is an optional and voluntary field. However, some of the personal data may be required only in the event that you use specific features, turn on optional parts of the Service or request certain resources, offerings, promotions, programs, etc. from us or our partners, as will be further indicated prior to collecting such personal data from you.

Moreover, some of the personal data, for instance to link our videos to your social media accounts and our surveys are optional and strictly voluntary. You do not need to provide personal data when it is an optional and voluntary field.

WHO MIGHT WE SHARE YOUR PERSONAL DATA WITH?

Intra-group transfers

We may disclose and/or receive your personal data to/from other companies within the MTG group if it is necessary for business and administrative purposes or the provision of our Services with you. MTG group companies who have access to your personal data follow practices consistent with this Privacy Policy.

Partners, media agencies and advertisers

We may share your personal data with our partners, media agencies and advertisers but only when necessary to perform our agreement(s) with you.

We may also use aggregate information to monitor usage of our Services in order to help us improve and develop our Services, and we may provide such aggregate information to third parties, e.g. content partners or advertisers. This aggregate information does not include personal data and cannot be linked to you.

Third parties for security or other legitimate reasons

We may also disclose your personal data to third parties, if we reasonably believe that disclosure of such personal data is necessary:

- to comply with valid legal obligations including subpoenas, court orders, governmental requests or search warrants, and as otherwise authorized by law;
- to protect our rights or property, or the safety of our customers or other individuals working with us;
- to protect against fraudulent, malicious, abusive, unauthorized or unlawful use of our Services and to protect our network, Services, devices, properties and users from such use;
- to advance or defend against complaints or legal claims in court, or administrative proceedings;
- to determine credit risks, for reporting purposes or to obtain payment for our Services;
- for governance purposes, such as mergers & acquisitions, provided that the prospective buyer or seller agrees to respect your personal data in a manner consistent with our Privacy Policy;
- to outside auditors and regulators.

Third party suppliers

We may use third party suppliers to perform services for us such as:

- to provide the infrastructure and IT services and systems including but not limited to personal data storage and management;
- to provide you with and manage surveys; to protect and secure the data;
- to improve our means of communication (e.g. chats, email); and/or
- to perform other similar activities.

In the performance of these services, third party suppliers may have access to your personal data, but it is only authorized to process it strictly on our behalf and in accordance with our instructions and agreements.

WHERE DO WE PROCESS YOUR PERSONAL DATA?

The personal data that we collect from you may be transferred to and stored at a destination outside the European Economic Area ("EEA"), including at destinations that are not subject to a decision by the European Commission establishing an adequate level of protection of personal data. It can be shared with other companies within the MTG Group, processed by staff working for us or for one of our suppliers, located outside the EEA. Such personnel may for example be involved in the fulfilment of your order, the processing of your payment details and execution of our support services. We will take all reasonably necessary steps to ensure that your personal data is treated securely and in accordance with this Privacy Policy and have adopted appropriate safeguards to protect it. If you wish to have further information on or a copy of these safeguards, please contact us using the contact information provided at the end of this Privacy Policy.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will only keep your personal data for as long as we consider necessary for the fulfilment of our purposes, which we described above under "WHY DO WE PROCESS YOUR PERSONAL DATA", after which we will securely delete or in some cases anonymise your personal data. We do status checks to review when personal data needs to be deleted. However, as we process your personal data for various purposes, the actual period for which the personal data will be stored will depend on the circumstances.

Typically, the following retention periods could apply:

- For the personal data of the contact person (representative) of a company related to our agreement: no longer than 2 years after the contractual relationship ends;
- For the personal data related to finance purposes, mainly necessary for the Tax Authorities purpose: 7 years after the present year of the termination of the agreement;
- For the personal data we have collected to send you our publishing schedule, our newsletter and/or similar information: no longer than the date that the contractual relationship ends;
- For the personal data for which you have given your consent: for the period for which you gave your consent for, unless consent is withdrawn preliminary. With regards to cookies in our website, you can find more about this in our Cookies Policy on our website and/or in our Cookies Banner.

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HOW DO WE PROTECT YOUR PERSONAL DATA?

Safeguarding your personal data is a priority for us. Any personal data that you provide to us is stored on secure servers and we use rigorous procedures to protect against loss, misuse, unauthorized access, alteration, disclosure, or destruction of your personal data.

We work hard to protect your personal data and try our best to prevent any unauthorized attempt to access, use or disclose personal data. Moreover, we maintain security in the event of a physical or technical incident to handle this in a timely manner and limit any negative effects of such incident.

WHAT RIGHTS DO YOU HAVE IN RELATION TO YOUR PERSONAL DATA?

We understand that you may at times need further information from us regarding your personal data and how it is processed or that you may wish to update or correct the personal data you have provided us with. In light hereof, you have *inter alia*, when appropriate and in the limits of the applicable data protection laws, the following rights:

- **Right to access your personal data:** you have the right to obtain confirmation from us as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and information.
- **Right to rectification of personal data:** if you find that personal data which we process about you is inaccurate, you have the right to have us correct such personal data.
- **Right to erasure of personal data (right to be forgotten):** under certain circumstances, such as if your personal data has been unlawfully processed or you have withdrawn your consent (if the processing of your personal data is based on consent), you have the right to request and obtain erasure of your personal data from us.
- **Right to restriction of processing:** under certain circumstances, such as if you question the accuracy of your personal data or you have objected to our legitimate purpose to process your personal data, you have the right to request that we restrict the processing of your personal data until a solution has been found.
- **Right to object to processing:** under certain circumstances, such as if you question the legitimate interest to process your personal data, you have the right to object, on grounds relating to your particular situation, to such processing. Moreover, with regard to our optional activities, for instance our publishing schedule, newsletters, and/or cookies, you have the right to object at any time and free of charge.
- **Right to data portability:** if your personal data is processed by automated means for the fulfilment of our contractual relationship, you have the right to

request that we provide you with your personal data in a machine-readable format as well as the right to request its transmission to another data controller.

- **Right to lodge a complaint with a supervisory authority:** you have the right to lodge a complaint regarding our processing of your personal data with your supervisory authority.

If our processing of your personal data is based on your consent, you have the right to withdraw such consent at any time (this will however not affect the processing based on your consent before its withdrawal) by contacting us or by updating the settings in our Services (where applicable).

Please contact us using the contact details provided below to make a request in respect of your rights and/or any question you might have about this privacy policy. We will use reasonable efforts to respond to your request within 30 days of receiving such request. If we cannot honour your request within the 30-day period, we will let you know the reasons why and when we expect to be able to respond to your request.

CHANGES TO THIS PRIVACY POLICY

Our Privacy Policy may change from time to time. Therefore, you should make sure to review the latest version of this policy on a regular basis. We will post any Privacy Policy changes here and, if the changes are significant, we will provide you with a more prominent notice through means such as an email notification. We will also keep prior versions of this Privacy Policy in an archive for your review.

CONTACT

We welcome any questions, comments and requests regarding this Privacy Policy. Zoomin's Privacy Offer can be contacted by email at data.privacy@zoomin.tv.