

ZOOM.in.B.V. INTERNAL 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 to your personal data and is committed to protecting and respecting your privacy and personal integrity. This Internal 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.

MINORS

We take it very seriously to protect the safety and privacy of minors, in particular in the online environment, and we do not knowingly process personal data of minors (individual under the age of 16 years old) without the aim to enter into a contract and/or having a contract in place with their legal representative(s). Therefore, if you are a legal representative, please read this privacy notice carefully.

WHAT PERSONAL DATA DO WE COLLECT FROM YOU?

When you work with us as, for instance, an employee, a contractor (e.g., freelancer), a VJ or an influencer, or if you apply for a job position with us, we may collect personal data about you. The personal data we collect will depend on the circumstances related to your work position, our agreement(s) with you and/or the services you provide to us, but could consist of the following:

Personal data we might collect or use about you

- Your CV, motivation letter, channels and webpages;
- Name, e-mail address, phone number, postal address and location;
- Gender (in most cases optional);
- Date of birth, social security number, national identification number, copies of identification documents (such as ID or passport);
- Payments, travel costs and expenses;
- Salary, PayPal/bank account details and invoice;
- Our agreement(s) with you;
- User identification, user account password and log in details to manage and secure our IT systems;
- Your requests sent via help desk and/or via our communication platforms(email, chat, others);
- Relevant legal documents such as employment agreement, certificate of residence, work permit and VISA evidence;
- Job-related information like your job position, working hours and your vacations;
- When applicable, for employees, personal data concerning pension and retirement;
- Information that you choose to provide for business improvement purposes (for instance, response to surveys);

- Personal data which is necessary for legal and tax purposes such as the relevant data required by Tax Authorities and/or relevant for claims/disputes.

Health-related data

- When applicable, for employees, health-related data such as absent, sick, leave and/or maternity leave data for hr/payroll or legal-related purposes

Evaluation of performance at work

- This activity aims to evaluate certain aspects relating to you, in particular to analyse aspects concerning your performance at work, developments, improvements, goals and/or achievements;
- Typically, your supervisor will conduct this assessment and rank your performance at work;
- This activity is relevant to manage the quality of our workforce and your work, mainly with regards to our employees and/or VJs;
- If we do not conduct this activity, we won't be able to effectively manage our business, workforce and agreement(s) with you.

Analysis of influencer's data

(This section is only applicable to influencers)

- When necessary to enter into and/or perform our contract, we will analyze your online content, mainly your *youtube videos*, such as the amount of likes you have, your expected earnings, impressions, clicks, and your views;
- All the data that we use and see is automatically generated by *Youtube CMS* which is used to enter into or perform our contracts with you. Please see the terms & conditions, privacy policy and other policies of *Youtube* if you would like to have further details of the methods used by *Youtube* to collect and to generate your data.
- This activity aims to develop your talent, provide coaching, promote your digital optimization, create revenue opportunities, support your production and perform other conditions defined in our contract(s) with you.
- If we do not have access to this information, we won't be able to assess properly and effectively manage our contract with you, for instance your payments.

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 recruitment platforms or *YouTube* and/or by other companies within our group, Modern Times Group MTG AB ("MTG").

What happens if you connect your social network to our working platforms?

You can use your social network account, for example your Facebook account, to connect with some parts of our working platforms. For instance, as an influencer you can create an account within our *MCN Channels*. If you choose to do so, we might gather certain information about your social network account for the purposes described under "WHY DO WE COLLECT YOUR PERSONAL DATA". We will only collect such personal data that is necessary to perform the agreement we have with you.

Please note that this Privacy Policy does not apply when you are using the features in your social network account. Instead, your interactions with these features are governed by the privacy policy and other policies of the companies providing them.

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:

- To select your adequacy for our open position and enter into an agreement with you;
- To draft and perform our agreement(s);
- For the provision of our agreement with you, including the rights and obligations defined in our agreement with you, and to administer our contractual relationship with you;
- To handle your payments/salary;
- To provide invoice information to you;
- To carry out analysis on the videos of the influencers;
- To manage your performance at work.

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 agreement with you;
- To provide information for governance structure purposes, such as merger & acquisition processes, for reasons of business and strategic management;
- To manage and administer our workforce, including for financial, accounting, legal and payroll checks/purposes;
- For the management and coordination of our teams;
- For security purposes at the workplace;
- For ensuring network and information security and the security of the related IT services offered via those networks and systems to ensure the adequate security of our technologies;
- 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. You do not face any negative and/or positive consequences if you opt to not reply to our surveys. In the majority of cases, we will not even request your name and/or any means of direct identification;
- To facilitate and allow better communication between our employees to improve internal network and business.

C) 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, such as tax, labour and/or corporate laws as well as the decisions of the authorities.
- D) To comply with health provisions
- We might have access to limited aspects of your health conditions, such as sick, absent, leave and medical checks' data, for the purpose of providing you with your rights and carrying out our obligations to comply with the applicable laws, such as employment laws, social security laws, social protection laws and health laws. Your information is strictly used within the limits of the applicable laws and with limited access rights by the relevant employees working at ZOOM.in BV

On what legal ground in the 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) is necessary to comply with a legal obligation or authority decision;
- point (D) when the processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment law, and social security and social protection law or for the assessment of the working capacity of the employee or the provision of health or social care or treatment.

Is it mandatory for you to provide your personal data?

Mandatory personal data that we request from you is marked "mandatory" in anyway, for example by using the * symbol and/or by using mandatory text boxes defined in our systems. That information is required for us to perform our contracts (for statutory, contractual, administrative, technical or similar reasons). However, some of the personal data, for instance influencers profile' picture, your social media accounts and our surveys are optional and strictly voluntary. You do not need to provide personal data when it is an option 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 agreement 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 to the extent defined in our agreement(s) with you. This section is mainly relevant for influencers and VJs working with us.

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 employees or individuals working with us;
- to protect against fraudulent, malicious, abusive, unauthorized or unlawful use of or systems and to protect our network and properties;
- to advance or defend against complaints or legal claims in court, administrative proceedings;
- for governance purpose, such as part of mergers & acquisitions, provided that the prospective buyer or seller agree 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, help desk); 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.

Additionally, we might obtain some of your personal data from third parties, in particular in regard to our VJs and our influencers, for instance through *YouTube*, your social media accounts and different channels.

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, that we have 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 requested to an applicant not selected for the employment position: the data will be deleted no later than 4 weeks after the recruitment process ends;
- For the personal data related to our agreement(s) with you, for instance employment agreements and/or influencers agreements: 2 years after the termination of the agreement;
- For the personal data needed for claims/disputes purposes: 5 years after the termination of the agreement;
- For the personal data related to the VJs: 5 years after the termination of the project. Due to the contractual nature of the services provided by our VJs, i.e. sporadic work based on the needs of each project, we've decided that it is of mutual interest to keep the personal data for a longer period in order to re-work with you in a future project;
- For the personal data related to finance and payroll purposes, mainly necessary for the Tax Authorities purpose: 7 years after the present year of the termination of the agreement.

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 effect 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 on how it is processed, or 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 is 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 that 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 is no longer necessary in relation of the purpose for which we collected the data, 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 our legitimate interest to process your personal data, you have the right to object, on grounds relating to your particular situation, to such processing.
- **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 on a machine-readable format as well as the right to request its transmission to another data controller.
- **Right related to (automatic) profiling:** in regard to profiling activities, in particular the management of your performance at work and/or automatic video analysis, relevant to influencers, you have the right to obtain human intervention, to express your point of view and to obtain an explanation of the decision reached after such activity and to contest the decision.
- **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.

Minor

- These rights can be exercised any time by the legal representative of a minor under 16 years old without the legal capacity or authority to exercise their rights. The minor is able to exercise their rights and/or their contractual rights and



obligation when the minor reaches the age of 16 years old and/or has legal capacity to do so.

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 inform you about 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 such as an email notification. We will also keep prior versions of this Privacy Policy in an archive for your review.

CONTACT

The responsible for data privacy at ZOOM.in BV can be contacted by email at data.privacy@zoomin.tv.

We welcome any questions, comments and requests regarding this Privacy Policy which should be sent to data.privacy@zoomin.tv.