

PRIVACY POLICY
(Last updated: June 2021)

UMI, a simplified joint stock company, registered in the Lyon Trade and Companies Register under number 798 755 00024, whose registered office is located at 1-3 place Giovanni Da Verrazzano 69009 Lyon- France (hereinafter the "Company" or "UMI") undertakes to ensure that the Processing of Personal Data referred to in this document complies with the applicable regulations on data protection (European General Regulation 2016/679 on Data Protection - "RGPD") and with the French Data Protection Act n°78-17 of January 6, 1978 as amended. UMI is the publisher of the website accessible at www.umi.us and the associated web application (hereinafter the "Site" and the "Application").

The following information is provided to you so that you may be aware of the commitments regarding the protection of Personal Data of UMI, which acts as the Data Controller of the Personal Data concerned.

The purpose of this Personal Data Privacy Policy is to inform you about how your data is processed by UMI and the extent of your rights.

ARTICLE 1 - DEFINITIONS

PERSONAL DATA

Refers to any information that directly or indirectly identifies or makes identifiable a natural person.

DATA SUBJECT

Means any natural person whose Personal Data is collected and processed by UMI.

DATA CONTROLLER

Refers to the person who determines the purposes and means of the Processing. UMI has this capacity for the purposes of this Privacy Policy.

DATA PROCESSOR

Refers to the person who processes Personal Data on the instructions of the Data Controller in the context of a service or provision.

DATA PROCESSING

Refers to any operation or set of operations carried out using automated or manual processes on an electronic or paper medium, such as the collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission and dissemination of Personal Data.

ARTICLE 2 - PROCESSING OF PERSONAL DATA AND PURPOSES

UMI implements various processing operations whose legal bases are as follows: your consent, its legal and regulatory obligations, its legitimate interests.

UMI processes and collects Personal Data:

- That you provide directly to UMI. This may include your last name, first name, email address. You provide this information when, for example, you use the "contact our sale team" form on the Site.
- Information that UMI automatically collects through cookies or other analysis tools. For example, this may include your IP address, browser, connecting device and operating system. This information is used to enhance your experience and help us improve our services.
- Which are publicly accessible on the Internet when authorized by the publisher of the source site from which your Personal Data originated.

a. Processing No. 1: sending of e-mails to collect consent in the case of indirect collect of your Personal Data

The purpose of the Processing is to obtain your consent before any other solicitation

In the case of this Data Processing, your Personal Data is collected indirectly from the following sources: LinkedIn website, Videoo, Xin or Researchgate.

It allows to:

- Gather your consent to be solicited by UMI,
- Register your Personal Data in our contact database.

Legal basis of the Data Processing:

Article 6 (1) a) of the GDPR: the Data Subject has consented to the Processing of his/her Personal Data.

Categories of Personal Data processed:

- Contact data: Last name, first name, professional e-mail address, position, country, name of employer.

Data Subject:

Anyone who may be interested in participating in a market test and in UMI's business in general.

Automated decision:

The Data Processing does not involve automated decision.

b. Data Processing No. 2: Sending of communication concerning questionnaires related to a market test, articles and any other type of communication that may be of interest to you by electronic means

It allows to:

- Send you questionnaires;
- To send you e-mails on different subjects related to our activity, newsletter.

Legal basis of the Data Processing:

Article 6 (1) a) of the GDPR: the Data Subject has consented to the Processing of his/her Personal Data.

Category of Personal Data collected:

- Contact information: Last name, first name, professional e-mail address

Data Subject:

Individuals who have consented to be included in UMI's contact database either at the time of direct collection or through indirect collection.

Automated decision:

The Data Processing does not involve automated decision.

c. Data Processing No. 3: Process/analyze your responses to the questionnaires

It allows to:

- Analyze and process your responses to our questionnaires;
- Produce a report for our partner (this report does not contain your contact data and is anonymized).

Legal basis of the Data Processing:

Article 6 (1) a) of the GDPR: the Data Subject has consented to the Processing of his/her Personal Data.

Category of Personal Data collected:

- Contact information: Last name, first name, professional e-mail address
- Data possibly transmitted via the questionnaire: position, company name, etc.

Data Subject:

Individuals who have consented to receive solicitations from UMI and to participate in a survey.

Automated decision making

The Data Processing does not involve automated decision.

d. Data Processing No. 4: to put you in contact with our partners

It allows to:

- Transmit your Personal Data to our partners if you have consented to it.

Legal basis of the Data Processing:

Article 6 (1) a) of the GDPR: the Data Subject has consented to the Processing of his/her Personal Data.

Category of Personal Data collected:

- Contact data: Last name, first name, professional e-mail address.

Data Subject:

Any person registered in UMI's database who has consented to the transfer of their Personal Data to an identified partner.

Automated decision:

The Data Processing does not involve automated decision.

e. Data Processing No. 5: to answer any request resulting from the sending of the form "Contact our sale team" available on our Site

It allows to:

- Respond to your requests sent via the contact form of the Site.

Legal basis of the Data Processing:

Article 6 (1) a) of the GDPR: the Data Subject has consented to the Processing of his/her Personal Data.

Category of Personal Data collected:

- Contact data: Last name, first name, professional e-mail address, all Personal Data provided in the free field.

Data Subject:

Persons sending the form to UMI.

Automated decision

The Data Processing does not involve automated decision.

f. Data Processing No. 6: Accessing your UMI account

It allows to:

- Give you access to the services available on your UMI account

Legal basis of the Data Processing:

Article 6 (1) a) of the GDPR: the Data Subject has consented to the Processing of his/her Personal Data.

Category of Personal Data collected:

- Account login information: username, password.

Data Subject:

User of the Site and the Application.

Automated decision:

The Data Processing does not involve automated decision.

g. Data Processing No. 7: Responding to requests made via the "Ask a question" form available on the Site

It allows to:

- Answer your questions,
- Get in touch with you.

Legal basis of the Data Processing:

Article 6 (1) a) of the GDPR: the Data Subject has consented to the Data Processing of his/her Personal Data.

Category of Personal Data collected:

- Contact data: first name, last name, e-mail address, company name and any data you send us via the free "message" field.

Data Subject:

Any person asking UMI a question via the "Ask a Question" form available on the Site.

Automated decision:

The Data Processing does not involve automated decision.

h. Data Processing No. 8: contact you following the sending of your CV and cover letter to the dedicated e-mail address as indicated on the "Join us" page available on the Site - process your application

It allows to:

- Process your application,
- Contact you and inform you of UMI's position following the submission of your application,
- Keep your data in our applicant database.

Legal basis of the Data Processing:

Article 6 (1) a) of the GDPR: the Data Subject has consented to the Data Processing of his/her Personal Data.

Article 6 (1) f) GDPR: processing is based on UMI's legitimate interest

Category of Personal Data collected:

- Contact and identification data: first name, last name, e-mail address, company name and any data you provide via your CV and cover letter (date of birth, place of birth, home address, marital status, number of children, etc.) .

Data Subject:

Any person applying for a job posted on our Site.

Automated decision:

The Processing does not involve automated decision-making.

i. Data Processing No. 9: Process your request to join the UMI community - community registration

It allows to:

- Process your request
- Connecting community members
- Send emails that may be of interest to the community member
- Send UMI newsletters

Legal basis of the Data Processing:

Article 6 (1) a) of the GDPR: the Data Subject has consented to the Processing of his/her Personal Data.

Article 6 (1) f) GDPR: processing is based on UMI's legitimate interest

Category of Personal Data collected:

- Contact and identification data: first name, last name, email address, company name and sector, associated keywords.

Data Subject:

Anyone interested in joining the UMI community.

Automated decision

The Data Processing does not involve automated decision.

Based on compliance with our legal and regulatory obligations, we also carry out processing for the following purposes:

1. Management of responses to official requests from public or judicial authorities authorized for this purpose;
2. Compliance with the regulations applicable to our activity;
3. Management of requests to exercise rights.

ARTICLE 3 – DATA RECIPIENTS

In order to achieve the purposes described above and to the extent necessary for the pursuit of those purposes, the Personal Data collected by UMI may be transmitted to any or all of the following recipients:

- Internal UMI departments authorized to manage our relationship with you;
- People in charge of marketing, sales, administrative and IT departments and their line managers;
- The partners of the Site for the needs of the execution of the services;
- Our partners who mandate us to carry out test markets when you have consented to the communication of your Personal Data.

ARTICLE 4 – DATA PROCESSOR

In accordance with its commitments, UMI chooses its Data Processors carefully and requires them to:

- A level of protection of Personal Data equivalent to his own;
- Use of Personal Data or information solely for the purpose of administering the services they are to provide;
- Strict compliance with applicable laws and regulations regarding privacy and Personal Data;
- The implementation of all appropriate measures to ensure the protection of Personal Data that they may be required to process;
- The definition of the technical and organizational measures necessary to ensure security.

UMI concludes with its Data Processors, in accordance with legal obligations, contracts defining precisely the conditions and modalities of the Processing of Personal Data.

ARTICLE 5 – PERSONAL DATA TRANSFERS OUTSIDE THE EUROPEAN UNION

The various categories of Personal Data collected and processed by UMI may be transmitted to Data Processors located in countries outside the European Union such as the United States.

In case of transfer of all or part of the Personal Data subject to Data Processing to a third country, i.e. located outside the European Union or not presenting a level of protection recognized as adequate within the meaning of the regulations, or to an international organization, UMI undertakes to provide the appropriate guarantees provided for within the regulations and to ensure that its Data Processors respect them.

Such transfers may be governed by a cross-border flow agreement drawn up in accordance with the standard contractual clauses for data controllers and processors issued by the European Commission and currently in force.

ARTICLE 6 - RETENTION PERIOD OF PERSONAL DATA

Purposes	Retention Period
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Managing our relationship with you as a user of the www.umi.us website	The data is kept for three years from the last incoming contact
The realization of statistics and analyses in order to improve the use of the site www.umi.us	The data is kept for three years from the last incoming contact
Managing our relationship with you as a community member	The data is kept until you unsubscribe
Managing cookies not subject to consent	The retention period does not exceed 13 months
The use of your contact data for sending questionnaires and any communication by electronic means (including in particular responses to solicitations via the forms available on the site www.umi.us)	The data is kept for the duration of your registration with the UMI community or for three years from the last incoming contact
Managing cookies subject to consent	The retention period does not exceed 13 months
Management of requests to exercise rights	The data is kept for one or six years depending on the right exercised

ARTICLE 7 - SECURITY MEASURES

UMI attaches particular importance to the security of your Personal Data.

UMI is committed to implementing:

- Physical security measures to prevent access to your Personal Data by unauthorized persons;
- Identity and access controls via an authentication system and password policy;
- An authorization management system;
- Processes and devices allowing to trace all the actions carried out on the information system and to carry out, in accordance with the regulations, reporting actions in case of incident impacting the Personal Data.

ARTICLE 8 - EXERCISE OF RIGHTS

In accordance with the provisions of the amended French Data Protection Act and the RGPD, you have a right to access, rectify, delete, limit, oppose and a right to the portability of Personal Data concerning you. To exercise all these rights, please send your request to our Data Protection Officer at the following e-mail address: dpo@umi.us (please also send us a copy of your identity card).

a. Right of access

You have a right of access to the Personal Data processed by UMI. This right allows you to review the Personal Data we have about you and, if you wish, to request a copy.

b. Rights to request the rectification

Under applicable data protection regulations, you may request that we correct inaccurate Personal Data about you. You may also request that incomplete Personal Data about you be completed, including by providing a supporting statement.

In order to make it as easy as possible for you to exercise this right, we invite you to make these changes and additions directly in your account, if necessary. If you believe that other Personal Data

concerning you should be modified or completed and that you are unable to make this change yourself, we invite you to contact our Data Protection Officer at the following address: dpo@umi.us.

c. Right to request the erasure

You have the right to obtain from us the erasure, as soon as possible, of Personal Data concerning you, subject to our legitimate interest or any legal obligation requiring us to keep it.

For security reasons and to avoid unwanted erasure of the account, we invite you to take this step by contacting us at the following address: dpo@umi.us.

d. Right of limitation

You may request UMI to limit the Processing of your Personal Data, where any of the following apply:

- you challenge the accuracy of your Personal Data. In this case, we will hide your Personal Data for a period of time that allows us to verify its accuracy;
- you believe that the Processing of your Personal Data is carried out unlawfully and you demand instead the limitation of their use;
- we no longer need your Personal Data for the purposes of the Data Processing but it is still necessary for you to establish, exercise or defend a legal claim;
- you have exercised your right to object under Article 21(1) of the GDPR.

We will proceed to limit the Processing of your Personal Data, while verifying whether the legitimate reasons we are pursuing prevail over your right.

If we decide to lift the limitation on the Processing of your Personal Data, we will inform you.

e. Right to object

You may opt-out of receiving communications, including commercial communications, from UMI. To this end, we provide you with an unsubscribe link in all the emails we send you.

You may also object, on legitimate grounds, to the Processing of your Personal Data, unless it is in response to a legal obligation imposed on UMI.

f. Right to portability

You may at any time request the portability of your Personal Data to UMI. In exercising this right, we undertake to transmit to you within a reasonable period of time and in a machine-readable format the Personal Data you have provided to us, whether declared by you or generated by your activity on the Site.

g. Right to Withdraw Consent

You have the right to withdraw your consent at any time as well as to refuse the Processing of your Personal Data for personal reasons.

h. Right to file a complaint with a supervisory authority

The supervisory authority competent to deal with any request concerning us is the Commission Nationale de l'Informatique et des Libertés (CNIL).

If you wish to submit any request to the CNIL, you will find below the contact information:

CNIL (NATIONAL COMMISSION FOR INFORMATION TECHNOLOGY AND LIBERTIES)
3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07
Phone: 01 53 73 22 22

Please note! The CNIL does not receive the public and does not provide any information on site.

If you wish to file a complaint with the CNIL, you can fill out the online complaint form available at the following address: <https://www.cnil.fr/fr/plaintes>

If you have a question about your rights regarding data processing and liberties, you can consult the CNIL website: www.cnil.fr.

ARTICLE 9 - COOKIES

Browsing the Site may cause cookies to be installed on your terminal (by the Company and/or its Data Processors). When you connect to the Site, you are asked to configure your choices regarding cookies.

a. Definition

A cookie is a small text file, deposited on your terminal, via the Internet browser, for example when visiting a site, reading an email, installing software, etc.

A cookie does not allow you to be identified but records information about your browsing.

b. Types of cookies used

The different types of cookies and their purposes :

- Consultation of the Site entails the deposit by UMI of cookies on your terminal in order to simplify and improve your navigation on the Site and to personalize the services offered to you under the conditions defined below.
- **Necessary cookies:** these are those that are strictly necessary for the proper functioning of the Site (for example: cookies that allow us to remember your choice on the deposit of cookies, certain audience measurement cookies). These cookies contribute to the technical functioning of the Site and cannot be deactivated.
- **Functional cookies:** these cookies make it possible to improve navigation on the Site and in particular to make navigation more fluid and personalized without being essential to the proper functioning of the Site (for example: memorization of connection information to your UMI account, etc.).
- **Analytical cookies or audience measurement:** these cookies allow UMI to know the use and performance of the Site and to improve its operation (for example, the most visited pages of the Site, the number of people connected at a given time and the place of connection, etc.).)

c. Cookie retention time

UMI stores the cookies listed above, subject to your consent and settings, for a maximum of 13 months.

d. Cookie settings

When you log on to the Site, you are invited to set your cookie preferences. You can modify your choices at any time. However, the setting of cookies is likely to have effects on your navigation on the Site. It is therefore advisable to set the parameters of cookies according to their respective purposes.

SECTION 10 - MODIFICATION OF THE PRIVACY POLICY

This Policy was last updated on the date indicated on page 1. UMI reserves the right to modify this Privacy Policy. If this Privacy Policy changes, UMI will not lower the level of protection afforded to your Personal Data.