



PRIVACY POLICY

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Preamble:

MEET MIDWAY, a single-member simplified joint-stock company with a share capital of 3,000 euros, registered with the Paris Trade and Companies Register under number 937537157 and whose registered office is located at 25 rue du Hameau, 75015 in Paris (hereinafter "MEET MIDWAY"), undertakes to comply with the legislation in force in France (Law No. 78-17 of 6 January 1978 "*Informatique et Libertés*") and in Europe (Regulation 2016/679 of 27 April 2016 "*GDPR*"), to ensure the protection, confidentiality and security of personal data, as well as to ensure respect for privacy.

In line with its values, MEET MIDWAY attaches great importance to the respect of personal data and the privacy of Internet users.

This privacy policy (hereinafter "the Policy") describes the way in which MEET MIDWAY collects and processes the Personal Data of people browsing the Application or using one of these features.

The Policy also specifies the legal bases on which MEET MIDWAY relies to process Personal Data and set its retention periods.

In any case, MEET MIDWAY undertakes to comply with the following principles:

- Personal Data is used only for explicit, legitimate and specific purposes in connection with the various functionalities offered on the Application;
- Only Personal Data that is useful for these purposes is collected and processed by MEET MIDWAY;
- Inform data subjects in a clear and transparent manner about the purpose of use of their Personal Data and their rights.

Article 1: Definitions

The terms and expressions mentioned below shall have the meanings given to them in this article, namely:

"Application": Refers to the IT solution that allows the User to use the functionalities and services offered by MEET MIDWAY via the Internet and/or via a smartphone. The said application, accessible on the Apple Store and Google Play, is published by MEET MIDWAY;

"Recipient": Refers to the natural or legal person who receives the communication of Personal Data, whether or not it is a third party;

"Personal data": Refers to any information relating to a natural person who is identified or identifiable directly (by his or her first or last name, for example) or indirectly (in particular by reference to an identifier, such as an identification number, location data or an online identifier);

"Data Subject" / "User" / "You": Refers to the identified or identifiable natural person whose personal data is processed by MEET MIDWAY;

"Data Controller": Refers to the natural or legal person, who, alone or jointly, determines the purposes and means of the Processing of personal data. In this case, the company MEET MIDWAY is responsible for the processing;

"Processor": Refers to the natural or legal person who processes Personal Data on behalf of the Data Controller;

"Processing": means any operation or set of operations which is performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission,

dissemination or otherwise making available, the alignment or interconnection, limitation, erasure or destruction;

"Third Party": means any authorised natural or legal person, public authority, agency or body other than the data subject, the controller, the processor and persons who, under the direct authority of the controller or processor, are authorised to process Personal Data;

"Personal Data Breach": means a breach that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

Article 2: When is your data collected?

Your Personal Data, as a User of the Application, may be collected in the circumstances listed below:

- When registering on the Application;
- When visiting and browsing the App and search history;
- When taking into account the User's location to carry out a search;
- When contacting MEET MIDWAY's customer service.

Article 3: What data is processed and on what grounds?

The Processing of your Personal Data is carried out by MEET MIDWAY exclusively for the following purposes:

| Purposes | Data collected | Legal basis | Retention periods |
|--|--|---------------------|--|
| Registration on the Application and creation of the personal account | Contact information (email address, nickname) | Consent | Until the account is deleted or after three (3) years of inactivity. |
| During the searches carried out by the User taking into account his current location | Contact details (location and interests) | Consent | Until data is deleted, account deletion, or after three (3) years of inactivity. |
| Management of contact requests and prospects | Contact details (name, surname, email address) | Consent | Up to three (3) years from the last contact with the person concerned. |
| Improved navigation | Login information, device used; preference settings. | Legitimate interest | 6 months. |

Regarding retention periods, it is understood that MEET MIDWAY only keeps your Personal Data for as long as necessary to achieve the purposes for which it was collected, including to meet any legal requirements.

Personal Data is stored and archived on a server with appropriate security measures.

Article 4: Who are the recipients of your data?

Personal Data about you may be processed by the following persons:

- Authorized members of the MEET MIDWAY team;
- Suppliers of IT systems and support for MEET MIDWAY's activity (e.g. IT service providers, various cybersecurity services, hosting and/or maintenance of the Application).

In any event, the Third Parties with whom MEET MIDWAY shares your Personal Data are limited (by law and by contract) in their ability to use your Personal Data for the specific purposes that MEET MIDWAY has identified.

In any case, MEET MIDWAY makes its best efforts to ensure that the recipients of your Personal Data are subject to confidentiality and security obligations in accordance with this Privacy Policy, applicable laws and in particular the GDPR and the so-called Data Protection Act in its latest version in force.

MEET MIDWAY only allows them to process your Personal Data for specific purposes and in accordance with its instructions and restricts this Data to what is strictly necessary to meet the purpose sought.

Article 5: Is your data transferred outside the European Union?

If the processing of your Personal Data involves a transfer outside the European Union, these transfers will be made in return for appropriate security and confidentiality guarantees in accordance with the applicable regulations (in particular standard contractual clauses, in accordance with the model clauses validated by the European Commission).

Article 6: What are your rights?

As a Data Subject of the Processing of Personal Data, you have various rights.

However, these are not absolute and are subject to certain conditions, in accordance with the GDPR and other texts in force applicable in particular to Law No. 78-17 of 6 January 1978 known as "*Informatique et Libertés*".

6.1. The right of access

You have the right to obtain confirmation from MEET MIDWAY as to whether or not your Personal Data is being processed by MEET MIDWAY, as well as information on how it is being processed.

You also have the right to obtain a copy of the Personal Data concerning you processed by MEET MIDWAY.

6.2. The right to rectification

You can request MEET MIDWAY to take steps to correct your Personal Data if it is inaccurate or incomplete.

6.3 The right to erasure ("right to be forgotten")

You may request the erasure or deletion of your Personal Data.

6.4. The right to restrict processing

You have the right to request the restriction of the Processing of Personal Data or to prevent the further use of your Personal Data.

The restriction of processing will not prevent the retention of your Personal Data, but MEET MIDWAY will not be able to use it beyond the limits you wish to impose.

6.5. The right to data portability

You have the right to retrieve and re-use certain Personal Data about you.

This right applies only to Personal Data that you have provided to MEET MIDWAY, which MEET MIDWAY processes with your consent, for the purpose of performing the contract and processed by automated means.

Where applicable, MEET MIDWAY will provide you with a copy of your Personal Data in a structured, commonly used and machine-readable format (where technically feasible).

MEET MIDWAY may also, if you wish, transmit (as far as possible) this type of Personal Data directly to another Data Controller.

6.6. The right to object

You have the right to object to certain types of processing, for reasons related to your particular situation, at any time, insofar as such processing has taken place for the purposes of legitimate interests pursued by MEET MIDWAY.

6.7. The right to withdraw your consent

Where MEET MIDWAY processes your Personal Data on the legal basis of your consent, you have the option to withdraw your consent at any time.

However, you are hereby informed that the withdrawal does not affect the lawfulness of the processing that took place before the exercise of this right of withdrawal and that you will no longer be able to benefit from the functionalities offered by the Application.

6.8. The right to provide us with instructions on the use of your personal data after your death

You have the right to provide MEET MIDWAY with instructions on the management (e.g. retention, erasure and disclosure) of your Personal Data after your death.

You can change or revoke your instructions at any time.

6.9. Right to lodge a complaint with the CNIL

In the event that you are not satisfied with MEET MIDWAY's response to your complaint or if you believe that the Processing of your Personal Data does not comply with the applicable regulations on the protection of personal data, you may lodge a complaint with the competent supervisory authority for data protection.

The Commission Informatique et Libertés (CNIL) is the data protection authority in France.

Article 7: How can you exercise your rights?

If you wish to exercise any of your rights, you can contact us at the following email address: contact@meet-mid-way.com

To find out more about your rights, you can visit the CNIL website (<https://www.cnil.fr/fr/mes-demarches/les-droits-pour-maitriser-vos-donnees-personnelles>)

When applying to exercise rights, an identity document could be required, if necessary, in particular to ensure the security of the processing concerned and to verify the identity of the applicant.

A response will be sent to you, depending on the complexity of your request, within the time limits prescribed by Article 12.3 of the GDPR.

Article 8: How is your personal data protected?

MEET MIDWAY ensures that Personal Data is treated securely and confidentially, including when certain operations are carried out by Data Processors.

To this end, MEET MIDWAY implements appropriate technical and organisational measures to prevent the loss, misuse, alteration and deletion of your Personal Data.

These measures are adapted according to the level of sensitivity of the Personal Data processed and the level of risk presented by the Processing of this data or its implementation.

If a breach of the security of your Personal Data occurs, MEET MIDWAY will inform you within the time limits and in the manner specified by the legal and regulatory provisions in force.

Article 9: Can this Policy be modified?

MEET MIDWAY reserves the right to modify this Privacy Policy.

If the amendments are technical amendments, the new policy will apply immediately.

If the changes or updates are substantial (e.g. insertion of a new purpose), the changes will be brought to your attention.

If consent is required again, MEET MIDWAY will naturally collect consent again.

In any event, you are invited to regularly consult this Privacy Policy in order to be fully informed of the way in which MEET MIDWAY processes your Personal Data.