

## Shift/Co, PBC – Privacy Policy

This Privacy Policy is edited by Shift/Co, PBC, a Delaware public benefit corporation having its registered office at c/o Registered Agent Solutions, Inc., 9 E. Lookckerman Street, Suite 311, Dover, DE 19901 (hereafter, the “**Data Controller**”).

The Data Controller offers a platform Shift/Connect (hereafter, the “**Platform**”) to its users which have subscribed on the Platform and as such have a user account (hereafter, the “**Users**”). The Platform is available at the following url address [shiftco.global](https://shiftco.global).

The Data Controller uses a solution called “Hivebrite”, which enables the import and export of user lists and data, the management of content and events, the organization of emailing campaigns and opportunity research and sharing as well as the management of funds and contributions of any kind.

In this regard, the Data Controller collects and processes User’s personal data in accordance with the Privacy and Cookie policy.

The Data Controller is particularly aware and sensitive with regards to the respect of its Users privacy and personal data protection. The Data Controller commits to ensure the compliance of the processing it carries out as data controller in accordance with applicable law.

The Data Controller has put in place an appropriate privacy and cookie policy to be fully transparent on how the personal data of Users are processed within the use of the Platform and services provided.

This privacy policy is intended for the Users of the Platform of the Data Controller.

Date of last update: June 25, 2021.

## ARTICLE 1. COLLECTED PERSONAL DATA

### 1.1 When subscribing on the Platform

When subscribing to the Platform, the User is informed that its following personal data is collected for the purpose of creating a user account:

Mandatory data

- First name ;
- Last name ;
- Email address;
- Peronal mobile;
- Business name;
- Description of product or servie;
- Closest major city;
- How did you hear about us?;

- Referral information;
- Address;
- Birth month and day;

The User is informed that it is not possible to access the Platform without providing the mandatory data strictly necessary to create an account and authenticate the User.

## 1.2 During the use of the Platform

The User may validly publish, at its own initiative, content on the Platform which shall be kept by the Company:

The User is aware that when using the Platform, the User may decide to provide sensitive data, for example, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, concerning sexual orientation, etc. By providing such sensitive data, the User agrees to their processing by the Platform in the conditions set forth in this Privacy Policy.

## ARTICLE 2. THE PURPOSE OF THE DATA PROCESSING

The Data Controller and its subcontractors process personal data that are freely transferred by the User when accessing the services proposed by the Platform for the following purpose:

Purpose
<i>Creation and management of a user account;</i>
<i>Providing the User with all functionalities of the Platform, meaning:</i> <ul style="list-style-type: none"><li>• <i>Sending invitations for events organized by Data Controller or other Users, if the User has accepted to receive such invitations;</i></li><li>• <i>Invite the User to events organized by the Platform</i></li></ul>
<i>Management of transactions through the Platform;</i>
<i>Management of delinquencies and claims ;</i>
<i>Management of prospection operations:</i> <ul style="list-style-type: none"><li>• <i>Sending email prospect campaigns;</i></li><li>• <i>Sending newsletters ;</i></li></ul>
<i>Making statistics in order:</i> <ul style="list-style-type: none"><li>• <i>to improve the quality of the services proposed by the Platform;</i></li><li>• <i>improve the usage functionalities of the Platform;</i></li></ul>

<i>Making statistics regarding the effective use of the Platform;</i>
<i>Making statistics regarding the different levels of activity on the Platform.</i>
<i>Enable the synchronization of the User's LinkedIn profile;</i>

### **ARTICLE 3. DATA RETENTION PERIOD**

The Data Controller informs the User that the personal data related to the User Account is retained only during the length of the User's subscription on the Platform.

A User can delete some data at any time. Following the termination of said subscription, the data collected upon the subscription as well as the content published by the User on the Platform shall be deleted after a period of one year.

### **ARTICLE 4. DATA TRANSFERS**

The Users' data are stored in the European Economic Area (EEA) by the Data Controller, and its trusted service providers. However, depending on the processing, the Users' data may also be transferred in a country outside the EEA, to our trusted service providers.

When transferring data outside the EEA, the Data Controller ensures that the data are transferred in a secured manner and with respect to the Data Protection Law. When the country where the data are transferred does not have a protection comparable to that of the EU, the Data Controller uses "appropriate or suitable safeguards".

When the service providers to whom personal data are transferred, are located in the United States, these transfers are governed by the standard data protection clauses adopted by the Commission.

### **ARTICLE 5. COMMITMENT OF THE DATA CONTROLLER**

The Data Controller commits to process User's personal data in compliance the Data Protection Law and undertake to, notably, respect the following principles:

- Process User's personal data lawfully, fairly, and in a transparent manner;
- Only collect and process the Users' data for the strict purpose as described under article 2 of the present privacy policy;
- Ensure that the personal data processed are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

- Do the best efforts to ensure that the personal data processed are accurate and, if necessary, kept up to date and take all reasonable steps to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Keep personal User's data for no longer than is necessary for the purposes for which they are processed;
- Put in place all necessary technical and organizational appropriate measures in order to ensure the security, confidentiality, integrity, availability and the resilience of the process systems and services;
- Limit the access to the Users' data to the persons duly authorized to this effect;
- Guarantee to the Users their rights under the Data Protection Law in relation to the processing of their data and make the best efforts to satisfy any request, where this is possible.

## **ARTICLE 6. EXERCISE OF THE USERS' RIGHTS**

The User is duly informed that it disposes at any time, depending on the legal basis of the processing, a right to access, to rectification, to erasure, to restriction of processing, to data portability, and to object.

When processing is based on User's consent, the right to withdraw consent at any time, without affecting the lawfulness of the processing based on consent before its withdrawal.

The User can exercise its rights by sending an email to the following address [shiftconnect@shiftco.global](mailto:shiftconnect@shiftco.global) or by mail at the following address P.O. Box 142282, Irving, TX 75039 provided that the User justifies his/her identity.

In addition, in the event the User considers that its rights have not been respected, the User of which the personal data is collected can lodge a complaint before the competent supervisory authority. For any additional information, you can review your rights on the websites of the competent authorities.

The competent supervisory authorities are listed on the following website:

[http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

## **ARTICLE 7. COOKIES**

The Data Controller informs the User that Hivebrite, as well as its subcontractors, uses a tracking technology on its terminal such as cookies whenever the User navigates on the Platform subject to the conditions described in the [Data Controller Cookie Policy](#).

## ARTICLE 8. RECIPIENT AND PERSONS AUTHORIZED TO ACCESS THE USERS' DATA

Only **authorized persons working for the Data Controller**, can access your personal data. The Data Controller makes its best effort to ensure that these groups of people remain as small as possible and maintain the confidentiality and security of User's personal data.

The Data Controller also uses **trusted service providers** to carry out a set of operations on his behalf for hosting and payment services. The Data Controller can also use service providers in the tech industry, editors of specific tools integrated in the Platform for technical purposes.

The Data Controller only provides service providers with the information they need to perform the service and ask them not to use your personal data for any other purpose. The Data Controller does his best to ensure that all these trusted service providers only process the personal data on our documented instructions and provide sufficient guarantees, in particular in terms of confidentiality, expert knowledge, reliability and resources, to implement technical and organizational measures which will meet the requirements of the applicable legislation, including for the security of processing.

The Data Controller may be required to disclose or share your personal data to comply with a legal obligation, or to enforce or apply our terms of use/sale or any other conditions you have accepted; or to protect the rights, safety or property of Shift/Co, PBC, its customers or employees.

List of the main service providers:

Service Provider	Service	You can consult the privacy policy by clicking on the following link:
KIT UNITED 44 rue la fayette 75009 Paris France	HIVEBRITE solution	<a href="https://hivebrite.com/privacy-policy">https://hivebrite.com/privacy-policy</a>
Stripe 510 Townsend Street San Francisco CA 94103, USA	Payment Service	<a href="https://stripe.com/fr/privacy">https://stripe.com/fr/privacy</a>

Google Cloud Platform Gordon House, 4 Barrow St, Dublin, Ireland	Hosting of all data and content produced / provided by the User, as well as images, profile pictures and backups	<a href="https://cloud.google.com/security/privacy/">https://cloud.google.com/security/privacy/</a>
Amazon AWS 38 avenue John F. Kennedy, L-1855, Luxembourg		<a href="https://aws.amazon.com/compliance/gdpr-center/">https://aws.amazon.com/compliance/gdpr-center/</a>
Sentry 132 Hawthorne Street San Francisco, CA 94107 USA	Production and storage of error logs enabling our developers to correct the code	<a href="https://sentry.io/privacy/">https://sentry.io/privacy/</a>
Sendgrid 375 Beale Street, Suite 300, San Francisco, CA 94105 USA	Sending of emails from the Platform	<a href="https://api.sendgrid.com/privacy.html">https://api.sendgrid.com/privacy.html</a>
Hivebrite, Inc. 16 Nassau St, New York, NY 10038, USA	Customer support for the Platform	<a href="https://hivebrite.com/privacy-policy">https://hivebrite.com/privacy-policy</a>