

Last Updated June 9, 2015

## WEBINTERPRET Privacy Policy

This privacy policy (the “**Privacy Policy**”) sets forth the collection and use practices of Webinterpret, a French Société par actions simplifiée, with a share capital of 2,661,854.23 Euros, registered with the Registry of Trade and Companies under RCS number 501 216 071 Grasse, which registered office is located 6 rue Soutrane – 06560 Valbonne, France (“**Webinterpret**”, “**we**”, “**us**” or “**our**”) for personal information that Webinterpret collects from you in the course of carrying out the services rendered to you through the Webinterpret website available at the following address: [www.webinterpret.com](http://www.webinterpret.com) and through any of its web pages (the “**Site**”).

By using our Services and/or registering for an account with us, you are accepting the terms of this Privacy Policy, and you are consenting to our collection, use, disclosure and retention of your personal information as described in this Privacy Policy. If you do not provide the information we require, we may not be able to provide all our Services to you.

We may amend this Privacy Policy at any time by posting the amended terms on this site. All amended terms automatically take effect 30 days after they are posted. We will notify you through an on-screen message and/or via email of any material changes to this Privacy Policy.

This Privacy Policy may refer to the user of Webinterpret’s services through the Site as “**you**” or through any second-person pronouns, such as “**yours**” etc.

We want to develop relationships with our users based on respect and integrity. We are aware of the trust and confidence you demonstrate when you use our services, visit the Site and provide us with information. This Privacy Policy is posted to demonstrate our commitment to protecting your privacy online.

### 1. Information Collected By Webinterpret

Webinterpret gathers the following types of information:

#### A. Information You Directly and Voluntarily Provide to Us

We collect the following types of personal information (collectively, “**Personal Information**”) that you voluntarily provide through the Site.

- **Personal Identifiers.** A “Personal Identifier” is information that can be used to identify and/or contact a natural person and includes name, postal address, telephone number, email address.

- **Other Personal Information.** “Other Personal Information” is information combined with Personal Identifiers voluntarily provided by users of the Site that may include demographic information (for example, gender, age, or occupation), purchase history or correspondence sent to us through the Site. If you choose to create a user account (“**Account**”) on our Site, you will be required, during the registration process, to provide certain information, such as your username for your accounts on third party online marketplaces, an email address and a password which will be associated with the Personal Identifiers you have provided.

We do not collect sensitive information such as information about your race, political views, religious views or health conditions. If you do not provide us with the Personal Information that we request, we may not be able to provide you with the services offered through the Site.

## **B. How We Directly Collect Personal Information**

There are a number of different ways that we collect Personal Information from you. These may include:

- **Communications From You.** When you email or write to us, you may provide us with your name, contact details, and other Personal Information as part of your message.
- **Customer Support.** You may provide us with Personal Information when you telephone or email us to request technical assistance with our services or information that you would like to receive about our services.
- **Email/Direct Mail Campaigns That You Approve.** If you elect to receive our newsletters or other promotional communications, from time to time we may contact you with information about new services, promotions or special offers. If you want to stop receiving promotional communications from us, you can follow the unsubscribe instructions at the bottom of each email, contact us at [privacy@webinterpret.com](mailto:privacy@webinterpret.com) or, if you have an Account with us, change your preferences by signing into your Account through the Site.
- **Purchases.** If you purchase Webinterpret services through the Site, we will collect the information necessary to complete your purchase and render the Services.

## **C. Information That We Automatically Collect From Your Computer**

We (or service providers on our behalf) may automatically collect information from you using “cookies” or “web beacons”. Cookies are small amounts of data that are stored within your computer’s Internet browser or on your mobile device and that are accessed and recorded by the

websites that you visit, as well as by the companies that place advertising on websites, so that they can recognize your device and remember if you have visited a website previously. Web beacons are web page elements that can recognize certain types of information on your computer

such as cookies and the time and date of a page view.

Information collected by cookies and web beacons may include, without limitation:

- the pages you visit within the Site;
- the date and time of your visit to the Site;
- the websites you visit before or after visiting the Site;
- the Internet Protocol (IP) address used to connect your computer to the Internet;
- your computer and connection information such as your browser type and version, operating system and platform;
- whether you open and whether you click on any link contained in an email message that we send you;
- details about your activities on third party platforms on which we have placed listings;
- and/or your purchase history on Webinterpret.

We may use data gathered automatically from your computer (i) to help us recognize you as a previous visitor to the Site, (ii) with your prior consent, to serve relevant online advertising to you or (iii) to analyze trends and statistics to improve your experience of the Site.

You can set your browser to reject cookies or to notify you when you are sent a cookie. You can also purchase and download software that will allow you to visit the Site without providing the information gathered by cookies. You are welcome to use the Site if you use such software, but your experience while visiting the Site may not be optimal. When your prior consent is required for the implementation of certain types of cookies, it will be specifically collected.

## **2. Use of Information Collected By Us**

We use the Personal Information described above to:

- administer your Accounts with Webinterpret;
- process any services you purchase through the Site;
- customize the service Webinterpret provides to you through the Site;
- administrate or otherwise carry out Webinterpret's obligations in relation to any agreement you have with Webinterpret; carry out market research and tracking of sales data;
- and with your prior consent, send you information about Webinterpret by email, postal mail, telephone or text message or other means about our services.

## **3. Sharing of Personal Information with Third Parties**

Generally, Webinterpret does not share the Personal Information collected - or that you provide to Webinterpret - with third parties unless Webinterpret has obtained your prior consent.

However, Webinterpret may share the Personal Information about you with affiliates, with vendors, agents and contractors that assist Webinterpret in administering the Site and in providing services to you, with the online marketplaces on which you advertise and sell your products, and in response to legal process or when Webinterpret believes that the law requires it (for example, in response to a court order) or to protect the rights, property or safety of Webinterpret, the Site, users of the Site and others.

Webinterpret may also disclose Personal Information as is necessary to identify, contact or bring legal action against a person or entity who may be violating Webinterpret's Terms of Service, or who may be causing harm to, or interfering with, other users of the Site.

Webinterpret may also disclose Personal Information about you to third parties who provide credit payment, reporting, order fulfillment services, and other services on Webinterpret's behalf.

In addition, in the event that assets of Webinterpret are transferred or sold to another entity, Personal Information may be transferred to the acquiring entity and/or to potential acquiring entities.

#### **4. Transfers of Personal Information outside of the European Economic Area**

The Personal Information that Webinterpret collects from you and that you provide to Webinterpret is processed in Ireland and is stored on servers in Ireland and in the US.

Your Personal Information may also be transferred to any third parties as described in the previous section. Some of these third parties to whom your Personal information will be shared are located outside of the European Economic Area, in countries whose data protection laws may not be as extensive as those which apply to us.

If we transfer your Personal Information to countries outside of the European Economic Area, we will ensure that we do this in accordance with French data protection regulations (for example, by putting in place an appropriate data transfer agreement). We will do this with a view to ensuring the level of protection which applies to your Personal Information processed in these countries is similar to that which applies within the European Economic Area.

#### **5. Links**

Webinterpret may place hypertext links on the Site that connect to third party websites. Webinterpret has no control over these linked sites or their content. Your use of such linked sites will be subject to such sites' terms of use and privacy policies and not Webinterpret's

Terms of Service or Privacy Policy, so be sure to read them before using such sites or transmitting any information to such sites.

Webinterpret cannot be responsible for any third party, or its affiliates or agents, failing to use your Personal Information in accordance with such third party's privacy policy, or any contractual or other legal obligations to which such third party, its affiliates or agents, may be subject.

## **6. Security**

We will take all steps reasonably necessary to ensure your Personal Information is treated securely and in accordance with this Privacy Policy and in accordance with applicable law. We use appropriate security measures to protect against unauthorized access, collection, use, disclosure, copying and disposal of your Personal Information.

All pages within our checkout process and areas containing Personal Information are secured using SSL (Secure Socket Layer) technology, which encrypts data between our computer and yours. To make sure your Internet browser is using the latest security features, you may want to download the most recent version of it, which should have full SSL support.

You are responsible for maintaining the confidentiality of your user ID and password which relate to your access to certain pages of the Site and/or any Account you set up with us. You agree to accept responsibility for all activities which occur in relation to the same. You should not permit other people to use your user ID or your password. Please contact us promptly using the details in the section "Contact Information" below if you believe your user ID or password may have been compromised. We will not be responsible to you if there is unauthorized access to your login details or unauthorized activity on this Site as a result of your log-in details becoming known by someone else, unless this was due to our negligence.

Despite our efforts regarding security it is important to bear in mind that the Internet is not a secure means of communication. Personal Information communicated through the Internet may be intercepted by other people. We cannot guarantee the security of Personal Information sent to us through this Site. You accept that you use this Site at your own risk.

## **7. Closing Your Account / Retention of Personal Information**

If you have created an Account through the Site, we will close your Account upon your request. We may also close or deactivate inactive Accounts or Accounts that are used in violation of our Terms of Service or any applicable law.

We will retain Personal Information from closed or inactive Accounts to the extent and as long as it is necessary and relevant for our operations and to comply with law, prevent fraud, collect

any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, enforce our Terms of Service, and take other actions otherwise permitted by law.

In general, Personal Information from closed or inactive Accounts will be deleted or anonymized 5 years after the Account is closed or deactivated unless we have reasonable grounds to believe that the Personal Information should be retained for one of the purposes identified above.

## **8. Access/Corrections/Information Removal**

If you wish to access Personal Information collected or stored by us, or if your name, e-mail, postal address, telephone number or other Personal Information changes, you may correct the relevant information by contacting us at [privacy@webinterpret.com](mailto:privacy@webinterpret.com). In addition, you have the right to object, at any time, to the processing of your Personal Information on legitimate grounds by contacting us at [privacy@webinterpret.com](mailto:privacy@webinterpret.com).

## **9. Reservation of right to modify the Privacy Policy**

Webinterpret reserves the right to modify the Site and this Privacy Policy at any time, in particular to reflect changes in market conditions affecting Webinterpret activities, changes in technology, changes in relevant laws and regulatory requirements and changes in Webinterpret system's capabilities. In the event that Webinterpret modifies this Privacy Policy, Webinterpret's revised Privacy Policy shall be effective immediately upon the posting of such revised Privacy Policy on the Site. Accordingly, we would recommend that you periodically re-review this Privacy Policy.

## **10. Contact Information**

If you have any questions or concerns about this Privacy Policy, please e-mail us at [privacy@webinterpret.com](mailto:privacy@webinterpret.com) or send a letter to: WebInterpret SAS, 6 rue Soutrane, 06560 Sophia Antipolis.