



Verified Reviews

by  Skeepers

Privacy & Cookie Policy

The protection of your personal data is Skeepers' top priority.

The purpose of this Privacy and Cookie Policy (hereinafter **the "Privacy Policy"**) is to inform **You ("Users" but also Internet Users)** of the processing of your personal data by Skeepers, and of your rights in this regard.

The Policy applies immediately upon your arrival on the Skeepers website from the following URL: <https://en.verified-reviews.com/> (the "**Site**") and when you accept our Privacy Policy when submitting a Review on a Verified Review Form. The Policy informs you of the use of Data made by Skeepers during your browsing on the Site and governs the use of Data made by Skeepers in the context of the execution of the Rating & Reviews Solution.

If you are a prospect, merchant ("**Merchant Partner**") subscribed to our Services, or if you are one of our suppliers, you should refer to **C) The processing of Personal Data by Skeepers (Data Controller) with respect to Merchant Partners.**

The Privacy Policy may be modified to take into account, in particular, changes in the processing of Data implemented and applicable legislation. You are therefore invited to read any new version made available by Skeepers.

This document was last updated in March 2024.

In the event of disagreement with the new wording of the "Privacy Policy", you retain the right to request the deletion of all Personal Data concerning you by complying with the terms and conditions set out in section "10: Rights relating to Personal Data and their management".



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1: Definitions

Capitalized terms and phrases shall have the following meanings:

"Verified Reviews" is a web page indexed by Google and/or other Search Engines, specific to each Merchant Partner, on which all Customer Reviews concerning it are displayed. This page can be accessed by clicking on the Widget or by clicking on the URL of said web page referenced by the Search Engine;

"Supervisory Authority " means an independent public authority established by a Member State pursuant to Article 51 of the GDPR, and with which any data subject may lodge a complaint concerning the protection of his or her personal data, i.e. the Commission Nationale de l'Informatique et des Libertés (CNIL) in France;

"Customer Reviews" is a general designation for "Product Reviews" and "Brand Reviews";

"Product Review" means a rating, rating or comment given by a Consumer on the quality of a Product;

"Site Review" means a rating, rating or comment given by a Consumer on the overall quality of his or her experience;

"Consumer Database" means all Personal Data relating to Consumers, transmitted by the Merchant Partner to Skeepers, in the context of the use of the Rating & Reviews Solution;

"Adwords campaign", an advertising system of the Google search engine, which displays ads or advertising banners, targeted according to the keywords typed by the Internet user or according to his browsing behavior;

"Merchant Partner" means a natural or legal person who uses the services of Skeepers to obtain Reviews from its Customers resulting from a purchased product, user experience or any other action that may give rise to a request for Customer Review;

"Order or Purchase" means an order, purchase or use of a Product made by a Consumer within a Partner Merchant's store or on its website;

"T&Cs or General Terms and Conditions of Use", terms applicable to any person connecting to the Skeepers website <https://en.verified-reviews.com/> and/or using Skeepers' services;



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"**T&Cs or General Terms and Conditions of Service**", conditions applicable to any person subscribing to a Skeepers offer;

"**Consent**" of the data subject, means any freely given, specific, informed and unambiguous indication of his or her wishes by which the data subject agrees, by a statement or by a clear affirmative action, to the processing of personal data concerning him or her;

"**Consumer**" means a natural person who acts for purposes that do not fall within the scope of his or her commercial, industrial, craft or liberal activity;

"**Personal data**" means any information relating to an identified or identifiable natural person (hereinafter referred to as "data subject"); an identifiable natural person means a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity.

More simply, "personal data" is to **be understood as any information that is specific to you** (surname, first name, age, address, email, telephone number, etc.) ;

"**Form**", a web page on which the Consumer can access by clicking on the hypertext link sent to him by email or SMS after each Order or Purchase, and which the Consumer can fill in in order to leave a Customer Review;

"**Skeepers Group or Skeepers**" refers to the economic entity formed by the company Skeepers, SAS with a capital of €11,480,257, registered with the Marseille Trade and Companies Register under number 879 038 990, whose registered office is located at 18-20 Avenue Robert Schuman, CS 40494, 13002 Marseille, and all the Group's Subsidiaries;

"**Search engine**" means a website that allows you to find resources associated with any word on the Internet;

"**Product**" means a product or service sold or offered free of charge by a Merchant Partner to the Consumer on its website or in stores;

"**Data Protection Regulation**": Includes REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, known as the General Data Protection Regulation (or GDPR), the Directive on Privacy and Electronic Communications 2002/58/EC (as amended by Directive 2009/136/EC, and as amended and replaced where necessary) and their transposition into national law, Law No. 78-17 of 6 January 1978 relating to data processing, files and freedoms, known as the "Data



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Protection Act"; and any regulations, rules, derivative or related legislation implemented by the European Union, a Member State of the European Economic Area and any country outside the European Union and the European Economic Area concerning the processing and protection of Personal Data (as amended and replaced from time to time);

"Data Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing; where the purposes and means of such processing are determined by Union law or the law of a Member State, the controller may be designated or the specific criteria applicable to its appointment may be provided for by the law of the European Union. the Union or by the law of a Member State;

"Service" / "Solution" refers to the service provided by the Skeepers Group – in this case Ratings & Reviews;

"Site" or "Platform" means the website from which the Skeepers Group offers its Ratings & Reviews Solution accessible from the following domain name: <https://en.verified-reviews.com/> ;

"Data Processor" means the natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller;

"Processing" means any operation or set of operations which is performed on personal data or on 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, alignment or interconnection, restriction, erasure or destruction.

More simply, **"Data Processing"** is any form of use of your data;

"Internet user" means a person browsing the <https://en.verified-reviews.com/> website;

"User" means any consumer leaving a Review on a Customer Form;

" Personal data breach " means a breach of security resulting in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

"Widgets", drawings created by Skeepers displaying the average score obtained from Brand Reviews or Product Reviews.



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2: General Information

By accessing and/or using the Site, and in general the Skeepers Services, you acknowledge that you have read the provisions of the Privacy Policy as a whole.

Access to the Site and use of the Services is prohibited to any minor under the age of sixteen. Therefore, by accessing and using the Site and Services, you represent and warrant that you are over 16 years of age if you are European, over 15 years of age if you are French, and over 13 years of age if you are American. If you are under the age requirement, you must not at any time or in any way access or use the Site and Services. If you are a parent or legal guardian of a minor and you believe that we hold Data about that minor, you may obtain deletion of the Data after proving your identity and legal authority over the minor by writing to privacy@skeepers.io.

3: Data Controllers and Data Subjects covered by this Privacy Policy

Skeepers, a simplified joint stock company with a capital of €11,480,257, registered with the Marseille Trade and Companies Register under number 879 038 990, and whose registered office is located at 18-20 Avenue Robert Schuman, CS 40494, 13002 Marseille, is the owner of the website <https://en.verified-reviews.com/>. It offers Ratings & Reviews, Feedback Management, Customer Data Activation, Influencer Marketing, Live Shopping and Consumer Videos.

Skeepers is particularly concerned about issues related to confidentiality, as well as the protection of the Personal Data of Users of its website and/or services, as well as those relating to its Customers. It takes this into account from the design of any new solution it offers to its customers.

It thus guarantees the highest level of protection of Personal Data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (known as the "General Data Protection Regulation", hereinafter "GDPR"), French law (Data Protection Act of 1978, known as "LiL") and, in general, with any regulations applicable to it in terms of the protection of such Personal Data "**Data Protection Regulation**".

This "Privacy & Cookie Policy" describes in detail the policy and practices of Skeepers (or the "Skeepers Group") regarding the collection, use and disclosure of Personal Data that it processes on its behalf or on behalf of its Merchant Partners. The Data Subjects concerned by the processing of the Data are the Users of the Rating&Reviews Solution (Verified Reviews) including in particular the Internet Users browsing the Site ("**You**").



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For the specific processing related to the publication of Verified Reviews, Skeepers acts as a trusted third party to, on the one hand, collect and disseminate Customer Reviews related to a consumer experience, and on the other hand, ensure that the content collected complies with French law and the AFNOR NF Z 74-501 (ISO20488) standard that Skeepers undertakes to comply with in order to preserve the reliability of the published Customer Reviews.

In this respect, Skeepers is qualified as a Processor for Merchant Partners who have subscribed to the Rating&Reviews Solution.

He is qualified as a joint Data Controller with the company Meta, the Facebook and Instagram button being inserted on the Site allowing access to the Skeepers Facebook and Instagram account. For more information on data processing and data protection at Meta: <https://www.facebook.com/about/privacy> and <https://about.instagram.com/fr-fr/safety/privacy>. To have access to the Data Controller Agreement, which determines the respective responsibilities for compliance with the obligations arising from the GDPR with regard to the Joint Processing of registration / connection to the Platform via the Facebook button: https://www.facebook.com/legal/controller_addendum.

He is qualified as a joint data controller with company X (formerly Twitter), the button X inserted on the Site allowing access to the Skeepers account For more information on data processing and data protection at X (formerly Twitter): <https://twitter.com/fr/privacy>.

He is qualified as a joint Data Controller with the company LinkedIn, the LinkedIn button inserted on the Site allowing access to the Skeepers LinkedIn account. For more information on data processing and protection at LinkedIn: <https://fr.linkedin.com/legal/privacy-policy>

He is qualified as a joint Data Controller with the company Google, the Youtube button inserted on the Site allowing access to the Verified Reviews Youtube account. For more information on data processing and data protection at Youtube: https://www.youtube.com/intl/ALL_fr/howyoutubeworks/user-settings/privacy/ but also for protection by reCAPTCHA <https://policies.google.com/privacy?hl=en>

He is qualified as a joint Data Controller with the company Bytedance, the TikTok button inserted on the Site allowing access to the Verified Reviews TikTok account. For more information on data processing and protection at TikTok: <https://www.tiktok.com/legal/page/eea/privacy-policy/fr>

As part of the deposit of cookies on the website <https://en.verified-reviews.com/>, Skeepers may be joint or separate Data Controller with the third-party companies which operate them (see the cookies banner) on their behalf and /or that of Skeepers.



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4: The processing of Personal Data by the Skeepers Group (origin of your data)

Skeepers receives, collects and processes your Personal Data from a variety of sources, which are set out below:

A) The processing of Personal Data carried out by Skeepers (Data Controller) on its website

1. Subscribe to the Newsletter

For any subscription to the Newsletter made via the "Subscribe to our newsletter" insert on the Website <https://en.verified-reviews.com/> the User gives his/her consent to Skeepers, by entering his/her email address, to send his/her newsletter.

The User can unsubscribe at any time via the unsubscribe link at the bottom of each email.

Your information will be kept until you exercise your rights of objection and/or deletion.

2. Registration for a demonstration

For any registration request made via the form available on the page <https://en.verified-reviews.com/demo/> the User gives consent to Skeepers, via a check box, so that it can process the Following personal data:

- First and last name ;
- E-mail address ;
- Telephone number;
- Company Name ;
- Country.

Information accompanied by an asterisk must be provided in order to be able to contact you to respond to your request, but also to send you personalized communications and offer you our



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additional solutions, which may be of interest to you given your needs (Feedback Management, Customer Data Activation, Influencer Marketing, Live Shopping and Consumer Videos. Otherwise, sending the contact form will be impossible.

Skeepers will also be able to process any other personal data that the User has chosen to communicate to them deliberately, in the body of the message and during their exchanges.

Your information will be kept for three years from the last contact, before deletion.

3. Platform login

As part of your use of our services, you have several choices for connecting to the Platform. By logging in with your Google or Microsoft account, you agree to share your Google or Microsoft account information with us. Your information is kept for the duration of your subscription to our services.

4. Market Surveys

As part of your use of our services, you may be invited, at the end of a review, to take part in one of our Market Surveys in order to share your purchasing behavior with us and thus better understand consumer trends. These surveys are completely anonymous, and only a few personal details may be requested but they are insufficient to be able to identify you, even indirectly.

5. Reporting illegal reviews (DSA)

As part of the implementation of the Digital Services Act (DSA), Skeepers must collect certain of your personal information in order to process reports of illegal notices received. They must be provided, otherwise the report cannot be validated. The data collected will be communicated to our Care team. They will be kept for five (5) years.

6. Cookies and other trackers

Accessing and browsing the Site <https://en.verified-reviews.com/> triggers the processing of data collected through cookies, pixels and other similar technologies, trackers (collectively referred to as "Cookies" in this "Privacy and Cookie Policy") necessary for the Site to function, in order to make your visit to the Site as simple, reliable and useful as possible.

Non-essential cookies are subject to the User's prior consent before they are deposited.

- **What is a cookie?**



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Cookies are basic digital information (text files) about how Internet users use the Internet; They do not identify you personally, but they do identify the computer you are using, based on data from your hardware and software. This data may include: your IP address and browser settings (type of browser used, browser language, time zone, referring website, domain names of sites visited, and information about your online activity: dates and times of access and the addresses of the website from which you accessed the Site).

Thus, during your various visits to the Skeepers Site, Cookies make it possible to recognize your computer or mobile device and thus personalize and improve your navigation. Cookies and other Trackers contain information that the Site uses to make communication with your browser more efficient.

To learn more about cookies, including how to block them on Chrome, Firefox and Internet Explorer browsers: <https://allaboutcookies.org/>

However, you are advised not to disable so-called "essential" Cookies from your browser as you may no longer have access to the Site and will no longer be able to browse it.

Where applicable, Skeepers declines all responsibility for the consequences related to the degraded behavior of the Site resulting from the impossibility of using the Cookies necessary for its operation.

- **Why does Skeepers use cookies?**

1/ Skeepers uses **so-called "essential" Cookies** ("necessary" is the term used by specialized sites, in particular on that of the CNIL) whose function is to facilitate your access to the Site, while helping you to navigate and use all the features of the Site.

These cookies are also used to detect and prevent fraud.

These cookies do not require your consent as they are strictly necessary for the Site to function.

In order to find out more, you can consult them when you first visit the <https://en.verified-reviews.com/> website and at any time from the button on the Cookies banner.

2/ Skeepers also uses **functionality and performance cookies** that provide it with information about the use made of its Site, and allow it to better understand how it can improve its Site.

These Cookies are used by Skeepers:

- for marketing purposes to generate different statistics such as demographic statistics;



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- for targeted advertising;
- in order to measure the performance and traffic of its Website;
- in order to optimize the experience on its Website.

[Data Sharing / "DO NOT SHARE/SELL MY PERSONAL DATA"]

In order to find out more, refuse or accept all or some of these functionality and performance Cookies, you can go to <https://en.verified-reviews.com/> website and at any time from the Cookies banner button. Thanks to the buttons at your disposal, you can accept all of them, reject them all, or accept some and reject others.

3/ By visiting the Skeepers <https://en.verified-reviews.com/> "Third-Party Cookies" may be installed: these are Cookies placed on a User's computer by the server of a domain separate from the Skeepers Site . Thus, a Third-Party Cookie "collected" on the Skeepers Site has not been placed by it but by its advertising partners, by social networks. They may be used by these companies to build a profile of your interests and provide you with relevant advertisements on other websites. They do not directly store personal data, but are based on the unique identification of your browser and internet device. If you do not allow these cookies, your advertising will be less targeted.

[Data Sharing / "DO NOT SHARE/SELL MY PERSONAL DATA"]

In order to find out more, refuse or accept all or some of these Third-Party Cookies (called "Social Network Cookies" and "Cookies for targeted advertising"), you can go to <https://en.verified-reviews.com/> website and at any time from the Cookies banner button. Thanks to the buttons at your disposal, you can accept all of them, reject them all, or accept some and reject others.

B) The processing of Personal Data carried out by Skeepers (Data Processor) under its Ratings & Reviews solution

Skeepers is required to process Personal Data as part of its Ratings & Reviews Solution as a Data Processor on behalf of Merchant Partners.

The Ratings & Reviews Solution makes it possible to collect Customer Reviews resulting from an Order placed by a Consumer on the website or in the store of one of the **Partner Merchants**.

After each Order or Purchase by a Consumer from one of Skeepers' partner Merchants, the Consumer is invited, by email or SMS, or by a QR code in a store to submit a Customer



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Review on his or her consumer experience, to which is attached a hypertext link that leads to a Customer Review Form on which the Personal Data listed in the table below is collected. This invitation is only valid for three months.

In order to be able to send this invitation, Skeepers necessarily receives the following information from the Merchant Partners:

- Consumer's last name;- First name;- Email address;- Date and reference of the Order;- Date and place of purchase if it is made in one of the stores of one of Skeepers' partner Merchants;- Name and internal and international references (GTIN / ISDNF) of the Product ordered.

In addition, it is possible that Skeepers may also collect other Data that may be sent by Merchant Partners, such as:

- Consumer's date of birth;- Gender;- Telephone number;- Consumption habits (type of products purchased, frequency of purchase);- Name and reference of the seller.

The Merchant Partners, as Data Controllers, ensure compliance with the Principles relating to the processing of Personal Data (Article 5 of the GDPR), i.e. the lawfulness, fairness and transparency of the processing of Personal Data collected from Data Subjects, which they then transmit to the Skeepers Group.

The Merchant Partners shall inform their Consumers prior to any collection of their data and in accordance with Articles 12 et seq. of the Regulation, in order to avoid any confusion during the processing of their Personal Data by the SKEEPERS Group. **The Skeepers Group's Merchant Partners remain solely responsible to the persons concerned for any lack of information, inaccuracies, errors or omissions relating to the processing of their Data.**

The Personal Data that is subsequently communicated to the Keepers Group must be accurate, adequate, relevant and limited to what is necessary for explicit and legitimate purposes determined by the Data Controllers. Skeepers, as part of its Ratings & Reviews solution, keeps it securely for no longer than is necessary for the purposes for which it is processed.

The Skeepers Group therefore declines all responsibility in the event of violation of these fundamental principles by Merchant Partners, and invites Data Subjects who believe that their rights have been violated, to contact the company in question directly.

Finally, no prior consent is required from Consumers, as the emails and SMS sent under the Rating & Reviews solution are not advertisements, marketing emails/SMS but surveys on the customer experience, lived by Consumers on products and/or services that they have already purchased or from which they have benefited from Skeepers' partner



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Merchants (Gifted reviews), who do so on the basis of their legitimate interest (Article 6.f) of the General Data Protection Regulation).

However, some Merchant Partners may wish to obtain the prior consent of their Consumers: the lawfulness of the prior consent obtained depends solely on them, and Skeepers is in no way responsible for consent that has not been obtained in a free, specific, informed and unambiguous manner within the meaning of Articles 4 and 7 of the General Data Protection Regulation (GDPR).

Consumers are not required to create a personal space on the Skeepers Site to post Customer Reviews.

Skeepers collects and processes Personal Data in the course of its activities in a variety of ways.

The table below details the data processing implemented by Skeepers as part of its Ratings & Reviews solution on behalf of Merchant Partners:

Nature of the operations carried out on personal data	<ul style="list-style-type: none">■ Reception■ Collection■ Registration■ Retention■ Modification■ Consultation/Access■ Usage■ Erasure■ Organization■ Extraction■ Communication■ Dissemination■ Provision■ Destruction
Purposes of personal data processing operations carried out by Skeepers on behalf of Partner Merchants	<ul style="list-style-type: none">• Collection, management and distribution of Consumer Reviews (on the Merchant Partner's websites, partner commercial sites, Third-Party Platforms, search engines, including Google, social networks)
Purposes of the personal data processing operations carried out by Skeepers specific to Consumers	<ul style="list-style-type: none">• Verification of the authenticity of your Customer Review with regard to the AFNOR NF Z 74-501 (ISO 20488) standard relating to online Customer



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	<p>Reviews, the collection process and moderation and restitution;</p> <ul style="list-style-type: none">• Moderation of your Notice in accordance with the AFNOR NF Z 74-501 (ISO20488) standard and the Skeepers T&Cs, and in particular:<ul style="list-style-type: none">- To contact you in the event that your Customer Review is reported by other users and, if necessary, to ask you to provide the necessary documents to verify your Customer Review;- To communicate with you during the moderation process and thus communicate to you the follow-up of your Customer Review, from the moderation, to the rejection of your Customer Review or its publication;- To communicate to you the Merchant Partner's possible response to your Customer Review and to allow you to exchange with them;• Provision of a support service;• Personalization of the Services, in particular by:<ul style="list-style-type: none">- The ability to share your Customer Review on social media;- The ability to display members of your Social Media networks who have submitted Customer Reviews through Skeepers in order to increase trust in Customer Reviews and create a better user experience on the Skeepers Website.
Categories of personal data processed	<ul style="list-style-type: none">• Consumer's name;• Consumer's first name;• Consumer's email;• Consumer's phone number if sending an SMS;• Order number / reference;• Order date;



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	<ul style="list-style-type: none">• Country Code;• Product purchased;• Image (if applicable);• Place of In-Store Purchase (if applicable);• IP address;• Email opening tracker (date, time, email delivery status, IP address, type of device used);• The ratings given by the consumer to their customer experience;• Content of the Review (personal opinion about their customer experience);• The date and time of publication of the Notice;• The consumer's response(s) to the Merchant Partner's comment(s) in relation to a Review;• Consumers' answer(s) to questions asked by Internet users on the Client's website.
	No sensitive data will be accepted/processed.
Categories of data subjects (hereinafter referred to as "Data Subjects")	<ul style="list-style-type: none">■ Consumers■ Leads■ Employees of the Partner Merchant
Legal basis	Merchant Partner's Legitimate Interest or Consumer Consent (at Merchant Partner's choice)
Recipients	At the choice of the Merchant Partner: <ul style="list-style-type: none">- E-commerce connectors;- Third-party vendors;- Social media;- Third-party platforms;- Brands and distributors.



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Retention period(s)	<p>Personal data is retained for 3 months from the sending of the VERIFIED REVIEWS email, if no review is filed, or 18 months from the filing of the Review, when a consumer has filed a Review.</p> <p>The personal data attached to each Review is deleted by automated anonymization.</p> <p>The anonymized Reviews are kept for a period of 5 years, from the date of their publication, solely for statistical purposes.</p> <p>They are deleted from the database and backups at the end of the 5 years. The data deletion process takes place over a rolling one (1) month.</p>
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Personal data is processed at Skeepers only by the competent departments, which need to know the information for the proper performance of their duties. They are subject to a Confidentiality Agreement.

VERIFIED REVIEWS WIDGET COOKIES :

Name: Skeepers performance tracker

Host: Merchant Partner website

Cookie Type: Performance Cookie (1st Party)

Legal basis: Consent collected by the Tag Manager of the Merchant Partner

Purpose: performance metrics to demonstrate the impact of the presence of the Customer Review Widget on prospects' purchasing behavior on the Partner Merchants' e-commerce site.

Shelf life: 13 months

SPECIAL PROCESSINGS:

SKEEPERS SAS with a capital of €11,480,257
18/20 Avenue Robert Schuman - CS 40494 - 13002 Marseille
RCS Marseille 879 038 990 – NII FR01879038990 – Siret: 879 038 990 00 21
<http://www.skeepers.io>



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a) When a consumer wishes to directly submit a Customer Review themselves, they have the option to do so by contacting Skeepers in three different ways:

- via the contact form;
- via the abuse deposit platform accessible from the Partner Merchant's Verified Reviews Certificate;
- via their email address.

On this occasion, Skeepers necessarily collects the following Personal Data:

- Last name;
- Forename;
- Email address;
- Date and reference of the Order;
- Date and place of purchase in the event of a Purchase in one of Skeepers' Merchant Partner stores.

In order to comply with the obligations resulting from the AFNOR NF Z 74-501 (ISO 20488) standard, Skeepers also asks consumers to justify their consumption experience by means of proof of purchase (invoice, proof of payment, purchase order, etc.).

As part of this verification process, Skeepers may collect the following additional Personal Data:

- Mailing address;
- Telephone number;
- Amount spent on ordering;
- Payment method used.

This Personal Data is only used to verify the reality of a consumer experience and to comply with the AFNOR NF Z 74-501 (ISO 20488) Standard. It is therefore not retained by Skeepers and is only processed for verification before being deleted.

b) At the strict request of the Merchant Partner, one or more additional questions on specific topics may be attached to the Form. Skeepers collects responses from these surveys. By completing this Form, consumers will have the opportunity to provide additional information such as:

- Age;
- Sex;



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- Consumption habits;
- Photos or videos;
- ETC.

The transmission of this information is not mandatory and does not condition the filing of a Notice, consumers may choose not to provide it.

c) Following the submission of a Review, Skeepers sometimes intervenes in a moderation phase of the Customer Review.

The services of collection, moderation and publication of online customer reviews carried out by Skeepers have been NF Service certified since March 28, 2014. As such, Skeepers undertakes to comply with the NF Z 74-501 (ISO 20488) standard and the NF 522 certification standard, which obliges it to publish all customer reviews, both positive and negative, subject to a moderation process defined in the General Terms and Conditions of Use of Verified Reviews. Skeepers is committed to not making any selection, so that any Consumer who has had a consumer experience with one of Skeepers' Partner Merchants will be surveyed, and will therefore receive a request for a Customer Review that they can submit, without any compensation, within three months from the date of receipt of the invitation.

All content relating to the identity of the Consumer, the Reviews collected and intended to be published are subject to moderation.

Moderation is a process prior to the publication of a Review that aims to ensure that the content collected complies with French law and the AFNOR NF Z74-501 (ISO 20488) standard, which Skeepers undertakes to comply with in order to preserve the reliability of the published Customer Reviews.

Through this moderation process, Skeepers ensures full transparency with respect to both Merchant Partners and Consumers. Indeed, in accordance with the AFNOR NF Z 74-501 (ISO 20488) standard, Skeepers undertakes to transmit and publish notes, comments, and additional information in a manner strictly identical to those collected, with the exception of any mention or statement of an illicit or inappropriate nature, or contrary to the General Terms and Conditions of Use.

Thus, Skeepers restores Customer Reviews in their entirety, whether positive or negative, without being able to modify or correct them, as soon as they have not been rejected during the moderation process defined in article 5.2 of the Skeepers General Terms and Conditions of Use.



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Thus, as part of the moderation process, Skeepers is required to collect Personal Data corresponding to the Consumer's response(s) to the Partner Merchant's comments in relation to a Customer Review.

It is reminded that Skeepers only serves as an intermediary and does not interfere in the existing relationship between the Merchant Partner and the Consumer.

d) Personal data collected after clicking on "helpful notice"

This mechanism makes it possible to indicate whether the Review that is read by an Internet User has been useful to him. It is therefore not necessary to write a Review to click on "helpful yes review" or "no helpful review". Any Internet user, reader of the Customer Reviews collected by Skeepers can specify, if they wish, whether the Review they have read seems useful to them in their search for information.

Thus, in order to ensure the relevance of this feature, Skeepers collects the IP address of the Internet user clicking on "useful notice" so that a Consumer can only vote once.

e) Personal data collected during the operation of the "Questions / Answers" module

The "Questions / Answers" module allows an Internet user to ask a question about a product. Consumers who have already ordered this product are asked by email to respond to the Internet user interested in this product.

Skeepers necessarily collects the following Data that it receives from its Merchant Partners:

- Last name;
- Forename;
- Email address;
- Date and reference of the Order;
- Date and place of purchase if it is made in one of the Partner Merchants' stores;
- Name and internal and international references (GTIN/ISDNF) of the Product ordered.

In addition, Skeepers may also collect other Data that may be sent by Merchant Partners, such as:

- Consumer's date of birth;
- Sex;
- Telephone number;
- Consumption habits (type of products purchased, frequency of purchase);



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- Seller's name and reference.

In addition, when a Merchant Partner has subscribed to the "Questions/Answers" module, Skeepers will collect the answer(s) of the Consumers of this product to the question asked by the said Internet User on the Merchant Partner's website.

C) The processing of Personal Data by Skeepers (Data Controller) with respect to Merchant Partners

As part of the subscription to one or more of the Skeepers Group's solutions, and then as part of this collaboration, Skeepers processes the Personal Data of Merchant Partners.

The table below details the data processing implemented by the Skeepers Group as part of its relations with Merchant Partners:

Nature of the operations carried out on personal data	<ul style="list-style-type: none">■ Reception■ Collection■ Registration■ Retention■ Modification■ Consultation/Access■ Usage■ Erasure■ Extraction■ Communication■ Dissemination■ Provision■ Interconnection■ Destruction
Purposes of the personal data processing operations carried out by Skeepers in connection with its relations with Partner Merchants	<ul style="list-style-type: none">• Listening to and recording telephone and video conversations in the context of incoming and outgoing calls with prospects/Merchant partners in order to improve the quality of the service provided;• Manage the contractual/commercial relationship;• Create and manage the Client's Back Office;• Enable access to and use of the Platform and its services;



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- Carry out all operations related to the Services, including, but not limited to:
 - Establishment of the Verified Reviews Certificate;
 - Verification, identification and authentication of the Data transmitted and in particular the verification of the authenticity of your Customer Review;
 - Management and processing of requests from the contact form;
 - Contact of users of the Site who request it;
 - Compliance of Customer Review collection services with the AFNOR NF ISO 20488 standard relating to online Customer Reviews, the collection process and moderation and restitution;
 - Implementation of the moderation process in accordance with the AFNOR NF ISO 20488 standard and the T&Cs of Verified Reviews
- Communicate with the Client in the context of the performance of the Services or for information purposes in the event of changes to the General Terms and Conditions;
- Provide a support service (in particular by Chatbot);
- Sending commercial information in relation to the Subscribed or Similar Services (UGC);
- Carry out Customer Review surveys;
- Analyze data, audience types and usage trends;
- Perform marketing and statistical analyses;



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	<ul style="list-style-type: none">• Carry out statistics in order to improve the functioning and optimize the Back Office;• Compile statistics in order to improve the operation and optimize our Solutions;• Maintain the Platform in its proper functioning and in a secure environment;• Resolve any technical incidents encountered;• Request payment for the Services subscribed to;• Manage unpaid bills, litigation and disputes;• Detection, prevention and fight against fraud and cybercrime;• Keeping of general and auxiliary accounts;• Responding to official requests from public or judicial authorities authorized for this purpose;• Acquisition audit by potential buyers.
Categories of personal data processed	<ul style="list-style-type: none">• Last name;• Forename;• Professional email address;• Business phone number;• Image (if video interview);• Voice (if video/audio interview);• Identifier;• Password;• Connection logs;• Cookies and other Trackers;• Bank details.
Categories of data subjects (hereinafter referred to as "Data Subjects")	<ul style="list-style-type: none">• Employees, assimilated or external employees hired by the Client
Legal basis (depending on the purpose)	<ul style="list-style-type: none">• Pre-Contractual / Contractual• Skeepers' legitimate interest• Consent (prior to video/audio interview recording)



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	<ul style="list-style-type: none">• Legal Obligation
Retention period(s)	<p>Five (5) years from the end of the contractual relationship between the Skeepers Group and the Client (common law statute of limitations in civil and commercial matters).</p> <p>Three (3) years from the last contact in the context of commercial prospecting.</p> <p>Retention for a maximum period of 6 months from the date of recording of the audio or video interview. The data in the analysis documents (reports and analysis grids) are kept for one (1) year from their collection.</p> <p>Retention for the duration of the litigation, deletion of the data once all appeals have been exhausted and the decision has become enforceable or the statute of limitations of the legal action.</p> <p>In the event of an amicable settlement of the dispute, deletion as soon as the dispute is settled.</p> <p>Retention for the current accounting year, increased by ten (10) years from closing.</p>

Personal data is processed in the Skeepers Group only by the competent departments, which need to know the information for the proper performance of their tasks. They are subject to a Confidentiality Agreement.

5: "DO NOT USE MY SENSITIVE DATA" (CCPA/CPRA)

Sensitive data is a special category of personal data.

This is information that reveals the alleged racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as the processing of genetic data,



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biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Skeepers does not collect any sensitive data on <https://en.verified-reviews.com/> (the "Site") or within its Rating&Reviews Solution. In the event that a Merchant wishes to collect sensitive data about you in the Notification Form, your prior consent will be required.

6: Social Media Data

In order to create a better experience and increase trust in published Customer Reviews, Skeepers offers the possibility to Consumers, when submitting a Customer Review, to link it with their profile on social networks such as Facebook. By posting your Review on your Facebook page, You agree to be bound by Meta's Privacy Policy.

When you log in, you acknowledge and agree that Skeepers collects and stores the information and data available on your Facebook page, as described in Facebook's [Privacy Policy](https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0) https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0 (the "Meta Data"), including, but not limited to:

- Username;
- E-mail address;
- Sex;
- Date of birth;
- Profile picture;
- Geographic location;
- Network of friends.

This feature allows Users of Skeepers' services who are connected on social networks to display the members of their network who have left a Customer Review.

You can revoke Skeepers' access to your Meta Data at any time via the security settings available at the following URL: <https://www.facebook.com/help/792552774106866>

7: Data Sharing / "DO NOT SHARE/SELL MY PERSONAL DATA" (CCPA/CPRA)

7.1 Publication of Customer Reviews

By completing and returning the Customer Review Form, Consumers are informed that their Customer Reviews will be made available to the public, by publishing and



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disseminating them on the Partner Merchant's website, as well as on partner commercial sites and Search Engines, in particular Google or Bing.

These Customer Reviews will be available to all visitors to these websites.

Each published Customer Review will include at least the following information about its author:

- Forename;
- First letter of the Name;
- Notes and comments;
- The date of publication of the Customer Review;
- The date of the Order or Purchase;
- The Product purchased;
- The place of purchase (in case of in-store purchase).

The Customer Review may also include:

- The Merchant Partner's right of reply and the consumer's entire interaction with the Merchant Partner, unless the Merchant Partner has disabled this feature.
- Any additional non-mandatory personal information that the consumer has chosen to provide, such as:
 - o Age;
 - o Gender;
 - o Consumption habits;
 - o Photos or videos.

Thus, each Customer Review is displayed only with the Consumer's first name and initial of the last name.

However, pseudonymization is possible at the time of submitting a Review from the thank you page, where there is a checkbox mentioning the option not to display the "first name + first letter of the last name". A name and surname will then be randomly generated next to the Posted Review.

If the Review has already been published and the Consumer wishes it to be pseudonymized, he or she may request it directly by contacting Verified Reviews at the following address: moderation@avis-verifies.com . A name and surname will then be randomly generated next to the published Review.



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7.2 Sharing with Processors

Skeepers undertakes to verify that all its Processors and partners necessary for the performance of the services scrupulously comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR) and to enter into contracts with them including a Data Processing Agreement and a Non-Disclosure Agreement.

In this context, all SKEEPERS Processors and partners are required to provide sufficient guarantees demonstrating that the applicable technical and organisational security measures for the protection of Personal Data have been taken (Article 32 of the GDPR).

In order to ensure the proper functioning of its Services, Skeepers uses IT and technical service providers (e.g. those in charge of maintaining the IS) such as IT service providers (e.g. the hosting provider), SaaS solutions that need to have access to Data to carry out the mission entrusted to them by Skeepers. Skeepers imposes strong obligations on these contracting parties in terms of processing, confidentiality and security of the Data to which these service providers have access.

Skeepers may also share your Data with its Processors in order to perform statistical analyses, send you an email, text message or letter, provide customer support, moderate Reviews, etc. These Processors may have limited access to some of your Personal Data in the strict context of the performance of their services. They have a contractual obligation to use it in accordance with the applicable provisions and regulations on the protection of Personal Data. They only use your Data to provide the services to which Skeepers has subscribed, and this is done with the guarantee of maintaining the strict confidentiality of the Data. For a complete list of Processors, please write to privacy@skeepers.io.

Skeepers may also be required to communicate your Data to third parties in certain specific cases:

- If Skeepers is obliged to follow up on claims made against it and to respond to administrative and judicial proceedings (**right to defence**);
- If Skeepers intends to divest a business or assets (including by divesting the business carrying on that business or owning those assets), your Data may be disclosed to the acquirer and potential acquirers as part of an audit, including their advice. If all or a portion of Skeepers' assets are acquired by a third party, Data will be one of the transferred assets. The Data will be processed by the acquirer who will act as the new data controller and its Data protection policy will then govern the processing of the Data (**merger, acquisition, sale of assets**);



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- If Skeepers is compelled to disclose or provide access to the Data to comply with a legal obligation or court order, or to enforce or apply the service contract or any other accepted circumstances, or to protect the rights, property, or safety of Skeepers, its customers, or its employees (**legal obligation**).

You have the right to object, at any time, to the Sharing of your data with Third Parties. We will then no longer transmit your data to these Third Parties, unless (i) these Service Providers are essential for the proper performance of the Services offered (you will then have to unsubscribe from our Services) (ii) we can justify to you that we have legitimate and compelling reasons for the Sharing/Processing of your data that override your interests and your rights and freedoms (iii) for the establishment, exercising or defending our legal rights.

For the sharing of data with social networks and ways to object to it, please refer to point 6: Social media data.

For the deposit of cookies and how to object to them, please refer to point 8. Cookies.

8: Data retention period

Your Data is only kept for the time strictly necessary for the purposes established in the previous articles of the Privacy Policy (**article 4. The processing of Personal Data by the Skeepers Group (origin of your data)**), in accordance with the recommendations of the CNIL, and in compliance with legal obligations, the AFNOR NF Z 74-501 (ISO20488), accounting and tax standards.

Beyond the defined retention periods, the Data will be anonymized and only kept for statistical and archival purposes, after which it will be destroyed.

9: Data storage and security measures in place

Skeepers ensures the security of your Data and takes all necessary measures to ensure its confidentiality and prevent access, use, alteration, corruption, disclosure, and/or destruction by unauthorized persons.

To this end, Skeepers has implemented organizational, technical, software and physical measures in accordance with Article 32 of the GDPR listed in its Security Assurance Plan and Information Systems Security Policy. These include:

- Data anonymization techniques upon request;



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- Regular backup of Personal Data with regularly validated restoration processes, in technically and physically separate backups;
- Secure hosting (Amazon Web Services hosting company ISO 27001 certified for technical measures, ISO 27017 for cloud security, ISO 27018 for cloud privacy, SOC 1, SOC 2 and SOC 3, PCI DSS Level 1, BSI Common Cloud Computing Controls Catalogue (C5), ENS High.);
- Protection in terms of access control (authentication and authorization control), processing, storage or exchange (encryption) to ensure confidentiality: access to your Data is limited and restricted only to the people/services that need to access it, who have signed a Confidentiality Agreement, this Data is stored on secure servers, Your Data is encrypted in transit and at rest (KMS encrypt). Access to your Data requires the use of a strong username and password.
- Skeepers' information system includes centralized and protected logging of the use of the services to detect any intrusion or fraudulent use, to try to identify the causes and origins, to avoid any contamination of other sites by bounce and finally to re-establish the system.
- An in-depth security analysis to assess its level. It should be noted that if the required level is not reached, a new design phase is opened in order to reach the level required by the Skeepers Group;
- Ongoing audits (Bug Bounty) carried out by accredited Third Parties.

Despite all these measures, your attention is drawn to the fact that the Internet is not a completely secure environment, so it is not possible to guarantee the security of the transmission and storage of your Data.

In accordance with Article 33 of the GDPR, Skeepers undertakes to notify the CNIL, as soon as possible, of any Data breach likely to cause a risk to the rights and freedoms of the Users of its Solutions (in cases where it is the Data Controller), and to inform them if the risk is high.

Skeepers is committed to ensuring that your data is hosted within the European Union and the European Economic Area. However, some specific services of Skeepers are operated outside the territory of the European Union and the European Economic Area, so a limited amount of your Personal Data will be shared with these service providers in countries outside the European Union.

Skeepers then ensures that Standard Contractual Clauses are signed in their latest version in force with the said third-country service providers, and that additional technical measures are



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implemented in order to be able to ensure a sufficient level of protection for the Sharing of your Data, according to the recommendations of the supervisory authorities, including the European Data Protection Board in its "Recommendations 01/2020 on measures that supplement transfer tools to ensure compliance with the EU level of protection of personal data".

10: Your rights

In the context of the Data processing carried out by Skeepers, you have the right to:

- To obtain access to/copy of your Processed Data;
- To obtain the rectification of your Data;
- To obtain the deletion of all or part of your Data when the Data, (i) is no longer necessary for the purposes for which it was collected, (ii) is based exclusively on consent, (iii) is the subject of an objection request;
- To object to the processing of your Data due to your particular situation;
- To obtain the restriction of processing, temporarily, when the accuracy of the Data is contested, when you have objected to the processing, when your Data is no longer necessary for Skeepers but is still necessary for the establishment, exercise or defence of legal claims;
- To unsubscribe or object to the receipt of commercial prospecting messages at any time by following the unsubscribe instructions indicated in the promotional emails you receive;
- Withdraw your consent at any time in the case of consent-based processing;
- To obtain the portability of your Data when the processing is based on consent and the processing is carried out using automated processes;
- Provide guidance on the fate of your Post-Mortem Data.

To exercise your right to delete your Data, your account, or to object, you can send your request to the following address: datadeletion@skeepers.io

To exercise any of your other rights or have any questions about this Privacy Policy, you may send a request to the following address: privacy@skeepers.io .

You can write to us at the address listed below:

SKEEPERS
Legal Department - Data Protection Officer
18-20 Avenue Robert Schuman
CS 40494
13002 Marseille

For any request to exercise your rights, you must, in your message:

SKEEPERS SAS with a capital of €11,480,257
18/20 Avenue Robert Schuman - CS 40494 - 13002 Marseille
RCS Marseille 879 038 990 – NII FR01879038990 – Siret: 879 038 990 00 21
<http://www.skeepers.io>



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- 1) Specify the address (email or postal) where you would like to receive a response from Skeepers. Otherwise, we will choose the same method you used to contact us;
- 2) Include a means by which you can be identified (order number, customer ID, etc. if the means provided does not seem sufficient to prove your identity, a copy of your identity document may be required);
- 3) Specify, if possible:
 - the context in which your data was collected,
 - as well as the Solution concerned (in this case Rating&Reviews – Verified Reviews)

This information is valuable so that the Data Protection Officer can respond to you as quickly as possible.

Skeepers informs you that no requests will be processed over the phone.

A response will be sent to you as soon as possible, which may not exceed one (1) month from the date of receipt of your request.

A two (2) month extension is possible, in the event of a complex application, or if a large number of applications have been received.

Your request, as well as any data relevant to the processing of your request, will be kept for a period of five years from receipt of your request. If you have been asked for a supporting document, or if you have sent it spontaneously, it will be kept for a period of one year.

If, after contacting the Data Protection Officer, and a period of one month has elapsed, you believe that your GDPR rights are not respected, file a complaint with the Supervisory Authority.