

PRIVACY POLICY

1. WHAT IS THIS PRIVACY POLICY FOR?

- 1.1. This privacy policy ("**Privacy Policy**") applies to the online media monitoring platform for floods and weather impact (the "**Platform**") operated by FloodTags ("**FloodTags**", "**us**", "**we**" and the like), as well as to other personal data we process.
- 1.2. Our Platform is an online application that monitors different types of (social) media such as Twitter and Youtube ("**Social Media**") and that provides high quality social media and online media analysis for floods and other weather impacts.
- 1.3. The Platform can be used by organizations who subscribe for a subscription with us, and by their clients, as well as by potential clients who get access for demonstration purposes (each organization: a "**Client**"). In order for the Client's users ("**Users**"), including Users who have been appointed as administrator ("**Administrator**"), to access and use the Platform, they must register for an account ("**Account**"). We create the Administrator's account. The log-information (e.g. email address, password) is necessary.
- 1.4. This Privacy Policy relates to the following types of data categories and processing activities:
 - Personal data of Users;
 - Personal data of Social Media users ("**Social Media Users**") and of persons whose personal data are included in content Social Media Users place on the relevant social media (also "**Social Media Users**");
 - Personal data of visitors of our website www.floodtags.com;
 - Personal data of candidates who apply for a job with us;
 - Personal data of other contact persons, such as at our suppliers and Clients.
- 1.5. Our Clients use personal data of Users and Social Media Users for their own purposes. We have added a section below (section 3.13-3.16) to explain this. Although we have included the information in our Privacy Policy, the Clients are responsible for informing these data subjects about the processing of their personal data.

2. FROM WHAT SOURCES DO WE RECEIVE PERSONAL DATA?

- 2.1. To be able to offer the Platform to our Clients, we receive Social Media Users' personal data that are included in messages they post on the relevant Social Media.
- 2.2. We currently receive information from the following Social Media sources:
 - Twitter: Twitter profile data and personal data in their Tweets, such as photographs. Please find Twitter's privacy policy at <https://twitter.com/en/privacy#twitter-privacy-1>.
 - YouTube API Services: YouTube videos with usernames of the Social Media User that posted the video and footage of Social Media Users in the videos. Please find Google's privacy policy at <https://policies.google.com/privacy?hl=en-US#infocollect>. By using YouTube API Services, we allow third parties to serve content, including advertisements.
- 2.3. With respect to Users, when they use the messenger functionality in the Platform, which is supported by Telegram, we register name, user-ID, telephone number (if you add this) and your message. Please find Telegram's privacy policy at <https://telegram.org/privacy>.
- 2.4. We store personal data of Users that are added to the Platform by their Administrators. We may receive personal data of candidates (name, contact details, CV) from head hunting or employment agencies, as the case may be.

3. WHAT ARE THE PERSONAL DATA USED (PROCESSED) FOR?

- 3.1. Below, we explain what we use the personal data for. In section 3.13-3.16. we explain what the Clients will likely use the personal data for.

Personal data of Users

- 3.2. We can use Users' names, email addresses and other log-in information, IP-addresses as well as access logging to be able to offer you the Platform, for security monitoring purposes, to be able to verify the amount of Users per Client for billing purposes, for load monitoring purposes, to send service updates and to verify compliance with the agreement concluded with the Client and the User (the [Terms of Service](#)) and, where applicable, to take actions in relation to a non-compliance with such an agreement.
- 3.3. Users can also contribute information to the Platform, e.g. by creating labels or adding annotations with respect to certain weather or flooding situations ("**Content**"). We also process the personal data in the Content (usually your name) for our own purposes, namely to enrich the information in the Platform and to make such information available to our other Client. We shall however remove your identifiers from the Content before sharing any data with our other Clients or adding it to the Platform for enrichment of the information in the Platform.
- 3.4. Users can communicate with other Users through the Platform using a messenger app functionality, we use the personal data in such communication to be able to offer you this functionality of the Platform.
- 3.5. We may aggregate your Content and other data and information resulting from your use of the Platform in a manner that does not identify you ("**Statistical Usage Data**"). We may use the Statistical Usage Data (which are not personal data) for our own purposes, including without limitation in order to improve the Platform and our services, to improve other products and for customer service purposes.

Personal data of Social Media Users

- 3.6. We use the Social Media Users' personal data for the purpose of offering the Platform. This means: making available Social Media Users' posts in the Platform to our Clients and ourselves, using information in those posts to analyze situations, show dashboard information and make reports and to make such information available to our Clients.
- 3.7. When we make available aggregated information to our Clients, e.g. in reports, we endeavor to not unnecessarily include any personal data in such information.
- 3.8. We only share Social Media Users' personal data with other parties, as indicated in section 5.

Personal data of website visitors

- 3.9. We register IP-addresses and page views on our website to analyze website visits and to improve our website's user friendliness.
- 3.10. We only place cookies through our website that are necessary (and for which your consent is not required).

Personal data of candidates

- 3.11. We process personal data of candidates, namely their names, contact details, CV, reference data, motivation (letter/email) for the purpose of evaluating their fitness for the job.

Personal data of other contact persons

- 3.12. Personal data of other contact persons, mainly their names, functions and contact details are used to be able to communicate with them, to manage the relationship with them and/or with the organizations they work for and for our (financial) administration.

How Clients use the personal data

- 3.13. Clients will generally use the personal data of their Users to manage their Accounts and to enable them to log into and use the Platform (such use also includes adding labels and annotations). If the Platform allows

Users to log into the Platform using their own social media credentials, those data will be used for those log in purposes.

- 3.14. Users will access Social Media User personal data for the purpose of using the Platform and its functionalities, including viewing Social Media Users' posts in the Platform, using information in those posts to analyze situations, viewing dashboard information and making and viewing reports.
- 3.15. Users may export data from the Platform, including Social Media User personal data, within the boundaries set by the relevant Social Media.
- 3.16. If interaction or engagement with the Client's social media pages or profiles is possible using the Platform, Users will use Social Media Users' personal data to interact with them.

4. ON WHAT LEGAL GROUNDS ARE YOUR PERSONAL DATA PROCESSED?

- 4.1. We process the personal data on the basis of the following legal grounds:
 - *Users*. Personal data of Users are primarily processed on the basis of our legitimate interests, which are set out in sections 3.2-3.5 and the Users' and our Clients legitimate interest to use the Platform;
 - *Social Media Users*. Personal data of Social Media Users are processed on the basis of our legitimate interests, which are set out in sections 3.6-3.8 and the Users' and our Clients legitimate interest to use the Platform and its functionalities;
 - *Website Visitors*. Personal data of website visitors are processed on the basis of our legitimate interest to be able to analyze website statistics;
 - *Candidates*. Personal data of candidates who apply for a job with us are processed for the purpose of taking steps prior to entering into the employment agreement (if the candidate is accepted);
 - *Other contact persons*. Personal data of other contact persons, such as at our suppliers and Clients are processed on the basis of our legitimate interests to be able to conduct our business.

5. WITH WHOM ARE YOUR PERSONAL DATA SHARED?

- 5.1. The Social Media Users' personal data are shared with the Users and the Clients. The Users' personal data are shared with their Administrator.
- 5.2. We use a hosting service provider that hosts the Platform, including the personal data in it. We use a service provider that supports us with the administration and contents of the Platform ("**Content Service Provider**").
- 5.3. We may be obliged by law to share certain personal data, e.g. with a government authority or with a third party on the basis of a court order.

6. WHERE ARE YOUR PERSONAL DATA STORED?

- 6.1. The personal data in the Platform are currently stored with outside the European Economic Area ("**EEA**") in the United States of America. Our Content Service Provider has access to personal data in the Platform from outside the EEA.
- 6.2. If a User accesses the Platform from outside the EEA, in as far as this is regarded as a transfer of personal data to outside the EEA, the User and the relevant Client agree to be bound by the Standard Contractual Clauses for transfers to outside the EEA.

7. HOW LONG ARE YOUR PERSONAL DATA STORED?

- 7.1. The storage criteria of the personal data are:
 - *Users*. Personal data of Users are stored for the duration of their use of the Platform; after their Accounts have been deleted, so are their personal data; we may however have to retain certain

personal data, e.g. log-in information and logging information, if this is necessary for example for investigations into security incidents;

- *Social Media Users*. Personal data of Social Media Users are stored in the Platform for as long as they are necessary for us to offer the Platform; when certain content of the Social Media User is removed from the relevant Social Media however, it is also removed from our Platform;
- *Website Visitors*. Personal data of website visitors are stored for 6 months;
- *Candidates*. Personal data of candidates who apply for a job with us but that are not offered a job are stored for four weeks after completion of the application procedure, or with the candidate's consent, for a year;
- *Other contact persons*. Personal data of other contact persons, such as at our suppliers and Clients are processed on the basis of our legitimate interests to be able to conduct our business. Generally, their data are stored for a period of 10 years.

8. WHAT RIGHTS TO DO YOU HAVE WITH RESPECT TO YOUR PERSONAL DATA?

8.1. Pursuant to the General Data Protection Regulation (GDPR), you have the following rights with respect to your personal data:

- the right to request access to your personal data;
- the right to receive information about the processing of your personal data;
- the right to have incorrect personal data rectified;
- under certain conditions to have your personal data erased;
- under certain conditions to have the processing of your personal data restricted;
- under certain conditions to object to the processing of your personal data – however when we use your personal data for direct marketing purposes, you can object to this unconditionally;
- if you have given consent for the processing of your personal data, to revoke that consent (this applies to future use of your personal data);
- the right to receive your personal data in a structured, commonly used and machine readable format, where it concerns personal data (i) you have submitted to us and (ii) we process based on your consent or required for the performance of our contract with you and (iii) that is processed by automated means; in that case you may also ask us to transfer your personal data to another processor, where technically feasible;
- the right to lodge a complaint with the supervisory authority.

8.2. If you want to exercise your rights, please send a request with respect to your personal data, detailing your request and using the contact details under 'Contacting Us' below. We may ask you to provide additional information in order for us to verify that your request relates to your personal data.

8.3. Please note that we may be entitled under applicable laws to refuse certain requests, in whole or in part.

9. CONTACTING US

If there are any questions regarding this Privacy Statement or about your personal data, please send an email to info@floodtags.com.

10. CAN THIS PRIVACY POLICY BE ALTERED?

Yes, we reserve the right to alter this Privacy Policy. You will be notified of material changes, e.g. through a notice on the website.

Month of publication: December 2022