

SPARKS

ONLINE PRIVACY POLICY

Sparks, company to be incorporated, (hereafter: we, us or Sparks) is committed to protecting and respecting your privacy.

This policy sets out the basis on which any information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your information and how we will use it. By visiting <https://sparks-meeting.eu/>, you are accepting and agreeing to the practices described in this Policy.

Our Privacy Policy contains the following sections:

1. Information we collect from you;
2. Cookies;
3. Uses made of your information;
4. Legal Basis;
5. Disclosure of your information;
6. Transfer of your information;
7. Your rights;
8. Security of collected information;
9. Retention of your information;
10. External websites/apps;
11. Agreement with collection and use of your information - changes to our Policy;
12. Identity of data controller - contact details.

1. Information we collect from you

We will collect and process the following information about you:

- o Information you give us.

This is information about you that you give us by filling in forms on <https://sparks-meeting.eu/> (hereafter: our website) or by corresponding with us, after having taken contact with us through our website, by phone, email or otherwise. It includes information you provide to us when you complete the online contact form or subscribe to the press releases and development updates about Sparks . The information you give us may include your name, surname, company and email address.

- o Information we collect about you.

During each of your visits to our website we will automatically collect the following information:

- technical information, including the Internet Protocol (IP) address used to connect your computer to the internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), products/services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page;

2. Cookies

Our website uses cookies.

Cookies are small data files, which are downloaded to your device when you visit our website. Cookies may gather information about your use of the website or may enable us to recognise you as an existing customer when you return to our website at a later date. Cookies allow us to recognise your device. You can find more information about cookies at <http://www.allaboutcookies.org> and <http://www.youronlinechoices.eu>.

You do not have to accept our cookies. However, note that if you do not accept or delete our cookies, you will not be able to take full advantage of certain features of our website and/or the user experience. You can find more information on how to disable and/or delete cookies below.

We use the following cookies on our website. These cookies are:

- functional cookies - cookies that are essential in order to enable you to move around our website and use its features.
- Performance & tracking cookies - these are cookies that allow us to know how many times a specific page has been visited. We only use this information to improve the content of our website. These cookies are only placed if you accept their placement.

- Functional cookies

Name	Expiration date	Purpose
i18n_redirected	1 year	To specify in which language you wish to visit the website
cookies-accept	1 months	To determine whether or not you close the cookiebar

- Performance & tracking cookies

Name	Expiration date	Purpose
<u>_ga</u>	2 years	Google Analytics - Used to distinguish users.
<u>_gid</u>	24 hours	Google Analytics - Used to distinguish users.
<u>_ga <container-id></u>	2 years	Google Analytics - Used to persist session state.
<u>_gac_gb <container-id></u>	90 days	Google Analytics - Contains campaign related information. If you have linked your Google Analytics and Google Ads accounts, Google Ads website conversion tags will read this cookie unless you opt-out. Learn more
__hstc	13 months	Hubspot - The main cookie for tracking visitors. It contains the domain, utk, initial timestamp (first visit), last timestamp (last visit), current timestamp (this visit), and session number (increments for each subsequent session).

hubspotutk	13 months	<p>This cookie keeps track of a visitor's identity. It is passed to HubSpot on form submission and used when deduplicating contacts.</p> <p>It contains an opaque GUID to represent the current visitor.</p>
__hs_do_not_track	25 days	<p>If this cookie is present, Hubspot will not track the user.</p>
__hssc	30 minutes	<p>Hubspot - This cookie keeps track of sessions.</p> <p>This is used to determine if HubSpot should increment the session number and timestamps in the __hstc cookie.</p> <p>It contains the domain, viewCount (increments each pageView in a session), and session start timestamp.</p>
__hssrc	expires at the end of the session	<p>Whenever HubSpot changes the session cookie, this cookie is also set to determine if the visitor has restarted their browser.</p> <p>If this cookie does not exist when HubSpot manages cookies, it is considered a new session.</p> <p>It contains the value "1" when present.</p>

Cookie settings can vary from one browser to another. By way of example, the below hyperlinks provide further guidance on how to disable the use of cookies on certain browsers, and/or on how to delete cookies:

- Chrome : <https://support.google.com/chrome/answer/95647?hl=en>;
- Internet Explorer : <http://windows.microsoft.com/en-US/windows-vista/Block-or-allow-cookies> and <http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies#ie=ie-11-win-7>;
- Mozilla Firefox : <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences?redirectlocale=en-US&redirectslug=Enabling+and+disabling+cookies> and <https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>;
- Microsoft Edge : <https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09>
- Safari : <https://support.apple.com/en-us/HT2012655>

3. Uses made of your information

We use the information we hold about you in the following ways:

- Information you give to us.

We will use this information:

- to provide you with the information and services that you request from us;
- to provide you with information about other services we offer that are similar to those that you have already used or enquired about;
- to review and assess your job application;
- to ensure that the content from our website is presented in the most effective manner for you and for your computer/device;
- to answer the questions you may have;
- to send you press releases and development updates about Sparks (when you subscribed for them through the website).

- Information we collect about you.

We will use this information:

- to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our website to ensure that content is presented in the most effective manner for you and for your computer/device;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our website safe and secure;
- to make suggestions and recommendations to you and other users of our website about goods or services that may interest you or them;

4. Legal basis

Your information is being collected and processed on the following legal bases:

- If it is necessary for pursuing our legitimate interests, considering these interests are not overridden by your fundamental rights and freedoms, e.g. we use your information to know your preferences so as to be able to better personalize our product offerings, to prevent fraud and to secure our website, or
- When you consented to this, e.g. if you have given your prior express consent thereto we may use your email address for sending you press releases and development updates about Sparks.

5. Disclosure of your information

You agree that we have the right to share your information with selected third parties including:

- o our business partners;
- o public authorities (including judicial and police authorities);
- o
- o our professional advisors;
- o providers of recruitment related services;
- o our suppliers of IT related services;
- o analytics and search engine providers that assist us in the improvement and optimisation of our site, e.g. Google.

We will also disclose your information to third parties:

- if that is appropriate to achieve any of the purposes set out in section 3 of this Policy;
- if we are under a duty to disclose or share your information in order to comply with any legal obligation or to protect the rights, property, or safety of Sparks, our customers, or others. This includes exchanging information with public authorities (including judicial and police authorities) in the event of, for example, a cyber-security incident;
- in the event that we sell or buy any business or assets, in which case we may disclose your information to the prospective seller or buyer of such business or assets.

6. Transfer of your information

We may transfer your information to a destination outside the European Economic Area (the EEA), if that is appropriate (i) to achieve any of the purposes set out under section 3 and/or (ii) to disclose your information to a third party in accordance with section 5 of this Policy.

If we transfer your information outside of the EEA, we will make sure that your information is protected by the following safeguards:

- the laws of the country to which your information is transferred ensure an adequate level of data protection (Article 45 GDPR); or
- the transfer is subject to data protection clauses approved by the European Commission (Article 46.2 GDPR) ;

If you wish to receive more information relating to the transfers of your information and/or the safeguards that have been implemented (including on how to receive a copy thereof), you can contact us through the contact details set out in section 12 below.

7. Your rights

You have certain rights regarding the information we hold about you. These rights can be exercised by contacting us as set out in section 12 below:

- you have the right to access the information we keep about you - this is because we want you to be aware of the information we have about you and to enable you to verify whether we process your information in accordance with the applicable data protection laws and regulations;

- you have the right, under certain circumstances, to block or suppress further use of your information. When the processing is restricted, we can still store your information, but we can no longer use it;
- if your information is inaccurate or incomplete, you have the right to request the rectification of your information;
- you have the right, under certain circumstances, to request the deletion or removal of your information from our systems;
- you have the right to lodge a complaint about the way we handle or process your information with your national data protection authority;
- if our processing of your personal information is based specifically on your consent, you have the right to withdraw that consent at any time;
- you have the right to obtain from us, under certain circumstances, your information in a structured, commonly used and machine readable form so you can reuse it for your own purposes across different services. you also have the right to object to certain types of processing

However, note that we may need to retain certain information, for example for legal or administrative purposes

For all requests set out above, please send us an email with “data privacy request” in the subject line and include a copy of your identity card or another proof of your identity (e.g. driver’s license) to help us prevent unauthorised individuals from accessing, changing or deleting your information. We will respond to your request as soon as practically possible. If we need more than one month (from receipt of your request) to respond to your request, we will come back to you and let you know.

8. Security of collected information

We have implemented a number of security features throughout our website in order to prevent the unauthorized release of or access to collected and/or received information. We have endeavored to create a secure and reliable website for you, but note that the confidentiality of any communication or material transmitted to or from us or any other party via our website or email cannot be guaranteed. We accept no responsibility or liability for the security of information transmitted via these methods.

All information you provide to us is stored on our secure servers.

9. Retention of your information

The information we hold about you will be retained in a manner consistent with the applicable data protection legislation. In any event, your information shall not be kept longer than is necessary to achieve the purposes stated in this Policy,

unless:

- the processing of your information is necessary in connection with any actual or potential dispute (e.g. we need this information to establish or defend legal claims), in which case we will keep your information until the end of such dispute; and/or
- the retention is necessary for us to comply with any legal or regulatory obligation, in which case we will keep your information for as long as required by that obligation.

10. External websites

Our website may, from time to time, contain links to and from websites and/or applications of our partner networks that are not under the control of Sparks. Links to such third party sites are provided for your information only. To the extent that hyperlinks or banners incorporating hyperlinks are utilized to access third party websites and/or applications, you should be aware that these third party websites and/or applications are not controlled by us and have their own privacy policies. Therefore, they are not subject to this Policy and we do not accept any responsibility or liability for these policies. If you decide to access any of these sites, you do so at your own risk. Please check these policies before you submit any information to these websites and/or applications.

The fact that Sparks provides a link to a third party site does not imply that Sparks approves, authorizes or funds any of these sites or that it is affiliated with any third party. Any mention of third party products or services is provided solely for your information and does not constitute an endorsement or recommendation of such products or services by Sparks.

These external websites may provide links to this Website. Sparks has not reviewed the content of these websites and has no influence or role whatsoever in the content or other features of these websites.

Where these external sites have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential.

11. Agreement with collection and use of your information - changes to our Privacy Policy

By using this website, you acknowledge that you have read the terms of this Policy and that you agree with the collection and the use of your information as set out above.

We may amend this Policy from time to time. Any changes we make to our Policy in the future will be posted on this page. Please check back frequently to see any updates or changes to the Policy. Your continued use of this website following the posting of changes to this Policy will indicate your acceptance of these changes. This Policy was most recently updated on November the 12th 2021].

12. Identity of data controller - contact details

The data controller under this Policy is Sparks, company to be incorporated.

Questions, comments and requests regarding the Policy must be addressed to our point of contact for data protection matters : Sparks, company to be incorporated, by mail to info@sparks-meeting.eu.