

PRIVACY POLICY

Legos ("**Legos**", "**we**", "**our** ") provides electronic communications services ("**Services**") to business undertakings ("**Clients**"), such as SMS, SIP trunking, secondary numbers, fixed-mobile convergence services, etc. As part of its Services, Legos also enables its Clients to provide electronic communications services themselves to the public.

When you are using the <https://legos.io/> or <https://www.legos.fr> website and Services provided by Clients, we may collect and process your personal data.

The purpose of this Privacy Policy (the "**Privacy Policy**") is to inform the users of the Services provided by Clients and users of Legos' website ("**User(s)**", "**you**", "**your**") about how we collect and process your personal data, in compliance with the applicable French and European legislation, including French Law No. 78-17 of 6 January 1978 on information technology, data files and civil liberties, Regulation (EU) No. 2016/679 of the European Parliament and 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 ("**GDPR**") and Directive 2002/58/EC of 12 July 2002 as amended by Directive 2009/136/EC ("**ePrivacy Directive**"), and any national transposition text or any subsequent text that may follow them (together, "**Applicable Regulations**").

It is very important to us to respect your privacy and protect your personal data.

It is important that you read this Privacy Policy so that you know how and why we process and use your personal data.

We regularly update the Privacy Policy in order to comply with any legislative, regulatory, jurisprudential, editorial or technical changes. The date of the latest update is 16th December, 2022.

1. DEFINITIONS

The terms "personal data", "process/processing", "data controller", "processor", "data subject", "recipient(s)" and "consent" have the same meaning as given in Article 4 of GDPR.

2. SCOPE

This Privacy Policy applies to our processing of your personal data where we act as a data controller with respect to the Services provided to Clients and Legos' website. This Privacy Policy does not apply to our processing of personal data of our Client's customers on behalf of our Clients where we act as a data processor. For the latter, please refer to privacy policies of our Clients who acts as data controllers for processing such customers' personal data.

Our website may include links to third-party websites, plug-ins and applications. Clicking on these links may allow third parties to collect your personal data. We do not control these third party websites and are not responsible for their processing of your personal data.

3. DATA CONTROLLER

The data controller for processing your personal data collected on our website and/or when you are using our Services is Legos – Local Exchange Global Operation Services, a *société par actions simplifiée* (SAS), registered in the Paris Trade and Companies Register under number 440 799 989, with offices located at

40 rue d'Oradour sur Glane – Paris 75015, and the contact details of which can be found in Article Contact information.

4. WHAT PERSONAL DATA IS COLLECTED?

We may collect, use, store and transfer various types of personal data from following categories (the list of examples of data for each category may not be exhaustive):

- **Identification data:** name(s), surname, title (Sir/Madam);
- **Contact data:** telephone number, email address, postal address;
- **Professional information:** role/job title, department of employment;
- **Authentication data:** user identifiers and encrypted password;
- **Commercial relationship data:** Services provided or in progress;
- **Invoice information:** postal address, payments due and received, banking account information;
- **Communications data:** messages sent to us via contact forms or emails, any correspondence from you that may be sent to us, any exchanges with us;
- **Content data:** your personal data such as calls, SMS, MMS, etc., that may transit through our Services or may be hosted by us for the purpose of providing them and providing support for such services;
- **Technical navigation and interaction data:** use statistics, IP address, connection data, browser type and version, time zone setting and location, types and versions of browser plug-ins, operating system and platform, as well as other technologies present on the devices that you use to access our website or Services, MAC address, cookies, for example, the pages visited by the User, the date and time of visits;
- **Traffic data:** data indicating the origin, destination, route, format, size, time or duration of an electronic communication;
- **Marketing data:** preferences for receiving marketing offers from us and our third party partners and preferences for the means of communication;
- **Usage data:** data relating to how you use our Services and our website.

We do not intentionally collect any special categories of data (such as health, sexual orientation, religious beliefs, etc.). If the Content data contains any special categories of data, we do not have any knowledge of it.

5. WHY DO WE COLLECT YOUR PERSONAL DATA?

The table below describes why we use your personal data for which we are data controller, and what is the legal basis for such use.

<u>Purpose</u>	<u>Legal basis</u>	<u>Categories of personal data</u>
Establish and manage our contractual relationship with our Clients	Necessary for performance of the contract	Identification data Contact data Professional information Commercial relationship data Invoice information Communications data
Provide you with the website's functionalities (including creating an account and answering to your requests)	Necessary for performance of the contract	Identification data Contact data Authentication data Communications data Technical navigation and interaction data
Operate and secure our network and prevent fraud	Legos's legitimate interest in securing our network in particular evaluating the volume of data transiting through our network at any given time, in order to manage this data Legos's legal obligations, in particular relating to security, fraud detection and management	Technical navigation and interaction data Traffic data Usage data
Perform our legal obligations in assisting law enforcement and other government authorities and regulators, in performing court decisions	Legos's legal obligations as described in the purpose (for example, providing data or implementing an interception upon request from law enforcement authorities)	All
Improve our Services and our website, in particular to optimize or offer new features to the Services and/or the website	Legos's legitimate interest in improving its Services and its website Your consent if legally required (i.e. for some cookies)	Communications data Commercial relationship data Technical navigation and interaction data Marketing data Usage data

<p>Adapt and optimize the promotional offers, parameters or preferences, appetites and interests, proven, assumed or deduced, of the User, which may result from your use of the Services provided by Clients or the website, information you enter, your navigation and your interactions with the Services and the website, as well as from any satisfaction surveys we may put in place</p>	<p>Legos's legitimate interest in providing you with offers that correspond to your preferences and interests</p> <p>Your consent if legally required (i.e. for some cookies)</p>	<p>Identification data</p> <p>Contact data</p> <p>Professional information</p> <p>Communications data</p> <p>Commercial relationship data</p> <p>Technical navigation and interaction data</p> <p>Marketing data</p> <p>Usage data</p>
<p>Inform you of Legos offers and news, as well as offers and news from Legos's partners</p>	<p>Legitimate interest of Legos to promote its services and propose you with offers and news</p> <p>Your consent to receive offers and news from Legos's partners</p>	<p>Identification data</p> <p>Contact data</p> <p>Professional information</p> <p>Commercial relationship data</p> <p>Marketing data</p>

6. WHO ARE THE RECIPIENTS OF YOUR PERSONAL DATA?

6.1 Data transferred to the authorities and/or public bodies

In accordance with the regulations in force, personal data may be forwarded upon request to the competent authorities, courts, officers of the law, ministerial officers, debt collection or public bodies, exclusively for Legos to satisfy its legal obligations.

6.2 Use of data by Legos and its partners/subcontractors

Your personal data may be used by Legos, its subcontractors, affiliates and/or, if applicable, by its business partners, for the purposes described in Article 5 above.

- **Legos's staff, auditors and Legos's subcontractors** may have access to your personal data as part of providing the website and/or the Services;
- **Other electronic communications services providers** that may receive your personal data as independent data controllers. In this case, any such processing would be subject to privacy policies of such providers. For example, to ensure the transmission of traffic on our network pursuant to the Services provided by Clients to you, we may share Traffic and Content data with other regulated electronic communications service providers;
- **Social networks:** if the User has an account on social network sites (Twitter/LinkedIn) and accesses our website, Legos may receive information from such social networks, and the social

network services may receive information relating to the use of the Services by the User. Such social networks act as independent data controllers of your data and you should consult their respective privacy policies for more information.

6.3 Transfer outside of the European Union

Your personal data may be processed outside the European Union, including via remote access for maintenance. Legos undertakes not to carry out any transfer of personal data outside the European Economic Area without implementing the appropriate safeguards in accordance with the Applicable Regulations.

7. SECURITY OF YOUR PERSONAL DATA

Legos undertakes to take all the necessary precautions and organizational and technical measures in order to preserve the security, integrity and confidentiality of your personal data, and, in particular, to protect such data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to it.

We require the third parties with whom we contract to respect the security of your personal data and to process it in accordance with Applicable Regulations.

8. RETENTION PERIODS OF YOUR PERSONAL DATA

Legos undertakes not to keep your personal data beyond the period strictly necessary for the purposes for which it was collected, and in accordance with the Applicable Regulations, as well as any laws and regulations, including taxing and accounting.

Legos undertakes to anonymize or delete your personal data as soon as the purpose and/or the duration of their established retention expire.

After having served its main purpose, personal data may be archived for auxiliary purposes, such as of researching, investigating and prosecuting criminal offenses, litigation, or accounting and tax purposes. Archiving implies that this personal data will be subject to limited access restrictions.

In order to determine retention periods of your personal data, we take into account:

- Volume, origin and category of personal data;
- Potential risks arising from fraudulent use or unauthorized disclosure of personal data; and
- Purposes for which the personal data has been processed.

As an example, please find below some established retention periods:

- Information about Services purchased: 10 years from the date of the last purchase or the last full payment of the last Service provided (5 years in “active base”, 5 years in archive);
- Personal data processed as part of marketing operations: 3 years from the end of the relationship with the User or from the last interaction initiated by the User;
- Communications data: 3 years from the end of the relationship with the User or from the last interaction initiated by the User.

9. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?

In accordance with the Applicable Regulations, you have the right to:

- access to your personal data,
- rectification of your personal data;

- erasure of your personal data (subject to any Legos's needs that should be justified, to retain personal data, for example with respect to its legal obligations);
- restriction of processing of your personal data (subject to limitations provided in Applicable Regulations);
- object to processing of your personal data (subject to limitations provided in Applicable Regulations);
- withdraw your consent, if the processing of your personal data was based on your consent;
- portability of some of your personal data (subject to limitations provided in Applicable Regulations);
- provide Legos with instructions regarding the use of your personal data after your death;
- lodge a complaint with the CNIL or the supervisory authority of the Member State of the European Union in which you normally reside.

To exercise the rights mentioned in this Article, you may contact Legos at legal@legos.io .

10. **CONTACT INFORMATION**

For any questions concerning the processing of your personal data, you can address your request directly to Legos by contacting it at legal@legos.io .

Legos will endeavour to find a satisfactory solution to ensure compliance with the Applicable Regulations.