

## **Privacy policy**

At FIIGEE we intend to give you as much control as possible over your personal information, including the registration data. We will let each user know how we will use the personal information derived from each user's access to and use of 20 Seconds to Midnight' website and/or the services.

To successfully pursue its activities FIIGEE sometimes needs to process personal data about individuals. These can include prospects, customers, job seekers, journalists, vendors, investors, competitors, alumni and other people the organization has a relationship with or may need to contact. <sup>1</sup>

FIIGEE is committed to respect the rights of the people whose personal data is being processed. Therefore, FIIGEE complies with data protection regulations such as the General Data Protection Regulation<sup>2</sup> ("GDPR") and national laws of the countries in which it operates.

This privacy statement describes which personal data we collect, why we do it, how long we keep it and the rights you can exercise with regard to your personal data. It applies to all personal data submitted to FIIGEE via the website, by email, or by any other means.

### **Controller**

The controller is the entity within FIIGEE through which website the Personal Data concerned have been collected. The controller is referred to as "FIIGEE" throughout this document.

### **Personal data we collect about you**

If possible, we will try to collect the personal data directly from the person concerned. However, it may be necessary to collect personal data from third parties in the context of future relationships (e.g. customers or candidates).

#### **I. Information you provide us:**

- contact form filled out by you (website): name, email, company, phone, function, subject and message;
- job applications (websites or via recruitment company): application forms, CV, interview notes and related recruitment information;
- your feedback;
- content of correspondence with us (by email, phone, letter, ...);
- subscription to newsletters;
- information from social media when you link to our website (online)
- information relating to your use of our products or services
- contact details of past, present and future customers
- contact details of past, present and future suppliers, vendors, investors or other stakeholders

#### **II. Information we may automatically collect if you visit our website:**

- technical information, including IP address, login information, browser type and version
- cookies and other technologies (See our Cookie Policy on our website for more info.)

- FIIGEE will track the domains from which people visit FIIGEE and analyse this data for statistical purposes. Subject to the provisions of this Privacy Policy, different FIIGEE sites may use accumulated data for different purposes, including but not limited to marketing analysis, service evaluation and planning.

### III. Use of children's data:

FIIGEE does not knowingly collect, process or store any personal data about children under the age of 16 and we do not offer any products or services directly to children under the legally allowed age.

Finally, information collected on our site may be stored and processed into anonymous statistics or log files for internal use.

### Purposes

In general, we may have to process all categories of personal data to comply with applicable legal or regulatory requirements, relevant industry standards and our policies, and for litigation or defence of claims.

- customers' and prospects' personal data:

We use your personal data for the performance of your contract(s) with FIIGEE or business development purposes. In particular we process customers personal data to deliver and provide our products or services and to invoice them, as well as for the execution and analysis of market surveys and marketing strategies.

We also use your contact details to further inform prospects and customers about our products and services that are in line with our already existing relationship and for marketing such as offering promotions.

- Suppliers', vendors, journalists and other stakeholders personal data:

We process your personal data to conclude and execute our agreements and manage our relationships.

- Investors' and shareholders' data:

We use your personal data in order to manage our relationship and our obligations. We maintain contact details for external communications and to respond to your queries.

- Students and Job seekers' data:

Your personal data are stored for the recruitment and selection procedures. More specifically, your personal data are processed for the purposes of assessing your profile and skills to fit a job and making you specific job offers.

Subject to your explicit consent, we will use your contact details to send you our newsletter, mailing and invite you to events. We also may use the personal data in other ways, for which we provide specific notice at the time of collection.

Other Notification: In order to implement or enforce the Terms of Service of the relevant FIIGEE site, FIIGEE may use personal data to contact users on an individual basis.

### Retention of your personal data

Your personal data is kept in our information systems only for as long as is necessary for the purposes for which it was collected (as described above). It will be deleted once it is no longer needed by us and once all requirements at law have been met.

We will retain and use your personal data for as long as reasonably necessary to perform our agreements or to consider tenders, to comply with our legal obligations (such as accounting and tax obligations) and to resolve disputes or enforce our agreements.

Therefore, your personal data will be held during the duration of our contractual relationship and up to 10 years thereafter.

Application forms (CV's), interview notes and references of unsuccessful candidates are kept for a period of 24 months following the closure of the hiring process. When we would like to stay in contact with an applicant who was not chosen for the job he/she applied for we will ask for his/her consent to keep the cv in our application pool for another 2 years.

In all cases personal data may be kept for a longer period of time where there is a legal or regulatory reason to do so, or a shorter period where the individual objects to the processing of their personal data and there is no longer a legitimate purpose to retain it.

### **Legal basis**

FIIGEE only processes your personal data if at least one of these grounds applies:

- For the preparation or performance of a contract.
- In order to comply with the legal and regulatory obligations to which we are subject.
- For legitimate business interests, in which case we always seek to strike a balance between that interest and respecting your privacy.
- If none of the above, where we have your explicit consent.

### **Disclosure to third parties**

FIIGEE does not share your personal data with third parties, unless:

- with our legal successors and other affiliated companies within the FIIGEE, for the same purposes as specified in this Privacy Statement.
- with subcontractors and third parties for the purpose of the performance of a contract that we hold with them or that we hold with you.
- with third party service providers who perform services on our behalf to help us with our business activities. These service providers are limited to only using your personal data as instructed to carry out their tasks.
- permitted or required by applicable law or regulatory requirements.
- with law enforcement authorities or other government officials.
- with other third parties with your consent.

### **Transfer to third countries**

When we transfer your personal data to other countries, outside of the European Economic Area, FIIGEE will take measures to ensure that your personal data is exclusively processed in accordance with this Privacy Statement and that adequate levels of protection have been implemented in order to safeguard your personal data. These arrangements can include Binding Corporate Rules for transfers within the FIIGEE , standard contractual clauses or approved certification mechanisms. Copy of any such applicable arrangements can be obtained by sending a request to [privacy@20 Seconds to Midnight.com](mailto:privacy@20 Seconds to Midnight.com).

### **Your rights**

In accordance with the GDPR, FIIGEE will respond to your requests in the GDPR mandated time to exercise following rights:

#### **Right to be informed**

FIIGEE is transparent by providing you any information relating to the processing of your personal data via this privacy statement or specific information notices at the time of collection.

### **Right to access**

You have the right to request a copy of the personal data that FIIGEE holds about you. We may require proof of identity before fulfilling such requests.

### **Right to rectification**

If the personal data that FIIGEE holds about you is inaccurate or incomplete, you have the right to ask us to update or rectify it.

### **Right to be forgotten**

You have the right to request FIIGEE to erase all your personal data. We will delete your personal data without undue delay if we do not have any legal reason or legitimate purpose to continue to process it.

### **Right to restrict processing**

In some specific cases, you have the right to ask FIIGEE to restrict how we process your personal data.

### **Right to data portability**

This right only applies to personal data that you have provided to 20 Seconds to Midnight, based on consent or for the performance of a contract. FIIGEE will provide your personal data in a structured, commonly used and machine-readable format to be able to transmit it to another controller, or have it directly transmitted by FIIGEE if technically feasible.

### **Right to object**

You have the right to object to the processing of your personal data if the processing is based on the legitimate interest of FIIGEE or on public interest. FIIGEE will discontinue the processing of your personal data, unless we can demonstrate compelling legitimate grounds for the processing which override your interests or rights, or for the establishment, exercise or defence of legal claims.

### **Right to withdraw consent**

Where your consent was required for the collection or use of your personal data, you have the right to withdraw your consent at any time. For example, you may choose to stop receiving our newsletter by following the unsubscribe instructions included in the emails.

### **Right to lodge a complaint**

You have the right to lodge a complaint with the competent supervisory authority if you consider that the processing of your personal data infringes this Privacy Statement or the GDPR.

You can exercise your rights by sending a request by email to [info@fiigee.com](mailto:info@fiigee.com)

**FIIGEE acting as data processor on behalf of a data controller (a customer)** Fulfil with the following requirements:

- acts on the controller's documented instructions, unless required by law to act without such instructions;
- takes appropriate measures to ensure the security of processing;
- engages a sub-processor with the controller's prior authorisation and under a written contract;

- takes appropriate measures to help the controller respond to requests from individuals to exercise their rights;
- takes into account the nature of processing and the information available, the processor must assist the controller in meeting its GDPR obligations in relation to the security of processing,
- deletes or returns all personal data to the controller (at the controller's choice) at the end of the contract, and also deletes existing personal data unless the law requires its storage; and
- submits to audits and inspections and gives the controller whatever information it needs to ensure they are both meeting their GRDP obligations.

### **Data security**

FIIGEE has security policies and procedures in place to protect your personal data from unauthorized loss, misuse, alteration or destruction. Despite our best efforts, however, security cannot be absolutely guaranteed against all threats.

To the best of our ability, FIIGEE has taken steps to ensure the ongoing confidentiality, integrity, availability, and resilience of systems and services processing personal information. These actions may include physical security measures, network security measures, and organizational measures such as confidentiality clauses and restricted access.

### **Limitations of responsibility**

FIIGEE contains links to other websites, whether owned or controlled by FIIGEE ' affiliates or unrelated third parties. FIIGEE is not responsible for the privacy policies and practices of such linked websites.

### **Publication**

User names and email addresses (as well as any additional information that a user may choose to post) are publicly available on the FIIGEE blog, unless a user elects to "opt-out" of such display of personal information. However, in cases where users voluntarily and publicly disclose personal information, which may contain Personal Data, it is his sole responsibility.

Surveys and Resulting Information: Subject to the foregoing, FIIGEE may conduct surveys or other studies of its customer base and usage for marketing and planning purposes. Participation in such surveys is at the user's option; FIIGEE does not conduct mandatory surveys.

With respect to information collected from such surveys or studies, and in the event that responses are to be publicly disclosed, users will be notified at the time they take the survey and FIIGEE will disclose only aggregate information regarding its users and not personal information identifying any specific individual. Circumstances under which FIIGEE would publicly disclose such aggregate information include, but are not limited to, sharing survey results with the site population, providing data to 20 Seconds to Midnight' advertisers on user preferences and/or demographics, and publicizing overall usage data in press communications.

Notwithstanding the foregoing, in cases where surveys allow users to submit written comments, and where FIIGEE advises users of the possibility of such disclosure at the time they take the survey, FIIGEE reserves the right to disclose text information provided by any user through such a survey, provided that no personal information identifying that user is disclosed.

### **Changes to our Privacy Policy**

FIIGEE may change this Privacy Policy from time to time to reflect new legal or regulatory obligations, or in response to new data processing activities. Where the changes are significant we may choose to send an e-mail to all our registered users with the new details. Any such changes will be posted here and will be effective from the time they are communicated, or, if required, when we have obtained your consent. We advise you to check back frequently to see any updates or changes. This Privacy Policy was last reviewed on May 23, 2018.

<sup>1</sup> Employees of FIIGEE can consult the Privacy Statement Employees on our private drive.

<sup>2</sup> 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, and repealing Directive 95/46/EC.