

Services Privacy Policy

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1. Introduction

Contentsquare group of companies (“**Contentsquare**”, “**we**”, “**our**”, or “**us**”) develops and provides customer experience analytics services. Such services allow our customers to recreate a web or app session showing their website and app visitors’ interactions on their website or mobile app, to gain meaningful insights into such interactions, and use them to create exceptional experiences.

This Customer privacy policy (“**Customer Privacy Policy**”) provides information on how Contentsquare collects, stores, uses, shares, discloses and transfers Personal Data relating to our customers, prospects, customers’ personnel (“**Customer**” or “**you**”) in connection with our products and services (collectively - “**Contentsquare Services**” or our “**Services**”) and interactions and communications between you and Contentsquare. It also provides you with information about your privacy rights in relation to such Processing of your Personal Data.

As used in this Privacy Policy, “**Personal Data**” means information that relates to an identified individual or to an identifiable individual, as defined under applicable data protection laws.

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See the list of Contentsquare entities, the registered address and contact details for each entity [here](#).

2. Scope of the Customer Privacy Policy

This Privacy Policy applies to the Processing of Customer’s Personal Data when you use our Services and any additional interactions and communications between you and Contentsquare.

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The other Processing activities performed by Contentsquare in relation with our website, and job applicants are governed by separate Privacy Policies. For more information on such Processing of Personal Data please visit [this link](#).

3. Who is responsible for processing your Personal Data?

Controller’s identity and contact details

Customer is responsible for processing your Personal Data in connection with Contentsquare Services. This means that Contentsquare is the Data Processor for such Personal Data processed on Customer’s behalf and under its instructions.

Contentsquare will process Customer Personal Data to provide the Services and other limited purposes as outlined in Section 5 below. In those limited purposes, Contentsquare is responsible for processing your Personal Data and is the Data Controller.

Controller's representative

Customer as the Data Controller:

For information about the representative for data protection matters pursuant to Article 27 of the General Data Protection Regulation ("GDPR") of a specific Contentsquare's customer, we suggest you reach out to such customer's representative at its dedicated privacy policy.

Contentsquare as the Data Controller:

Content Square SAS has been designated as Contentsquare's representative in the European Union for data protection matters pursuant to Article 27 of GDPR.

Data Protection Officer and contact details

Customer as the Data Controller:

For information about the DPO of a specific Contentsquare's customer, we suggest you reach out to such customer's DPO at its dedicated privacy policy.

Contentsquare as the Data Controller:

Contentsquare has appointed DPOs to oversee the protection of your Personal Data. If you have any questions about this privacy policy or about our data protection practices, you can contact our DPOs at:

- Global DPO: Content Square Inc., Attn: Global DPO, 53 Beach St New York, NY, 10013-2304 United States. Email to privacy@contentsquare.com.
- EEA DPO: Content Square SAS, Attn: EU DPO, 7 rue de Madrid 75008 Paris, France. Email to privacy@contentsquare.com.

4. Which Personal Data do we process about you and how?

Contentsquare collects and processes Personal Data that mainly indirectly identifies you (e.g. unique identifiers). We may also collect and process Personal Data that may directly identify you (e.g. name, contact details) for specific purposes and from various sources.

We process your Personal Data mainly to provide the services to our customers in accordance with agreement with the customer. We may also process your Personal Data for other purposes including to support our legitimate interests in maintaining and improving our Services and sales offerings, understanding how our Services are used, to optimize our marketing Services, customer service and support operations and to respond to a request from a regulator or to defend a legal claim in order to comply with applicable laws.

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We collect and process Personal Data about you from the following sources:

- **Contentsquare as a Data Processor**

Category of Personal Data	Source of Personal Data	Purpose of processing	Legal basis
Identification and Contact Data	When you order and use our Services;	Provide the Services including support, maintenance, and account management	As determined by Customer
Professional or Employment-Related Data	When you order and use our Services;	Provide the Services including support, maintenance, and account management	As determined by Customer
Unique identifiers	When you use our Services (via cookies or web beacons)	Provide the Services to you, including visitor digital behavior, website and mobile app performance analytics, and other usage monitoring and analytics activities as part of the Services to you	As determined by Customer
Device and technical data	When you use our Services (via cookies or web beacons)	Provide the Services to you, including visitor digital behavior, website and mobile app performance analytics, and other usage monitoring and analytics activities as part of the Services to you	As determined by Customer
Digital behavioral data	When you use our Services (via cookies or web beacons)	Provide the Services to you, including visitor digital behavior, website and	As determined by Customer

		mobile app performance analytics, and other usage monitoring and analytics activities as part of the Services to you	
Any additional Personal Data agreed to be processed or otherwise collected under the Agreement with the Customer	When you use our Services	Provide the Services to you, including visitor digital behavior, website and mobile app performance analytics, and other usage monitoring and analytics activities as part of the Services to you	As determined by Customer*

*Customers must refrain, and are contractually prohibited, from transferring to Contentsquare any Personal Data which is subject to specific regulatory or statutory protection regimes (e.g “special categories” of data under the EU GDPR, data of children under the age of 16, health data, financial data, social security information, etc.).

We may process all of the above personal data to comply with our various legal obligations (“**Legal Obligations**”). Our Legal Obligations include:

- Comply with applicable laws, regulatory requirements, and our internal policies
- Prevent, mitigate, and investigate data protection and security incidents, fraud, errors, or any illegal or prohibited activity relating to Contentsquare Services
- Protect the rights, safety, property, or operations of Contentsquare, you, or others
- Respond to regulator, law enforcement authorities or other government official/agency request or your data protection requests
- Enforce agreements with you, resolve disputes, and defend a legal claim

• Contentsquare as a Data Controller

Category of Personal Data	Source of Personal Data	Purpose of processing	Legal basis
Identification and	When you order and	Deliver the Services	Performance of a

<p>Contact Data: First and last name, email address, and telephone number</p>	<p>use our Services, or contact us or otherwise interact with us;</p> <p>From third parties and publicly available sources</p>	<p>and provide Customer services;</p> <p>Marketing Communications (as defined below);</p> <p>Organize, manage, and facilitate access to our events;</p> <p>Administer the Contentsquare Customer Loyalty Program</p>	<p>contract;</p> <p>Consent or legitimate interest</p>
<p>Professional or Employment-Related Data: Job position, job title, workplace, and industry</p>	<p>When you order and use our Services, or contact us or otherwise interact with us;</p> <p>From third parties and publicly available sources</p>	<p>Marketing Communications;</p> <p>Organize, manage, and facilitate access to our events</p>	<p>Consent or legitimate interest</p>
<p>Agreement and Transaction Data: Agreements, orders, purchases, payment status, and invoices; and your other interactions with us related to transactions, such as service requests and messaging with our customer service</p>	<p>When you order and use our Services</p>	<p>Manage payments, contracts, transactions, and otherwise meet our contractual requirements</p>	<p>Performance of a contract; compliance with a legal obligation</p>
<p>Payment Data: Corporate bank account information of customers</p>	<p>When you order our Services</p>	<p>Manage payments, contracts, transactions, and otherwise meet our contractual requirements</p>	<p>Performance of a contract; compliance with a legal obligation</p>
<p>Any other Personal Data you</p>	<p>When you order and use our Services,</p>	<p>Fulfill your request related to the</p>	<p>Consent or legitimate interest</p>

<p>voluntarily choose to provide: Personal Data in request or feedback you send us</p>	<p>contact us or otherwise interact with us</p>	<p>Services and communicate with you in contract-related matters via phone, mail, email, SMS, chat, and other digital channels including social media;</p> <p>Marketing Communications</p>	
<p>Unique identifiers: IP address, cookie IDs, device IDs, web beacons, pixels, and other similar technologies (as described in our "Cookies Policy")</p>	<p>When you use our Services (via cookies or web beacons)</p>	<p>Internal Development (as defined below)</p>	<p>Consent or legitimate interest</p>
<p>Device and technical data: Domain server, type of device/operating system/browser used to access the Sites, local and language settings; session logging, heatmaps and scrolls; screen resolution, ISP, referring or exit pages; and date and time of your visit.</p>	<p>When you use our Services (via cookies or web beacons)</p>	<p>Internal Development</p>	<p>Consent or legitimate interest</p>
<p>Digital behavioral data: Web page interactions (clicks, browsing, zooms and other interactions), referring web</p>	<p>When you use our Services (via cookies or web beacons)</p>	<p>Internal Development</p>	<p>Consent or legitimate interest</p>

page/source through which you accessed the Sites, and statistics associated with the interaction between device or browser and the Sites.			
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“**Marketing Communications**” means when we contact you about Contentsquare Services or send you communications about Contentsquare’s business and events (including communications based on your interests, personal and business characteristics, and location)

- For Customers and Prospects relations management: we use Personal Data to manage our Customers’ relationships by communicating about relevant topics, ensure current contact information is accurate, and promote events and contests which we arrange.
- For Sales and Marketing optimization: we use Personal Data that is collected during the Customer relationship, such as from Customer surveys and online behavioral data. Based on these Personal Data, we are able to make marketing more relevant and effective, and send you more personalized communications such as newsletters, special offers and sales, new product announcements, etc. or any other information we think you will find valuable. We may provide such notices through any of the contact means available to us (e.g. phone or email), through the Services, or through our marketing campaigns on any other means.

“**Internal Development**” means when Contentsquare improves and better develops the Services for our Customers including testing, research, reporting, benchmarking, machine learning, analysis about our Services performance, predictions and trend analysis in order to support our business decision-making, to analyze our Customers’ engagement with our Services, to assess the quality of our Services and to consider our Customers’ feedback and needs.

Please note that for our Internal Development, we process de-identified and aggregated data to the extent possible. We may use samples of real data, for example, to test the quality and the performance of our Services. If you do not wish to be part of this test, you can let us know at any time.

5. How long do we keep your Personal Data?

Your Personal Data will be stored by us and our service providers in accordance with applicable data protection laws and data protection authorities guidelines to the extent necessary for the

processing purposes set out in this Customer Privacy Policy. Subsequently, we will delete your Personal Data in accordance with our Data Retention, Archiving and Disposal Policy or take steps to properly render the Personal Data anonymous, unless we are legally obliged to keep your Personal Data longer (e.g. for legal compliance, tax, accounting or auditing purposes).

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Below you will find a summary of the data retention related to each purpose of processing:

- **Contentsquare as a Data Processor**

Purpose of Processing	Data retention
Visitor Digital Behavior analytics and User usage monitoring and analytics	13 months (for up to 24 months upon agreement with you)
Support, maintenance, and account management	For the agreement duration with Customers and then archived for 7 years

- **Contentsquare as a Data Controller**

Purpose of Processing	Data retention
Deliver Services, provide customer service and manage payments, contracts and transactions and otherwise meet our contractual requirements	For the agreement duration with Customers and then archived for 7 years
Fulfill your request related to the Services and communicate with you in contract-related matters via phone, mail, email, SMS, chat, and other digital channels including social media	For the agreement duration with Customers and then archived for 7 years
Administer the Contentsquare Customer Loyalty Program	For the Loyalty Program duration and then archived for 7 years
Marketing Communications	2 years from the last contact, or 30 days after a deletion request

Organize, manage, and facilitate access to our events	For the time necessary to achieve this purpose
Internal Development	Up to 24 months
Legal Obligations	As required by applicable law or regulation except: in case of a dispute, until the settlement of the dispute; in case of a legal claim, for the duration of the proceedings and until the ordinary and extraordinary means of recourse are exhausted with regard to the decision rendered

6. When and to whom we share your Personal Data

Your Personal Data is shared for business and commercial purposes throughout Contentsquare and with third parties such as service providers, and government, judicial and law enforcement entities.

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In connection with one or more of the purposes outlined in the Section 5 above, we may disclose your Personal Data to:

- **Contentsquare as a Data Processor**

Contentsquare subsidiaries and affiliated companies

We may share, disclose and transfer your Personal Data with our current (please see the list [here](#)) and future subsidiaries and affiliated companies for all purposes mentioned in Section 4 above.

Service providers

We use third parties service providers to provide the Services to our Customers. These services include data hosting, data analytics, IT services and cybersecurity and support. Some of our service providers may perform the Services on our behalf, under our instructions, in accordance with our agreement and in compliance with appropriate technical and organizational security measures to protect your Personal Data.

Please see [here](#) for the current list of service providers used by Contentsquare as Sub-Processors.

Integrations and enrichment providers

Our tool allows you to integrate third-party tools to send or receive Personal Data to and from the Contentsquare solution in connection within the Contentsquare Services. Customers remain

responsible for any Personal Data transmissions between these integration tools and Contentsquare.

Other third parties

We may disclose your Personal Data to third parties, including:

- Government authorities or public authorities, courts, intergovernmental or supranational bodies for legal processes or protection of life and safety where we believe that access, use, preservation, or disclosure of the information is reasonably necessary, including:
 - To comply with laws, regulations, legal processes or to respond to lawful requests;
 - To enforce or apply our agreements;
 - To protect the rights, interests, property, or safety of Contentsquare, our customers, you, and others;
 - In connection with claims, disputes, or litigation;
 - To protect you and others from fraudulent, abusive, or unlawful use of our Services, and other fraudulent activity. Such disclosure or access may occur if we believe in good faith that we are legally compelled to do so, or that it is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing.

- **Contentsquare as a Data Controller**

Service providers

We use third parties service providers to perform services complementary to our own and support our business. These services include data hosting, data analytics, IT services and cybersecurity, customer services, payment services, consulting, development, support, marketing and advertising, events, promotions and contests. Some of our service providers may perform the Services on our behalf, under our instructions, in accordance with our agreement and in compliance with appropriate technical and organizational security measures to protect your Personal Data. We may also use data broking service providers for Marketing Communications purposes, including data enrichment, data matching, data cleansing and tracing. While some of these service providers may act as a Data Controller, we undertake appropriate and careful due diligence before using their services and they perform their services in accordance with our agreement.

Please see [here](#) for the current list of service providers used by Contentsquare as processors.

Other third parties

We may disclose your Personal Data to third parties, including:

- Partners for marketing, advertising, promotions, contests, events or other similar purposes. (please see [here](#) for the list of our current Partners);

- A buyer, investor, new affiliate or other third party in the event that Contentsquare, or any portion, group thereof, undergoes a business transition, such as a merger or acquisition, or during steps in contemplation of such activities (e.g., negotiations and due diligence).
- Government authorities or public authorities, courts, intergovernmental or supranational bodies for legal processes or protection of life and safety where we believe that access, use, preservation, or disclosure of the information is reasonably necessary, including:
 - To comply with laws, regulations, legal processes or to respond to lawful requests;
 - To enforce or apply our agreements;
 - To protect the rights, interests, property, or safety of Contentsquare, our customers, and others;
 - In connection with claims, disputes, or litigation;
 - To protect you and others from fraudulent, abusive, or unlawful use of our Services, and other fraudulent activity. Such disclosure or access may occur if we believe in good faith that we are legally compelled to do so, or that it is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing.

7. To whom and how we transfer your Personal Data

Your Personal Data may be accessed, processed and stored in other countries in which Contentsquare has operations, including countries outside of the European Economic Area (EEA).

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Contentsquare has implemented safeguards to ensure an adequate level of data protection where your Personal Data is transferred to countries outside the EEA, such as:

- the recipient country has an adequacy decision from the European Commission;
- the European Commission's Standard Contractual Clauses for the transfer of Personal Data.

To see in detail the countries where your Personal Data may be transferred, please click [here](#).

8. How we secure your Personal Data

In order to protect your Personal Data held with us and our service providers, we use industry-standard physical, procedural and electronic security measures. However, please be aware that regardless of any security measures used, we cannot and do not guarantee the absolute protection and security of any Personal Data stored with us or with any third parties as described in Section 7 above.

9. What are your privacy rights and how to exercise them?

You have rights for the Personal Data we process about you. You can choose to object to, restrict our use of your Personal Data, delete, change or correct your Personal Data, access your Personal Data by filling out our [Data Subject Request Form](#).

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Subject to applicable data protection laws, you have multiple privacy rights in respect of the Personal Data we process about you:

- request confirmation that we are processing your Personal Data;
- request a copy of Personal Data we hold about you;
- request that we update Personal Data we hold about you or correct such data that is inaccurate or incomplete;
- restrict the way in which we use your Personal Data (e.g., if we have no legal right to keep using it) or limit our use of your Personal Data (e.g., if your Personal Data is inaccurate or unlawfully held);
- object to our processing of your Personal Data relating on grounds to your particular situation or if your Personal Data is processed by us for direct marketing purposes, object at any time to the processing of your Personal Data for such marketing;
- withdraw the consent that you have given us to process your Personal Data (where we process your Personal Data on the basis of your consent);
- request that we delete the Personal Data we hold about you; and
- lodge a complaint with the relevant data protection authority regarding our processing of your Personal Data.

If you want to exercise one or more of the rights mentioned above, you can submit your request using our Data Subject Request Portal [here](#). Please note that as part of your data subject request, we may require additional information and documents, including Personal Data, in order to authenticate and validate your identity and to process your request. Such additional data will be then retained by us for legal purposes (e.g. as proof of the identity of the person submitting the request), in accordance with Section 6 above.

10. Children's Privacy

Our Services are not designed to attract children under the age of 16. If we learn that a person under the age of 16 is using our Services, we will prohibit and attempt to block such use and will make reasonable efforts to promptly delete any Personal Data stored with us with regard to such child. If you believe that we might have any such data, please contact us via our Data Subject Request Portal [here](#).

11. How to contact us?

If you have any comments or questions about this Website Privacy Policy or our handling privacy practices, please contact us at privacy@contentsquare.com. You can also contact our DPOs at:

- **Global DPO:** Content Square Inc., Attn: Global DPO, 53 Beach St New York, NY, 10013-2304 United States. Email to privacy@contentsquare.com.
- **EEA DPO:** Content Square SAS, Attn: EU DPO, 7 rue de Madrid 75008 Paris, France. Email to privacy@contentsquare.com.

12. Updates and Amendments to this Customer Privacy Policy

We may update and amend this Customer Privacy Policy from time to time. The “Effective Date” at the top of this webpage mentions when this Customer Privacy Policy was last revised. Any changes will become effective when we post a revised version of this Customer Privacy Policy on our website (www.contentsquare.com). We encourage you to review this Customer Privacy Policy periodically to remain informed about how we are protecting your data.