

# Privacy Policy

## 1. The Scope of this Policy

This privacy policy (the “Policy”) describes how Gutenberg Technology collects, uses, consults, or otherwise processes an individual’s Personal Data. **GUTENBERG TECHNOLOGY (GT)**, whose headquarters are located at 3-5 rue de Vincennes in Montreuil (93100), France, is registered under number 519 672 844.

**Telephone:** +33 1 49 20 70 70

**Email:** [contact@gutenberg-technology.net](mailto:contact@gutenberg-technology.net)

**Intra-community VAT number:** FR12519672844

This Privacy Policy is intended to inform you how we gather, define, and use information that could identify you, such as your name, email address, address, other contact details, online identifiers or other information that you provide to us when using our websites or when relying on our services. Please take a moment to read this Privacy Policy carefully.

This policy is to be read as consistent with the [Cookie Policy](#).

This policy includes a description of your data protection rights, including a right to object to some of the processing activities we carry out.

## 2. Contacting Us

If you have general questions about your account or how to contact Customer Service for assistance, please send us an email at [contact@gutenberg-technology.com](mailto:contact@gutenberg-technology.com).

For questions specifically about this Privacy Policy or use of your personal information please contact us by mail at [contact@gutenberg-technology.com](mailto:contact@gutenberg-technology.com).

For transparency and accountability, we have designated a Data Protection Officer (DPO) who will address your concerns regarding your data privacy. You may reach out to our DPO at [dpo@gutenberg-technology.com](mailto:dpo@gutenberg-technology.com).

Please note that if you contact us to assist you, for your safety and ours we may need to authenticate your identity before fulfilling your request.

### **3. Collection of Information**

The purpose of the Website is to create an online community of professionals involved in Gutenberg Technology who would like to publish and/or assess content. We emphasize transparency in the collection of data and ensure that all processes adhere to GDPR (General Data Protection Regulation) and other relevant data protection laws. As part of our effort to create this online community, we receive and store information about you such as:

#### **Personal informations**

Comments published on Gutenberg Technology are accessible to all visitors. However, certain Gutenberg Technology and MyEcontentFactory (MEF.io) software and services may require registration. Users may register (“sign-up”) on-site (for example, at <https://mef.io/#/info/2c92a0fc5ba41815015ba96c75e2210a?lang=en>). Upon signing up, an account is created for the user (“Account”). We have implemented robust encryption measures to ensure the security and confidentiality of your data during the registration process. Users who sign up on-site are required to confirm their registration by clicking on an activation link which is sent to them via email. All active user accounts have the capability to create content on MEF.

Users are required to provide part or all of the following information below, depending on the features or services they wish to access (some of which may be automatically retrieved directly from LinkedIn):

- First and last name
- Email address
- Company name, size, industry, state, and country
- Job title, focus, and level
- Work Phone

Once you complete activation, you will be able to create your profile (“Profile”). We respect your privacy and will only ask for the information necessary to provide you with our services and improve your user experience. You may be required to provide us with additional information and consent to our terms as part of our general TOS and Privacy Policy.

### **Non-personal information**

We automatically track and collect certain non-personal information such as Website navigation data, Internet Protocol (“IP”) addresses, timestamps, and URLs. We use this information to do internal research on our users’ demographics, interests, and behavior to better understand, protect, and serve you and our community. We ensure that all non-personal information collected adheres to data privacy standards and is used to enhance user experience and improve our services.

### **Correspondence information**

If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on our Website, we may store such information on our servers. Your correspondence will be stored securely with restricted access.

## **4. Use of Information**

We use your information to provide, analyze, administer, enhance, and personalize our services and marketing efforts, to process your registration, your orders, and your payments and to communicate with you on these and other topics. For example, we use the information to:

- 1) Resolve disputes; troubleshoot problems; help promote safe matching; collect fees owed; measure consumer interest in Services; inform you about offers, products, services, and updates; customize your experience; detect and protect us against error, fraud, and other criminal activity; enforce our TOS; and as otherwise described to you at the time of collection. We have systems in place to ensure the lawful processing of your data and uphold your rights under the GDPR.
- 2) Send you system emails about the functionality of our Website that you cannot opt-out from and you will have to receive if you want to use our Website. If you

want to stop receiving our system emails, you will have to deactivate your Account by contacting [contact@gutenberg-technology.net](mailto:contact@gutenberg-technology.net).

- 3) Send you newsletters and promotions in conjunction with your use of our Services via the email associated with your Account. If you do not wish to receive newsletters you may unsubscribe by clicking the unsubscribe link in the newsletter email. We adhere to the guidelines of the CAN-SPAM Act and ensure that our marketing communications are compliant with international spam laws.
- 4) Provide benchmark analysis and aggregate statistics using your Business Information. This particular Business Information will be anonymized, will not contain personal identification, and will not be transferred or sold to third parties in any way or format that identifies you. We use advanced anonymization techniques to ensure that the data used cannot be traced back to you.
- 5) Use Website navigation data to operate and improve the Website. We may also use Website navigation data alone or in combination with your Business Information to provide aggregated information about the industry. Our analytics systems are designed to respect user privacy and provide insights without compromising data security.
- 6) Collect the IP Addresses to track when you use our Website. We use IP Addresses to monitor the regions from which you navigate our Website and sign-up to use our Services. Your IP-address is also registered for statistical purposes and to better our advertising and layout of the Website. In specific, we use your IP Addresses for the following reasons:
  - a) Send the most appropriate advertising based on geographic area or information derived from your IP address. Many IP addresses are commonly associated with Internet service providers, universities, or major corporations in specific regions or localities. Aggregate information derived from IP addresses may also be reported to advertisers. We use geolocation data responsibly and in accordance with data privacy laws to provide a tailored user experience.
  - b) Estimate the total number of Internet users visiting our Website from specific countries or regions of the world. Our systems are designed to provide accurate and insightful analytics to help us understand our global user base.
- 7) For users other than those only signing in to the whitepapers, case studies, eBooks, or Webinar recording page of the Website, we do not share your full name, e-mail, phone number, and job title with third parties for their marketing purposes as a matter of course. However, if we decide to share such information, you shall be notified and shall have the option to opt-out from providing us with

your personal information above for this purpose. We prioritize your data privacy and ensure that you have control over who has access to your data.

We abide by the GDPR's principles of data minimization and purpose limitation ensuring that we collect only the data that we need and use it only for the purposes described.

We do not transfer, sell, or rent your Business Information to third parties for their marketing purposes other than what is stated in this Privacy Policy. We request only the information that we need to operate our Services and improve our Website's user experience. We do not use your Information to create any advertising creative.

- 8) For users signing in to the whitepapers, case studies, eBooks, or webinar recording page of the Website, in consideration for free access to a variety of whitepapers, case studies, eBooks, or webinars and related resources, you agree that Gutenberg Technology may submit some or all of your Information to a third party, including a webinar presenter who may use it for marketing purposes. We ensure that all third parties comply with data privacy laws and uphold the same standards of data protection.

## **5. Protection of Information**

We use reasonable administrative, logical, physical, and managerial measures to safeguard your personal information against loss, theft, and unauthorized access, use, and modification. These measures are designed to provide a level of security appropriate to the risks of processing your personal information. Indicatively:

- 1) All our employees, independent contractors, and agents have executed non-disclosure agreements, which provide explicit confidentiality protections. We uphold a culture of data privacy within our organization ensuring that your data is handled responsibly. Any employee, independent contractor, or agent who violates such privacy and/or security policies is subject to possible termination and civil and/or criminal prosecution.
- 2) We do not make any of your Information available to third parties for their marketing purposes. Gutenberg Technology's software runs on individual servers and no data are given or collected or shared with other social media platforms. If however, we share your Information with third parties, we will notify you. Please

note that no transmission over the Internet can guarantee confidentiality and non-disclosure, and as such, you transmit at your own risk. We use industry-leading encryption techniques to safeguard your data during transmission.

- 3) We use robust security measures to protect data from unauthorized access, maintain data accuracy, and help ensure the appropriate use of data. When the Services are accessed using the internet, Secure Socket Layer (SSL) technology protects your Information, using both server authentication and data encryption. These technologies help ensure that your Information is safe, secure, and only available to you and to whom you have granted access. Our systems are designed to provide maximum security while ensuring a seamless user experience.
- 4) We do not tolerate Spam. To report Gutenberg Technology related spam, please contact us at [contact@gutenberg-technology.net](mailto:contact@gutenberg-technology.net). You may not use our communication tools to send spam or otherwise send content that would violate our TOS. We may check for spam, viruses, phishing attacks, and other malicious activity or illegal or prohibited content of the Website, but we will not permanently store messages sent through these tools. We have implemented advanced spam detection and filtering solutions to ensure a spam-free environment.
- 5) Gutenberg Technology does its utmost to secure communications and data storage in order to protect the confidentiality of your Information against loss and interception by third parties. However, it is important to know that there is no zero risk against loss or interception by others of your Information. We continually assess and improve our security measures to ensure the safety of your data. You are responsible for maintaining the security and confidentiality of your Account's username and password.

## **6. Storage of Information**

We save your Information in our database in order to improve our Website's and user experience and in accordance with our TOS. If you wish that your Business Information be permanently deleted from our database when you stop using our Services, please notify us at [contact@gutenberg-technology.com](mailto:contact@gutenberg-technology.com). In accordance with the current version of the Computing and Civil Liberties Law of 6 January 1978, on its most up-to-date version, GT made an advance declaration on the 7th of June, 2017 to the Commission Nationale de l'Informatique et des Libertés concerning the processing of Users' personal data (declaration number: 207095 1). GT is responsible for the processing of personal data.

The Client and Users consent to the collection and processing of personal data, as well

as data that is non-personally identifiable but necessary for the management of the Services. Collected data allows Clients to subscribe to a Subscription and Users to register online to create an account and to use the Services.

The collection of this data is necessary to manage Subscriptions to Services, and payments for Services, as well as to improve Services and information addressed to Users. This data may also be used for loyalty programs, commercial solicitations, and promotions.

Storage of User's personal data is provided by Amazon Web Services, Inc., P.O. Box 81226, Seattle, WA 98108-1226, located in the United States and in Ireland. This dual-region hosting approach enables GT to comply with data sovereignty requirements while ensuring efficient service delivery to its diverse international customer base, in accordance with applicable data protection laws.

Users' personal data will be shared with organizations or third parties only if such sharing or use is reasonably justified:

- By legal or regulatory requirements, judicial proceedings, or governmental requests that are legally binding;
- To apply the General Conditions then in force, including to establish possible breaches of the latter;
- To detect, prevent, or address fraudulent activities, security breaches, or any technical problems;
- To deter any infringement of the rights, property, or safety of GT, or of its Users, pursuant to and in compliance with the law.

If GT takes part in a merger, acquisition, or any other form of asset transfer, GT agrees to guarantee the confidentiality of personal data and to inform Users before any data is transferred or becomes subject to new rules of confidentiality.

In accordance with the current version of the Computing and Civil Liberties Law of 6 January 1978, GT agrees to adopt any measures that are useful for preserving the security of Users' personal data, and, in particular, to prevent the distortion, damage, or unauthorized access by third parties to such data.

Personal data will be retained as long as the Client uses the Services and for a maximum duration of 1 year after the end of its use of the Services.

In accordance with the current version of the Computing and Civil Liberties Law of 6 January 1978, any User may at any time access, correct, or block the use of all or part

of their personal data by contacting GT at the address indicated in Article 1 and by providing proof of their identity.

## **7. Information and Rights**

Once you have provided your Personal Data, you have several rights, which you can in principle exercise free of charge, subject to statutory exceptions. These rights may be limited, for example, if fulfilling your request would reveal Personal Data about another person, or if you ask us to delete information that we are required by law to keep or have compelling legitimate interests in keeping. To exercise any of your rights, you can file a request here [contact@gutenberg-technology.net](mailto:contact@gutenberg-technology.net). Should you have unresolved concerns, you have the right to lodge a complaint with a Supervisory Authority where you live or where you believe a breach may have occurred. We encourage you to come to us in the first instance but, to the extent that this right applies to you, you are entitled to complain directly to the relevant Supervisory Authority.

### **Right to withdraw consent**

Wherever we rely on your consent, you will be able to withdraw that consent at any time you choose and at your own initiative by logging into your account on our website (if you have one) or by contacting us at [contact@gutenberg-technology.net](mailto:contact@gutenberg-technology.net). The withdrawal of your consent will not affect the lawfulness of the collection and processing of your data based on your consent up until the moment you withdraw your consent.

### **Right to access and rectify your data**

You have the right to access, review, and rectify your Personal Data. You may be entitled to ask us for a copy of your information, to review or correct it if you wish to rectify any information like your name, email address, passwords and/or any other preferences, you can easily do so by logging into your account on our website (if you have one) or by contacting us here [contact@gutenberg-technology.net](mailto:contact@gutenberg-technology.net). You may also request a copy of the Personal Data processed as described in this Privacy Policy.

### **Right to erasure**

You have the right to the erasure of your Personal Data processed by us as described in this Privacy Policy in case it is no longer needed for the purposes for which the Personal Data was initially collected or processed or in the event you have withdrawn your consent or objected to processing as described in this Privacy Policy and no other

legal ground for processing applies. Should you wish to have your Personal Data erased, please file a request here [contact@gutenberg-technology.net](mailto:contact@gutenberg-technology.net).

### **Right to restriction of processing**

Under certain circumstances, you may ask us to restrict the processing of your Personal Data. This is, for example, the case when you contest the accuracy of your Personal Data. In such event, we will restrict the processing until we can verify the accuracy of your data. Should you wish to have your Personal Data restricted, please file a request here [contact@gutenberg-technology.net](mailto:contact@gutenberg-technology.net).

### **Right to object to processing**

Under certain circumstances, you may object to the processing of your Personal Data, including where your Personal Data is processed for direct marketing purposes. If you no longer want to receive certain communications from us via email, simply click the unsubscribe link in any of our emails.

### **Right to data portability**

Where you have provided your data directly to us and where the processing is carried out by automated means and based on your consent or the performance of a contract between you and us, you have the right to receive the Personal Data processed about you in a structured, commonly used and machine-readable format, and request portability of your Personal Data.

## **8. Other Websites**

GT's website may contain links to sites operated by third parties whose policies regarding the handling of information may differ from ours. These websites and platforms have separate and independent privacy or data policies, privacy statements, notices and terms of use, which we recommend you read carefully. In addition, you may encounter third-party applications that interact with Gutenberg Technology services.

## **9. Changes to this Privacy Policy**

We reserve the right to modify and update this Privacy Policy from time to time. We will bring these changes to your attention should they be indicative of a fundamental

change to the processing or be relevant to the nature of the processing or be relevant to you and impact your data protection rights.

## **10. Data Retention**

We retain your Personal Data for as long as is required to fulfill the activities set out in this Privacy Policy, for as long as otherwise communicated to you or for as long as is permitted by applicable law.

**Effective Date:** January 16, 2024