



# BOOKSBASE®

## The Marketplace For Education & Innovation

### Privacy Agreement

Effective Date: 10<sup>th</sup> of December 2019

Your privacy is important to us. BooksBase attaches great importance to the protection, confidentiality, and integrity of your data. In this privacy statement, we explain what personal information we collect from you when you make use of our services and how we use this information.

#### Our services

The current application is the Beta version of BooksBase platform. As the platform is still in the development and testing phases, a paid membership will be introduced at a later stage (BooksBase Ultimate Membership).

Via the free version or the current version (BooksBase Basic Membership), the services offered on the platform relate to the selling/purchasing of books; BooksBase will facilitate the process. However, purchases and payments will be made outside of BooksBase, and BooksBase will not be held liable for any damages that might incur. Furthermore, BooksBase allows users to view, add, and save content from/to the free and public available forums.

#### Which data is collected?

We collect your data via two methods; through your profile with us (personal data) and End User information (non-personal data).

#### Which personal data is collected?

- First and last name
- Your address
- E-mail address
- Your phone number
- School information (Optional)
- IP address

#### Which non-personal data is collected?

When a User uses the Services, the following End User information may be received and processed by BooksBase (collectively, "End User Data").

- Technical Information → refers to technical information related to an End User's mobile device or computers, such as browser type, device type, and model, CPU, system language, memory, OS version, Wi-Fi status, timestamp, and zone, device motion parameters, and carrier.
- Technical Identifiers → refers to various unique identifiers that generally only identify a computer, device, browser, or Application. For example, IP address

(which may also provide general location information), User-agent, IDFA (identifier for advertisers), Android ID (in Android devices), Google Advertiser ID, Users issued user-ID, and other similar unique identifiers.

- **Engagement Information** → this refers to information relating to the Users' ad campaigns and End User actions, such as clicks on Users ads, ad impressions viewed, audiences or segments to which an ad campaign is attributed, the type of ads and the webpage or application from which such ads were displayed, the webpages on Users' website visited by an End User, the URL from the referring website, downloads and installations of Applications, and other interactions, events and actions Users choose to measure and analyse within our Application or site (e.g. add to cart, in-app purchases made, clicks, engagement time etc.).

While End User Data does not generally contain any information that directly identifies an individual, such as names, addresses, credit cards or other similarly regulated financial information, health information, or any other type of sensitive personal information ("PII"), we acknowledge that under certain jurisdictions the End User Data we do receive when a User uses the Services may be deemed personal data and therefore, where applicable, will be treated as such. Within the scope of the engagement between Users and BooksBase, Users are prohibited from collecting PII, unless otherwise agreed by BooksBase.

However, Users have sole control over their properties (including their documents and articles) and configuration of the Services, and thus Users have the technical ability to configure the Services to collect PII. This includes, for example, a User using an End User's email address as a User issued user ID Technical Identifier. If a user has configured the Services to collect PII then we may receive and process such data.

### **The purpose and basis of which we process personal data**

BooksBase processes your data for the following purposes:

- The execution of the agreement made with you as a. End-User of BooksBase
- The targeting of advertisements to possible Users
- To provide more relevant information on the newsfeed and improve engagement
- Matching you with users from the same location and have the same background or interests.
- The handling of your payment (applicable in later updates)

This means that the processing takes place under the following principles recognized in the General Data Processing Regulation ('GDPR'):

- The processing is necessary for the execution of the agreement concluded with you
- The processing is crucial for the representation of our legitimate business interests, for example, i) the ability to carry out our business activities and ii) for the security of our network and systems

- The processing is necessary to comply with a legal obligation, such as the retention obligation for administrative data

### How long we store personal data

BooksBase does not store your personal information longer than is strictly necessary to achieve the purposes for which your data is collected.

We use the following retention periods for the following (categories) of personal data:

Category	Storage period BooksBase	Reason
Personal data issued in connection with the creation of an account	During the term, you are registered as a user and during 14-days thereafter	Justified business interests
Personal data issued in connection with the verification of your email and phone number	During the term, you are registered as a user and during 14-days thereafter	Justified business interests

### Third parties that receive information from our clients

BooksBase does not sell your data to third parties and only provides it to third parties if this is necessary for the execution of our agreement with you or to comply with legal obligations.

With companies that process your data in our order, to the extent necessary, we conclude a processing agreement to ensure the same level of security and confidentiality of your data. In the case of passing on data, this may include all data included in the table above. BooksBase remains responsible for these processing operations.

Our 3rd party services include, but are not limited to, the following:

Type of organization	Data processing
Facebook (and ad services), Google, outlook (and mailing services), Sendgrid, Bulkgate (and verification services)	The personal data we receive from you to be able to perform our services to you, run ICT systems and the backup thereof
These platforms process your information when you sign up using your account on one of those platforms. Sendgrid and Bulkgate use your information to verify your email and phone number.	<ul style="list-style-type: none"> <li>• First and last names</li> <li>• Email</li> <li>• Phone nr</li> <li>• Country of Residence</li> <li>• Birthday</li> </ul>

**Where are your data processed?**

Your data will be stored in the Netherlands and the EU.

**Automated decision-making**

BooksBase does not make decisions based on automated processing on matters that can have (significant) consequences for people. This concerns decisions taken by computer programs or systems, without a person (for example, a BooksBase employee) being involved.

**How we protect personal data**

BooksBase takes the protection of your data seriously and takes appropriate measures to prevent misuse, loss, unauthorized access, unwanted disclosure, and unauthorized modification. With third parties who receive your personal data through us, we conclude agreements to protect this purpose.

**View, modify or delete data**

You have the right to view, edit, or delete your data. Besides, you have the right to withdraw your consent to the data processing or to object to the processing of your personal data by BooksBase, and you have the right to data portability. That means you can file a request with us about the personal information we have from you to send via a computer file to you or someone else indicated by you.

You can send a request for access, correction, deletion, data transfer of your personal data, or request for cancellation of your consent or objection to the processing of your personal data to [info@booksbase.com](mailto:info@booksbase.com)