

## **Privacy Policy**

NarativLab respects the privacy of Internet users and strictly complies with the Law No. 78-17 of January 6, 1978, relating to data processing, files, and freedoms, as amended, known as the "Data Protection and Freedom of Information Law," and since May 25, 2018, with the European Regulation on data protection (GDPR) No. 2016/679.

We take data protection very seriously and, as a result, have a dedicated customer service to address any questions regarding your aforementioned rights.

You can reach out to us at [contact@narativlab.io](mailto:contact@narativlab.io) and please mention 'Privacy Policy' in the email subject line.

As a European Crowdfunding Service Provider, NarativLab collects personal data in the context of its crowdfunding service provision, to which the User expressly consents by using the website.

### **Use of Data**

Data is collected when the user visits the platform, creates an account, or communicates with NarativLab, after logging into the Site or providing their identity.

The collection of this data is intended to enable the User to access the services available on the Site, to offer the possibility of opening an Electronic Wallet, to propose investment products tailored to their profile, and to allow NarativLab to comply with the applicable obligations related to its crowdfunding service provision.

### **Data Retention**

The retention period of personal data depends on the purpose of processing and the circumstances in which they are collected. In principle, it is five (5) years due to the regulatory obligations applicable to NarativLab as a European Crowdfunding Service Provider. However, if the contractual commitment period of investors is longer for the purposes of the Fundraising Campaign, the retention period may be aligned with this duration. In this case, the five (5) year period begins only after the last repayment made in connection with that investment.

The personal data collected are not used for purposes other than those mentioned above. NarativLab does not engage in the commercialization of this personal data. All information provided by the User during the creation of their profile, except for their username, is protected by a username and password, ensuring that only the User has access to their personal information.

NarativLab uses personal data for the purpose of processing the client suitability questionnaire, in order to determine products that are suitable for the Investor's profile, considering their knowledge, risk tolerance, and investment limits.

### **Personal Data Collected**

As a crowdfunding service provider, NarativLab collects and stores certain personal data for the purpose of providing its services. Information is collected when you create an account or fill out the registration form as an Approved Investor or prospective one.

The collected data includes:

- your password,
- your email address,
- your first name,
- last name,
- date and place of birth,
- postal address,
- phone number,
- proof of identity and residence,
- answers to questionnaires,
- preferences and tax options,
- and the last IP address used during your login.

For legal entities, the collected information may include the SIRET number, the registered office address, the articles of incorporation, the KBIS extract, the declaration of beneficial owners, and the details of a valid bank account opened in France, held by the investor.

Data related to online payments is processed and stored directly by NarativLab's Banking Partner and does not pass through NarativLab's servers.

Server logs (IP addresses and visited pages) are retained for a period of 8 days. This data is used to enable access to the services available on the site, to propose the opening of an Electronic Wallet, to offer investment products tailored to the investor's profile, and to comply with the obligations applicable to the crowdfunding service provision activity.

Lastly, the last IP address used during your login is used in collaboration with NarativLab's internet service provider only if the company deems it necessary to enforce its terms of use or protect its services, clients, or upon request by judicial authorities.

## **Sharing of this Information**

We take the confidentiality of your information very seriously and do not share your personal data with third parties, except as provided in this privacy policy.

However, we are legally obligated to transmit some of your information to third parties in the following circumstances:

- To public authorities when required by law;
- To the project creator, after a subscription, in order to comply with their legal obligations to maintain a register of issued securities. In such cases, we share your first name, last name, and tax address so that the project creator can include you in their subscriber register;
- To our payment service provider (PSP), in accordance with the law, to securely manage your funds and verify your identity as part of Anti-Money Laundering and

Counter-Terrorism Financing (AML-CTF) requirements. Therefore, we are obligated to provide your email, first name, last name, proof of identity, proof of residence, and IP address to our Banking Partner, who stores them in accordance with the law. Your banking details are also stored.

- To our other third-party service providers, such as server managers, customer service, email services, and CRM, to comply with our regulatory obligations, manage our platform, and improve your experience. We have obtained their data protection policies and privacy charters, updated in compliance with the General Data Protection Regulation (GDPR). We ensure that these third parties adhere to the same privacy and data protection requirements outlined in this privacy policy.

## **Use of Cookies**

When you browse our website, we store certain messages on your browser, known as 'cookies,' to facilitate your use of our platform. Some of these cookies are essential for the proper functioning of our site, such as session cookies that allow you to navigate our platform without having to log in again with each new page you open, or authentication cookies that enable us to identify you if you come from a partner site.

Other non-essential cookies are used to measure the effectiveness of certain commercial and marketing actions or to improve the usability of our platform.

## **User Rights Regarding Collected Personal Data**

As a data subject, you have several rights under national and European data protection regulations. Firstly, you have the right to access your personal data and request information about the purposes of processing, the categories of personal data processed, the recipients or categories of recipients to whom the data has been or will be disclosed, the retention period of the data, and the rights you have under the regulations.

You also have the right to request the data controller to rectify or erase your personal data, or to restrict the processing of such data, as well as the right to object to such processing. You can also lodge a complaint with the competent supervisory authority.

It is important to note that the provision of personal data to NarativLab is both contractual and regulatory, and NarativLab can only provide its crowdfunding services if you provide this information.

Finally, if decisions are made about you based on automated processes, including profiling, you have the right to receive meaningful information about the underlying logic of this processing, as well as the expected consequences for you.

In accordance with applicable data protection legislation, you also have the right to request NarativLab to limit the use of your personal data in the following situations:

- If you dispute the accuracy of your personal data, you can request that their use be restricted while their accuracy is verified.
- If the processing of your personal data is unlawful, you can demand that their use be restricted instead of requesting their deletion, if this is possible.

- If we no longer need your personal data for processing purposes, but you still need them to exercise, defend, or establish legal claims, you can request that their use be restricted.
- If you object to the processing of your personal data under Article 21 of the General Data Protection Regulation (GDPR) while we are verifying whether our legitimate grounds outweigh yours, you can request that their use be restricted.

When processing is restricted, we ensure that your personal data is only used with your consent, for the exercise or defense of legal claims, to protect the rights of another person, or for important reasons of public interest. We will inform you before the restriction is lifted.

To exercise these rights, you can contact NarativLab by email at: [contact@narativlab.io](mailto:contact@narativlab.io)

### **Complaint to a Supervisory Authority**

If you encounter any difficulties regarding your personal data or believe that NarativLab is using your personal data inappropriately, please do not hesitate to inform us.

You also have the option to file a complaint with the competent authority:

National Commission for Information Technology and Civil Liberties (CNIL) on its website: <https://www.cnil.fr/fr/plaintes>, or by postal mail at: CNIL, 3 Place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07.