

# PRIVACY POLICY

## Your privacy matters to us

betoobe's mission is to connect independent professionals to allow them to be more productive and successful. Central to this mission is our commitment to be transparent about the data we collect about you, how it is used and with whom it is shared.

This Privacy Policy applies when you use our Services (described below). We offer our users choices about the data we collect, use and share as described in this Privacy Policy.

### 1. CONTROLLER

betoobe (<https://betoo.be>) is an online Professional Development Network for Independent Professionals managed by WinIgnite BVBA, with registered office at B-1930 Zaventem, Da Vincilaan 1, Company Register BE0719.778.70.

WinIgnite BVBA will be the controller of your personal data provided to, or collected by or for, or processed in connection with our Services. As a Visitor or Member of our Services, the collection, use and sharing of your personal data is subject to this [Privacy Policy](#) (which includes our [Cookie Policy](#) and other documents referenced in this policy) and its updates.

### 2. CHANGE

betoobe ("we" or "us") can modify this Privacy Policy, and if we make material changes to it, we will provide notice through our Services, or by other means, to provide you the opportunity to review the changes before they become effective. If you object to any changes, you can close your account without notice or indemnity.

You acknowledge that your continued use of our Services after we publish or send a notice about our changes to this Privacy Policy means that the collection, use and sharing of your personal data is subject to the updated Privacy Policy.

We may modify this Contract, our [Privacy Policy](#) and our [Cookie Policy](#) from time to time. If we make material changes to it, we will provide you notice through our Services, or by other means, to provide you the opportunity to review the changes before they become effective. We agree that changes cannot be retroactive. If you object to any changes, you may close your account. Your

continued use of our Services after we publish or send a notice about our changes to these terms means that you are consenting to the updated terms.

## 3. DATA WE COLLECT

### 3.1 DATA YOU PROVIDE TO US

#### Registration

To create an account you need to provide data including your name, email address and/or mobile number, and a password. If you register for a premium Service, you will need to provide payment (e.g., credit card) and billing information.

#### Profile

You have choices about the information on your profile, such as your education, work experience, skills, photo, city or area and endorsements. You do not have to provide additional information on your profile; however, profile information helps you to get more from our Services, including helping business opportunities find you. It's your choice whether to include sensitive information on your profile and to make that sensitive information public. Please do not post or add personal data to your profile that you would not want to be publicly available.

#### Posting and Uploading

We collect personal data from you when you provide, post or upload it to our Services, such as when you fill out a form, (e.g., with demographic data or rate), respond to a survey, or submit a resume. If you opt to import your address book, we receive your contacts (including contact information your service provider(s) or app automatically added to your address book when you communicated with addresses or numbers not already in your list).

If you sync your contacts or calendars with our Services, we will collect your address book and calendar meeting information to keep growing your network by suggesting connections for you and others, and by providing information about them, e.g. times, places, attendees and contacts.

You do not have to post or upload personal data; though if you do not, it may limit your ability to grow and engage with your network over our Services.

### 3.2 DATA FROM OTHERS

#### Content and News

You and others may post content that includes information about you (as part of articles, posts, comments, videos) on our Services. Unless you opt-out, we collect public information about you, such as professional-related news and accomplishments (e.g., speaking at conferences, patents granted, professional recognition, projects) and make it available as part of our Services (e.g. suggestions for your profile, or notifications of mentions in the news).

#### Contact and Calendar Information

We receive personal data (including contact information) about you when others import or sync their contacts or calendar with our Services, associate their contacts with Member profiles, or send messages using our Services (including invites or connection requests). If you or others opt-in to sync email accounts with our Services, we will also collect “email header” information that we can associate with Member profiles.

#### Partners

We receive personal data about you when you use the services of our customers and partners, such as clients, prospective clients and applicant tracking systems providing us job application data.

#### Related Companies and Other Services

We receive data about you when you use some of the other services provided by us or our affiliates. For example, you may choose to send information about your contacts in apps and services to us for improved professional networking activities on our Services.

## 4. SERVICE USE

We log usage data when you visit or otherwise use our Services, including our sites, app and platform technology (e.g., our live chat services), such as when you view or click on content (e.g., learning video) or ads, perform a search, install or update one of our mobile apps, share articles or apply for jobs. We use log-ins, cookies, device information and internet protocol (“IP”) addresses to identify you and log your use.

### 4.1 COOKIES, WEB BEACONS AND SIMILAR TECHNOLOGY

As further described in our [Cookie Policy](#), we use cookies and similar technologies (e.g., web beacons, pixels, ad tags and device identifiers) to recognize you and/or your device(s) on, off and across different Services and devices. We also allow some others to use cookies as described in our Cookie Policy (e.g. Google Ads). You can control cookies through your browser settings and other tools.

### 4.2 YOUR DEVICE AND LOCATION

It is inevitable due to the functioning of the World Wide Web that whenever you visit or leave our Services (including our plugins or cookies or similar technology on the sites of others), we receive the URL of both the site you came from and the one you go to next.

For the same reason, we get information about your IP address, proxy server, operating system, web browser and add-ons, device identifier and features, and/or ISP or your mobile carrier.

### 4.3 MESSAGES

We collect information about you when you send, receive, or engage with messages in connection with our Services. For example, if you get a connection request, we track whether you have acted on it and will send you reminders. We also use automatic scanning technology on messages.

### 4.4 OTHER

Our Services are dynamic, and we often introduce new features, which may require the collection of new information. Before we collect materially different personal data or materially change how we use your data, we will notify you about the purpose, legal basis and possible transfer and may also modify this Privacy Policy.

## 5. HOW WE USE YOUR DATA

How we use your personal data will depend on which Services you use, how you use those Services and the choices you make in your settings. We use the data that we have about you to provide and personalize, including with the help of automated systems and inferences we make, our Services (including ads) so that they can be more relevant and useful to you and others.

### 5.1 SERVICES

**We use your data to execute the contract between you and betoobe.**

#### **Be connected**

**Our Services allow you to stay in touch and up to date with peers, partners, clients, and other professional contacts. To do so, you will “connect” with the professionals who you choose, and who also wish to “connect” with you. Subject to your settings, when you connect with other Members, you will be able to search each others’ connections in order to exchange professional opportunities.**

**We will use data about you (such as your profile, profiles you have viewed or data provided through address book uploads or partner integrations) to help others find your profile, suggest connections for you and others (e.g. Members who share your contacts or job experiences) and enable you to invite others to become a Member and connect with you. You can also opt-in to allow us to use your precise location or proximity to others for certain tasks (e.g. to suggest other nearby Members for you to connect with, calculate the commute to a new job, or notify your connections that you are or will be at a professional event).**

**It is your free choice whether to invite someone to our Services, send a connection request, or allow another Member to become your connection. When you invite someone to connect with you, your invitation will include your name, photo, network and contact information. We will send invitation reminders to the person you invited. You can choose whether to share your own list of connections with your connections.**

Visitors have choices about how we use their data.

### **Be informed**

**Our Services allow you to stay informed about news, events and ideas regarding professional topics you care about, and from professionals you respect. Our Services also allow you to improve your professional skills or learn new ones. We use the data we have about you (e.g., data you provide, data we collect from your engagement with our Services and inferences we make from the data we have about you), to recommend relevant content and conversations on our Services, suggest skills you may have to add to your profile and skills that you might need to pursue your next opportunity. So, if you let us know that you are interested in a new skill, we will use this information to personalize content in your feed, suggest that you follow certain members on our site, or watch related learning content to help you towards that new skill. We use your content, activity and other data, including your name and picture, to provide notices to your network and others. For example, subject to your settings, we may notify others that you have updated your profile, posted a blog, took a social action, made new connections or were mentioned in the news.**

### **Be productive**

**Our Services allow you to collaborate with peers, search for potential clients, customers, partners and others to do business with. Our Services allow you to communicate with other Members and schedule and prepare meetings with them. If you choose so, we scan messages to provide “bots” or similar tools that facilitate tasks such as scheduling meetings, drafting responses, summarizing messages or recommending next steps.**

## **5.2 COMMUNICATIONS**

We will contact you through email, mobile phone, notices posted on our websites or apps, messages to your betoobe inbox, and other ways through our Services, including text messages and push notifications. We will send you messages about the availability of our Services, security, or other service-related issues. We also send messages about how to use the Services, network updates, reminders, job suggestions and promotional messages from us and our partners. You may change your communication preferences at any time. Please be aware that you cannot opt-out of receiving service messages from us, including security and legal notices.

We also enable communications between you and others through our Services, including for example invitations, groups and messages between connections.

## **5.3 ADVERTISING**

We target (and measure the performance of) ads to Members directly using the following data, whether separately or combined:

- Data from advertising technologies like web beacons, pixels, ad tags, cookies, and device identifiers;

- Member-provided information (e.g., profile, contact information, title and industry);
- Data from your use of our Services (e.g., search history, feed, content you read, who you follow or is following you, connections, groups participation, page visits, videos you watch, clicking on an ad, etc.);
- Information from advertising partners and publishers; and
- Information inferred from data described above (e.g., using job titles from a profile to infer industry, seniority, and compensation bracket; using graduation dates to infer age or using first names or pronoun usage to infer gender).

We will show you ads called “sponsored content” which look like non-sponsored content, except that they are labelled “ads” or “sponsored.” If you take an action (such as like, comment or share) on these ads, your action is associated with your name and viewable by others, including the advertiser. Subject to your settings, if you take a social action on the betoobe Services, that action may be mentioned with related ads.

#### Info to Ad Providers

We do not share your personal data with any third-party advertisers or ad networks for their advertising except for: (i) anonymised data; (ii) with your separate permission (e.g., lead generation form) or (iii) data already visible to any users of the Services (e.g. profile). However, if you view or click on an ad on or off our site or apps, the ad provider will get a signal that someone visited the page that displayed the ad, and they may through the use of mechanisms such as cookies determine it is you. Advertising partners can associate personal data collected by the advertiser directly from you with our cookies and similar technologies.

## **5.4      MARKETING**

We use data and content about Members for invitations and communications from betoobe promoting membership and network growth, engagement and our Services.

## **5.5      DEVELOPING SERVICES AND RESEARCH**

#### Service Development

We use data, including public feedback, to conduct research and development for the further development of our Services in order to provide you and others with a better, more intuitive and personalized experience, drive membership growth and engagement on our Services, and help connect professionals to each other and to economic opportunity.

#### Surveys

Polls and surveys are conducted by us and others through our Services. You have no obligation to respond to polls or surveys, and you have choices about the information you provide. You may opt-out of survey invitations.

## 5.6 CUSTOMER SUPPORT

We use the data (which can include your communications) to investigate, respond to and resolve complaints and Service issues (e.g., bugs).

## 5.7 AGGREGATE INSIGHTS

We use your data to produce and share aggregated and anonymised insights that do not identify you. For example, we may use your data to generate statistics about our members, their profession or industry, to calculate ad impressions served or clicked on, or to publish visitor demographics for a Service or demographic workforce insight.

## 5.8 SECURITY AND INVESTIGATIONS

We use your data (including your communications) if we think it's necessary for security purposes or to investigate possible fraud or other violations of our User Agreement or this Privacy Policy and/or attempts to harm our Members or Visitors.

# 6. HOW WE SHARE INFORMATION

## 6.1 OUR SERVICES

### Profile

Your profile is fully visible to all Members and customers of our Services. Your settings, degree of connection with the viewing Member, the subscriptions they may have, their usage of our Services, access channels and search types (e.g., by name or by keyword) impact the availability of your profile and whether they can view certain fields in your profile.

### Posts, Likes, Follows, Comments, Messages

Our Services allow viewing and sharing information including through posts, likes, follows and comments.

- When you share an article or a post (e.g., an update, image, video or article) publicly it can be viewed by everyone and re-shared anywhere (subject to your settings). Members will be able to find and see your publicly-shared content, including your name (and photo if you have provided one).
- In a group, posts are visible to others in the group. Your membership in groups is public and part of your profile, but you can change visibility in your settings.
- Any information you share through companies' or other organizations' pages on our Services will be viewable by it and others who visit those pages.
- When you follow a person or organization, you are visible to others and that "page owner" as a follower.

- We let senders know when you act on their message, subject to your settings where applicable.
- When you like or re-share or comment on another’s content (including ads), others will be able to view these “social actions” and associate it with you (e.g., your name, profile and photo if you provided it).

## **6.2 COMMUNICATION ARCHIVAL**

Some Members need, for legal or professional compliance, to archive their communications and social media activity, and will use services of others to provide these archival services. We enable archiving of messages by those Members outside of our Services. For example, a financial advisor needs to archive communications with her clients through our Services in order to maintain her professional financial advisor license.

## **6.3 RELATED SERVICES**

We will share your personal data with our affiliates to provide and develop our Services. We may combine information internally across the different Services covered by this Privacy Policy to help our Services be more relevant and useful to you and others.

## **6.4 SERVICE PROVIDERS**

We use others to help us provide our Services (e.g., maintenance, analysis, audit, payments, fraud detection, marketing and development). They will have access to your information as reasonably necessary to perform these tasks on our behalf and are forbidden to disclose or use it for other purposes.

## **6.5 LEGAL DISCLOSURES**

It is possible that we will need to disclose information about you when required by law or legal process or if we have a good faith belief that disclosure is reasonably necessary to (1) investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (2) enforce our agreements with you, (3) investigate and defend ourselves against any third-party claims or allegations, (4) protect the security or integrity of our Service (such as by sharing with companies facing similar threats); or (5) exercise or protect the rights and safety of betoobe, our Members, personnel, or others. We will notify Members about legal demands for their personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we cannot guarantee challenging every demand.



## 6.6 CHANGE IN CONTROL OR SALE

We can also share your personal data as part of a sale, merger or change in control of betoobe, or in preparation for any of these events. Any other entity which buys betoobe or part of our business will have the right to continue to use your data, but only in the manner set out in this Privacy Policy unless you agree otherwise.

## 7. YOUR CHOICES & OBLIGATIONS

### 7.1 DATA RETENTION

We retain your personal data while your account is in existence or as needed to provide you Services. This includes data you or others provided to us and data generated or inferred from your use of our Services. Even if you only use our Services when looking for a new job every few years, we will retain your information and keep your profile open until you decide to close your account. In some case we choose to retain certain information in an anonymised form.

### 7.2 RIGHTS TO ACCESS AND CONTROL PERSONAL DATA

We provide many choices about the collection, use and sharing of your data, from deleting or correcting data you include in your profile and controlling the visibility of your posts to advertising opt-outs and communication controls. We offer you settings to control and manage the personal data we have about you.

For personal data that we have about you:

- **Delete Data:** You can ask us to erase or delete all or some of your personal data (e.g., if it is no longer necessary to provide Services to you).
- **Change or Correct Data:** You can edit some of your personal data through your account. You can also ask us to change, update or fix your data in certain cases, particularly if it is inaccurate.
- **Object to, or Limit or Restrict, Use of Data:** You can ask us to stop using all or some of your personal data (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., if your personal data is inaccurate or unlawfully held).
- **Right to Access and/or Transfer your data:** You can ask us for a copy of your personal data and can ask for a copy of personal data you provided in machine readable form.

You may also contact us using the contact information below, and we will consider your request in accordance with applicable laws.

### 7.3 ACCOUNT TERMINATION

If you choose to close your betoobe account, your personal data will generally stop being visible to others on our Services within 24 hours. We generally delete closed account information within 30 days of account closure, except as noted below.

We retain your personal data even after you have closed your account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our User Agreement, or fulfill your request to “unsubscribe” from further messages from us. We will retain anonymised information after your account has been closed.

Information you have shared with others will remain visible after you closed your account or deleted the information from your own profile or mailbox, and we do not control data that other Members copied out of our Services. Groups content and ratings or review content associated with closed accounts will show an unknown user as the source. Your profile may continue to be displayed in the services of others (e.g., search engine results) until they refresh their cache.

## **8. OTHER IMPORTANT INFORMATION**

### **8.1 SECURITY**

We implement security safeguards designed to protect your data, such as HTTPS. We regularly monitor our systems for possible vulnerabilities and attacks. However, we cannot warrant the security of any information that you send us. There is no guarantee that data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

### **8.2 CROSS-BORDER DATA TRANSFERS**

betoobe does not process personal data outside the European Union. Our platform is hosted in France.

### **8.3 LAWFUL BASES FOR PROCESSING**

We will only collect and process personal data about you when we have lawful bases. Lawful bases include consent (where you have given consent), contract (where processing is necessary for the performance of a contract with you (e.g. to deliver the betoobe Services you have requested) and the legitimate interest of betoobe.

Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object. If

you have any questions about the lawful bases upon which we collect and use your personal data, please contact our Data Protection Officer at [legal@betoo.be](mailto:legal@betoo.be).

## **8.4 CONTACT OR COMPLAINTS**

If you have questions or complaints regarding this Policy, please first contact betoobe online. You can also reach Winlgnite bvba by post at Winlgnite BVBA, Da Vincilaan 1, B-1930 Zaventem.

If contacting us does not resolve your complaint, you have more options. You also have the right to contact our Data Protection Officer at [legal@betoo.be](mailto:legal@betoo.be). You have the right to file a complaint with the Belgian Privacy Commission: <https://www.gegevensbeschermingsautoriteit.be/>.