

## Privacy Statement

Thank you for visiting our website. The protection and confidentiality of your personal data is of particular importance for us. By using the Site, you agree to the collection and use of information in accordance with the following policy.

In this document we will inform you about the processing of personal data in connection with the services we offer at [www.satbeams.com](http://www.satbeams.com) as well as our desktop/mobile applications and other branded tools (collectively referred to as “Platforms”). Personal data comprises all information that relates to an identified or identifiable natural person (Article 4 (1) GDPR). This includes information such as your name, e-mail address, birth date, postal address or coordinates.

### 1. Who is responsible for the processing of your personal data?

The data controller (hereinafter referred to as “Satbeams” or “we”) in the sense of the GDPR and other national data protection laws of the member states as well as other data protection regulations is: Satbeams SPRL/BVBA, Av de la Bonne Fosse 12, 1420 Braine-l’Alleud, Belgium <https://www.satbeams.com/contact>

### 2. Contact details of the data protection officer

You can contact our data protection as follows: Satbeams SPRL/BVBA, Av de la Bonne Fosse 12, 1420 Braine-l’Alleud, Belgium <https://www.satbeams.com/contact>

### 3. Purposes and legal basis of the data processing and period for which data will be stored

In the following we inform you about the different purposes for which we process personal data, on which legal basis such processing takes place, and for how long we store the data. Insofar as we obtain the consent of the data subject for processing personal data, Art. 6 (1) (a) EU General Data Protection Regulation (GDPR) is the legal basis for the processing of personal data. If the processing of personal data is necessary for the performance of a contract to which the data subject is a party, Art. 6 (1) (b) GDPR will be the legal basis. This also applies to processing operations required to carry out pre-contractual actions. If processing of personal data is required to fulfill a legal obligation that our company is subject to, Art. 6 (1) (c) GDPR is the legal basis. If processing is necessary to safeguard the legitimate interests of our company or a third party, and if the interests, fundamental rights, and freedoms of the data subject do not prevail over the first interest, Art. 6 (1) (f) GDPR is the legal basis for processing. The personal

data of the data subject will be stored for as long as the purpose continues.

## **3.1 Data processing in the context of a general use of our Platforms and services**

### **3.1.1 General access to our Platforms**

With each access to our Platforms, we automatically collect data and information from the accessing device and store this data and information in the log files of the server. We may collect the browser types and versions used, the operating system used by the accessing system, the website from which an accessing system accesses our website (known as referrers), the sub-web pages that are accessed on our website, the date and time of access to the website, an Internet protocol address (IP address), the Internet service provider of the accessing system and other similar data and information used for detecting and preventing fraud and unauthorized access and maintaining the security of your systems. For security purposes, i.e. to be able to reconstruct an eventual attack against our Platforms, we store such data including the IP address for 30 days and then anonymize or delete such data. The IP address is required during the connection to transfer the contents of our Platform to your device. The legal basis for the processing and storage of the IP address is a legitimate interest as per Article 6 (1) (f) GDPR. The legitimate interest for the transmission of the IP address is that it is required to display the contents of the website; without transmission of the IP address it is not possible to display the content of the Platform. The legitimate interest for the temporary storage are our security interests.

### **3.1.2 Optimization of search and recommendation functions**

We may also store information about your usage patterns on our Platforms in order to create statistical models to make our Platforms more user-friendly and, in particular, to optimize the functionalities to search for and recommend suitable job advertisements. In this context we also save your IP address in a pseudonymized form (that means that a natural person can no longer be identified based purely on the information in the statistical model) to exclude automated accesses (bots) to our Platforms when creating the statistical models. Legal basis for this purpose is Art. 6 (1) GDPR. Our legitimate interest is to ensure the functionality of the statistical model to improve our services. The IP address is deleted after one year.

### **3.1.3 Objections to marketing**

If you raise an objection with us against marketing purposes, we may put your personal contact information on a blacklist to ensure that we no longer send you any unwanted marketing material. The legal basis is a legitimate interest within the meaning of Art. 6 (1) (f) GDPR, where the legitimate interest is that we can meet our obligations from your objection against marketing. The data will be stored for this purpose until you expressly withdraw the objection to marketing in writing.

### **3.1.4 Contact form and e-mail contact**

Our Platforms provide contact forms that can be used to contact us electronically. By clicking the "Send" button, you consent to the transmission to us of the data entered in the input form. In addition, we save the date and time of your contact. Alternatively, contact via the e-mail address provided is possible. In this case, the user's personal data transmitted along with e-mail and our response will be stored. The personal data voluntarily transmitted to us in this context is used to process your inquiry and to contact you as needed. The legal basis for the transmission of the data is Art. 6 (1) (a) GDPR. The data will be used for this purpose until the specific conversation with you has ended. The conversation will be deemed ended when it can be inferred from the circumstances that the relevant facts have been conclusively clarified.

### **3.1.5 Use of data processors for hosting and securing of our Platforms**

We use data processors, which we list below, to provide our services. The legal basis for using these data processors is legitimate interest under Art. 6 (1) (f) GDPR. The legitimate interest lies in the execution of our business activities, particularly to provide the services described elsewhere in this Privacy Statement. No conflicting interest is apparent because we have entered into a data processing agreement with the respective processors under Art. 28 GDPR.

#### **3.1.5.1 Hosting, email and support services**

We host our Platforms and email service in the data center of our data processor, meaning that personal data that is stored on our Platforms is transferred to this data processor. This data processor is LeaseWeb Netherlands B.V., Luttenbergweg 8, 1101 EC Amsterdam, Netherlands who processes our Platforms data solely in the EU and is fully compliant with GDPR principles ( <https://www.leaseweb.com/legal>

). In exceptional cases, e.g. if needed to resolve technical issues LeaseWeb Netherlands B.V. may consequently also have access to your personal data but should not copy and store it outside of our Platforms.

#### **3.1.5.2 Content Delivery Network (CDN) services**

We use CacheNetworks LLC, 111 W. Jackson Blvd., Suite 1600, Chicago, IL 60604, USA as data processor for the purposes of proxy caching of some of our Platforms code and content. That means that during the visit of our website some of the code and content is loaded from CacheNetworks CDN cache servers instead of our website. This is done solely to speed-up the Platforms performance and CacheNetworks will cache selected code and content (but not personal data). CacheNetworks LLC complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland ( <https://www.cachefly.com/privacy-policy> ).

#### **3.1.6 Cookies and similar technology**

We use cookies on our website. Cookies are text files that are stored on a computer system via an Internet browser. We use such cookies both as a technical means of providing services on our Platforms as well as for analyzing the website behavior of our visitors and on that basis developing a more user-friendly design of our offerings. For this purpose, we may also use other techniques, such as tracking pixels or code in apps. In addition, we may use these cookies or other techniques to target you with relevant content. For the sake of clarity, we have moved the information on cookies and similar techniques in section 4. of this Privacy Statement.

### **3.2 Data processing if you register for Satbeams account**

Satbeams offers a variety of services that require registering an account. Registered users can modify some of the website content in the “Charts” (Channels) section in a way that content is “tagged” with respective user name as content originator (that includes user abilities to indicate which programs one can receive at their locations). This process is regulated by our “Terms and Conditions” ( <https://www.satbeams.com/website/terms-and-conditions> ). Users of Satbeams mobile applications are required to register an account to be able to download application data via API.

### **3.3 Data**

#### **processing for general marketing purposes**

We process personal data about our visitors for the purpose of direct marketing, as far as legally permitted. The legal basis is a legitimate interest in accordance with Art. 6 (1) sentence 1 f GDPR. The legitimate interest lies in the processing of personal data for the purpose of direct advertising itself (see recital 47 GDPR). The data subjects have the right to object at any time to

the processing of personal data concerning them for the purpose of such advertising. You object at any time under the contact details set out in clause 1; in the case of advertising by e-mail, you will also find an opt-out link directly in the respective e-mail. We will store personal data for this purpose as long as we are still interested in entering into a contract with the respective business or until the business objects.

## **4. Cookies and similar technology**

We use cookies on our website. Cookies are text files that are stored on a computer system via an Internet browser. We use such cookies both as a technical means of providing services on our Platforms, for enabling e.g. certain functions, as well as for analyzing the website behavior of our visitors and on that basis developing a more user-friendly design of our offerings. For this purpose, we can also use other techniques, such as tracking pixels. In addition, we may use these cookies or other techniques to target you with advertisements and other content. Some of the cookies we use are deleted at the end of the browser session, i.e. when you close your browser (known as session cookies). Other cookies are kept on your end device and enable us or our partner companies to recognize your browser on the next visit (persistent cookies). If not specifically stated below, you can view the exact retention period of a given cookie by displaying the cookie in your browser. You can set your browser up such that you are notified when a cookie is set and can decide individually whether to accept them or whether you opt out of accepting cookies for specific cases or generally. If you opt out of accepting cookies, the functionality of our website may be limited. We deal with specific cookies or similar technology below.

### **4.1 Technically necessary cookies**

We use technical cookies. These are cookies that are merely required to collect certain information on our Platforms to provide a service required or wanted by you as user. This extends to navigation or session cookies that enable smooth navigation and use of the website (and for instance permit access to the restricted area); analysis cookies that are set directly by us to collect aggregated information about the number of users and their behavior; functional cookies that provide you with navigation by certain selected criteria as part of a service optimization. The legal basis for these cookies is a legitimate interest under Art. 6 (1) sentence 1 f GDPR, namely pursuance of our business purposes.

### **4.2 Cookies and technologies that we use via third party providers**

We also use cookies or other technology provided to us by external providers in various areas. In the following, we inform you about the respective providers and how you can object to the cookie or the corresponding technology. In general, you can make an appropriate setting in your browser.

#### **4.2.1 Chartbeat**

On our website we use services by Chartbeat Inc., 3826 Broadway, Floor 6, New York, NY 10003, USA in the framework of our common responsibility as defined under Art. 26 GDPR. The purpose of the processing is to understand how our audience is connecting with our content in the moment – across platforms, channels, and devices – so we can act to optimize it when trends happen. Chartbeat holds strict guidelines around consumer data privacy and data security and is GDPR compliant (<https://chartbeat.com/gdpr/>). Within the scope of the joint responsibility for the data processing described in this clause 4.1, you can assert your rights under the GDPR against us and Chartbeat either with us or with Chartbeat. The legal basis is a legitimate interest under Art. 6 (1) sentence 1 f GDPR, namely pursuance of our business purposes.

#### **4.2.2 Google**

### **Analytics**

On our Platforms we also use Google Analytics, a web analysis service offered by Google LLC ("Google"), located at 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States for statistical purposes. Google Analytics itself uses cookies to analyze how visitors use our website. The information generated by the cookie about your use of our website (including your IP address, the time you visit the site, the type of browser you use, the pages you consult and the files you download) is transferred to and stored by Google on servers in the United States. Google uses this information to compile reports on website activity. Google may not provide this information to third parties unless Google is legally obliged to do so. Google will not combine your IP address with other data held by Google. By using our website you consent to the processing of the information by Google in the manner and for the purposes described above. Google maintains the Safe Harbor principles and is affiliated with the Safe Harbor program of the US Department of Commerce. If you do not want data about your website visit to be passed on to Google Analytics, you can download and install the Google Analytics Opt-out Browser Add-on ( <https://tools.google.com/dlpage/gaoptout> ). More information about privacy in Google Analytics can be found here: <https://www.google.com/analytics/terms/us.html>

### **4.2.3 Google Advertising**

On our Platforms we also use Google DoubleClick for Publishers (DFP), DoubleClick Ad Exchange (AdX), AdMob and AdSense services from Google LLC ("Google"), located at 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States. This enables us to target our Platforms users with advertising by displaying personalized, interest-driven advertisements to the users of the website when they visit other websites in the Google Display network. Google uses cookies to perform the analysis of the website use, on the basis of which the interest-driven advertisements are generated. No personal data of users is stored. If you then visit another website in the Google Display network, you will be shown advertisements that are highly likely to relate to product and information areas you have previously accessed. The legal basis is a legitimate interest under Art. 6 (1) sentence 1 f GDPR, namely pursuance of our business purposes and the targeted marketing of our services. You can use Ads Settings to manage the Google ads you see and opt out of Ads Personalization ( <https://adssettings.google.com/> ). Even if you opt out of Ads Personalization, you may still see ads based on factors such as your general location derived from your IP address, your browser type, and your search terms. Alternatively, you can deactivate the use of cookies from third-party providers by accessing the deactivation page of the Network Advertising Initiative at <http://optout.networkadvertising.org/> and the implementing the additional information about opting out as set out there.

### **4.2.4 Facebook Products**

On our Platforms we also use Facebook Connect, Custom Audience and Pixel services from Facebook Inc ("Facebook"), located at 1 Hacker Way, Menlo Park, California 94025, United States. The information collected (including your IP address, the time you visit the site, the type of browser you use, the pages you consult and the files you download) is transferred to and stored by Facebook on servers in the United States. Facebook uses this information to compile

reports on Platforms activity that help us to offer our users more relevant content as well as promote our services to Facebook users. Facebook is committed to and making big efforts to comply with GDPR ( <https://www.facebook.com/business/gdpr> ) The legal basis is a legitimate interest under Art. 6 (1) sentence 1 f GDPR, namely pursuance of our business purposes and the targeted marketing of our services. More information about Facebook data policy can be found here: <https://www.facebook.com/about/privacy>

#### 4.2.5 Yandex Metrica

On our Platforms we also use Yandex Metrica from Yandex Oy Limited Company - Moreenikatu 6, 04600 Mantsala, Finland ("Yandex"). The information collected (excluding your IP address, the time you visit the site, the type of browser you use, the pages you consult and the files you download) is transferred to and stored by Yandex. Yandex is committed to and making big efforts to comply with GDPR ( [https://yandex.ru/legal/metrica\\_agreement/](https://yandex.ru/legal/metrica_agreement/) ). More information about Yandex data policy can be found here: <https://yandex.ru/legal/confidential/?lang=en>

## 5. Rights of the data subject

If your personal data is processed, you are a data subject within the meaning of the GDPR and you have the following rights vis-à-vis the data controller: **5.1 Right of access**

You may request confirmation from us as to whether we process personal data relating you. If such processing is taking place, you can request the following information from us: the purposes for which the personal data is being processed; the categories of personal data that are being processed; the recipient or categories of recipient to whom the personal data concerning you has been or will be disclosed; the envisaged period for which the personal data concerning you will be stored or, if no concrete information about this is possible, criteria used to determine that period; the existence of a right to rectification or erasure of the personal data concerning you, a right restrict the processing of the data by the controller or a right to object to this processing; the existence of a right to lodge a complaint with a supervisory authority; any available information about the origin of the data if the personal data was not collected from the data subject. This right to information may be limited if it is likely to render impossible or seriously impair the achievements of the statistical purposes and the limitation is necessary for satisfying the statistical purposes. **5.2 Right to rectification**

You have a right to rectification and/or completion vis-à-vis the data controller if the personal data concerning you that is being processed is incorrect or incomplete. The data controller must perform the rectification without undue delay. Your right to rectification may be limited if it is likely to render impossible or seriously impair the achievements of the statistical purposes and the limitation is necessary for satisfying the statistical purposes. **5.3 Right to**

### **restriction of processing**

If the following conditions are met, you can demand that the processing of the personal data



concerning you is restricted: if you contest the accuracy of the personal data relating for you for a that enables us to review the accuracy of the personal data; if the processing is unlawful and you oppose the erasure of the personal data and instead request a restriction of the use of the personal data; if we no longer require the personal data for the purposes of the processing, but you need it to establish, exercise, or defend legal claims or if you have objected to the processing in accordance with Art. 21 (1) GDPR and it has not yet been verified whether our legitimate reasons override yours. If the processing of the personal data concerning you has been limited, this data – with the exception of being stored by you – may only be processed with your consent or for the purpose of establishing, exercising, or defending legal claims or to protect the rights of another natural or legal or on grounds of a compelling public interest of the EU or a Member State. If a restriction of processing has been imposed in accordance with the above conditions, we will notify you before the restriction is lifted. Your right to restrict processing may be limited if it is likely to render impossible or seriously impair the achievements of the statistical purposes and the limitation is necessary for satisfying the statistical purposes.

### **5.4 Right to erasure**

You may request that we erase the personal data concerning you without undue delay, and we are obliged to erase this data without undue delay where one of the following grounds applies: the personal data concerning you is no longer needed for the purposes for which it was collected or otherwise processed; you withdraw your consent upon which the processing was based pursuant to Art. 6 (1) (a) or Art. 9 (2) (a) GDPR, and no other legal ground for the processing applies; you object to the processing in accordance with Art. 21 (1) GDPR and no overriding legitimate grounds for the processing apply, or you raise an objection to the processing under Art. 21 (2) GDPR; the personal data concerning you has been processed unlawfully; the erasure of the personal data concerning you is required in order to comply with a legal obligation under EU law or the law of the Member States to which we are subject or the personal data concerning you is collected in the context of information society services pursuant to Art. 8 (1 ).

### **5.5 Right to object**

You have the right to object, on grounds relating to your specific situation to object, at any time to the processing of the personal data concerning you which is based on Art. 6 (1) (e) or (f) GDPR. In this case we will stop processing the personal data concerning you unless we can provide compelling and legitimate grounds for the processing that override your interests, rights and freedoms, or the data is being processed for the purpose of establishing, exercising, or defending legal claims. Your right to object may be limited if it is likely to render impossible or seriously impair the achievements of the statistical purposes and the limitation is necessary for satisfying statistical purposes.

### **5.6 Right to withdraw the declaration of consent under data-processing law**

You have the right to withdraw your declaration of consent under data-processing law at any time. Withdrawing the consent has no bearing on the lawfulness of any processing performed up to the point of the revocation.

## **6. Amendment of the data protection policy; amendment of purpose**

We reserve the right to amend this Privacy Statement in consideration of stipulations under data-protection law. If we are intending to process your data for other purposes, i.e. those for which it was collected, we will notify you about this in advance in compliance with the statutory

provisions.