

# RHC EU PRIVACY POLICY

Last Updated: August 1<sup>st</sup>, 2024

## 1. Introduction

This Privacy Policy describes how Reveal Holdco EU B.V. (d/b/a RHC EU or FeatherSnap) and our subsidiaries and affiliated companies (collectively, “*Company*,” “*we*,” or “*us*”) collect, use, disclose and otherwise process personal data except for processing of your data relating to our mobile applications (the “*App*”), and our connected cameras and other devices (“*Devices*”) or certain services. This Privacy Policy applies to information we collect when you access or use our websites (collectively, the “*Website*”), our mobile applications (the “*App*”), and our connected cameras and other devices (“*Devices*,” and, together with the Website and App, the “*Services*”), or when you otherwise interact with us, such as through our customer support channels.

It is important to note that each country in which RHC EU operates has a specific Privacy Policy tailored to that region. These country-specific policies take precedence over the global policy within their respective regions. They are tailored to comply with local regulations and data protection laws.

It is important to us that you always feel safe and informed about how we process your personal data. In this Privacy Policy, you can learn more about what personal data we collect and process about you, why we do it, how we use the personal data and how we ensure that your personal data is handled, and what rights you have. You can of course contact us, or our data protection representative/coordinator, if you have questions about our processing of your personal data. See contact details.

## 2. The Data Controller – RHC EU, is the controller of your personal data.

DSM has appointed a coordinator in charge of data protection issues who can be reached at the following email address: [dataprotection@FeatherSnapcam.com](mailto:dataprotection@FeatherSnapcam.com)

RHC EU has taken technical and organisational measures to ensure the protection and confidentiality of your data.

## 3. Personal data processed -Purposes - Legal basis - RHC EU only collects and processes data that you have provided to it personally or the data of administrators or contact persons that its suppliers, service providers, consultants or customers have transmitted to it as part of a contract or as part of pre-contractual measures.

The categories of data processed and the legal basis for the processing vary depending on the purpose (purpose) of the processing:

### 3.1. Conclusion and execution of contracts with suppliers, service providers, consultants or customers

<i>Categories of data processed</i>	<i>Legal basis</i>	<i>Data retention period</i>
Identification, contact and financial data of suppliers, service providers, consultants or customers	Processing necessary for the performance of a contract to which you are a party or pre-contractual measures	The duration of the negotiations or contractual relationships increased by the period necessary to allow

Identification/contact data of administrators, managers and contact persons	Processing necessary for the purposes of our legitimate interests, namely the conclusion or performance of the contract to which a legal person or your employer is a party	RHC EU to comply with its legal obligations to retain records (including accounting and tax obligations)
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**3.2. On FeatherSnap website - including information about our processing of personal data related to your account on Feathersnapcam.com and our processing of personal data collected using cookies**

<i>Purpose</i>	<i>Categories of data processed</i>	<i>Legal basis</i>	<i>Data retention period</i>
Analyses web/cookies When you visit our website, we collect certain information about you using cookies and other tracking technologies. This is for our website to function, to improve the user experience of our website, to collect visitor statistics and to provide you with relevant marketing in various channels (see more details regarding the marketing purpose)	For more information on how we manage cookies, see our Cookie Policy.		We will continue to process your personal data for up to thirty (30) days after you have terminated your account.
To administer your FeatherSnap ID account on feathersnapcam.com (from registration to termination) and provide with all the functionality related to your ID.	Identification/contact data of persons, password, relevant market and preferred language	Our legal basis for processing your personal data is to perform the contract (GDPR, article 6.1 (b)).	

**3.3. To respond to a request or when we are in contact with you - including those submitted via the contact form on the website [www.feathersnapcam.com](http://www.feathersnapcam.com) which includes information about our processing of personal data relating to our customer support, our contacts with you on social media and on Feathersnapcam community.**

**3.3.1. Customer support via phone, e-mail or our website (chat, online enquiries etc.)**

<i>Purpose</i>	<i>Categories of data processed</i>	<i>Legal basis</i>	<i>Data retention period</i>
To provide customer support, including to communicate with you and respond to your questions and enquiries, resolve the support case and to deliver the services and information you have requested via phone, email or on our website, such as via enquiries about our products, offers and services.	Name, e-mail address, telephone number, call recordings with you (if applicable), e-mail correspondence with you (if applicable), enquiry (if applicable), history of your customer support cases, history of our relationship and previous contacts with you, information about the customer support case and all other	Our legitimate interest to provide you with customer support services (GDPR, article 6.1 (f)).	The time it takes to respond to you and follow up on your request.

	personal data that is relevant to the customer support case.		
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### 3.3.2. Contacts with you on social media and FeatherSnap community

<i>Purpose</i>	<i>Categories of data processed</i>	<i>Legal basis</i>	<i>Data retention period</i>
To communicate with you and respond to your questions and comments. The purpose with FeatherSnap Community is for our users to share stories, ask questions and engage in discussions with other community members and FeatherSnap directly. You will also have access to various announcements and updates from FeatherSnap.	Social media: Name, username, e-mail address and information provided by you in our contacts. FeatherSnap Community: Name, e-mail address, username, market, language, FeatherSnap ID, and information provided by you in our contacts.	Social media: Our legitimate interest to provide you with customer support services (GDPR, article 6.1 (f)). FeatherSnap Community: Performance of the contract (GDPR, article 6.1 (b)).	Until you choose to delete your content, or until we have to delete it following our rules (e.g. when the content is disrespectful, bullying etc.)

## **3.4. When marketing and advertising our business, brands, products and services - including information about our processing of personal data relating to marketing through telephone, e-mail, websites, social media and press releases. In this section you will also find information about our profiling for marketing purposes.**

### 3.4.1. Marketing via e-mail and on websites (our and third parties)

<i>Purpose</i>	<i>Categories of data processed</i>	<i>Legal basis</i>	<i>Data retention period</i>
To send relevant and high-quality marketing communication about FeatherSnap news and FeatherSnap's business, products and services – including products and services from FeatherSnap's business partners (e.g., suppliers of feathersnapcam.com). The purpose includes some profiling.	Name, e-mail address, IP number, cookies, your response and interactions with the digital marketing communication that you receive (e.g., by means of embedded image files that you download or links that you click on), your interactions with us, your online behaviour on our websites (processed in relation to marketing on websites, if you have accepted the use of cookies) and your segment affiliation.	Your consent (GDPR, article 6.1 (a)).	Until you unsubscribe or opt out.

### 3.4.2. Marketing by telephone

<i>Purpose</i>	<i>Categories of data processed</i>	<i>Legal basis</i>	<i>Data retention period</i>
To call you to follow up on previous interactions with us or to provide you with offers from us or our business partners. The purpose includes some profiling.	Name, telephone number, your purchase history, your interactions with us and segment affiliation.	Your consent (GDPR, article 6.1 (a)).	Until you unsubscribe or opt out.

#### 3.4.3. Marketing on social media

<i>Purpose</i>	<i>Categories of data processed</i>	<i>Legal basis</i>	<i>Data retention period</i>
To provide you with relevant and high-quality marketing communication about FeatherSnap news and FeatherSnap's business, products and services – including products and services from FeatherSnap's business partners. The purpose includes some profiling.	Username and information provided by you in our contacts. E-mail address, IP number, cookies, your response and interactions with the digital marketing communication that you receive (e.g. by means of embedded image files that you download or links that you click on), your interactions with us, your online behaviour on our websites (if you have accepted the use of cookies for targeting and advertising) as well as your segment affiliation/lookalike audience.	Our legitimate interest to provide you with marketing on social media (GDPR, article 6.1 (f)).	For customers: Up to twelve (12) months after the customer relationship has ended.

#### 3.4.4. Subscription to press content

<i>Purpose</i>	<i>Categories of data processed</i>	<i>Legal basis</i>	<i>Data retention period</i>
To provide you with all the latest media information from FeatherSnap	Name, e-mail address, market, company that you work for (if applicable).	Your consent (GDPR, article 6.1 (a)).	Until you unsubscribe or opt out.

#### 3.4.5. Profiling

To ensure that marketing and other communication you receive from us is relevant to you considering your specific situation, we will combine certain types of data to predict your personal preferences and categorise you into a “segment affiliation”. One segment usually consists of 5,000-15,000 individuals with similar preferences, interests and behaviour. Everyone categorised into the same segment affiliation will receive

the same type of marketing. The segments we create can for example include, “people that visited the product page, started configuration and chose the colour void”.

For this purpose, we process your IP address, information on your browsing on our website, e.g. product interest and configuration, device information, unique online identifiers and interaction in relation to our ads on third-party websites (your “Online Web Behaviour Data”), in pseudonymised form. If you consent to the use of cookies for targeting and ads, we will combine your Online Web Behaviour Data with aggregated data obtained from third party data providers through cookies, such as information about your personal preferences, demographics and content consumption (“Third Party Data”), and data that you provide us with when you interact with us, such as e-mail address, phone number, postal code, country of residence, your interests, purchased products or services and your interactions with us (“Customer Data”). This data will determine your segment affiliation.

Your segment affiliation may also be used to create so-called lookalike audiences, meaning that we create a target audience based on the same characteristics of the individuals belonging to a certain segment affiliation. This enables us to target potential customers with similar interests, behaviour or characteristics as the people that already have shown an interest in our products and services. In other words, we will use your segment affiliation to target other individuals with the same characteristics.

We will also use your segment affiliation to get a better general understanding of you and your needs, provide better customer support and to keep track of your interactions with us.

Your segment affiliation will not produce any legal effects or affect you in any similar way. The legal basis for placing, collecting and having access to the mentioned information from cookies is your consent, read more in our Cookie Policy. The legal basis for creating profiles, placing you in a segment affiliation, creating lookalike audiences and for sending you marketing based on your segment affiliation is your consent to marketing and profiling.

**3.5. When developing our business, products and services - including information about our processing of personal data relating to our training of our employees and our continuous work with developing our business, systems, products and services.**

3.5.1. General development of our business

<i>Purpose</i>	<i>Categories of data processed</i>	<i>Legal basis</i>	<i>Data retention period</i>
To develop, streamline, follow up and ensure quality of our business, systems, products and services (including producing reports, statistics and analysis for this purpose).	All personal data that we have about you for other purposes listed in this privacy policy.	Legitimate interest to develop, streamline, follow up and ensure quality of our business, systems, products and services, both on our part and on the part of the system provider (when applicable)	The data is not saved specifically for this purpose but will be used for this purpose during the general retention period for each purpose. Where possible, we restrict analysis to anonymised or pseudonymised data. All statistical

		(GDPR, article 6.1 (f))	reports will be anonymous.
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### 3.5.2. Educate customer support employees

<i>Purpose</i>	<i>Categories of data processed</i>	<i>Legal basis</i>	<i>Data retention period</i>
To educate customer support employees and ensure high quality customer support.	Customer feedback.	Our legitimate interest in educating our employees and ensuring high quality customer support (GDPR, article 6.1 (f)).	Up to twelve (12) months from the date of the feedback.

### 3.5.3. Educate employee in general

<i>Purpose</i>	<i>Categories of data processed</i>	<i>Legal basis</i>	<i>Data retention period</i>
To educate our employees in general and ensure high quality business operations.	All personal data that we have about you for other purposes listed in this privacy policy, depending on the employees' position and the purpose of the training.	Our legitimate interest in educating our employees and ensuring high quality business operations (GDPR, article 6.1 (f)).	No personal data is saved specifically for this purpose but may be used for this purpose during the general retention period for each purpose.

## 3.6. E-mail analyses

We use technologies such as tracking pixels or click-through links when sending you e-mails. The purpose of using tracking pixels is to analyse if and how many emails are delivered and opened. The purpose of using click-through links is to analyse which links in our emails are clicked, to understand what interest there is in specific content. We use the result to make our e-mails more relevant or to stop them from being sent. By deactivating the display of images in your e-mail client, we will not be able to measure the opening rate of our e-mails using tracking pixels and the e-mail will not be displayed completely. However, if you click on text or graphic links in the e-mail, we will still be able to track whether the e-mail has been opened. To avoid that such data is collected and tracked, do not click on text or graphic links in the e-mails.

## 3.7. When you apply for a job at FeatherSnap

### 3.7.1. Announced position

<i>Purpose</i>	<i>Categories of data processed</i>	<i>Legal basis</i>	<i>Data retention period</i>
To administer and review your job application for potential employment at FeatherSnap	Name, e-mail address, telephone number, work experience, languages, what position you are applying for, information on legal permission to work in the country where the position is located, and other personal data contained in your job application.	To take steps at your request prior to entering into a contract and to perform the contract (GDPR, article 6.1 (b)).	Rejected application: until the rejection decision is made unless the candidate agrees to keep his or her CV for a position to be filled in the future. Application selected for interviews: the duration of the job interviews and, if the candidate is not selected, 1 year after the end of the interviews in order to respond to any complaint (unless the candidate agrees to keep his or her CV for a position to be filled in the future).

### 3.7.2. Unsolicited application

<i>Purpose</i>	<i>Categories of data processed</i>	<i>Legal basis</i>	<i>Data retention period</i>
To administer and review your job application for potential employment at FeatherSnap	Name, telephone number, work experience, what department and countries you are interested in working in, and other personal data contained in your job application.	To take steps at your request prior to entering into a contract and to perform the contract (GDPR, article 6.1 (b)).	Rejected application: until the rejection decision is made unless the candidate agrees to keep his or her CV for a position to be filled in the future. Application selected for interviews: the duration of the job interviews and, if the candidate is not selected, 1 year after the end of the interviews in order to respond to any

			complaint (unless the candidate agrees to keep his or her CV for a position to be filled in the future).
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**3.8. To comply with laws, legal obligations and voluntary undertakings and in the event of claims, disputes, supervision etc. – including information about our processing of personal data relating to recalls, claims and complaints, data subject requests, data subject complaints, data breaches and supervision, disputes, bookkeeping, financial reporting, transfer of data in the event of merger and acquisition and sharing of personal data with authorities.**

**3.8.1. Claims and complaints**

<i>Purpose</i>	<i>Categories of data processed</i>	<i>Legal basis</i>	<i>Data retention period</i>
To administer, investigate and respond to claims and complaints.	The categories of personal data relating to the data subjects that are necessary with regard to the claim or complaint.	Our legitimate interest to administer your complaint (if applicable). (GDPR, article 6.1 (f)).	Until the file is closed, increases the legal retention period of the archives.

**3.8.2. Data subject right requests**

<i>Purpose</i>	<i>Categories of data processed</i>	<i>Legal basis</i>	<i>Data retention period</i>
To administer and accommodate your request to exercise any of your GDPR rights.	Name, e-mail address, phone number, information about your consents, your request and the information required to meet your request.	Legal obligation (GDPR, article 6.1 (c) and chapter III).	Up to two (2) years from the date your request has been met.

**3.8.3. Management of the exercise of rights and notifications in the event of a data incident**

<i>Purpose</i>	<i>Categories of data processed</i>	<i>Legal basis</i>	<i>Data retention period</i>
To investigate personal data breaches and other data subject claims and provide requested information to	Identification and contact data of the data subject and data concerning the right exercised/the relevant incident	Processing necessary for compliance with a legal obligation	2 years in order to be able to respond to any control by the



regulatory authorities in the event of supervision.		imposed on us (GDPR, article 6.1 (c))	Data Protection Authority
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### 3.8.4. Management of possible disputes

<i>Purpose</i>	<i>Categories of data processed</i>	<i>Legal basis</i>	<i>Data retention period</i>
To protect our interests in the event of a dispute	The categories of personal data relating to the data subjects that are necessary with regard to the subject matter of the dispute and the parties involved as well as identification and contact details of any legal and technical advisers	Special categories of personal data (according to the definition in article 9 of the GDPR): When it is necessary for the establishment, exercise or defence of legal claims (GDPR, article 9.2 (f)). Other personal data: Our legitimate interest in protecting our interest in the event of a dispute namely to protect ourselves (GDPR, article 6.1 (f)).	Until the file is closed, increases the legal retention period of the archives.

### 3.8.5. Sharing with authorities

<i>Purpose</i>	<i>Categories of data processed</i>	<i>Legal basis</i>	<i>Data retention period</i>
To share personal data with authorities, such as the police authority, when legally obliged to do so	The categories of personal data relating to the data subjects that are necessary and requested by the authority	Legal obligation (GDPR, article 6.1(c)).	N/A

**Commented [VB1]:** Steve, any other data? In case you have an entity in Europe and employees or offices, some data will be shared with eg manager of the building (badges or other) this will then need to be added

## 4. Disclosure of your personal data

### 4.1. How we disclose your personal data and who we disclose it to

RHC EU only communicates data to third parties when such communication is necessary to achieve the purpose of the processing.

Depending on the purpose concerned, the categories of recipients are as follows:

<i>Purpose of the processing</i>	<i>Categories of data recipients</i>
Negotiation and execution of contracts with suppliers, service providers, consultants or customers	RHC EU affiliates / insurer / service provider who takes care of our IT infrastructure / consultants / Notary public / expert/ Bbusiness partners, e.g., the distributor in your country, legal counsels, printing companies (marketing purposes), advertising agencies/companies, market research companies, and providers of social media platforms.
Responding to a request from you	Service provider that takes care of our IT infrastructure
Management of possible disputes and complaints	Official authorities, courts, mediator, experts, bailiffs, lawyer, technical advisor
Management of the exercise of rights and notifications in the event of an incident	Data Protection Authority
Application Management	Recruitment company or consultant, subsidiaries of RHC EU

When the recipient is a subcontractor or co-contractor of RHC EU, RHC EU ensures that these third parties provide adequate guarantees for the protection of your personal data and comply with the GDPR.

#### **4.2. Processing of your personal data outside of EU/EEA**

We strive to process your personal data within the EU/EEA area. However, your personal data will be transferred outside the EU/EEA in some situations, such as when we share your information with our headquarter, a business partner or subcontractor operating outside the EU/EEA.

We transfer personal data to the following countries outside of the EU/EEA: the United States and the United Kingdom.

We always ensure that the same high level of protection applies to your personal data according to the GDPR, even when the data is transferred outside of the EU/EEA. As regards the United Kingdom, the Commission has decided that it ensures an adequate level of protection (article 45 of the GDPR), but regarding transfers to the United States we have entered into EU Model Clauses ( Publications Office (europa.eu) ) with all relevant third parties (article 46 of the GDPR) or they are certified under the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S Data Privacy Framework and/or the Swiss-U.S. Data Privacy Framework with the U.S. Department of Commerce. In addition, we take additional technical and organisational security measures when needed, such as encryption (TLS) and pseudonymisation.

### **5. Your rights**

#### **5.1. Withdrawal of consent**

When the processing of your data is based on your consent given to DSM, you may withdraw your consent at any time by sending an email to the following address: [dataprotection@feathersnapcam.com](mailto:dataprotection@feathersnapcam.com) As a result of this withdrawal, we will no longer be able to respond to or follow up on your request.

## 5.2. Rights in relation to your personal data

Below, you can find a list of your rights related to our processing of your personal data.

Certain rights can only be exercised under circumstances or for reasons determined by the General Data Protection Regulation of 27 April 2016 (GDPR). The text of this regulation is easily accessible on the internet (in particular on the European Union website).

5.2.1. Right of access: You have the right to request access to the personal data we process about you. A copy will be provided to you electronically free of charge (unless you request a postal mailing).

5.2.2. Right to rectification: You can ask us to rectify personal data about you that is inaccurate, incomplete or no longer up to date.

5.2.3. Right to erasure (right to be forgotten): You can ask us to erase your personal data for any of the grounds listed in Article 17 GDPR.

5.2.4. Right to restriction of processing: In the cases referred to in Article 18 of the GDPR, you can ask us to restrict our processing of your personal data.

5.2.5. Right to portability: in the cases provided for in Article 20 GDPR, you have the right to request a copy of your personal data in a structured, commonly used and machine-readable format in order to transmit it to another controller.

5.2.6. Right to object: under the conditions set out in Article 21 of the GDPR, you may object to our processing of your personal data, including processing for direct marketing purposes, scientific or historical research, or statistical purposes.

## 5.3. Changes to this privacy policy

We reserve the right to change this privacy policy from time to time, in particular for the purpose of complying with applicable privacy legislation. We will inform you of any changes by posting the updated privacy policy on our website (including clarification of updates). If we make any material changes to our privacy policy, we will send a notification by e-mail. We encourage you to contact us if you have any questions about the privacy policy or about how we process your personal data.

## 5.4. Request for information, Exercising your rights and Complaint

You may address any question regarding this policy or the way in which RHC EU processes your personal data and exercise your rights regarding your personal data by sending an email to the following address: [dataprotection@feathersnapcam.com](mailto:dataprotection@feathersnapcam.com)

When exercising your rights, please make sure that you clearly identify yourself and indicate which right you wish to exercise. We will ask you to prove your identity in order to ensure that a third party does not have access to or manipulate your data. We will respond to you within one month of receipt of your request to exercise your rights. This period may be extended (up to a maximum of 3 months) depending on the complexity and number of requests.

You also have the right to lodge a complaint with a supervisory authority. Below the list of "Data Protection Authority" in Europe per country.

- European Data Protection Supervisor (regulates EU institutions) [https://edps.europa.eu/\\_en](https://edps.europa.eu/_en)
- Austria [www.dsb.gv.at](http://www.dsb.gv.at)
- Belgium [www.privacycommission.be](http://www.privacycommission.be)
- Bulgaria [www.cdpd.bg](http://www.cdpd.bg)
- Croatia [www.azop.hr](http://www.azop.hr)
- Cyprus [www.dataprotection.gov.cy](http://www.dataprotection.gov.cy)
- Czech Republic [www.uoou.cz](http://www.uoou.cz)
- Denmark [www.datatilsynet.dk](http://www.datatilsynet.dk)
- Estonia <http://www.aki.ee/>
- Finland [www.tietosuoja.fi](http://www.tietosuoja.fi)
- France [www.cnil.fr](http://www.cnil.fr)
- Germany [www.bfdi.bund.de](http://www.bfdi.bund.de)
- List of regional data protection authorities in Germany :  
[https://www.bfdi.bund.de/DE/Infothek/Anschriften\\_Links/anschriften\\_links-node.html](https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html)
- Greece [www.dpa.gr](http://www.dpa.gr)
- Hungary [www.naih.hu](http://www.naih.hu)
- Italy [www.garanteprivacy.it](http://www.garanteprivacy.it)
- Latvia [www.dvi.gov.lv](http://www.dvi.gov.lv)
- Lithuania [www.ada.lt](http://www.ada.lt)
- Luxembourg [www.cnpd.lu](http://www.cnpd.lu)
- Malta [www.dataprotection.gov.mt](http://www.dataprotection.gov.mt)
- Netherlands [www.autoriteitpersoonsgegevens.nl/nl](http://www.autoriteitpersoonsgegevens.nl/nl)
- Poland [www.giodo.gov.pl](http://www.giodo.gov.pl)
- Portugal [www.cnpd.pt](http://www.cnpd.pt)
- Romania [www.dataprotection.ro](http://www.dataprotection.ro)