

## PRIVACY POLICY

Effective as of January 1, 2015

Enablon S.A. and our affiliates (“**Enablon**”) take seriously the confidentiality of your information. The following Privacy Policy sets forth how we collect information, what types of information we collect, how we use it, the steps we take to safeguard it, and the choices you have regarding how it may be used and disclosed. **BY ACCESSING OR USING THIS WEBSITE (“Site”), YOU AGREE TO THE TERMS OF THIS PRIVACY POLICY AND CONSENT TO THE COLLECTION AND USE OF INFORMATION AS DISCUSSED IN THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY, DO NOT ACCESS THIS SITE.**

This Site is a commercial website and is intended for use by our customers, prospective customers, vendors, and their respective employees and agents to obtain information about Enablon’s products and services.

We reserve the right to modify or amend this Privacy Policy at any time. All changes will be effective immediately upon posting to this Site. Material changes will be conspicuously posted on this Site. By accessing or using this Site after such changes are posted you agree and consent to all such changes.

Use of our Site and Enablon’s services is strictly limited to persons who are of legal age in the jurisdictions in which they reside. You must be at least eighteen (18) years of age to use our Site and Enablon’s services.

Enablon will not knowingly accept any information from an individual under the age of 18 years. Any information that Enablon may receive from any individual who is reasonably believed to be under the age of 18 years will be deleted. **IF YOU ARE UNDER THE AGE OF 18 YEARS, PLEASE DO NOT PROVIDE ANY PERSONAL INFORMATION THROUGH THE SITE.**

### **The Types of Information We Collect**

We may collect Personal Information you voluntarily share with us through communicating with us regarding our services, as well as other anonymous information that is automatically collected when you use this Site. This information will be used to help us provide a better Site and allow us to gain information about the technical efficiencies of our Site and services. Anonymous information means information that does not directly or indirectly identify, and cannot reasonably be used to identify you, such as an IP address, domain type, cookies and other aggregated data, as further explained below.

We may also collect location information, which means information that may be collected by certain mobile applications that identify your physical location. This information may be collected from your mobile device’s location-aware features when you request certain services that are dependent on your physical location.

## **I. How We May Collect Your Information**

### **Information You Provide to Us**

We collect Personal Information from you or about you if you choose provide this information to us directly. “**Personal Information**” refers to information that identifies you, such as your name, address, e-mail address, telephone number, date of birth and demographic information. We may obtain Personal Information when you request information, products or services from, or otherwise interact with us, on this Site.

We may also gather such Personal Information through your access to your accounts online, as well as your asking questions through our “Contact Us” link, such as your name, address, e-mail address and other contact information. We may also collect data resulting from your activity, such as transaction information.

### **Your IP Address**

Like most websites, each time you visit our Site, we may automatically collect your IP address and the web page from which you came to our Site. IP addresses are not used to track your session. This information only helps us determine how often different areas of our site are visited and helps us optimize the Site. We do not link IP address to any information that is personally identifiable. We may also supplement this information with Site traffic information that is collected automatically when you visit our Site, and with information acquired from our joint marketing partners, third parties and our affiliated companies.

### **Cookies**

We use cookies as a convenience feature to save you time, to understand how our Site is used, and to improve the content and offerings on our Site. We may use cookies to track the use of our Site and to facilitate and enhance your experience on our Site. “Cookies” are small pieces of information that are stored by your browser on your computer’s hard drive. Cookies can also help us to improve your enjoyment of this Site, for example, by remembering your login information. The cookies we use, if any, are not linked to any Personal Information while using this Site unless you have given us permission to link Personal Information to one or more cookies.

Most or all browsers permit you to disable or reject cookies. You can do this by adjusting your preferences in the browser. Use the “Help” feature of your browser to obtain more information about refusing cookies. If you set the browser you use to reject cookies, you may not be able to access the Site or use the full functionality of the Site, or it may take additional time to utilize such functionality. If you opt to reject cookies, you may need to re-register with us every time you visit our Site.

Enablon does not track its customers over time and across third party websites to provide targeted advertising and therefore does not respond to “Do Not Track” signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of Personal Information about an individual consumer's online activities over time and across third-party websites or online services. Accordingly, your selection of the “Do Not Track” option provided by your browser may not have any effect on our analytics or tracking tools.

### **Flash Cookies**

We may use local shared objects, sometimes known as Flash cookies, to store your preferences and to assist with online authentication by allowing us to recognize you and your device when you return to the Site. This permits us to display content based upon what you view on our Site to personalize your use of our services. Our third party service providers also may use Flash cookies to collect and store information. Flash cookies are different from browser cookies because of the amount and type of data they collect, as well as how data is stored. Cookie management tools provided by your device or browser will not remove Flash cookies. If you disable Flash cookies, you will not have access to many features that make your user experience more efficient.

### **Pixel Tags, Web Beacons and Similar Technologies**

These are typically small pieces of data that are embedded in images on the Site, our applications or certain e-mail communications. They may involve the transmission of information directly to us, to another party on our behalf or to another party in accordance with its privacy policy. We may use these technologies to compile information we collect about you.

### **Clickstream Data**

As you use the Internet, a trail of electronic information is left at each website you visit. This information, which is sometimes referred to as “clickstream data,” can be collected and stored by a website’s server. Clickstream data can identify the type of computer and browsing software you use and the address of the website from which you linked to the Site. We may use clickstream data as a form of non-Personal Information to anonymously determine how much time visitors spend on each page of the Site, how visitors navigate throughout the Site and how we may tailor our web pages to better meet the needs of visitors.

### **Log Files**

We or our hosting provider may collect traffic information from visitors for statistical analysis and Site improvement. When you access the Site, we or our hosting provider may collect information about your visit in a log file on a server. Log file information may include, but is not limited to, internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks. We or our hosting

provider use this information to analyze trends, administer sites, track users' movements in the aggregate, and gather demographic information for aggregate use. We and/or our hosting provider may review this information to better understand overall trends and to determine what kinds of content are popular with and useful to users.

### **Location Tracking on Mobile Devices**

Certain applications on mobile devices may transmit information to us about your location when you request information from them. We may use that information to improve the products and services we provide to you as well as to improve our services generally in your area. You always have the ability to control what information your mobile device sends to us. You can exercise this control by changing the settings of your mobile device.

## **II. How We Use Your Personal Information**

We may use your Personal Information to help us improve our product and service offerings, improve the Site's functionality process queries on the Site, to contact you when necessary in connection with products or services you accessed or inquired about via the Site, to provide you with account login credentials, and to send you information, offers and other promotional materials from us and selected third parties.

## **III. Disclosure of Information**

We maintain full rights to any information collected on this Site, and may freely collect, use and disclose such information unless prohibited by this Privacy Policy or applicable law. In the event of a change in control or reorganization of Enablon or sale by Enablon of substantially all of its assets, any information owned by or in the control of Enablon may be transferred to its successor, who will comply with the terms of this Privacy Policy.

Except as described in this Privacy Policy, we do not disclose information about your individual visits to our site, or Personal Information that you provide to any outside parties, except when we believe, in good faith, that releasing your information is reasonably necessary to (i) comply with law, or (ii) protect the rights, property or safety of Enablon, our users or others.

We may also provide information to other companies that provide services to help us with our business activities such as to host or maintain our Site; for data processing services; to provide website or data security; to provide operational, analytical or reporting services; or to provide technical support ("**Service Providers**"). In connection with providing those services to Enablon, an Agent may have access to your Personal Information. Your Personal Information will be treated as private and confidential by the Service Providers and will not be used for any purpose other than as Enablon authorizes, and your Personal Information will not be disclosed by the Service Providers to any third party.

In addition, we reserve the right to use and share your information if we believe doing so is necessary to operate this Site or where such disclosure may be required by law, or to protect our rights or the rights of others.

We may also disclose personal and other information that you have provided to us to our subsidiary and parent companies and businesses, and other affiliated legal entities and businesses with whom we are under common corporate control.

#### **IV. Third Party Websites**

This Site may link to, or be linked to, other websites not maintained by or related to Enablon. We are not responsible for the privacy policies or practices of any third parties or third-party websites, including any linked or linking websites. To the extent that you disclose personally identifiable information to any such third parties, different rules may apply to their use and disclosure of personal information that you disclose to them. We encourage you to review the privacy policies of such websites before disclosing your personal information to them.

#### **V. Supplementation of Information**

We may supplement the information we receive from you with other information we receive from third-party sources or clearinghouses. Thus, information we obtain through the Site may be intermingled with and used in conjunction with information obtained through sources other than our Site, including both offline and online sources.

#### **VI. Account and Password Security**

You may establish a unique user name and password (“**Credentials**”) while completing a registration process for certain portions of the Site. It is your responsibility to safeguard and protect your Credentials and to monitor use of these Credentials for all purposes. You accept all responsibility for maintaining the security of your Credentials and for all utilization of the Site with your Credentials, with or without your knowledge or consent. You agree to (a) immediately notify Enablon of any unauthorized use of your Credentials or any other breach of security; (b) ensure that you log out and exit completely from your account at the end of each session; and (c) notify Enablon immediately if you have lost your Credentials or wish to terminate your access or have your Credentials changed.

#### **VII. Our Security Precautions; Geographic Location of Information**

Enablon will take reasonable precautions to protect Personal Information provided to us through the Site from loss, misuse, unauthorized access, disclosure, alteration and destruction, including physical, electronic and managerial procedures designed to safeguard and secure such Personal Information. Our security and privacy policies are periodically reviewed and enhanced as necessary. While Enablon strives to undertake such reasonable and necessary efforts to secure Personal Information provided to us through the Site, even such security

measures do not guarantee the security of all Personal Information, and Enablon cannot guarantee that the Personal Information it collects, uses and retains will be protected in all circumstances, including those beyond Enablon's reasonable control.

Particularly sensitive information is encrypted. You can usually tell whether encryption is being used by noting the "locked" or other status indicator on the browser you are using. If the browser you are using does not indicate that the session is secure (e.g., by displaying a lock, a key or a similar icon), you should assume that the connection is not secure and that third parties will receive the information shared by you and us during that part of the session. Your information may be transferred to and maintained on computer networks that may be located outside of the state, province, country or other governmental jurisdiction in which you reside, and the country or jurisdiction in which these computer networks are located may not have privacy laws as protective as the laws in your country or jurisdiction.

#### **VIII. Notice Regarding Unauthorized Access or Disclosure of Personal Information**

For the purposes of any applicable law regarding notification of persons whose Personal Information was, or is reasonably believed to have been, acquired by an unauthorized person, any required notification may, where permitted by law, be made by the use of e-mail, telephone, fax or mail (including a notice printed in an available area of a bill or statement) or by posting a notice on the Site. The specific means used is up to us, and we will use our best judgment based on the circumstances. Where any notice is to be sent to a specific address or number (such as an e-mail address, physical address, telephone number, etc.), we will use the latest available address in our records. **YOU AGREE TO THIS MEANS OF NOTIFICATION.**

#### **IX. Site and Service Updates**

We may send to you updates and service announcements about our Site, but you may not unsubscribe or opt not to receive such announcements because such announcements contain important information about the products and services offered through our Site.

#### **X. Accessing, Correcting or Updating Personal Information**

As per applicable law, you have the right to request to access to your Personal Information held by Enablon. To request access to your details, please contact **notice@enablon.net** with details necessary in order to allow Enablon to identify you and locate your Personal Information. If you wish to request that we update your Personal Information or correct any factual errors that you believe may exist regarding this information, you may contact us through the "E-mail Us" form at **notice@enablon.net**. Note that some information may be changed only by contacting the administrator of the Site.

## **XI. Managing E-Mail Settings**

If you no longer wish to receive emails from us, please log into your account and modify your account settings or follow the opt-out instructions in your e-mail. If you continue to receive promotional materials 30 days after modifying your account settings, please contact us directly using the information below. We will use commercially reasonable efforts to make any changes you request. If you require an immediate change to your Personal Information and are unable to make such a change using the available Site resources, please contact us. If you choose to opt-out and then provide your Personal Information to us again by using the Site or under other circumstances that permit us to use your information, we will regard your opt-out as having been rescinded. Also, please note that users may not necessarily opt out of sharing certain information with third parties, as specified as being necessary in various portions of this Privacy Policy.

Please note that changing or deleting your information through the Site, or otherwise opting out of receipt of e-mail communications from us and third parties, will only change or delete the data in our database for purposes of transacting future business on or relating to the Site and for managing future communications from us and third parties. These changes and deletions will not change or delete information previously collected through this Site.

## **XII. Contact Us**

If you have any questions or concerns about this Privacy Policy, the practices of the Site, or your dealings with the Site, you can contact us at **notice@Enablon.com**. You can also send us mail to:

Enablon S.A  
2 boulevard Georges Clemenceau,  
92400, Courbevoie  
France  
Attn: Legal Counsel