

Radionomy SA's PRIVACY POLICY

I. Identification of the site and the organization responsible for it

Modern information and communication technologies play a fundamental role in the activities of an organization like Radionomy SA.

Our main activities consist of creating and providing aid for the creation of radio stations, on Internet and providing services related to this activity, as well as providing tools and services for the listening of radio stations and music on the Internet (here below called the 'Services'). The Services include all services supplied by the Site, particularly: hosting services, enhancement and provision of multimedia content, communication between Users, making tools (including software) available, and more generally any other service proposed by the Site. The Services also include communications intended for Users particularly administrative messages, newsletters pertaining to the Services and forums/blogs.

In this context, Radionomy SA undertakes to scrupulously respect Belgian legislation concerning protection of personal data. This legislation is available in full on the site of the Privacy Commission: [http:// www.privacycommission.be](http://www.privacycommission.be)

Our policy with regard to privacy applies to Radionomy SA and to its web site www.radionomy.com (here below referred to as the Site).

The organization responsible for data processing is RADIONOMY SA
Address: 55 Bd International (bâtiment K), 1070 Brussels.
Legal Entity Registry Number - VAT BE 0892.300.624 RPM/RPR Brussels
E-mail address: info@radionomy.com
Contact person: Alexandre Saboundjian

II. Acceptance of our privacy policy

By using the Site, you explicitly declare that you accept Radionomy SA's privacy policy and you consent to our collection and processing of your personal data for the purposes and in the manner described in this policy.

III. Identification of users of the Site

The Site may be visited and used by various categories of persons:

- Visitor: Any person occasionally consulting the Site, not registered in the system, having access to the content of this Site including the content published on the personal pages of Members, Radio Creators and Content Producers;
- Listener: Any person gaining access to the Services to listen to a web radio station and, as the case may arise, making use of tools (including software) and related services proposed on the Site, but not registered in the system as a Member;

- Member: Any person who registered and gave an identifier (e-mail address) and a password, as well as some additional information, in order to have access to the functionalities reserved for members, including the benefits granted to Visitors and/or Listeners;
- Radio Creator: Member who has decided to create a web radio station by using the Services proposed by the Site;
- Fan: Term that describes any User who voluntarily accepts to be in direct communication with a Radio Creator by e-mail and/or by chat and to appear in the list of Fans of a radio station.
- Content Producer: Person who subscribed to a specific "Content Producer" contract. He makes content available (musical or audio) so that Radio Creators can integrate it in their radio broadcasts and he benefits from publication space to define content and has access to statistics on the use of that content.
- Moderator: Designated member of a group who monitors compliance with the objectives and the regulation of exchanges of electronic or audio messages made in an organized context. The moderator notably sees that unauthorized advertising messages and comments that could constitute criminal offences are not broadcast, this in accordance with applicable laws. When operating live, the moderator takes action by giving warnings and by excluding offending Users.
- Users: All Visitors, Listeners, Members, Radio Creators, Content Producers, and Fans of the Site.

IV. Automatic collection of surfing information

The following information is collected automatically when Users surf on the Site:

IP Address, DNS Address, Navigator Screen resolution, Page preceding arrival on the Site. We collect this data exclusively for purposes of statistics on frequency of visits to the Site, and we do not connect them with personal data we collect otherwise.

V. Cookies

'Cookies' may be recorded on your system (a "Cookie" is a small file sent by the Internet server which is recorded on your system and keeps track of the Internet site visited and contains certain information on the visit that is accessible by that site only) during your visit to the Site. Where required by applicable law, we will obtain your prior consent to the placing of cookies on your system in accordance with applicable laws. Please note that you can refuse these cookies by programming your Internet browser or system either to be informed of the existence of cookies, or to refuse them systematically. Cookies are used for the purpose of facilitating navigation on our site as well as for statistics.

Radionomy SA does not establish a link between the information that may have been automatically recorded by cookies and the nominative personal data concerning Users.

VI. Data collected and specification of purposes

We only collect personal data other than those mentioned under IV and V if you voluntarily supply your data. We can also collect information concerning you from other sources (public bodies or private organizations that process your personal data and have the right to transmit them to us). We may also receive personal data where acquiring assets or business from a third party in accordance with applicable law.

We will only process the data we collect when you register on the Site or use it for the purposes described in this Privacy Policy or as permitted in accordance with applicable law. We do not request nor collect sensitive data about you . You will be invited to fill in a form where certain fields in bold or possibly followed by an asterisk (*) must be filled in to enable us to supply the service requested. Other fields are optional. The optional fields are exclusively intended to let us contact you quickly if this proves necessary or to better identify your fields of interest in order to send you information corresponding to them.

If you communicate your postal address to us, you may receive direct marketing postal mail from us (except if you object to the use of your data for marketing purposes) or, subject to your specific consent, from our commercial partners. If you do not wish to receive such mail any longer, you may object at any time and free of charge by contacting us at the address mentioned in point 1 here above.

If you communicate your telephone number to us, you may receive a telephone call from us (except if you object to the use of your data for marketing purposes) or, subject to your specific consent, from one of our commercial partners for marketing purposes. If you do not wish to receive such calls any longer, you may object at any time and free of charge by contacting us at the address mentioned in point 1 here above.

If you communicate your e-mail address to us and check appropriate opt-in boxes on our Site to provide your prior consent, this means that you accept to receive direct marketing e-mail from us, or from our partners. If you do not wish to receive such e-mail any longer, you may object at any time and free of charge by contacting us at the address mentioned in point 1 here above.

VII. Categories of personal data processed

Depending on your use of the Site and of our Services, personal data that are collected and processed by us about you may include:

- information you provide when you register for the Services (such as name, e-mail address, birth date);
- information about the tools and services you request from us;
- information about how you use the Services, including webpages you visit, software you download, responses to offerings and advertisements shown on the Site;
- information about the searches you perform through the Services and how you use the results of those searches;

- transaction-related information (such as credit card or other preferred means of payment, billing or shipping information, or a history of products purchased through the Services);
- customer service information about you personally as a User.

VIII. Purposes of data processing

The purposes for which we collect your personal data are as follows, depending on whether you made a simple visit to the Site or filled in a form to benefit from a service proposed by the Site. .

- Visitor and Listener:

Managing statistics on visits to the Site based on the data collected automatically;

Managing statistics on the visit of radio stations;

Doing market studies;

Managing a request for information;

Providing the tools and Services that you request;

- Member:

Managing statistics on visits to the Site;

Managing statistics on the visit of radio stations;

Managing the file of members;

Doing market studies;

Managing a request for information;

Providing the tools and Services that you request;

Subject to your prior consent where required by law, sending promotional information corresponding to your centers of interest both from Radionomy SA and from its commercial partners. For this purpose, you are entitled to object to receiving any message containing direct marketing in the future, at any time, without cost and without giving any reason for your choice either (i) by contacting the contact person identified in point 1 here above; or (ii) by responding directly to our partner if you do not wish to receive commercial proposals from that partner; or (iii), if you no longer wish to receive any direct marketing proposal from any company by post or by phone, registering with a special list for this purpose by going to the site <http://www.robinsonlist.be> (Robinson Mail) or <https://www.ne-m-appellez-plus.be/> (former Robinson Phone) managed by the Belgian direct marketing association (ABMD).

- Radio creator:

Managing statistics on visits to the Site;

Managing statistics on the visit of radio stations;

Managing the file of Radio creators;

Doing market studies;

Managing a request for information;

Managing Blogs, chat, e-mails and instantaneous electronic messaging on radio stations;

Managing web radio content created by Radio Creators;

Subject to your prior consent where required by law, sending promotional information corresponding to your centers of interest both from Radionomy SA and from its commercial partners. For this purpose, you are entitled to object to receiving any message containing direct marketing in the future, at any time, without cost and without giving any reason for your choice (i) either by contacting the contact person identified in point 1 here above; or (ii) by responding directly to our partner if you do not wish to receive commercial proposals from that partner; or (iii), if you no longer wish to receive any direct marketing proposal from any company by post or by phone, registering with a special list for this purpose by going to the site <http://www.robinsonlist.be> (Robinson Mail) or <https://www.ne-m-appellez-plus.be/> (former Robinson Phone) managed by the Belgian direct marketing association (ABMD).

Fan:

Managing statistics on visits to the Site;
Managing statistics on the visit of radio stations;
Managing the file of Fans;
Doing market studies;
Managing a request for information;
Managing electronic communications used;

Subject to your prior consent where required by law, sending promotional information corresponding to your centers of interest both from Radionomy SA and from its commercial partners. For this purpose, you are entitled to object to receiving any message containing direct marketing in the future, at any time, without cost and without giving any reason for your choice (i) either by contacting the contact person identified in point 1 here above; or (ii) by responding directly to our partner if you do not wish to receive commercial proposals from that partner; or (iii), if you no longer wish to receive any direct marketing proposal from any company by post or by phone, registering with a special list for this purpose by going to the site <http://www.robinsonlist.be> (Robinson Mail) or <https://www.ne-m-appellez-plus.be/> (former Robinson Phone) managed by the Belgian direct marketing association (ABMD).

- Content Producer

Managing statistics of visits to the site and to content proposed by the Content Producer;
Managing the file of Content Producers;
Managing electronic communications used;
Doing market studies;
Managing a request for information;

Subject to your prior consent where required by law, sending promotional information corresponding to your centers of interest both from Radionomy SA and from its commercial partners. For this purpose, you are entitled to renounce receiving any message containing direct marketing in the future, at any time, without cost and without giving any reason for your choice (i) either by contacting the contact person identified in point 1 here above; or (ii) by responding directly to our partner if you do not wish to receive commercial proposals from that partner; or (iii), if you no longer wish to receive any direct marketing proposal from any company by post or by phone, registering with a special list for this purpose by going to the site <http://www.robinsonlist.be> (Robinson Mail) or <https://www.ne-m-appellez-plus.be/>

plus.be/ (former Robinson Phone) managed by the Belgian direct marketing association (ABMD).

Moderator:

Managing statistics of visits to the Site;

Managing the file of Moderators and their activity on the Site;

Doing market studies;

Managing a request for information;

Subject to your prior consent where required by law, sending promotional information corresponding to your centers of interest both from Radionomy SA and from its commercial partners. For this purpose, you are entitled to object to receiving any message containing direct marketing in the future, at any time, without cost and without giving any reason for your choice (i) either by contacting the contact person identified in point 1 here above; or (ii) by responding directly to our partner if you do not wish to receive commercial proposals from that partner; or (iii), if you no longer wish to receive any direct marketing proposal from any company by post or by phone, registering with a special list for this purpose by going to the site <http://www.robinsonlist.be> (Robinson Mail) or <https://www.ne-m-appalez-plus.be/> (former Robinson Phone) managed by the Belgian direct marketing association (ABMD).

This privacy policy shall not restrict the rights that Radionomy SA may have with regard to the processing of personal data of any natural person in virtue of contracts or other legislation.

Radionomy SA may also process personal data, albeit anonymising it to the full extent permitted so as not to make it irrelevant, to comply with laws, decrees, as well as judicial and/or administrative orders in the field of intellectual property laws.

IX. Disclosure of data to a third party.

We may disclose, with your prior consent where required by law, your personal data to our commercial partners, so we or our commercial partners can send you promotional offers corresponding to your preferences. At any time and free of charge, you have the right to object from receiving direct marketing from these partners.

We may also share your personal data within the Radionomy SA group of companies.

We reserve the right to transmit personal data on the request of a judicial or administrative authority where required by law or upon a legitimate request from such authority.

The above recipients may be located in or out of the European Economic Area ('EEA'), including in countries that may not adduce the same level of protection of personal data as in the EEA. Radionomy SA shall implement appropriate measures in accordance with applicable law in order to provide an adequate level of protection to the transfer of your

personal out of the EEA, for example by entering into appropriate data transfer agreements conforming to the EU Commission's standard contractual clauses and/or obtaining your unambiguous consent to such transfers.

X. Duration of conservation of data

The data collected are kept for an indeterminate duration, as long as you do not unsubscribe for the Services for which you are registered, or as further required by law.

Your data will no longer be processed in the context of these Services as soon as you request the termination of the Services by contacting us at the address indicated in point 1 here above.

After that, they will be kept exclusively for statistical purposes or in the context of our legal rights and obligations, such as accounting and tax, and will not be exploited in any further commercial way.

XI. Confidentiality and security

We do not systematically give the possibility to visitors of our site to use a secure transmission method to send us personal data. Our Site and our company apply a policy, rules and security measures targeting the protection of personal data. Radionomy SA diligently updates data to correct or eliminate inaccurate, incomplete or irrelevant data as certain that, for persons acting under its authority, access to data and the possibilities for processing are limited to what is needed by these persons for the exercise of their duties, or corresponds to the needs of the service; informs persons acting under its authority of the provisions of Belgian law and implementing decrees, as well as any pertinent requirements concerning protection of privacy in the processing of personal data; ascertains compliance of programs used for automatic processing of personal data with the terms of its declaration to the Privacy Commission, and monitors the regularity of their application; ascertains that any person who has access to personal data under the authority of the organization responsible for processing data or that of a subcontractor, and the subcontractor itself, can only process such data on instructions from the organization responsible for processing data, except in the case of an obligation imposed by or in virtue of the law, a decree or a court order. Radionomy SA takes the necessary technical and organizational measures, and requires its subcontractors and partners to do the same, to protect personal data from accidental or unauthorized destruction, accidental loss and from modification, access or any other processing of data of a personal nature. These measures ensure an adequate level of protection in view, on one hand, of the state of techniques in the field and the costs entailed for the application of these measures and, on the other hand, of the nature of the data to be protected and the potential risks.

XII. Third party processors

When processing is entrusted to a subcontractor, Radionomy SA will choose a subcontractor that provides sufficient guarantees with regard to technical and organizational security

measures concerning processing; will ensure compliance of these measures particularly by stipulation of contractual terms; in the contract, will determine the subcontractor's liability to the organization responsible for processing personal data; will agree with any subcontractor that such subcontractor will act only on the instructions of the organization responsible for the processing and is bound by the same obligations as those binding the organization responsible for the processing in application of the law; will set down in writing or in an electronic medium the elements of the contract concerning protection of data and the requirements on security measures.

XIV. Access to your personal data processed by Radionomy SA

You have the right to request access to and receive details about the personal data we hold about you as data controller, and to request update of – and rectification of inaccuracies in – your personal data. You also have the right to object, at any time and free of charge, to the processing of your personal data for direct marketing purposes.

You may exercise your rights of access, rectification and objection by sending a letter by post to the contact person mentioned under point 1 here above. We will request proof of your identity (copy of identity card or passport) to be sure to respect your personal data and not to send them to a third party. The information that we hold concerning you, or a notice specifying that we do not hold any data concerning you, will be sent without cost within 45 days of your valid request.

Newsletters, e-mails, mailings and correspondence that you receive will always mention the possibility of objecting to receiving any message in the future and modifying your personal data if necessary.

XV. Contact points for protection of privacy

For any question or problem concerning our policy for the protection of privacy, please contact the contact person whose name is given in point 1 here above.

If you are not satisfied with our response: you can contact the Privacy Commission, the particulars of which are found on its site <http://www.privacycommission.be> , and with which Radionomy SA has lodged the necessary declarations.