

## Introduction

Privacy Policy Effective as of February 16th, 2014. EZC Group S.A. (hereinafter "EZC"), Registered office at 1 rue de l'Industrie L-3850 FOETZ Luxembourg, registered in Luxembourg under N° B140949 with a registered capital of €31500 has a commitment to your privacy and provides you the following privacy policy applicable to the our online YobiDrive services (usually at domain names \*.yobidrive.com).

When we provide the YobiDrive service, protecting our partners' and customers' privacy is an important priority at EZC Group S.A. The privacy of your information is a significant responsibility and we value the trust you place in us. EZC Group S.A. is committed to ensuring that any personal data supplied by its customers or otherwise generated by its business activities is collected and processed fairly and lawfully. Our privacy policy is designed to inform you about the information we collect, how we use it, and your options with regard to that collection and use.

Please keep in mind that this privacy policy only applies to YobiDrive services directly provided by EZC Group S.A. (usually at domain names \*.yobidrive.com) and not to services "Powered by YobiDrive" operated by other companies based on YobiDrive Y3 platform and modules.

## 1. User's data privacy

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EZC may act as a data processor (within the meaning of EU Directive 95/46/EC, as it may be amended, restated or replaced) in the context of the processing of personal data belonging to Users (acting in their capacity as controllers, within the meaning of the same text). In this case, EZC undertakes to process such personal data only insofar as required for the performance of its Services.

EZC partners with selected datacenters to provide the service. Those datacenters have procedures and access control measures to prevent unauthorized access to the hosting. To prevent unauthorized disclosure, copying or transfer, unauthorized destruction and alteration, unauthorized processing, DDOS; we have implemented technical and security measures to restrict access to the all parts of its infrastructure, such as, but not limited to, firewalls or encryption.

YobiDrive's platform uses a set of cryptographic measures to limit access to administration processes and to user data, which are stored encrypted. Only registered employees are allowed access to the YobiDrive servers.

YobiDrive uses state of the art encryption techniques and a patent pending collaborative encryption for strong-room protection (also called digital safe). Only authorized users have access to data on the YobiDrive platform.

## Access by unauthorized service user

All YobiDrive online services that demand access to personal data are subject to prior registration, except services with public access or public access with a key is part of the service description. When not accessed via a third party cloud platform managing authentication, the YobiDrive platform provides features that enhance security regarding authentication and password management, in order to reduce the risk of an attack on end-user accounts, such as, but not limited to, verification of user identity, password strength control, account blocking...

## Unauthorized export/migration from one user account to another

Internal data transfers within YobiDrive are not accessible to end-users. The transfer of data within the system is only possible from one account to another with read privilege on one side and write privilege on the other side.

## Unauthorized system logins

The YobiDrive platform logs all sign-in attempts, crypto failures ( for digital safes ) and the IP-address of any access attempt to the platform. Some YobiDrive services also provide audit trail at file level.

## Sniffing

YobiDrive uses Hypertext Transfer Protocol Secure (hereafter known as HTTPS) for all online transactions.

## Accidental loss

YobiDrive replicates data and implements clustering techniques, without eliminating user's responsibility for doing backups.

## Strong-rooms

If you have activated the strong-room mode for highest confidentiality, EZC cannot read your files and therefore **CANNOT RESTORE THEM IF YOU LOOSE YOUR PRIVATE KEYS** and have not printed a backup key.

## 2. Law enforcement

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EZC will also actively investigate and cooperate with law enforcement agencies regarding any allegations of abuse or violation of system or network security. EZC will disclose personal data to help investigation against unlawful activity, or to comply with an order made by any court.

## 3. Personal & navigation data

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### Personal identification data

Upon registration directly or via a cloud marketplace, personal data is collected and might include (but not necessarily does) identification data such as, but not limited to, name, email, postal address, company identification, VAT number, country. Personal data is kept for a duration extended to legal requirements and at least for the duration of your relationship with EZC. Except specific request by you, those data might be used by EZC for marketing purposes, as long as not communicated to third parties. The responsible of personal data processing is EZC. You have the right to access and change those data by writing to:

responsible of personal data processing,

EZC Group S.A.

1, rue de l'Industrie

3895 FOETZ

Luxembourg

You may request not to receive marketing emails or post-mails from EZC, or request that we don't keep any data after the end of the business relationship and the legal requirements by writing us to [unsubscribe\[at\]ezcgroup.net](mailto:unsubscribe@ezcgroup.net)

### Navigation data, usage and visits

Usage and visits (hereinafter: "Navigation Data") of the YobiDrive services might be recorded. Navigation Data might include the IP (Internet Protocol) address of your computer, the browser and operating system, date and time, http referrer (page from where you were coming prior to access our services), the time, the email addresses as collected for the purpose of rendering the service, and performing navigation statistics, by means of server side recording or by cookies. We only process navigation data for the purposes of optimizing our services, detecting and preventing fraud, and provide fully anonymized statistics to advertisers that do not contain any personal data. We reserve the right to implement systems that track usage of the YobiDrive services to identify content in violation of copyright laws.

### Cookies

For the purpose of tracking navigation and delivering the functionality of the service,

YobiDrive uses a session cookie. Cookies are small files recorded on your computer for the purpose of recording information that persist during your session ("session cookies") or persist between user sessions ("cookies"). When possible we use other means than cookies to provide the functionality of our services. To use our services, you will mostly need to allow session cookies, but for some services long-term cookies might be required, such as unauthenticated services. Session cookies are deleted when closing your browser. For some of the YobiDrive services, and in particular the FREE services, third party advertisers and web analytics companies might also use cookies to record navigation data for marketing purposes such as displaying the most relevant ads on. EZC does not control those third party cookies and does not guarantee that our services will continue to be rendered with its full functionality if you disable cookies in your browser, except for the premium subscriptions where ads are removed. In all cases session cookies should not be disabled.

## Usage of personal and navigation data by EZC and its partners

EZC uses the personal and navigation data it collects to perform actions required to run service in a secure manner, such as, but not limited to, account management, technical support, service optimization, fraud prevention and detection, regulatory or law enforcement requirements.

EZC does not disclose personal data to unaffiliated third parties except:

- When it's requested for the performance of the service;
- On demand of a legal authority.

Such necessary disclosures would occur in accordance with applicable laws.

In addition, EZC may disclose personal data to auditors and/or to intelligence and risk management consultancies. Those companies, like any other subcontractor of EZC, will be prohibited from using personal data for any other purpose. Anonymized data might be disclosed for analytics purposes.

## Case of downloaded applications

YobiDrive downloaded applications stores information on your computer or mobile device, for the sole purpose of performing the service, such as keys or parameters. Unless otherwise stated, downloaded applications rely on the host operating system to store and protect files, being transparent from the data privacy standpoint. IP addresses and connections of downloaded application to the YobiDrive servers are logged for the same purpose as Web access.

# 4. Miscellaneous

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## Business Transitions

In the event EZC goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, your personally identifiable

information will likely be among the assets transferred. You will be notified via a prominent notice on our Web site for 30 days of any such change in ownership or control of your personal information.

### Correcting and Updating Your Information

You may write us for updating personal information at support.yobidrive[at]ezcgroup.net with the subject "CINFO". Please note this only applies to information that can't be updated by other means, such as our account management pages or the account management pages of the cloud marketplace where you have purchased the services. Hosted data such as files stored as part of our services must be updated via the service's user interface.

### Alerts

Some of our services propose an alerting service, such as a mail sent to you to inform you of a new file made available by another user. Those alerts are part of the business process implemented in YobiDrive and are sent under the responsibility of the participants whose actions trigger those alerts.