



MIRAKL WEBSITE PRIVACY POLICY

Last updated: February 11th, 2020

Mirakl (“Mirakl”, “we” or “us”) takes your privacy very seriously. This Policy describes our privacy practices regarding the use of personal data in our websites. More precisely, it explains what data we collect, how we use, store and/or transfer it.

This Policy applies to individuals who visit (“visitor”, “you” or “yours”) Mirakl’s Website (“website”) and covers the following websites:

- miraklsummitus.com

Our websites contain links to other websites. The privacy practices of other websites are covered by their own privacy policies. Please visit their privacy policies if you wish to know more.

Personal data processed in connection with the website is controlled by Mirakl Inc, a company incorporated in Delaware with offices located at 100 Dover street, Somerville, MA 02144, USA.

What data we collect and how we use it

Forms

Our websites contain contact forms. When you “register” or you try to “contact us” via these forms, we require you to submit your contact information which contain personal data such as: full name, email, phone number. We may use your contact information to send you offers about our services. You can opt-out of future mailings at any time by clicking on the “unsubscribe” button located at the bottom of the emails you receive.

Browsing data

When you visit our websites, we automatically collect your browsing data that may include your IP address, device, your region, your browser type, your internet service provider and/or mobile carrier, the pages and files you viewed, your searches, your operating system and system configuration data, and the date and time of your visit.

Some of the above data is used to create general statistics which allow us to assess the number of visitors to our website, identify what pages are visited most frequently and, ultimately, make the website more user friendly.

Cookies

Cookies are small text files that are placed in your computer by the websites you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the website.

Our cookies

We mainly use cookies that are session-based. They typically store data in the form of a session identification that does not personally identify you. Session cookies exist during one session. They disappear from your computer or device when you close your browser software or turn off your computer.



MIRAKL

You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our websites.

Third-party cookies

We also use cookies delivered by third parties for statistical and advertising purposes. These cookies are governed by their own privacy policies. If you wish to opt-out third-party cookies, please check their privacy policies by clicking on the links below.

Type of cookie	Purpose	More information
Google Analytics	These cookies are used to collect information about how visitors use our websites. They collect information in an anonymous form that does not identify a visitor. They provide information regarding the number of visitors to the sites, where visitors have come to the site from and the pages they visited. We use this information to compile reports and to help us improve the way our websites work.	Click here for an overview of privacy practices at Google. To opt-out being tracked by Google Analytics across all websites, visit Google
Hubspot	These cookies are used to show you ads for Mirakl solutions that we think may interest you on any device you may use and track the performance of Mirakl advertisements.	Click here for more information about cookies set by Hubspot.
AppNexus	These cookies are used to build group of users (segments) for target advertising. They provide information about the types of websites your browser has visited. This information is not matched to personally identifiable information.	Click here for more information about cookies set by AppNexus
Social media	We embed social media buttons in our websites to redirect you to our social media accounts. They may set cookies on your computer when you click on them.	Click here for an overview of the cookies policy at LinkedIn Click here for an overview of the cookies policy at Twitter

Web beacons

We use web beacons alone or in conjunction with cookies to compile information about prospects and visitors' usage of its websites and interaction with emails from Mirakl. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular website tied to the web beacon, and a description of a website tied to the web beacon. For example, we may place web beacons in marketing emails that notify us when you click on



a link in the email that directs you to one of Mirakl's websites. We use web beacons to operate and improve our websites and email communications.

Customer testimonials

We posts customer testimonials videos on the websites that contain data such as customer names and titles. We have obtained the consent of each customer before posting any data on such testimonials.

With whom we share it

Mirakl's parent company

We may share data, notably contact details, about its prospects with our parent company in order to work with them. For example, we may need to share data with our parent company Mirakl SAS for marketing and account management purposes.

Third parties

Sections "Cookies" and "Web beacons" of this Policy, specifically address the data we or third parties collect through cookies and web beacons, and how you can control cookies through your web browser. We do not not sell data to any third parties.

Compelled disclosure

We reserve the right to use or disclose information if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process.

Retention

We retain personal data only as long as necessary for using it in accordance with the purposes described in this Policy, or as otherwise necessary to comply with applicable laws. When your data is no longer necessary or relevant for our purposes, or required by applicable laws, we take steps to have it deleted or made anonymous.

How we protect your data

We put in place all the necessary measures to protect your data form unauthorized access to, disclosure, alteration, or loss. In particular, we use SSL certificates to encrypt our websites and only a limited number of staff have access to the data we use. We review and update our practices regularly to enhance your privacy and ensure that our internal policies are followed.

If you have found a vulnerability or would like to report a security incident, you may send an email to security@mirakl.com.

The security of our applications and infrastructure is paramount to us and our clients. At Mirakl, we value coordinated disclosure when it comes to security issues. That is why we encourage reporters to privately disclose their findings and provide us with a reasonable time frame so that we can investigate, develop and deploy any necessary fix.

EU-US and Swiss-US Privacy Shield

We comply with the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. We have certified to the Department of Commerce that we adhere to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles



shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

Prior to disclosing personal data to a third party, we shall notify the data subject of such disclosure and allow the data subject the choice to opt-out of such disclosure unless the disclosure meets any legal requirement we need to comply with. We shall enter into contracts to ensure that any third party to whom personal data may be disclosed is aware of, adheres to the principles or is subject to law providing the same level or privacy protection as is required by the principles and agrees to provide an adequate level or privacy protection. We shall also, upon notice, take reasonable and appropriate steps to stop and remediate unauthorized processing by third party agents and agree to provide a summary or a representative copy of the relevant privacy provisions of its contracts with agents to the DOC upon request.

Mirakl's commitments under the EU-US and Swiss-US Privacy Shield Framework are subject to the investigatory and enforcement powers of the United States Federal Trade Commission.

Accountability for onward transfers

In the context of an onward transfer, we have responsibility for the processing of personal information it receives under the Privacy Shield and subsequently transfers to a third party acting as an agent on our behalf. We shall remain liable under the Principles if our agent processes such personal information in a manner inconsistent with the Principles, unless we prove that we are not responsible for the event giving rise to the damage.

Contact

In compliance with the Privacy Shield Principles, we commit to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Mirakl at: legal@mirakl.com

We have further committed to cooperate with the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner with regard to unresolved Privacy Shield complaints data transferred from the EU and Switzerland.

If neither Mirakl nor the EU Data Protection Authorities or Swiss Federal Data Protection and Information Commissioner resolve your complaint, you have the possibility to engage in binding arbitration through the Privacy Shield Panel.

You may also contact us in order to limit further use made of your data, to block or withdraw consent to the processing of your data (without affecting the lawfulness of processing based on consent before its withdrawal). When contacting us through the "Contact Us" form on our websites, we offer you the choice to withdraw from marketing communications.

Alternatively, if you wish to access, correct, modify or delete your personal data or if you have any question regarding this policy, please contact us at: legal@mirakl.com.

Changes

We may change this policy from time to time. Make sure to check our Privacy Policy regularly.
