

Website Privacy Policy

Effective Date of Current Policy: December 27th, 2019

Introduction

This Privacy Policy applies to information collection and use by BASE Media Cloud Ltd. and its affiliates ("BASE," "we," "us," "our") including while you are visiting and using our website located at www.base-mc.com or any other BASE owned or operated website (the "Sites"). For the purposes of EU data protection laws BASE is also the data controller (i.e. the company responsible for, and which controls the processing of your personal information).

If you do not agree with the use of your information as set out in this Privacy Policy, please do not use the Sites.

The Information We Collect

BASE collects two types of information about the users of our Sites:

1. Personally identifiable information (or personal data) is information that identifies you as an individual or from which you are identifiable. The provision of personally identifiable information by you is necessary in order for us to provide you with certain services and where in our legitimate interests for the performance of a contractual relationship with you. You are under no obligation to provide any such information. However, if you should choose to withhold requested information, we may not be able to provide you with certain services. You may elect to electronically provide certain personally identifiable information such as your name, physical address, and email address to us through means described on the Sites from time to time. We use such personally identifiable information to respond to your inquiries. Subject to obtaining your consent where required by applicable data privacy laws, we may also use such personally identifiable information to notify you of events that we think may be of interest to you. If you decide at any time that you no longer wish to receive notifications from us, please refer to the paragraph below captioned "Changing or Deleting Personal Information."

If you contact us by email through the Sites, we may keep a record of your contact information and correspondence. We reserve the right to use your email address and any information that you provide to us in your message to respond to you. In addition, we may send by email important administrative information regarding either the Sites or services to users who have provided us with their email addresses. Because this information may be important to your use of the Sites, it is generally not possible to "opt out" of receiving these email communications. The Sites are not intended for or directed to children under eighteen (18) years of age, and BASE does not knowingly collect personally identifiable information from such individuals. If you are younger than eighteen, do not provide any personally identifiable information while using the Sites.

2. Non-personally identifiable information: we may use cookies to collect non-personally identifiable information in connection with the Sites. Our web pages may incorporate "pixel tags", "web beacons", or other similar tracking technologies (collectively, "pixel tags") that allow us or our agents to track the actions of users of our Sites. Pixel tags collect non-personally identifiable information, such as the identity of your internet service provider, the IP address of the computer you are using, the type of operating system and browser software that you use, the date and time of your access to our Sites, the website address, if any, from which you linked directly to our Sites, the website address, if any, to which you then travel from our Sites, and any similar traffic-related information. We may also aggregate your information with similar data collected from other users in order to help us improve our Sites and the services we provide through our Sites. We do not use this data in any way to create or maintain a personal profile of you or to collect personally identifiable information from you.

How We Use the Information We Collect

BASE may use personally identifiable information about you for the following purposes: (i) to establish or maintain our relationship with you; (ii) to contact you and respond to your requests and inquiries; (iii) to provide you with services you have requested; (iv) to keep you informed of products and

services we think may be of interest to you; (v) to personalize your experience with us and to assist you while you use the Sites; (vi) for business administration, including statistical analysis; (vii) to improve the Sites by helping us understand who uses the Sites; and (viii) for fraud prevention and detection and to comply with applicable laws, regulations or codes of practice.

We may disclose your personally identifiable information to our affiliates and to our service providers to the extent necessary to enable them to perform certain Site-related services (for example, web hosting, to improve Site-related services and features, or for maintenance services) on our behalf. All service providers are required to comply with the privacy practices and policies of BASE and are permitted to use data only for the purpose of performing services on our behalf. We also reserve the right to disclose such information to any third party if we believe that we are required to do so for any or all of the following reasons: (i) by law; (ii) to comply with certain legal processes or governmental requests; (iii) to prevent, investigate, detect, or prosecute criminal offenses or attacks on the technical integrity of the Sites or our network; and/or (iv) to protect the rights, property, or safety of BASE and its affiliates, their partners, and employees, the users of the Sites, or the public.

Data Transfers

Where you are located in the European Economic Area (“EEA”), personally identifiable information collected from you, including via the Sites, may be transferred to recipients in countries located outside the EEA which do not provide a similar or adequate level of protection to that provided by countries in the EEA. We will take appropriate steps to ensure that any personally identifiable information is treated securely and in accordance with this Privacy Policy. You hereby expressly consent to the transfer of your personally identifiable information to recipients, as described in this Privacy Policy, which are located outside the EEA.

Cookies

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie. Cookies are useful because they allow a website to recognise a user’s device. You can find more information about cookies at <http://www.allaboutcookies.org> and <http://www.youronlinechoices.eu> for a video about cookies visit <https://www.google.com/policies/technologies/cookies/>.

Cookies perform different functions such as letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience. A list of the cookies that may be used on the Sites is set out below:

Strictly necessary cookies are essential in order to enable you to move around the Sites and use its features, such as accessing secure areas of the Sites. Without these cookies, certain services you have asked for cannot be provided.

Performance cookies collect information about how you use the Sites, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don’t collect information that identifies a visitor. All information that these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

Functionality cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize. They may also be used to provide services you have asked for. The information these cookies collect may be anonymized and they cannot track your browsing activity on other websites.

Your Rights

Individuals in the EU have certain data subject rights which may be subject to limitations and/or restrictions. These rights may include the right to: (i) request access to and rectification or erasure of their personal information; (ii) obtain restriction of processing or to object to processing of their personal information; and (iii) the right to data portability. If you are based in the EEA and would like to exercise one of the above-mentioned rights, please send us your request via email to support@base-mc.com. Individuals in the EU also have the right to lodge a complaint about the processing of their personal information with their local data protection authority.

Security

BASE seeks to adopt appropriate physical, technological and organizational security measures that are consistent with industry practice in order to assist with protection against the loss, misuse, and alteration of personally identifiable information that is under our control. Unfortunately, no security system or system of transmitting data over the Internet is guaranteed to be 100% secure. As a result of the foregoing, while we do undertake commercially reasonable efforts to protect your personally identifiable information, we cannot guarantee the security of our website servers, the means by which information is transmitted between your computer and BASE's website servers, or any information shared with us or with any third party through or in connection with the Sites. You provide all such information entirely AT YOUR OWN RISK. BASE retains personally identifiable information for as long as necessary to fulfil the purposes for which such personally identifiable information was collected and in compliance with applicable laws.

Marketing

We may contact you periodically by e-mail to provide information regarding events, products, services and content that may be of interest to you, unless you advise us that you do not wish to receive marketing or market research communications from us. If applicable law requires that we receive your explicit consent before we send you certain types of marketing communications, we will only send you those types of communications after receiving your explicit consent.

If you wish to stop receiving marketing or market research communications from us, or would like to stop processing your personal information in any other way, you can contact us as described below to let us know what types of communications you wish to stop receiving.

Revisions to Our Website Privacy Policy

The Internet and its benefits are evolving rapidly, as are the ways people use the Internet and also the laws surrounding such use. BASE therefore reserves the right to update and revise this Website Privacy Policy at any time and from time to time, as it deems necessary or appropriate. You may determine if this Website Privacy Policy has been revised since your last visit by referring to the "Effective Date of Current Policy" date noted at the top of this page. Your use of our Sites constitutes your acceptance of the terms of this Website Privacy Policy as amended or revised by us, and you should therefore review this Website Privacy Policy regularly in order to ensure your awareness of its terms. If we make material changes to this Website Privacy Policy we will notify you by means of prominent notices on the Sites prior to the change becoming effective.

Links to Other Sites

Our Sites may contain links to other websites operated by third parties. Please be aware that we are not and cannot be responsible for the content and privacy practices of other websites and that this Website Privacy Policy applies only to the information that we collect through the Sites. Thus, we encourage you to read the privacy statements of all of the destination websites which you visit.

Contact Us

If you have any questions or concerns regarding this Privacy Policy please email the applicable BASE contact listed on the applicable Site or contact us either by email at support@base-mc.com, or by regular mail at Legal Department, BASE Media Cloud Ltd, 62 Michelham Gardens, Twickenham, TW1 4SB, United Kingdom.