

iBabs Privacy Policy (Platform)



iBABS

A EURONEXT COMPANY

INTRODUCTION

iBabs B.V. provides a secure, digital board portal solution designed to assist organizations with efficient meeting management, document sharing, and collaboration. The platform facilitates communication and decision-making for businesses, public institutions, and other organizations. Importantly, iBabs operates solely as a Data Processor in relation to the personal data processed through the platform. The responsibility for determining the purposes of data collection and ensuring compliance with data protection laws rests entirely with our clients, who act as Data Controllers.

The iBabs platform includes a range of tools to support governance and administrative efficiency, such as meeting scheduling, document access, task tracking, and voting. In addition, the platform provides optional webcasting functionality through iBabs Stream, a module designed to support real-time video conferencing and public or private meeting broadcasts, particularly for the public sector. Where this feature is enabled, audio and video data of participants and meeting content may be captured and streamed live or recorded.

Our platform is intended for use by authorized users selected by our clients, and the personal data collected is processed solely for the purposes defined by our clients in accordance with their internal policies and requirements.

OUR ROLE AS DATA PROCESSOR

iBabs As a **Data Processor**, iBabs does not control the personal data it processes. All data processing activities are carried out on behalf of our clients (the **Data Controllers**), based on their instructions. This means that iBabs processes personal data exclusively for the purposes of providing the platform's functionality, including but not limited to:

- Enabling meeting scheduling
- Facilitating document sharing
- Supporting video conferencing and collaboration features
- Supporting webcasting and streaming of meetings via iBabs Stream, including real-time video/audio capture and playback

iBabs does not use, access, or share personal data for its own purposes. We strictly adhere to the instructions provided by our clients when processing personal data, and we only process data as necessary to provide the services outlined in our contractual agreements.

(GDPR) and other relevant regulations.

As Data Processors, we ensure that all data handling complies with applicable data protection laws, including the General Data Protection Regulation (GDPR) and other relevant regulations.

DATA WE COLLECT

iBabs may collect and process different types of personal data through its platform, which includes:

- **User Profile Data:** Information necessary to establish user accounts, including your name, email address, job title, and organizational affiliation. This data is provided directly by the Data Controllers or authorized administrators.
- **Usage Data:** Information about how users interact with the platform, such as IP addresses, device types, browser details, login timestamps, and session durations. This data helps us monitor and improve the functionality of the platform.
- **Meeting and Event Data:** Data generated from meetings or events conducted via the platform. This may include video recordings, audio, chat content, attendance logs, and other data related to meeting interactions. Where iBabs Stream is used, personal data such as names, roles, political affiliations (if publicly disclosed), and voice/video recordings may be processed. Viewer IP addresses may also be logged for security and performance analysis.
- **Technical Data:** Information related to the operation and functionality of the platform, including error logs and system performance data, which are necessary to maintain the platform's security and performance.

This data is processed exclusively for the purpose of delivering and supporting the features of the iBabs platform. iBabs does not use this data for marketing or other unrelated purposes.

DATA PROCESSING LOCATION

The personal data processed by iBabs is generally stored and processed within the European Economic Area (EEA), where it is subject to the protective provisions of European data protection laws. In some cases, personal data may be transferred to countries outside of the EEA, including the United States. When such transfers occur, iBabs ensures that appropriate safeguards are in place to protect the data, such as the use of Standard Contractual Clauses (SCCs) approved by the European Commission. iBabs Stream data is hosted within the European Economic Area, primarily in AWS Ireland and Microsoft Azure West Europe, through secure infrastructure partners such as CYSO and Euronext Technology Unipessoal LDA (PETU).

We also ensure that any international transfers of data are compliant with applicable regulations and that your personal data continues to be protected, even outside of the EEA.

DATA SECURITY

iBabs takes the security of personal data seriously and implements a range of robust technical and organizational measures to safeguard the data we process. These measures include:

- **Encryption:** Sensitive data is encrypted during transmission and at rest to prevent unauthorized access.
- **Access Control:** Access to personal data is restricted based on user roles and responsibilities, ensuring that only authorized personnel can access data necessary for their work.
- **Regular Security Audits:** We conduct regular security assessments and audits to identify and mitigate potential risks to the platform and data.
- **ISO Certifications:** The iBabs platform is certified under ISO/IEC 27001:2013 for information security and ISO/IEC 9001 for quality management, ensuring adherence to globally recognized standards for information security and operational excellence.

Data processed through iBabs Stream is also protected by the same security controls, including AES-256 encryption at rest, TLS 1.2 encryption in transit, access restrictions, and secure hosting in certified cloud environments.

Despite these measures, we also advise users that the transmission of data over the internet is not 100% secure. Therefore, users should exercise caution when transmitting sensitive information through the platform.

YOUR RIGHTS

As a user of the iBabs platform, you have certain rights under applicable data protection laws. However, since iBabs acts as a Data Processor and does not control the data, your rights regarding personal data should be exercised with the Data Controller (your organization or employer), who is responsible for the data you provide on the platform. This includes personal data processed through optional modules like iBabs Stream. If you have appeared in a streamed or recorded meeting, and wish to exercise your rights, please contact your organization's data controller, who determines the purpose of the stream and participant management.

Some of your key rights include:

Right to Access: You have the right to request a copy of the personal data we process about you

Right to Rectification: You can ask for any incorrect or incomplete data to be corrected.

Right to Erasure: You may request the deletion of your personal data under certain conditions.

Right to Restrict Processing: You can request that we limit the processing of your personal data in certain situations.

Right to Object: You can object to the processing of your personal data if we process it based on legitimate interests.

To exercise these rights, please contact your organization's Data Controller. If you have any concerns, please feel free to reach out to iBabs, and we will guide you on the next steps.

CONTACT US

Contacting the Euronext Data Protection Officer dpo.ecs@euronext.com

By post:

iBabs B.V.

Attn. Data Protection Officer

14, place des Reflets – CS30064

92054 Paris la Défense.

We may request proof of identity to verify your request in line with our internal procedures.

CHANGES TO THIS PRIVACY POLICY

This privacy policy may be updated to reflect changes in data processing practices. The latest version will be available on the iBabs platform. This privacy policy may be updated from time to time to reflect changes in data processing practices or applicable laws. We encourage you to review the privacy policy periodically to stay informed about how we handle your personal data.

The most recent version of this privacy policy will always be available on the iBabs platform. Any significant changes will be communicated through the platform's notification system.

This version is effective as of [Month, Year].

ANNEXES

Annex 1 - Glossary of used terms

TERM	DEFINITION
Data Processor	A natural or legal person, public authority, agency, or other body that processes personal data on behalf of the Data Controller. iBabs acts as a Data Processor in this case.
Data Controller	A natural or legal person, public authority, agency, or other body that determines the purposes and means of processing personal data. In this policy, the client organization is the Data Controller.
Personal Data	Any information relating to an identified or identifiable natural person. Examples include name, email address, and meeting attendance.
Usage Data	Information about how users interact with the platform, such as IP addresses, device types, login timestamps, and session durations.
Meeting and Event Data	Data generated from meetings or events conducted via the platform, including video recordings, audio, chat content, attendance logs, and other data related to meeting interactions.
Technical Data	Information related to the operation and functionality of the platform, including error logs and system performance data.

Data Subject	An identified or identifiable natural person to whom personal data relates.
Lawful Basis	The legal grounds under data protection laws that allow the processing of personal data, including legitimate interest, performance of a contract, compliance with a legal obligation, and consent.
Encryption	A process used to protect sensitive data during transmission and at rest, to prevent unauthorized access.
iBabs Stream	A webcasting feature available within the iBabs platform that enables clients to stream, record, and publish governance meetings, particularly in the public sector. It may involve processing of audio, video, chat, participant data, and viewer logs, as instructed by the client organization (Data Controller).
Access Control	Restricting access to personal data based on user roles and responsibilities, ensuring only authorized personnel can access data necessary for their work.
ISO Certifications	The iBabs platform is certified under ISO/IEC 27001:2013 for information security and ISO/IEC 9001 for quality management, ensuring adherence to globally recognized standards.
Standard Contractual Clauses (SCCs)	A legal mechanism that allows for personal data to be transferred safely between countries outside the EEA, ensuring adequate data protection standards are maintained.
Data Protection Authority (DPA)	An independent public authority responsible for monitoring the application of data protection laws, handling complaints, and enforcing compliance.
Pseudonymized Data	Personal data that has been processed so that it can no longer be attributed to a specific individual without additional information (e.g., a key). Pseudonymised data is still considered personal data under the GDPR and must be protected accordingly.



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