

REVEAL HOLDCO EU BV PRIVACY & COOKIE POLICY AND GENERAL TERMS AND CONDITIONS OF USE OF THE WEBSITE

Last Updated: August 30th, 2024

1. INTRODUCTION

This policy covers processing of personal data collected via cookies or similar technologies by Reveal Holdco EU BV (d/b/a RHEB or Tactacam) or FeatherSnap or Defend and our subsidiaries and affiliated companies (collectively, "**Company**," "**we**," or "**us**") when visiting our website and the general terms and conditions of use of the website, see contact details below.

Our website uses cookies and similar technologies to improve your browsing experience, personalise content and ads, provide social media features, and to analyse our traffic.

This policy is updated continuously to reflect the measures taken by RHEB in relation to your personal data.

We ensure that our practices for the protection of your personal data comply with the laws applicable in Belgium and the General Data Protection Regulation (EC) 2016/679 of 25 May 2018 (hereinafter "**GDPR**").

2. ACCEPTANCE AND MODIFICATION OF THE PRIVACY AND COOKIES POLICY AS WELL AS THE GENERAL TERMS AND CONDITIONS OF USE OF THE WEBSITE

By continuing to browse our website, you acknowledge that you have read and accepted this Privacy and Cookies Policy as well as the Terms and Conditions of Use of our website set out below. We may change this Privacy Policy and the website Terms of Use at any time. We therefore encourage you to check periodically for any changes to this document.

3. PRIVACY & COOKIES POLICY

3.1. Responsible for the processing of your personal data

RHEB is responsible for the processing of data collected during the use of this website.

We would like to draw your attention to the fact that we do not assume any responsibility for the privacy and confidentiality policy of third party websites to which our website may refer (links). The use of third-party sites (which may be linked to our website) is at your own risk. In this case, we invite you to consult the confidentiality and privacy policy of these third-party.

3.2. The personal data processed and the purposes of the processing

Subject to Cookies (see below) we only process personal data that you choose to provide to us when using our website to contact Us, submit requests to us.

The personal data that we may collect and process are those appearing on the contact forms, i.e. your surname, first name, e-mail address and telephone number, as well as the data that you decide to communicate to us spontaneously in your message.

3.3. Cookies and pixels

Cookies may store information about you, your preferences, or your device, but they do not usually directly identify you. We use strictly necessary cookies for the website to function properly. For the optimal experience and personalised content, we use functional, performance, targeting and advertising cookies with your consent. You can choose not to allow some types of cookies, but it may affect your site experience.

Cookies are small text files stored on your device that help us enhance your user experience and learn what interests you. We have a cookie privacy manager that allows you to decide how cookies are used. We use a cookie to remember the choices, so you will need to update them if you delete all your cookies or use a different device or browser.

We also use pixel tags, which are small graphic files loaded from the servers of the respective service provider when a user accesses our website.

3.3.1. First party cookies

First party cookies are cookies that we, or contracted service providers, place on the website and with which you interact if you continue to use our website.

3.3.2. Third party cookies

Third-party cookies are created by domains other than the website you're interacting with, allowing other companies to collect information about your online activities across multiple websites.

3.3.3. Local storage

A local storage is a file created by a website in your device. Local storage has the same function as cookies. In contrast to cookies, local storage does not have an expiration date and the data will persist until manually cleared by the user or the website. Local storage data can be deleted through the browser settings. Information stored in local storage can only be accessed by scripts on the same domain.

Cookie Consent Management Platform. You have the right to withdraw your consent to cookies at any time which you do in the Cookie Consent Management Platform. Please view “cookies settings” on our website to manage your settings.

3.4. Cookies and similar technologies

Some cookies are strictly necessary for the website to work – these are always on when you visit our website. The legal ground for using strictly necessary cookies is our legitimate interest in providing you with a functioning website. We classify other cookies into functional, performance, targeting and advertising cookies – for these, we rely on your consent and you can choose to turn them on or off. We process your geolocation data in the form of your IP address to ensure that we can provide you with the services closest to your current location. This functionality is used throughout our website.

You have the right to withdraw your consent to cookies at any time which you do in the Cookie Consent Management Platform. Please view “cookies settings” on our website to manage your settings.

3.4.1. Strictly necessary

These cookies are necessary in order for the website to function correctly. These cookies are saved automatically when the website or a particular function is requested, unless you have disabled cookies in your browser settings.

Related Cookies

Purpose	Cookie Name	Source	Description	Type
Essential	PHPSESSID	Magento	To store the logged in user's username and a 128bit encrypted key. This information is required to allow a user to stay logged in...	1st Party
Essential	private_content_version	Magento	Appends a random, unique number and time to pages with customer content to prevent them from being cached on the server.	1st Party
Essential	persistent_shopping_cart	Magento	Stores the key (ID) of persistent cart to make it possible to restore the cart for an anonymous shopper.	1st Party
Essential	form_key	Magento	A security measure that appends a random string to all form submissions to protect the data from Cross-Site Request Forgery (CSRF).	1st Party
Essential	store	Magento	Tracks the specific store view / locale selected by the shopper.	1st Party
Essential	login_redirect	Magento	Preserves the destination page the customer was navigating to before being directed to log in.	1st Party

Essential	mage-messages	Magento	Tracks error messages and other notifications that are shown to the user, such as the cookie consent message, and various error me...	1st Party
Essential	mage-cache-storage	Magento	Local storage of visitor-specific content that enables e-commerce functions.	1st Party
Essential	mage-cache-storage-section-inval	Magento	Forces local storage of specific content sections that should be invalidated.	1st Party
Essential	mage-cache-sessid	Magento	The value of this cookie triggers the cleanup of local cache storage.	1st Party
Essential	product_data_storage	Magento	Stores configuration for product data related to Recently Viewed / Compared Products.	1st Party
Essential	user_allowed_save_cookie	Magento	Indicates if the shopper allows cookies to be saved.	1st Party
Essential	mage-translation-storage	Magento	Stores translated content when requested by the shopper.	1st Party
Essential	mage-translation-file-version	Magento	Stores the file version of translated content.	1st Party
Essential	section_data_ids	Magento	Stores customer-specific information related to shopper-initiated actions such as display wish list, checkout information, etc.	1st Party

Essential	last_visited_store	Magento	Magento uses this to keep track of visited stores by user.	1st Party
Essential	mage-banners-cache-storage	Magento	Magento uses it.	1st Party

3.4.2. Functional

These cookies are used to personalise your end-user browsing experience. These cookies are anonymous and don't track browsing activity across other websites.

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3.4.3. Performance

These cookies are used to see how you interact with our website, which helps us improve performance and adapt the content to your interests. To do this, we use the services of third-party providers that receive information about your use of our website and may, for their own purposes, also combine this with other data that they have received from you and possibly from elsewhere.

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3.4.4. Targeting & advertising

These cookies can be set by our advertising partners, via our website, and may be used to create a user profile based on your behaviour on our website in order to show you relevant advertisements on other websites. They work by clearly identifying your browser or your end device. If you do not allow these cookies, you will not experience our targeted advertising on other websites (but you may still see non-targeted advertising).

Related Cookies

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Essential	mage-banners-cache-storage	Magento	Magento uses it.	1st Party
Marketing	recently_viewed_product	Magento	Stores product IDs of recently viewed products for easy navigation.	1st Party
Marketing	recently_viewed_product_previous	Magento	Stores product IDs of recently previously viewed products for easy navigation.	1st Party
Marketing	recently_compared_product	Magento	Stores product IDs of recently compared products.	1st Party
Marketing	recently_compared_product_previo	Magento	Stores product IDs of previously compared products for easy navigation.	1st Party
Marketing	__kla_id	Klaviyo	Cookie used by Klaviyo.	3rd Party

Marketing	yotpo_pixel	Yotpo	Yotpo uses this to collect user information.	3rd Party
Marketing	_fbp	Facebook	Facebook Pixel.	3rd Party
Marketing	AEC	Google	Typically includes essential cookies that are necessary for the basic functioning of the website, as well as cookies related to user...	3rd Party
Marketing	NID	Google	The "NID" cookie is used by Google to store preferences and other information, such as language preference and personalized advertising...	3rd Party
Marketing	mf_user	Unclear		3rd Party
Analytics cookies	_ga	Google Analytics	Used to distinguish users.	3rd Party
Analytics cookies	_gid	Google Analytics	Used to distinguish users.	3rd Party
Analytics cookies	_gat	Google Analytics	Used to throttle request rate.	3rd Party
Analytics cookies	1P_JAR	Google	The "1P_JAR" cookie is used by Google to collect statistics on website usage and track conversion rates for advertising purposes.	3rd Party

Analytics cookies	DV		The "DV" cookie is a Google Analytics cookie used to differentiate between users and sessions.	3rd Party
Analytics cookies	_gcl_au	Google	Used to distinguish users	

3.5. Sharing of your personal data

3.5.1. How we share your personal data and who we share it with

To provide our services and to comply with laws and regulations, we need to share your personal data with others, including our subsidiaries and affiliated companies and third parties assisting us in various parts of our business and helping us to deliver our services. In the tables above you find information about the third-party cookies we are using, and you can also find the categories of recipients are listed below.

- IT providers, e.g. companies that manage the necessary operation, technical support and maintenance of our IT solutions,
- DSM affiliates,
- Subcontractors: chat services, banks and payment service providers, providers of analytics services,
- Authorities, e.g. the police, regulatory authorities, public courts, enforcement agencies,
- Business partners, e.g. legal counsels, advertising companies, and
- Providers of social media platforms.

All being bound by a confidentiality clause.

3.5.2. Processing of your personal data outside of EU/EEA

We strive to process your personal data within the EU/EEA area. However, your personal data collected via cookies or similar technologies on RHEB/Tactacam's websites will be transferred outside the EU/EEA in some situations, such as when we share your information with a business partner or subcontractor operating outside the EU/EEA.

We transfer personal data to the following countries outside of the EU/EEA: the United States and the United Kingdom. Our business partners have servers in different countries, and depending on the amount of website users and other factors, the services that use cookies may come from any of these countries.

We always ensure that the same high level of protection applies to your personal data according to the GDPR, even when the data is transferred outside of the EU/EEA. As regards the United Kingdom, the Commission has decided that it ensures an adequate level of protection (article 45 of the GDPR). Regarding transfers to the United States or other third countries we have entered into EU Model Clauses with relevant third parties (article 46 of the GDPR) or they are certified under the EU-U.S. Data Privacy

Framework, the UK Extension to the EU-U.S Data Privacy Framework and/or the Swiss-U.S. Data Privacy Framework with the U.S. Department of Commerce. In addition, we take additional technical and organisational security measures when needed, such as encryption (TLS) and pseudonymisation.

3.5.3. Google Analytics

With your consent, our website uses the functional cookies "ga", "gid" and "gat" from Google Analytics, a web analytics service provided by the US company Google.

We use these cookies to track and report on how visitors use the website. The lifespan of these cookies has been limited to 2 years for the "ga" cookie, 24 hours for the "gid" cookie and 10 minutes for the "gat" cookie.

Google may only provide this information to third parties if it is legally obliged to do so or if third parties process the information on Google's behalf. We have no influence on these communications. We have not allowed Google to use the analytics information obtained for other Google services. By default, we have anonymized IP addresses sent to Google Analytics in order to protect your anonymity. The information is transferred to and stored by Google on servers in the United States. Google LLC is one of the organizations that complies with the new "Data Protection Framework" that allows it to benefit from the new adequacy decision of 10 July 2023 of the European Commission concerning the United States. This means that there is an appropriate level of protection for the processing of personal data.

3.6. Meta

The Facebook Ads Pixel is a piece of code provided by Meta that allows us to track and measure the effectiveness of our advertising campaigns on Meta platforms. It helps us understand how users interact with our website after seeing our ads on Facebook, enabling us to optimize our marketing efforts and deliver more relevant content to our audience. Additionally, the data collected through the Facebook Ads Pixel is used for targeting purposes, allowing us to tailor our advertising based on users behavior and preferences.

The types of personal data that the Facebook Ads Pixel collects includes device Information (device type, operating system, and unique device identifiers), IP address and cookie data (unique cookie-id).

When a Facebook user previously clicked on one of our ad campaigns and later on returns to our website and fill in any of our forms, personal data is collected to gives precise data on the number of users who have been exposed to certain ad campaigns on Facebook and who have converted as a result. The data collected when filling in forms may include name, e-mail address, phone number, geographic data: town/city, county/region, postal code, and country, date of birth and external ID.

The locations of processing for Facebook Ads Pixel are within the European Union and in the USA based on [certification under the EU-U.S. Data Privacy Framework and the Swiss-U.S. Data Privacy Framework with the U.S. Department of Commerce](#).

3.7. Social Media and Third-Party Platforms Data Use

When you use our services, you may have the option to interact with social media features, such as "Like" buttons, content sharing options, or use your social media credentials to log in. These features are provided by third-party social media platforms such as Facebook, TikTok, Twitter, and others. When you engage with these features, these platforms may collect information about you, such as your IP address and which page you are visiting on our site. They may set a cookie to enable the feature to function properly. The interaction and information obtained by such third-party platforms are governed by the privacy policies of the companies that provide them.

Please be aware:

- 3.7.1. Data Control: We do not have control over, or access to, the information these platforms collect or how they use it. As such, we cannot manage the data retention practices of these social platforms.
- 3.7.2. Privacy Policies of Third-Party Platforms: Your interactions with these features are subject to the privacy policies of the third-party social media companies. We encourage you to review these policies to understand how these platforms handle your information.
- 3.7.3. Responsibilities: While we integrate these social media features into our service for enhancing user experience, the processing of your data by these platforms is outside our control. We have agreements in place with these platforms regarding the embedding of their features on our service, but we do not share your personal data with them without your explicit consent.
- 3.7.4. Your Choices: If you prefer not to share your data with these platforms, you may choose to disable cookies through your browser settings or refrain from using the social media features provided on our service.

By using the social media features integrated into our service, you acknowledge and agree to the processing of your personal data by these third-party platforms in accordance with their privacy policies.

3.8. Enabling and Disabling Cookies

When you first visit our website, a banner informs you of the presence of cookies and allows you to give your consent for the functional cookies listed above.

You have the right to withdraw your consent to functional, performance or targeting and advertising cookies at any time which you do in the Cookie Consent Management Platform. Please view “cookies settings” on our website to manage your settings. Stored cookies can also be deleted at any time in the system settings of your device and/or Internet browser. Local Storage data can be deleted through your browser settings. Please note, that the functionality and range of functions may be limited if you block cookies or similar technologies or do not give your consent to their use. For more information on your rights in relation to our processing of your personal data and contact details for further information and complaints as well as contact details, please visit our Privacy Policy.

3.9. Duration of storage of personal data

Your personal data (excluding cookies) will be kept for a period of 6 months from the last use of our website as well as for the time necessary to comply with the legal obligations to which we are subject.

3.10. Security

We make every effort to ensure the security, integrity and confidentiality of personal data transmitted on/through our website and to prevent its accessibility by unauthorized third parties. However, no Internet communication can be guaranteed to be completely secure.

3.11. Your rights in relation to your personal data

You may, at any time, exercise the following rights in relation to your data:

- 3.11.1. the right of access: you have the right to know whether we hold personal data about you and, if so, (i) to obtain a copy of it as long as it does not adversely affect the rights and freedoms of others and (ii) to obtain the information listed in Article 15.1(a) to (h) of the GDPR;
- 3.11.2. the right to rectification and erasure: you have the right to obtain the updating and rectification of your personal data that is inaccurate or incomplete;
- 3.11.3. the right to erasure (to be forgotten): subject to a legal obligation that would require us to process your data and subject to processing necessary for the establishment, exercise or defence of legal claims, you have the right to demand the erasure of your personal data when:
 - this data is no longer necessary for the purpose for which it was collected,
 - the processing was based solely on your consent and you withdrew the consent,
 - you object, for reasons relating to your particular situation, to processing of your data that we rely on our legitimate interest or you object to the processing for direct marketing purposes and there are no legitimate or overriding grounds for continuing the processing,
 - the personal data has been unlawfully processed,
 - the deletion is necessary to comply with a legal obligation,
- 3.11.4. the right to restriction of processing: you have the right to obtain the restriction of the processing of your personal data in the cases provided for in Article 18.1 a) to d) of the GDPR;
- 3.11.5. the right to object: you can object to (i) the processing of your data based on our legitimate interest on grounds relating to your particular situation if there are no legitimate or overriding grounds for continuing the processing or (ii) object to the processing of your data for prospecting purposes (direct marketing);
- 3.11.6. the right to portability: In the cases and under the conditions provided for in Article 20 of the GDPR, you have the right to receive your personal data in a structured, commonly used and machine-readable format in order to transmit it to another controller.

3.12. Withdrawing Your Consent

If the processing of your data is based on your consent, you can revoke your consent at any time and free of charge by sending an email to the privacy@tactacam.com address.

The withdrawal of your consent does not remove the lawfulness of processing based on consent before revocation.

3.13. Complaint to the supervisory authority

You can lodge a complaint with the supervisory authority.

Below the list of "Data Protection Authority" in Europe per country.

- European Data Protection Supervisor (regulates EU institutions) https://edps.europa.eu/_en
- Austria www.dsb.gv.at
- Belgium www.privacycommission.be
- Bulgaria www.cdpd.bg
- Croatia www.azop.hr
- Cyprus www.dataprotection.gov.cy
- Czech Republic www.uoou.cz

- Denmark www.datatilsynet.dk
- Estonia <http://www.aki.ee/>
- Finland www.tietosuoja.fi
- France www.cnil.fr
- Germany www.bfdi.bund.de
- List of regional data protection authorities in Germany :
https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html
- Greece www.dpa.gr
- Hungary www.naih.hu
- Italy www.garanteprivacy.it
- Latvia www.dvi.gov.lv
- Lithuania www.ada.lt
- Luxembourg www.cnpd.lu
- Malta www.dataprotection.gov.mt
- Netherlands www.autoriteitpersoonsgegevens.nl/nl
- Poland www.giodo.gov.pl
- Portugal www.cnpd.pt
- Romania www.dataprotection.ro

3.14. Contact us or exercise your rights in relation to your personal data

For any contact request or to exercise your rights regarding the protection of your personal data, you can send an email to privacy@tactacam.com. We may ask you to prove your identity (in order to prevent a third party from manipulating your personal data).

4. GENERAL TERMS AND CONDITIONS OF USE OF THE WEBSITE

4.1. General considerations

Consultation of the website is free of charge for visitors (hereinafter referred to as the "User"). The use of the services is not subject to any warranty on the part of RHEB. By using the website, you agree to these website Terms and Conditions of Use. Users of the website declare that they are aware of the risks associated with the technical specificities of the Internet network. RHEB cannot therefore guarantee the confidentiality of the exchanges, nor the possible interception of the information exchanged via the website.

4.2. Responsibility

The website contains links to other websites. RHEB cannot exercise control over the content and practices of these sites and cannot assume responsibility for their content. The presence of these links does not imply that RHEB approves the information contained on these sites. As a result, RHEB cannot be held responsible for any dispute arising between a site referenced on the website and a User of the website.

Should any information, products or services included on the website contain inaccuracies, we will make all reasonable efforts to correct them as soon as they are brought to our attention. The User remains solely responsible for the commitments he undertakes. RHEB does not guarantee the completeness of all information obtained directly or indirectly on/through the website and therefore cannot be held responsible for the information, products and services present on the website.

It is the responsibility of the User of the website to use the information contained on the website with caution and to carry out any necessary verification before entering into any commitments.

4.3. Use of the website

When, as a User, you post messages or information, in any form, on the website or send them by e-mail to RHEB, RHEB reserves the right to use such messages and/or information freely (except for personal data). You, as the sender, acknowledge that you are solely responsible for the content and security of such messages and/or information. They may be processed by RHEB on a non-confidential basis and without acknowledging any ownership rights vis-à-vis the sender of such messages and information.

Under no circumstances shall the website be used in violation of these Terms and Conditions of Use, in order to violate legal regulations or public order or for other unauthorized purposes.

4.4. Intellectual property

The entire content of the website ("**the Content**"), including all information, messages, images and all other elements, is owned by RHEB or is placed on the website with the permission of the owners of the copyright and other intellectual property rights. The contents of the website may not be reproduced or communicated without the express prior written permission of RHEB.

4.5. Applicable law and jurisdiction

These Terms and Conditions are exclusively subject to Dutch law. As a User of the website, you acknowledge that French law applies to all disputes that may arise from the use of the website. In the event of a dispute, you agree to the exclusive jurisdiction of the courts of the Netherlands. If a court finds any provision of these Terms to be void or unenforceable, this will not affect the validity and enforceability of the remaining provisions of these Terms.