

Privacy Policy

Last updated: April 21, 2023

Please read these privacy policy carefully before using Our Service.

Introduction

Snowball Analytics, a French company (SIRET 914 331 640 00013) having its registered office LE FORUM 27 RUE MAURICE FLANDIN 69444 LYON CEDEX 3 (hereinafter "Company" or "Us" or "We") operates the website, <https://snowball-analytics.com/> (the "Service").

As part of its activities and in accordance with the regulations applicable in France and in Europe, particularly the EU General Data Protection Regulation, Snowball Analytics is committed to ensuring the protection, confidentiality and security of the personal data of its users, customers, prospects and suppliers, as well as to respecting their privacy.

This Privacy Policy describes Our policies and procedures on the collection, use, and disclosure of personal data when you use our Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy. If you do not agree to this collection and use of information in full and without modification, then you may not access, view, use, or register for any portion of the Services.

Our Service is not intended for minors unless authorised by their legal representatives.

The Privacy Policy may be subject to changes. It is specified that Snowball Analytics may amend the Privacy Policy at any time, including to adapt it to current legislation. Users are made aware of these modifications simply through their publication online. We recommend that you regularly check the current version available.

Information Collection And Use

We collect several different types of information for various purposes to provide and improve our Service to you. The types of data we collect are listed below.

Personal Data

Access to Our Service granted after registering an account, for that purpose You provide Us email address and name of account. Once you register and sign in to our Service, you are not anonymous to us.

If you want to buy a subscription, we may need your first name, last name and postal address.

To provide You analytics and other information about your investing results You provide Us your Portfolio Data (can include transactions).

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

We use Transport Layer Security (TLS) encryption technology in order to protect certain information that you submit to us. This technology protects you from having your information intercepted by anyone while it is being transmitted to Snowball Analytics or payment processor.

Usage Data

To make our Service better we may also collect information how the Service is accessed and used ("Usage Data"). This Usage Data may including information, but not limited to, such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Usage Data includes the following:

- Internet Protocol (IP) address of computers accessing the site
- Web page requests
- Referring web pages
- Browser used to access site
- Time and date of access

Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service.

More info at “Cookie and local storage usage policy” paragraph below

Data we receive from third parties

When you sign in to your account using your social internet service credentials (Facebook, Twitter, Google, Yahoo!, LinkedIn), such service sends us your username and the email address associated with the credentials you've used. We neither control nor take any responsibility for the way third parties provide information about you and/or process your personal data.

Use of Your Personal Data

We may use Personal Data for the following purposes:

- **To provide and maintain our Service.**
- **To manage Your Account:** to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- **For the performance of a contract:** the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.
- **To contact You:** To contact You by email or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide You** with news, special offers and general information about services we offer, unless You have opted not to receive such information.
- **To manage Your requests:** To attend and manage Your requests to Us.
- **Testimonials and customer feedback collection:** If you share a testimonial or review about your experience using our Service, it can be shared or otherwise used on the website.

We may share your personal information in the following situations:

- **With Service Providers:** We may share Your personal information with Service Providers for connecting Your online financial accounts, fetching latest asset value, processing payments, monitoring usage, report bugs, customer support, email marketing and for targeting the Company's promotional campaigns.
- **For Business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company

assets, financing, or acquisition of all or a portion of our business to another company.

- **With Affiliates:** We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.

Where is your personal data stored?

Your personal data is stored inside the European Union, either in our databases or in those of our service providers.

In some cases, and mainly for technical reasons, data may be stored on servers located outside the European Union.

Data transfers outside the EU

Due in particular to the international dimension of Snowball Analytics, some of our partners are located outside the European Union. The data collected may therefore be transferred to countries outside the European Union which have different personal data protection legislation from those inside the European Union.

In this case, Snowball Analytics implements the means to ensure the security and confidentiality of such data and ensures that the transfer meets the legal framework: the transfer to a country ensuring a sufficient level of protection, signature of contractual clauses issued by the European Commission, or any other regulatory or contractual means to ensure a sufficient level of protection.

Snowball Analytics strictly requires its partners to only use your personal data to manage or provide the services requested, and also asks its partners to always act in compliance with the applicable laws on personal data protection and pay particular attention to the confidentiality of such data.

Retention of Data

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to

strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

Disclosure of Your Personal Data

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

YOUR RIGHTS

You have the following rights in relation to your personal data under the GDPR:

1. to obtain information on how we handle your personal data and access documents which contain your personal data;

2. to request us to correct or update your personal data if it is inaccurate or out of date;
 1. to object to the processing of your personal data for the purposes of our legitimate interests, as discussed above;
3. to erase personal data about you that is held by us:
 1. which is no longer necessary in relation to the purposes for which it was collected,
 2. to the processing of which you object, or
- which may have been unlawfully processed by us;
1. to restrict processing by us, i.e. to restrict processing to storage only:
 1. where you oppose to deletion of your personal data and prefer restriction of processing instead, or
 2. where you object to the processing by us on the basis of its legitimate interests;
2. to transmit personal data that you submitted to us back to you or to another organisation in certain circumstances; and
3. If we rely on your consent (for example, when setting cookies on your device or for direct marketing), you may withdraw your consent at any time.

If you at any time decide to exercise any of these rights, please contact us through **support@snowball-analytics.com**. If you are unhappy with how we have dealt with your request or concern, you have the right to file a complaint with a data protection supervisory authority in the EU.

Children and sensitive personal data

Our Service is not directed to wards children who are under the age of 18. We do not knowingly contact or collect personal information from children below the age of 18 years, or sensitive personal data ("racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or a natural person's sex life or sexual orientation," etc.). Please consult Art. 9 GDPR for more information. If you believe we have inadvertently collected such information, please contact us immediately so that we can either obtain special consent or delete the information.

Cookie and local storage usage policy

In the interest of transparency, this policy contains detailed information on Snowball Analytics use of cookies and other similar technologies, and explains how the User can control the use of cookies and other similar technologies.

By accessing Service, the User accepts the terms and conditions of this policy, applicable during each connection and from any terminal.

WHAT IS A COOKIE AND LOCAL STORAGE OBJECT?

Definition

Cookies and other similar technologies such as local storage objects, local shared objects, flash cookies or pixels, are small files that web servers send to your computer to store and retrieve information about your visits, as well as to provide proper functioning of the site. The use of these devices allows the webserver to remember some data concerning the user, such as their preferences for viewing the pages of that server (country, language, etc.), name and password, products they are most interested in, etc. in order to improve the services offered and contribute to a better browsing experience for the user.

Before HTML5, application data had to be stored in cookies, included in every server request. Web storage is more secure, and large amounts of data can be stored locally, without affecting website performance.

Legal framework

Clause 32 of the French data protection act (loi informatique et liberté) pursuant to the transposition into French law of the first Telecoms Package by law 2004-669 of 9 July 2004 governing electronic communications and audiovisual communication services requires that all users are informed clearly and comprehensively of the purpose of each type of cookie and the options available for blocking their installation.

Detailed information on cookies used on this website

Information about proprietary and strictly necessary cookies:

Certain cookies (and other similar technologies) are exempt from the consent requirement under French data protection law, namely cookies (and other similar technologies) whose sole purpose is to enable or facilitate electronic communications or that are **strictly necessary** for the provision of an online communication service as expressly requested by the user. We use localStorage object to store authentication data, persistent user interface customization data, necessary user data.

These functional/technical localStorage object is necessary to display the website correctly, and to guarantee the website's correct functioning. This allows you to browse our website and to use the different options and services available. With these, we can, for example, control traffic and data communication, identify you during the session, give you access to sections with restricted access, and use security elements during your navigation.

Information about third-party cookies:

These cookies are administered and controlled by third-party entities, aiming to carry out/provide features, conduct browsing analyses, personalise navigation and search, in addition to compartment advertising.

- Functional/technical cookies: they allow you to navigate on our website, using the different options or services provided on it, such as viewing videos or sharing content on social media.

Third-party owner	Duration	Information on use and purpose
YouTube	Session / 1 year	https://www.google.es/intl/es/policies/privacy/
Twitter	Session / 1 year	https://help.twitter.com/es/rules-and-policies/twitter-cookies
Facebook	Session / 1 year	https://es-es.facebook.com/policies/cookies/
LinkedIn.	Session / 1 year	https://es.linkedin.com/legal/cookie-policy
Google Inc	Permanent	https://www.google.es/intl/es/policies/p

Privacy/

CookieScript 12 months Consent This cookie is used by Cookie-Script.com service to remember visitor cookie consent preferences. It is necessary for Cookie-Script.com cookie banner to work properly.

- Analytical(Performance) cookies: these third-party cookies provide us with statistical information on the behaviour of the different users who visit our website, to be able to introduce improvements based on an analysis of the data on the usage of the website's products and/or services.

Name	Provider / Domain	Expiration	Description
_ga_NV375FXVKD	.snowball-analytics.com	1 year 1 month	This cookie is used by Google Analytics to persist session state.
_ga	Google LLC .snowball-analytics.com	1 year 1 month	This cookie name is associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports.
_ga_NV375FXVKD	Google LLC .snowball-analytics.com	1 year 1 month	This cookie is used by Google Analytics to persist session state.

- Targeting cookies: these allow us to display advertising on other websites, based on criteria such as viewed content or requested services.

Name	Provider / Domain	Expiration	Description
_uetvid	Microsoft Corporation .snowball-analytics.com	1 year	This is a cookie utilised by Microsoft Bing Ads and is

			a tracking cookie. It allows us to engage with a user that has previously visited our website.
IDE	Google LLC .doubleclick.net	1 year	This cookie is set by Doubleclick and carries out information about how the end user uses the website and any advertising that the end user may have seen before visiting the said website.
MUID	Microsoft Corporation .bing.com	1 year	This cookie is widely used by Microsoft as a unique user identifier. It can be set by embedded Microsoft scripts. Widely believed to sync across many different Microsoft domains, allowing user tracking.
_uetsid	Microsoft Corporation .snowball-analytics.com	1 day	This cookie is used by Bing to determine what ads should be shown that may be relevant to the end user perusing the site.
_fbp	Meta Platform Inc. .snowball-analytics.com	3 months	Used by Meta to deliver a series of advertisement products such as real time bidding from third party advertisers
_gcl_aud	Google LLC .snowball-analytics.com	3 months	Used by Google AdSense for experimenting with advertisement efficiency across websites using their services

- **Unclassified: other not necessary cookies**

Name	Provider / Domain	Expiration	Description
FPLC	.snowball-analytics.com	20 hours	
FPID	.snowball-analytics.com	1 year 1 month	
rdt_uuid	.snowball-analytics.com	3 months	
FPAU	.snowball-analytics.com	2 months 29 days	FPAU

Contact Us

For any questions, please contact us through the following methods:

- Name: Snowball Analytics SAS
- Address: LE FORUM 27 RUE MAURICE FLANDIN 69444 LYON CEDEX 3
- Email: support@snowball-analytics.com
- Website: <https://snowball-analytics.com>