

Privacy Statement Pressfilter

As a journalist you want to know how we handle your privacy in Pressfilter. This is what this privacy statement is about. We explain why we collect personal data via Pressfilter, which data this concerns and for how long we store it. Pressfilter is a product of Smart.pr B.V. We are compliant with the relevant legislation, the General Data Protection Regulation (GDPR). For readability reasons, we use both the terms "you/your" and "(the) journalist(s)", always referring to you in your profession as a journalist.

1. What is Pressfilter?

Pressfilter is a secured database with professional data of journalists and media, categorized by interests. To receive more relevant news, as a journalist you can indicate (and adjust) your interests at any time. The other way around, PR-professionals can investigate for which journalists their press release might be relevant exactly, based on these interests. These PR-professionals can only access Pressfilter via <u>Smart.pr</u>, a secured online system to manage press relations and send press releases. This system is exclusively used by PR-people that work for organizations with a professional PR- and communications policy in place. It was developed to solely encourage the exchange of press releases containing news that is relevant to the receiving journalist. Because inherently, a press release is only useful in case you as a journalist care about the topic at hand.

2. What are "personal data"?

Personal data are all information by which you as a person may be directly or indirectly identified. Please note that in Pressfilter this always concerns professional, job-related data of you in your role as a journalist. We do not process any of your personal, private data.

3. Legal bases for processing

It is always our preference that you as a journalist give us **consent** for the processing of your personal data via Pressfilter. In addition, every day our team of data analysts researches the international press and media carefully. In case we believe Pressfilter could be useful to you in your work as a journalist, we send you an email in which we show you the data we collected. Via this email you can actively give consent and/or change your preferences, and you can access or erase your data. Also you can register for the No Press Release Register when applicable (please see header 4).

Sometimes you as a journalist neither follow up on our invitation to check or alter your personal data via Pressfilter, nor do you unsubscribe from our emails, nor do you register for the No Press Release Register. In this case, we base the processing of your personal data on the **legitimate interest** in light of the GDPR. As a journalist, you need your news provision to be as relevant as possible. So, for the execution of your profession, you benefit from Pressfilter being as up to date as possible. Moreover, please note that this always concerns professional data that, because of the public nature of your job as a journalist, are easily found online (for example via the colophon of the media your work with). For these reasons, we believe that there's a fair balance between the interests of all parties involved (please also see header 5).

4. No Press Release Register and Smart.pr

Naturally, as a journalist you can immediately unsubscribe from any press release you receive via our system. In addition, we created the No Press Release Register. As a journalist you can register in the No Press Release Register in case you do not wish to receive press releases at all. This register is technically connected to both Pressfilter and the software we offer PR-professionals, Smart.pr. This assures that it is impossible for *any* Smart.pr user to send a press release to somebody registered in the No Press Release Register. Please note that we do not (yet) offer the No Press Release Register in all countries where Pressfilter is currently active.

5. For what purpose does Pressfilter process (personal) data and which data does it concern?

We collect professional data of you as a journalist, some of which classify as personal data according to the GDPR. We do this because we want to build the best journalist database in the world, that offers you as a journalist both insight and the possibility to engage. We believe the exchange of news should be relevant and should be a respectful interaction between PR-professionals and journalists, helping each other in their work.

We believe in the importance of a strong and independent press, and we believe our transparency is key in supporting this. Before we started Pressfilter, we saw numerous databases with outdated and unreliable data, that were handled in a poor and often obscure manner. Unfortunately, this is a problem we cannot fix. What we can do however, is create our own database that balances the interests of journalists and PR-professionals. More so, we can try our best to have this become the international golden standard in journalist databases. This is the vision of Pressfilter. And our own interest is aligned with this: only a database that is up to date and that is built on the right foundations, is appealing to (future) Smart.pr users, our clients. So, Pressfilter's purpose is to make the exchange of news between PR-professionals and journalists as relevant as possible.

To live up to this vision and to attain this goal, in Pressfilter we can process the following data of you in your professional role as a journalist:

- First and last name
- Gender
- Email address for press
- releases
- Phone number
- Postal address
- Related media or contractors

- Job description Interests or areas of
- specialisation
- URLs of blogs, social media
- Region(s) of publication
- Region(3) of publication
- Public source where these data can be found
- Aggregated click behaviour (number of emails, opens, clicks, fails, unsubscribes)
- When applicable: separate contact details for necessary communication about Pressfilter itself

These (personal) data are of a professional nature and stem from public online sources, like the colophon or the website of any particular media. Often, the processed data only concern part of the above. The data are solely applied in the execution of the jobs of PR-professional



and journalist, and are therefore only meant to help conduct professional PR policies and distribute relevant press releases. Pressfilter is not intended to distribute mass mailings, advertising, commercial newsletters, or any other form of commercial communications.

As a journalist you can contribute to, change, or erase these data yourself via your personal Pressfilter page. We do not send you updates for minor updates in your data. In accordance with the GDPR, we do however always inform you directly in case we would for example add a new category of personal data. We monitor aggregated click behaviour to see whether your email address still works. Lastly, when you register for the No Press Release Register, you give us consent to process your first and last name, email address and the media you work with at the time of registration. These data are used to technically prevent users of our software and Pressfilter to send you any press releases (also in the future).

6. For how long do we store your (personal) data?

As soon as your personal data are no longer needed for the abovementioned purposes, the information is erased immediately. We keep our dataset as up to date as we possibly can. The moment we notice data are incorrect or outdated, we will directly change or (in case this applies) erase it. We also periodically check the accuracy of all data. We strive to identify incorrect data within six months.

When you file a request for the erasure of your data, we will instantly make your personal data inaccessible, and we will erase all redundant information. We do however keep your email address, to make sure our analysts do not accidentally add your data again in the future. And in case you or your work appear(s) in the search results of a Smart.pr user, we'll show your name with a clear notice that you unsubscribed. These data do not have any other purposes.

7. Do we share your (personal) data with others?

In case we process data of you as a journalist in Pressfilter, we share this information with the following data processors and controllers:

<u>Processors</u> – We use third parties that support us in offering our services. In this light, these organizations process personal data on our behalf. For example, we use processors to host data (Amazon, EU), to manage data (Google Workspace, US), to keep in touch with you as a journalist (Reply.io, EU/US), or (by Smart.pr users) to send press releases via email (Sendgrid, US). These processors are only allowed to process the personal data we collected and shared with them, following our specific instructions and never otherwise or for any other purpose. With these parties we have Data Processing Agreements in place.

<u>Controllers</u> – Smart.pr users can use the data from Pressfilter on their own responsibility via a password-protected, personal login. These people are solely PR-professionals who work for organizations with a professional PR- and communications policy in place, like NGO's, PR-agencies, (semi-) governments or corporates. At their first access to Pressfilter, these users accept a code of conduct that clarifies how we expect them to handle the privacy of journalists. This code of conduct also states how we demand these users to (for example) handle notes they make next to your data, or how they use the optional email tracking pixel which can indicate whether you as a journalist are interested in a press release. This information by the way is not data that we process for our own purposes, but only on behalf of PR-professionals, so that they can better gauge whether you as a journalist are interested in their news or not.

We collaborate with partners within the European Union as much as we can, and we do not share more data than needed. We may transfer data to parties outside of the EU, in case a processor or controller is based there. In this case, we adhere to the relevant legislation (chapter 5 of the GDPR) for as much as we can. We do not share your data with other third parties unless we are legally obliged to do so.

8. Your rights as a journalist

Based on our processing of your personal data aligned with the GDPR, as a journalist you have the right to:

- Request us to change or update your data. You can also do this yourself via your Pressfilter profile;
- Request us to erase your data from our files, without stating any reason. You may also do this yourself on your profile;
- Request us to provide you with a copy of the data we processed of you. At your request, we can send your data to another data controller;
- Withdraw your consent to process your data, in case this processing was based on consent in the first place. This does not affect the legitimacy of the processing that happened before the withdrawal of your consent
- Contact us to object to the processing of your data;
- File a complaint with the Dutch authorities ("Autoriteit Persoonsgegevens") in case you think we process your data unrightfully.

Upon having received a request, we will make an effort to respond as soon as possible.

9. In conclusion

We currently offer Pressfilter in The Netherlands, Belgium, Luxemburg, and Denmark. For all (future) Pressfilter journalist databases, we use the same fundamental values regarding both you as a journalist and any PR-professional involved. As Dutch Law applies to our company and its legal affairs, the original Dutch privacy statement always prevails over any translation. This English version only serves to clarify who we are and what we do. Should the privacy statement change, we will notify you on our website. Here you can download the latest version.

We hope this document clearly explains what we do and why. Should you still have any questions or remarks about the way we handle your (personal) data, or about our services in general, or do you wish to execute your rights, please get in touch. Our team is happy to help.

Team Pressfilter