

PRIVACY POLICY

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I. INTRODUCTION

LittleBig is dedicated to protecting your Personal Data, upholding its confidentiality, security, and your privacy, all in accordance with the relevant regulations, including the GDPR (General Data Protection Regulation).

This Privacy Policy elaborates on how LittleBig manages your Personal Data during your use of the LittleBig Platform.

Please note that we refrain from processing specific data categories, commonly referred to as sensitive data. These categories encompass information such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic details, biometric data, health-related data, and information related to an individual's sexual life or orientation.

LittleBig acts as a Data Controller for the data processing on the Platform. Nonetheless, in cases where you, either as the Client or Provider, handle Personal Data independently outside of the Platform, on your own IT devices and infrastructure, you each assume the role of a distinct Data Controller. This scenario applies to the Client's Personal Data being processed by the Provider on behalf of the Client.

Identity of the Data Controller

Company: Community , parent company of LittleBig Connection

Address: Chemin des Coquelicots 16, 1214 Vernier, Switzerland

Registration number: CHE-376.132.256

Data Protection Officer: "DPO Consulting", a simplified joint stock company, based in France at 18 Rue Pasquier 75008 Paris

II. Definition

- **Account Managers:** members of the LittleBig staff responsible for overseeing sales activities.
- **Consultant:** an individual employed by a consulting firm or subcontractor assigned to a project.
- **Consulting firm:** a type of Provider that manages a community of consultants on the Platform.
- **Client:** a registered user on the Platform under a client profile.
- **Connect Services - Sourcing ("Sourcing"):** refers to the matchmaking situation by which a non-referenced Service Provider is selected following the retention of his application for an RFP by the End Customer on LB marketplace. LB manages the administrative and contractual aspect of the transaction within a subcontracting agreement.
- **Connect Services - Portage ("Portage"):** refers to the service in which LB manages the administrative and contractual aspect of the relationship between the End Customer, having selected an Off-Platform Service Provider "OPSP".
- **Data Controller:** a natural or legal person, department, or other body which, alone or jointly with others, determines the purposes and means for data processing, as defined by GDPR.
- **Data Processor:** a natural or legal person, public authority, agency or other body that processes personal data on behalf of the controller, as defined by GDPR.
- **Employee:** any salaried staff member of the entity creating a user account.
- **Freelancer:** a self-employed provider.
- **GDPR:** General Data Protection Regulation, namely, European Parliament and Council Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.
- **LittleBig Connection or "We" or LittleBig:** a platform that facilitates clients in entering agreements with Consulting Firms and/or Freelancers to carry out projects requiring specific skills.
- **Platform:** an integrated source-to-pay software designed for managing the external workforce, accessible at www.littlebigconnection.com. The Platform also offers a marketplace where Clients can publish request for proposals viewable by all registered Providers.
- **Personal Data:** any information relating to an identified or identifiable natural person. An "identifiable natural person" is a natural person who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, identification number, location data, online login or username, or by one or more specific features of their physical, physiological, genetic, mental, economic, cultural or social identity.
- **Processing:** any operation or series of operations, whether automated or not, applied to personal data or datasets. This includes data collection, recording, organization, retention, modification, retrieval, or consultation.
- **Provider:** a user registered on the Platform under a Provider profile, acting as a legal entity (Consulting Firm or Freelancer) with distinct and specialized skills, providing one or more services to the Client through the LITTLEBIG Platform.
- **SaaS or Rise Services:** refers to the functionalities used by the Referenced Service Provider to manage the entire purchasing cycle of intellectual services with the End Customer.
- **User or You:** a data subject, either a natural person or a representative of a legal entity, whose data is being processed as an LittleBig Platform user.

III. Data processed as a Client

Data subject involved: individuals employed by the Client (acting within the Client universe)

Data processed:

MANDATORY DATA	OPTIONAL DATA
<p>Identification data</p> <ul style="list-style-type: none"> • First and last name <p>Contact data</p> <ul style="list-style-type: none"> • Work email <p>Messaging</p> <ul style="list-style-type: none"> • Chat history (message content) • Q&A answers <p>Connection data</p> <ul style="list-style-type: none"> • IP address • Connection time • Logs • Logins and password (encrypted) when simple connection is used • Cookies (see section “Platform Cookies”) 	<p>Identification data</p> <ul style="list-style-type: none"> • Profile picture <p>Contact data</p> <ul style="list-style-type: none"> • Mobile phone number <p>Professional data</p> <ul style="list-style-type: none"> • Professional profile • Job title • Role within the Client's organization

Data processing purpose:

- Account administration
- Publish RFP
- Manage the proposal selection process for the Client RFP
- Engage in contractual agreements with Providers
- Communicate with Providers
- Archive all procurement activities for reporting purposes
- Work together with Providers on assignments and approve the activity reports (AR)

IV. Data processed as a Provider

Data subject involved: individual typically employed by a Consulting Firm and Freelancers

Data processed:

MANDATORY DATA	OPTIONAL DATA
<p>Information collected from Data subject involved</p> <p>Identification data</p> <ul style="list-style-type: none"> • First and last name <p>Contact data</p> <ul style="list-style-type: none"> • Email <p>Messaging</p> <ul style="list-style-type: none"> • Chat history (message content) • Q&A answers • Ratings and the corresponding comments provided by the Client (exclusively tied to the project, with visibility restricted to the Client and relevant LittleBig staff) <p>Financial data</p> <ul style="list-style-type: none"> • IBAN (otherwise related accountancy data such as swift number) <p>Connection data</p> <ul style="list-style-type: none"> • IP address • Connection time • Logs • Logins and password (encrypted) • Cookies (see section "Platform Cookies") <p><u>Note:</u> LittleBig collects certain corporate documents that also contain basic Personal Data (which can include fundamental information, such as but not limited to name, contact information...)</p>	<p>Optional additional information collected from Data subject involved</p> <p>Identification data</p> <ul style="list-style-type: none"> • Profile picture <p>Messaging</p> <ul style="list-style-type: none"> • Comments left by the Client when declining an application • Comments left by the Client on the activity reports (AR) <p>Professional data</p> <ul style="list-style-type: none"> • Resume • Job title • Studies and training • Professional qualifications and experience • Flexibility to work from another region

Purpose of the processing:

- To conduct a pre verification and to ensure your company is in full compliance with all applicable regulations
- Enable you to share your consultant file with a Client on an RFP
- To enable communication between you and Clients
- To keep track of RFP, mission and activity report history with Clients
- To administrate payment and invoice for *Connect* and/or *Rise* Services

Data recipient:

A Client can only access your LittleBig profile if you either submitted your proposal, and/or if they have selected you for a project.

Additionally, your LittleBig profile may be forwarded to our Clients by our Account Managers as part of an RFP process. If you are a Consultant, it falls upon your consulting company to secure your prior consent.

V. GENERAL (for Clients and Providers)

a. Data processing purpose

We will process your Personal Data for the following purposes:

- To send you notifications about Platform updates and assist you in understanding how to navigate the Platform (such as tutorials and alerts). We may also send you customized newsletters and offers unless you opt out of receiving such communications.
- To invite you to participate in surveys (e.g., satisfaction or opinion surveys). Your participation is voluntary, and you can decline to participate.
- To ensure the security of our Platform and its use in compliance with the Terms of Use.
- To allow you to leave reviews or comments on projects when validating activity reports.
- To provide assistance in using the Platform, improve the quality of our services, and/or of our commercial offers.

b. Legal basis

We process your Personal Data using various legal basis, depending on the specific processes involved:

- **Legitimate Interest:** we may process your data based on our legitimate interest. For example, this may include collecting your IP address and connection time to detect unusual activity on our Platform. Additionally, we may use your email address to communicate with you about products, services, promotions, studies, surveys, news, updates, and events.
- **Contractual Obligations:** we process data to fulfill the obligations outlined in the contract that binds us, such as providing SaaS services, commercial intermediation, and portage.
- **Consent:** in cases where you provide explicit consent, we process data accordingly. For example, if you agree to have your picture and testimonial displayed on our website, we will use your data for that specific purpose. It's important to note that if you are a consulting company Provider, you must obtain the Consultant's consent before uploading their data to the Platform.

c. Data recipient

Your data will be accessed and processed by specific members of the LittleBig team who require such access. This includes but not limited to members of the business management team, the support team, and the product team.

LittleBig retains the right to share certain data, such as invoicing information, with its group and international subsidiaries to facilitate payment processing by our finance team. However, it's important to note that other data within your profile and your activities on the Platform are not part of the shared data. LittleBig does not engage in the sale or rental of Users' Personal Data to third parties for commercial purposes.

In the event of a subpoena, court decision, warrant, court order, or any other legally binding regulation, LittleBig may be obligated to disclose Personal Data and related information. Additionally, LittleBig may choose to assert its rights in court as a response to legal actions.

d. Data transfers

i. Internal processors (Intragroup)

SUBPROCESSOR NAME	DATA PROCESSING PURPOSE	PROCESSING LOCATION	APPROPRIATE SAFEGUARD
LITTLEBIG AFFILIATES	To provide support to users on the Platform and/or performing administrative services for the contract lifecycle	France Mauritius (user support) Spain Tunisia Canada South Africa India	Standard Contractual Clauses

ii. External processors

You will find an updated list of our Sub-processors [here](#).

By submitting your data and accepting this Privacy Policy, you are considered to have granted consent for such data transfers.

We will not share, sell, rent, or disclose your Personal Data to entities other than those explicitly mentioned above without obtaining your prior consent and without implementing appropriate security measures.

e. Data security

i. Data hosting

All your data is hosted in France (Ile de France) in a dedicated environment in data centers owned by Scaleway, an ISO-27001-certified company.

	Data center(s)	Data hosting back up
Provider	Scaleway	OVH
Full address	DC5 : 25 Rue de l'Eguillette 95310 St-Ouen l'Aumône, France DC3 : 59 Rue Julian Grimau, 94400 Vitry-sur-Seine, France DC1 : Amsterdam	GER1 Frankfurt FRA1 : 59820 Gravelines, Nord-Pas-de-Calais- Picardie, France

ii. Data security

Our IT teams are well-versed in data protection protocols and are prepared to respond swiftly in case of a potential breach of Personal Data.

Furthermore, all your data is stored within a dedicated environment located in data centers owned by Scaleway, a company certified under ISO 27001 standards.

LittleBig is proud to hold ISO 27001 certification, and we are diligently committed to upholding the security of personal data at both organizational and technical levels.

1. Organisational measures:

- Set up a Personal Data privacy governance body: (1) a Data Protection Officer, (2) a Personal Data Team.
- Set up a dedicated private channel for handling Personal Data requests: personal-data@littlebigconnection.com. All requests are managed by our Personal Data Team.
- Map and maintain a record of data processing.
- Implement the Privacy by design principles by establishing a committee in charge of validating all projects. A member of the Personal Data Team participates in this committee to identify potential impacts or risks related to data privacy.
- Draft and communicate various security and privacy procedures.
- Data privacy awareness: all LittleBig employees are obligated to complete a specialized GDPR e-learning course. Subsequently, distinct training sessions are periodically conducted for various target audiences. LittleBig staff are required to sign non-disclosure agreements when they join the company.
- Obtain criminal records of employees in specific jobs deemed by LittleBig to be of a sensitive nature.
- Implement a strong password policy.

- Ensure alignment with our business partners, both Clients and Providers, by revising our commercial contracts to incorporate our data privacy requirements and standards.
- External security audits conducted once a year.

2. Technical measures:

- Security measures implemented by [Scaleway](#).
- Automated detection of security vulnerabilities on server.
- We have implemented access restrictions based on job roles and responsibilities. These restrictions are designed to grant LittleBig staff access only to the essential data needed to carry out their respective tasks.
- Made VPN installation mandatory to access non-production environments and servers.
- Platform is now accessed by SSO.
- Installing an antivirus program.
- Two-factor authentication (2FA) or multi-factor authentication (MFA).
- Microsoft Intunes.
- Password encryption.
- Login management.

f. Platform cookies

We utilize cookies and comparable tracking technologies to enhance your experience on the Platform and to ensure its security.

Cookie name	Purpose	List of partners that use these cookies
Performance cookies (audience)	Establish statistics and help us understand how the user uses the help centre from a global perspective. These cookies are set up by LittleBig and stored within the European Union.	Zendesk
	Generate statistics regarding the usage of the Platform, including the content and pages visited. These statistics assist LITTLEBIG in comprehending the Platform's performance, user interactions, and the identification of any technical issues. All data is stored within the European Union.	Pendo

g. Data retention

LittleBig adheres to established data retention periods and does not process Personal Data longer than necessary to meet the data processing purposes listed above. To comply with legal requirements, certain Personal Data, such as information found in invoices, contracts, or mission records, may be retained.

Please be aware that your Personal Data associated with past projects may continue to be accessible within the Client or Supplier tabs, even after you have exited the LittleBig Platform.

For Clients:

Providers' Personal Data and accounts will remain on the Platform until their most recent activity on the Platform is recorded.

h. Your rights

You have several rights over your Personal Data:

- **The right to access** your Personal Data and be informed about how your data is processed.
- **The right to rectify** your Personal Data. Please note that you can modify your Personal Data directly on your profile. As a user, it is your responsibility to provide accurate and current information.
- **The right to erase your data and the right to withdraw your consent.** You have the option to revoke your consent at any time. If you choose to do so, we will delete your Personal Data before the designated retention period expires, unless there is a legal requirement for us to continue processing your Personal Data.
- **The right to oppose the processing of your Personal Data.** The right to object to the processing of your Personal Data. You can opt out of receiving communications, including commercial messages, from LittleBig. To facilitate this, we include an “unsubscribe” link in all our emails to you. You may also object, on legitimate grounds, to the processing of your data when LittleBig has relied on legitimate interest. In such cases, LittleBig will cease processing, unless there are compelling legitimate reasons to continue processing.
- **The right to restrict the processing of your data.** This option is available when your data cannot be completely erased because LittleBig Connection requires it for legal defence purposes. In such instances, we will strictly process your data within the specified framework.

You can also file a complaint with the supervising authority in charge in your country.

You can exercise these rights at any time by writing to: personal-data@littlebigconnection.com. Your request will be handled within one (1) month by our Personal Data Team.

If you wish to simply deactivate your profile, you can proceed directly on your account through the dedicated feature or by contacting our support team.

i. Data Protection Officer and Personal Data Team

LittleBig Connection appointed an external independent Data Protection Officer, in charge of ensuring that We process your data in compliance with the obligations set by the GDPR and any other applicable data privacy regulation. This Data Protection Officer has been appointed by the French "CNIL". Data Protection Officer contact details:

"DPO Consulting"
personal-data@littlebigconnection.com
18 Rue Pasquier 75008 Paris, France

Our Data Protection Officer is supported by our Personal Data Team, which is made up of the internal legal team and our Legal & Compliance Officer.