PRIVACY POLICY

NAANO SAS

Last updated: September 3, 2026

1. Controller and privacy contact

NAANO SAS ("Naano", "we", "us" or "our") is the controller of the personal data described in this policy.

- Registered office: 84 Avenue du Roule, 92200 Neuilly-sur-Seine, France
- Legal form: Societe par actions simplifiee (SAS)
- SIREN: 100 248 772
- Website: https://naano.com
- Privacy contact: Naano's technical and management team
- Email: justine@naano.com

The privacy contact coordinates compliance with applicable privacy laws and handles requests concerning access, correction, deletion, restriction, objection and portability. This contact is not presented as a formally appointed Data Protection Officer unless Naano separately makes such an appointment.

2. Scope

This policy explains how Naano processes personal data when individuals use our website, creator marketplace, dashboards, creator and business accounts, campaign tools, payment features, support channels and connected services.

It applies principally to:

- Content creators who register for or use Naano;
- Representatives of businesses that use Naano;
- People who visit our website or contact us;
- People who interact with content connected to a Naano campaign, where applicable; and
- Service providers, contractors and business contacts.

3. Personal data we process

Depending on how a person uses Naano, we may process:

- Identity and contact information, including name, email address, telephone number and account identifiers;
- Creator profile information, including biography, professional topics, location, social profile links, selected portfolio content and visibility preferences;
- LinkedIn Member Portability Data obtained from LinkedIn only after the relevant eligible member authorizes Naano through LinkedIn's OAuth consent flow, as described in Section 9;
- Business information, including company name, industry, representatives, registration information, billing information and tax identifiers;
- Campaign and collaboration information, including briefs, applications, deliverables, approvals, messages and status history;
- Performance information, including Naano tracking-link clicks, conversions and campaign reporting;
- Public LinkedIn engagement information about people who react to or comment on campaign-related LinkedIn posts, including their name, professional headline, profile image, LinkedIn profile URL and the relevant reaction or comment. During the limited legacy transition described in Section 10, this information may be collected through Apify and is not obtained through LinkedIn's official APIs;
- Payment and transaction information processed with payment providers, including payout status and limited billing records. Naano does not store complete card or bank credentials when they are handled directly by the payment provider;
- Technical and security information, including IP address, device and browser information, timestamps, logs and fraud-prevention signals;
- Usage information, including pages and features used and account actions; and
- Communications sent to support, sales or other Naano channels.

We do not treat LinkedIn Portability Data as verified or confirmed by LinkedIn. We do not intentionally use such data to infer sensitive characteristics.

4. Why we process personal data

We process personal data to:

- Create, authenticate and administer accounts;
- Operate the creator marketplace and enable collaborations between creators and businesses;
- Allow creators to maintain a creator-controlled portfolio and visibility settings;
- Process applications, campaigns, deliverables, approvals and communications;
- Track campaign links, attribute results and provide performance reporting;
- Identify and measure engagement with campaign-related LinkedIn posts and provide the business customer funding or managing the relevant campaign with a report of identifiable engagers as potential business leads;
- Calculate balances, process payments and maintain legally required financial records;
- Provide customer support and communicate service or security updates;

- Protect Naano, its users and the public from fraud, abuse and security incidents;
- Improve the service and develop features using appropriately limited information;
- Comply with legal, regulatory, accounting and tax obligations; and
- With consent where required, measure use of our public website.

5. Legal bases

Where the General Data Protection Regulation (GDPR) applies, Naano relies on one or more of the following legal bases:

- Contract: processing necessary to enter into or perform a contract with a creator or business user;
- Consent: for example, when an eligible LinkedIn member chooses to connect LinkedIn and authorize data access, or when a website visitor accepts optional analytics cookies;
- Legitimate interests: operating and securing Naano, preventing fraud, responding to requests, improving our service, measuring campaign engagement and conducting proportionate business-to-business activities, provided those interests are not overridden by individual rights. People whose public LinkedIn engagement information is processed may object as described in Sections 10 and 14;
- Legal obligation: retaining and processing information needed for accounting, tax, regulatory or legal compliance; and
- Establishment, exercise or defense of legal claims, where applicable.

Consent may be withdrawn at any time. Withdrawal does not affect processing carried out lawfully before withdrawal.

6. Recipients and service providers

Personal data is available only to people and providers that need it for the purposes described in this policy. Recipients may include:

- Authorized Naano personnel and contractors subject to confidentiality obligations;
- Hosting, database, security and infrastructure providers, including Vercel and Supabase;
- Payment providers, including Stripe and Stripe Connect;
- Email and customer-communication providers;
- Analytics providers where the user has given any required consent;
- The authenticated Naano business customer funding or managing a campaign, which may receive identifiable information about people who publicly reacted to or commented on the relevant campaign-related LinkedIn posts as part of its campaign report;
- Professional advisers and public authorities where disclosure is legally required;

- Visitors to a creator's public Naano storefront, including visitors who are not signed in, but only for profile and portfolio information the creator has chosen to publish. Public storefronts may also be indexed and displayed by search engines; and
- Authenticated Naano business customers, but only for creator information that a creator has chosen to make available for collaboration purposes and only as permitted by applicable law and platform terms.

Naano does not sell LinkedIn Member Portability Data. Naano does not provide LinkedIn access credentials or stand-alone access to LinkedIn APIs to customers or other third parties.

Service providers act under contracts requiring appropriate privacy, security and confidentiality protections. They may process data only to provide their contracted services to Naano unless the law provides otherwise.

7. International transfers

Some service providers may process personal data outside France, the European Union or the European Economic Area. Where required, Naano uses an available lawful transfer mechanism, such as an adequacy decision, the European Commission's standard contractual clauses or another legally recognized safeguard. Information about relevant safeguards may be requested through the privacy contact in Section 1.

8. Retention

Naano keeps personal data only for as long as necessary for the applicable purpose, subject to legal obligations and the specific LinkedIn rules in Section 9.

Typical periods are:

- Active account data: while the account is active and the information is needed to provide the service;
- Ordinary customer, creator and prospect records: generally up to three years after the end of the relationship or last meaningful interaction, unless a shorter period applies;
- Accounting, tax and transaction records: up to ten years where required by French law;
- Campaign and contractual records: for the relationship and applicable limitation periods;
- Legacy public LinkedIn engager records: no longer than three years after the person's last meaningful interaction and, in all cases, only until the earlier purge required before activation of the LinkedIn Member Data Portability API under Section 10, unless a shorter period is required following a valid objection or deletion request;
- Security and technical logs: generally no longer than twelve months unless needed to investigate an incident or comply with law; and
- Optional analytics data: according to the settings and periods described in Section 12.

These general periods do not override the following rules:

- LinkedIn Member Portability Data will be deleted promptly when the member requests deletion, disconnects LinkedIn, withdraws the relevant consent or closes the Naano account, except for information Naano must

retain to comply with law. Any retained legal record will exclude LinkedIn content unless retaining that content is legally required;

- OAuth access tokens will be revoked or deleted when the connection ends, subject to technical completion of the revocation process;
- Before Naano activates the LinkedIn Member Data Portability API integration, legacy LinkedIn content obtained outside LinkedIn's official APIs will be removed from Naano systems as described in Section 10; and
- Data that no longer identifies a person may be retained in genuinely anonymized form.

9. LinkedIn Member Data Portability API

Naano is applying to use LinkedIn's Member Data Portability API for eligible members in the European Economic Area and Switzerland. The integration will not be activated until LinkedIn grants access and Naano completes the transition safeguards in Section 10.

9.1 Member choice and authorization

An eligible creator will initiate the connection from Naano and will be redirected to LinkedIn. LinkedIn will describe the requested permissions and ask the member to authorize or deny access. Naano will not request LinkedIn usernames or passwords and will not hide or bypass LinkedIn's authorization flow.

Naano will access only data made available by LinkedIn within the approved API scopes and only for the authorizing member. Naano will not use the Portability API to collect profiles of people who have not authorized Naano.

9.2 Data and purposes

Subject to the member's authorization and the data LinkedIn makes available, Naano may receive profile details, professional information, content history, media references and related records generated through the member's use of LinkedIn.

Naano will use this data to:

- Simplify creator onboarding and reduce manual entry;
- Let the creator maintain a creator-controlled portfolio of professional information and published content;
- Display the creator's imported information back to that creator in a private dashboard;
- Subject to the creator's visibility and publication choices, present selected creator information to authenticated Naano business customers for paid creator collaboration opportunities and, when the creator publishes a storefront, to public visitors and search engines. Information imported from LinkedIn will not be made public unless the creator affirmatively chooses to include it in the published storefront; and
- Support account administration, connection status, security and deletion requests.

Naano will not represent this data as verified or confirmed by LinkedIn. Naano will not use Member Portability Data to make decisions about credit, insurance or employment, to recruit employees, to target advertising, to create sensitive profiles, or to sell personal data.

9.3 Storage, sharing and deletion

Member Portability Data is stored only while Naano has a valid legal basis and the member's connection or consent remains effective. Access is limited to authorized Naano personnel and systems, the member, authenticated business users where the member has chosen the relevant visibility, and public storefront visitors or search engines only where the member has affirmatively chosen to publish the relevant information.

The member may disconnect LinkedIn or request access, correction or deletion by using available account controls or emailing justine@naano.com. Naano will delete the member's Portability Data promptly after disconnection, withdrawal, account closure or a valid deletion request, except where retention is required by law. Naano will also honor applicable LinkedIn deletion or revocation signals.

Where Naano processes personal data received through the Portability API, the applicable LinkedIn data-processing terms and the LinkedIn Data Portability API terms will also govern that processing.

10. Transition away from non-official LinkedIn collection

At the date of this policy, Naano operates legacy features that may collect public LinkedIn profile, post or engagement information through a third-party extraction provider, Apify, and through creator-initiated browser import tools. This includes identifiable information about people who publicly react to or comment on campaign-related posts, which may be presented as named engagement leads to the authenticated business customer funding or managing the relevant campaign. Naano's website visitor-identification provider, RB2B, may also return a likely LinkedIn profile URL for certain business visitors. These are not LinkedIn Portability API sources and LinkedIn has not endorsed them.

Naano is applying for official LinkedIn API access in order to replace these legacy LinkedIn collection methods. Naano will not make any production call to the LinkedIn Member Data Portability API until it has completed and documented all of the following actions:

- Disabled LinkedIn scraping, crawling and third-party extraction through Apify;
- Disabled browser-based or extension-based imports of LinkedIn content outside the official APIs;
- Stopped ingesting LinkedIn profile URLs or other person-level LinkedIn content from RB2B or similar providers;
- Cancelled or quarantined pending legacy collection jobs so they cannot restart;
- Deleted legacy LinkedIn profile, post, engagement and associated derived content obtained outside LinkedIn's official APIs from production systems, backups where technically and legally feasible, and user-facing displays; and
- Verified that official LinkedIn API data cannot be combined with legacy scraped or otherwise non-official LinkedIn content.

Until those actions are complete, the Portability API integration will remain inactive and no Portability Data will be obtained. Once the transition is complete, this policy will be updated to remove the legacy-processing description and record the effective transition date.

Legacy LinkedIn data remains subject to applicable privacy rights during the transition. This includes people whose public reaction or comment information appears in a campaign report. A person may object to its

processing or request access, correction or deletion through justine@naano.com; Naano will also communicate an applicable restriction or deletion to campaign customers that received the information where required by law.

11. Campaign tracking, collaboration and payments

Naano may generate unique tracking links and process clicks, timestamps, technical signals and conversion information to attribute campaign results, reduce fraud and calculate compensation. Where possible, technical identifiers used for fraud prevention and attribution are limited or pseudonymized.

Campaign participants may see reporting necessary to administer their collaboration. Creators can see their own results, and businesses can see information relating to campaigns they fund or manage. Naano limits access according to account role and campaign relationship.

Payments are processed through Stripe or Stripe Connect. Naano receives limited account, transaction and status information needed to reconcile balances and comply with legal obligations. Complete payment-card and bank credentials are handled directly by the payment provider where available.

12. Website analytics and visitor identification

12.1 Google Analytics

Subject to any consent required by law, Naano uses Google Analytics 4 to measure visits to public marketing pages and improve their content. Optional analytics is not loaded until the visitor accepts it through the available consent control. Naano configures analytics to limit personal data, disables advertising-personalization signals where described in the consent interface, and avoids intentionally sending private account paths or technical secrets.

Google Analytics may use first-party cookies such as `_ga` and `_ga_<container-id>`. Naano's local consent choice is generally retained for up to 180 days. User-level analytics retention follows the active Google Analytics property setting and is normally no longer than fourteen months. Visitors may withdraw consent using the Cookies control and may also remove cookies or local storage through their browser.

12.2 RB2B transition

Naano currently uses RB2B, provided by Retention.com, Inc., for limited business-to-business website visitor identification. Depending on availability, this may include an inferred company and a likely professional profile URL derived from IP and provider data. Naano uses this information for proportionate business-to-business follow-up and does not sell it.

As stated in Section 10, before activating the LinkedIn Member Data Portability API, Naano will stop ingesting and remove LinkedIn profile URLs or other person-level LinkedIn content supplied by RB2B. If Naano continues using RB2B after that transition, its use will be limited to information that does not constitute non-official LinkedIn content and this policy will be updated accordingly.

Visitors may object to this processing and request access or deletion through justine@naano.com.

13. Social media pages

Naano maintains public pages on services such as LinkedIn, Instagram and X. When a person visits or interacts with those pages, the relevant platform processes information under its own privacy terms. Naano may receive and process messages, comments, aggregated statistics and other information made available to page administrators to communicate with users and maintain its public presence.

14. Individual rights

Subject to applicable law, individuals may have the right to:

- Obtain confirmation of whether Naano processes their personal data and receive access to it;
- Correct inaccurate or incomplete information;
- Request deletion of personal data;
- Restrict processing in certain circumstances;
- Object to processing based on legitimate interests and object at any time to direct marketing;
- Withdraw consent at any time;
- Receive eligible data in a structured, commonly used and machine-readable format; and
- Lodge a complaint with a competent supervisory authority.

Requests may be sent to justine@naano.com or to NAANO SAS, 84 Avenue du Roule, 92200 Neuilly-sur-Seine, France. Naano may request information necessary to verify identity and protect the account. Naano aims to respond within one month, subject to lawful extensions.

In France, the competent supervisory authority is the Commission Nationale de l'Informatique et des Libertes (CNIL), 3 Place de Fontenoy, TSA 80715, 75334 Paris Cedex 07, France, https://www.cnil.fr.

15. Security

Naano applies technical and organizational safeguards appropriate to the risks, including access controls, encryption in transit, protected secrets, logging, backups, environment separation and review of service-provider access. No method of transmission or storage is completely secure. Users should protect their credentials and notify Naano of suspected unauthorized access.

16. Changes to this policy

Naano may update this policy to reflect changes in law, services, providers or processing. The date at the top identifies the latest version. Where a change requires consent or individual notice, Naano will provide it through an appropriate channel.

17. Contact

Questions and privacy requests may be sent to:

NAANO SAS

84 Avenue du Roule

92200 Neuilly-sur-Seine, France

Email: justine@naano.com