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**Ethical Data
Intelligence Platform**

**Additional information on ethics
Update as of Sept. 13, 2023**



The Ethical Aspect: Basic Principles at Propulso



No data collection

They come from our ethical suppliers with whom we work.

No data storage

Data is generated, processed in RAM and destroyed. Only derived metrics and calculations are retained.

No data sales

Our customers only have access to reports and campaigns. They cannot access the raw data.

The Ethical Aspect : Ownership and Consent



- **Information and data are always the exclusive property of an individual. That is a fundamental right.**
- **Access to and processing of data is only possible with the person's consent.**
- **Real consent must be freely given, informed, and given without pressure. The use of data must be explained and validated multiple times when necessary (pop-ups, request layers, etc.).**

The Ethical Aspect : Ownership and Consent



- **Consent is renewable:** it expires in time and must be validated again during a cellular activation, for example.
- **The data collected is erased after a while,** a bit like our documents that we shred after x months or years, depending on their nature.
- **At any time, it is possible to request an opt-out** from providers and even have our data erased. Adchoice and Trustee are the mechanisms that oversee everything.



Coming soon

A universal "opt-out" form for all suppliers will soon be integrated into the Propulso website.

The Ethical Aspect : Anonymity and Batch Processing



The new laws worldwide are very strict regarding personal information, but anonymous data is typically excluded from these legislations or at least regulated differently.

At Propulso, we apply the same rigor to anonymous data as we do to personal information, going above and beyond the current industry standards and laws.

The Ethical Aspect : Anonymity and Batch Processing



How?

- **No personal information is processed by Propulso; it is only anonymous data. It can be compared to a car count, without identifying the driver or passengers.**
- **Our data and platform ensure data anonymity and non-reversibility. This includes the processing and metrics calculated/provided to clients.**
- **The processing is only done in large batches (> 5000 visits). No individual cases are processed (profiling).**
- **Anonymous identifier required for erasing and/or managing consent.**

The Ethical Aspect : Intention and Transparency



At Propulso, we have established a guideline that can be summarized as “be a good human being”.

- Every report and campaign generated on our platform is reviewed by our internal team as well as external teams to ensure proper and ethical intent and use of our technology.
- Several uses and industries are prohibited on our platform.

The Ethic Aspect : Exclusion List*

**In continuous review to adapt and expand our list to the cases presented to us.*

- Any illegal act or use
- Police, armed forces or intelligence services
- Drugs, weapons, cigarettes, vaping, cannabis
- Casinos and gambling: no promotion (awareness only)
- Politics or lobbying
- Pornography
- Daycare and primary schools**
- Specialized medical clinics (e.g., abortion, palliative care, AIDS, cancer, etc.)
- Discrimination, profiling, etc.
- To correlate or pair with personal information

****No data is provided on individuals under the age of 18 (COPA requires a minimum of 14 years).**

The Ethical Aspect : Application of Law 25



The establishment of a committee on **access to information and the protection of personal information** is underway!

For any questions about the application of Law 25 at Propulso

→ **Mathieu Le Reste, CEO**
Privacy Officer