

## PERSONAL DATA PROTECTION POLICY

Applicable as of May 25, 2018

*Last update : May 2018*

PRADEO SECURITY SYSTEMS (SAS, whose registered office is located at 71, Place VAUBAN, 34000 Montpellier, France), in its capacity as controller, attaches great importance to protecting and respecting your privacy.

PRADEO wishes to inform you through this policy of how we collect, process and protect your personal data processed via the website [www.pradeo.com](http://www.pradeo.com).

PRADEO complies with all the French and European regulations and laws relating to the protection of personal data.

PRADEO applies an extremely strict policy to guarantee the protection of the personal health data of its users:

- Every PRADEO user remains the master of his data.
- They are treated transparently, confidentially and securely.
- PRADEO is engaged in a continuous process of protecting the data of its users, in accordance with the Data Protection Act of 6 January 1978 (hereinafter "LIL") and the General (EU) Data Protection Regulation of 27 April 2016 (hereinafter "GDPR").

This policy is intended to inform you of our practices regarding the collection, use and sharing of information that you are required to provide us through our website [www.pradeo.com](http://www.pradeo.com).

This policy, together with our [Cookies Policy](#), describes how we treat the personal data we collect and provide to you.

We invite you to read this document carefully to know and understand our practices regarding the processing of your personal data.

## Your personal data we collect

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### TYPES OF DATA COLLECTED

PRADEO collects the data:

- 1) Directly, following an action on your part, when you register to receive our news, access a document or make a request for contact.
- 2) Indirectly, using technologies such as cookies.
- 3) Indirectly, but following a voluntary act on your part, when you share, on social networks, content on our website (article, ...).

The information you send us directly:

- The data you provide by completing one of the forms on our site:
  - Name, surname
  - Name of the company for which you work
  - Occupied position in society
  - Work email
  - Continent
  - Any information deliberately provided by the user as part of the free text entry

The data we collect automatically (indirectly):

In the event that you connect to our website, PRADEO will have access to certain data. During each of your visits, we may collect, in accordance with the applicable legislation and with your acceptance of our [Cookies Policy](#), if applicable, information about the devices on which you use our services or the networks from which you access our services, such as your IP addresses, login details, types and versions of Internet browsers used, types and versions of your browser plugins, operating systems and platforms, data about your navigation on our site, including your browsing on the various pages of our website, the content you access or view, the search terms used, download errors, the duration of viewing certain pages, the advertising ID of your device as well as interactions with the page. Parmi les technologies utilisées pour recueillir ces informations, nous avons notamment recours aux cookies.

We also collect information about your use of our site (such as your message response rate, your registration date, etc.).

To learn more about this, please refer to our [Cookies Policy](#).

**Data that we collect indirectly but following a voluntary act on your side:**

**SOCIAL MEDIA**

The PRADEO User has the possibility to click on the icons dedicated to the Twitter, Facebook, LinkedIn and Google Plus social networks appearing on the Site in order to share PRADEO content on their own social network account.

Social networks improve the usability of the Site and help promote it through sharing.

When the User clicks on these buttons, PRADEO may have access to the personal information that the User has indicated as public and accessible from his Twitter, Facebook, LinkedIn and Google Plus profiles.

However, PRADEO does not create or use any database independent of Twitter, Facebook, LinkedIn and Google Plus from the personal information that the User may publish there and PRADEO will not process any data relating to his private life in this way.

If the User does not want PRADEO to have access to the personal information published on the public space of his profiles or his social accounts, the User must then use the means made available by Twitter, Facebook, LinkedIn and Google Plus to limit access to his data.

## Purpose of the personal data we collect

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PRADEO uses the collected data to carry out its activities and ensure the supply of its products. We use them to improve our products.

We may also use this data to communicate with you, for example, to provide you with information about security news, our latest content and about our products.

We use the data we collect in order to:

AIMS	FONDEMENT LEGAL
to share our news and inform you of the changes made to our services;	This treatment is (i) based on our legitimate interest (to promote our services), (ii) necessary to the respect of our legal obligations and / or (ii) on your consent.
manage our site and perform internal technical operations as part of problem solving, data analysis, testing, research, analysis, studies and surveys;	This treatment is based on our legitimate interest (ensuring the safety of our site and improving its characteristics).
improve and optimize our site, in particular to ensure that the display of our content is adapted to your device;	This treatment is based on our legitimate interest (providing you with adapted content).
to help us preserve a healthy and secure environment on our site;	This treatment is (i) based on our legitimate interest (ensuring the security of our Platforms), (ii) necessary to comply with our legal obligations
evaluate the effectiveness of the advertising messages we address and adapt them to our market.	This treatment is based on (i) our legitimate interest (measuring and optimizing the effectiveness of our campaigns) and / or (ii) your consent.

## Who has access to the information we collect and why do they have access to your personal information?

### Basic principle: NON-COMMUNICATION OF PERSONAL DATA

The Personal Data of the User are intended for the use of PRADEO and are only accessible by PRADEO employees who have all signed a confidentiality clause.

They are not passed on to commercial and advertising partners.

### Exceptions to the non-communication of personal data:

If we have the legal obligation to disclose personal data or if we believe in good faith that this is necessary to (i) respond to any claim against PRADEO, (ii) comply with any legal request.

In the event that PRADEO sells or acquires a business or assets, in which case we reserve the right to share your Personal Data with the potential seller or buyer of this company or these assets. If necessary, new information will be sent to the persons concerned with regard to Article 32 III. of the Data Protection Act and Article 14 of the General Data Protection Regulation.

### **What are your rights to your personal data (GDPR article 12.1)?**

On proof of your identity and if the conditions of exercise of these rights are fulfilled, you can exercise your right of access, right of rectification, right of cancellation, right to the limitation of the treatments, right of opposition, right of to lodge a complaint with the CNIL or by directly contacting our delegate for the protection of your personal data, at the following e-mail address: [dataprivacy@pradeo.com](mailto:dataprivacy@pradeo.com)

#### **Right to information**

You have the right to receive a copy of your Personal Data in our possession ("right of access") by directly contacting our delegate for the protection of your personal data, at the following email address: [dataprivacy@pradeo.com](mailto:dataprivacy@pradeo.com)

You can, by email, ask us to confirm if the personal data concerning you will be processed by us. If such treatment has occurred, you can ask us for the following information:

- (1) the purposes for which the personal data are processed;
- (2) categories of personal data processed;
- (3) the recipients or categories of recipients to whom the personal data concerning you have been or are still disclosed;
- (4) the expected retention period of the personal data concerning you or, if no specific information on this subject is possible, the criteria for determining the shelf life;
- (5) the existence of a right to rectification or deletion of your personal data about you, a right to limit treatment by the controller or a right to oppose such treatment;
- (6) the existence of a right of appeal to a supervisory authority;
- (7) any information available on the origin of the data if the personal data are not collected from the data subject;
- (8) the existence of an automated decision-making process, including profiling in accordance with art. 22, para. 1 and 4 of the GDPR and - at least in these cases - useful information on the logic involved as well as the scope and expected effects of such treatment for the data subject.

You have the right to ask if the personal data concerning you are transferred to a third country or to an international organization. In this context, you can ask to be informed of the appropriate warranties in accordance with art. 46 of the GDPR as part of the transmission.

## Right of rectification

Whenever PRADEO processes Personal Data, PRADEO takes all reasonable steps to ensure the accuracy and appropriateness of the Personal Data in relation to the purposes for which PRADEO collects it.

If the User wishes to know how PRADEO uses his Personal Data, requests to rectify or oppose their treatment, the User may contact PRADEO in writing at the following email address: [dataprivacy@pradeo.com](mailto:dataprivacy@pradeo.com).

In this case, the User must indicate the Personal Data that he would like PRADEO to correct, update or delete, by identifying himself precisely with a copy of an identity document (identity card or passport). Requests for the deletion of Personal Data will be subject to the obligations that are imposed on PRADEO by law, particularly with regard to the preservation or archiving of documents.

You have a right of rectification and / or completion regarding the controller if the personal data processed about you are incorrect or incomplete. The person in charge will proceed without delay to the rectification.

## Right of limitation of treatment

You have the right to limit the processing performed on your Personal Data ("right to limitation"). Please note that this right only applies if (i) you dispute the accuracy of your Personal Data during the period that allows us to verify the accuracy of your Personal Data; (ii) in case of unlawful processing by us and that you require a limitation of their use rather than an erasure, (iii) we no longer need the personal data for the purposes of processing but these are you still necessary for the establishment, exercise or defense of rights in court; and (iv) if you exercise your right of objection during the verification period as to whether the legitimate grounds we pursue are yours.

You may request that the processing of your personal data be limited, under the following conditions:

- (1) if you dispute the accuracy of personal data about you during a period allowing us to verify the accuracy of personal data;
- (2) if the processing is illegal and you oppose the deletion of personal data and instead ask that the use of personal data be limited;
- (3) if we no longer need personal data for processing purposes, but you need it to enforce, exercise or defend lawsuits, or
- (4) if you have opposed the treatment in accordance with art. 21, para. 1 of the GDPR and it has not yet been established whether our justified reasons outweigh yours.

If the processing of personal data about you has been limited, such data may only be processed - apart from their storage - with your consent or for the purpose of asserting, exercising or defending rights or protecting rights of another natural or legal person or for reasons of significant public interest of the Union or a Member State.

(5) If the restriction of treatment has been limited in accordance with the above conditions, we will notify you before the restriction is lifted.

## **Right of cancellation**

## **Shelf life of your data**

Your Personal Data is archived at the end of the following periods:

- 3 years after your last use of our site, if you have not canceled your subscription to our newsletter;
- 1 year after the cancellation to our newsletter.

In the event that your account has been suspended or blocked, we keep your data for a period ranging from 2 to 10 years from the suspension in order to avoid any circumvention by you of the rules in effect on our Platforms.

## **Obligation to delete**

You can also request the deletion of your Personal Data as well as the rectification of the erroneous or obsolete Personal Data ("right of cancellation and right of rectification"). Please note that we may retain certain information about you when required by law or when we have a legitimate reason to do so.

You may ask us to delete your personal data immediately and we are required to delete this data immediately as long as one of the following reasons applies:

- (1) Your personal data is no longer necessary for the purpose for which it was collected or processed.
- (2) You revoke your consent, on which the treatment was based under the terms of art. 6, para. 1, point a or art. 9, para. 2, point a of the GDPR, and the treatment is not based on any other legal basis.
- (3) You oppose treatment according to art. 21, para. 1 of the GDPR and there are no compelling and legitimate reasons for treatment, or you oppose treatment in accordance with art. 21, para. 2 of the GDPR.
- (4) Your personal data has been subject to unlawful processing.
- (5) The deletion of your personal data is necessary to fulfill a legal obligation under European Community law or the law of the Member States to which we are subject.
- (6) Your personal data has been collected as part of the information society services provided in accordance with Art. 8, al. 1 of the GDPR.

## **Exceptions**

The deletion right does not exist as long as the processing is necessary.

(2) To enable the fulfillment of a legal obligation required for processing under European Community law or of the Member States to which the controller is subject or the performance of a public interest mission or in the exercise of the public authority conferred on the controller;

(5) To assert, exercise or defend legal rights.

### **Right to portability of data (Portability)**

You also have the right to the portability of your data, that is to say the right to receive Personal Data that you have provided in a structured, commonly used and machine readable and the right to transmit such data to another data controller ("right to portability"). You have the right to receive personal data about you that you have provided us in a structured, common and machine readable format. You also have the right to transfer this data to another manager without our intervention, provided that

(1) the treatment is based on consent in accordance with art. 6, para. 1, point a of the GDPR or in art. 9, para. 2, point a of the GDPR or on a contract in accordance with art. 6, para. 1, point b of the GDPR

(2) the treatment is performed using automated methods.

By exercising this right, you also have the right to request that personal data about you be transferred directly from one controller to another, as far as technically possible. The freedoms and rights of others should not be affected.

### **Right of opposition**

You may at any time exercise your right to object, for reasons arising from your particular situation, to the processing of your personal data, pursuant to Article 6, para. 1, point e or f of the GDPR; this also applies to profiling on the basis of these provisions.

We will no longer process personal data about you unless we can demonstrate compelling reasons for protection for treatment that outweigh your interests, rights and freedoms, or if the treatment is for the purpose of asserting, exercising or to defend legal rights.

If your personal data is processed for direct marketing purposes, you may object at any time to the processing of your personal data for advertising purposes; this also applies to profiling, insofar as it is associated with this type of direct marketing.

If you object to processing for direct marketing purposes, your personal data will no longer be processed for these purposes.

You have the opportunity to exercise your right of objection in the context of the use of Information Society services by means of automated procedures using technical specifications, notwithstanding Directive 2002/58 / EC. You also have the right to object to the processing of your personal data for statistical purposes, in accordance with art. 89, para. 1 of the GDPR, for reasons arising from your particular situation.



### **Right to revoke consent to data processing**

You have the right to revoke your consent to data processing at any time. The revocation of consent does not affect the legality of the treatment on the basis of consent until revocation.

### **Right of appeal to a supervisory authority**

Without prejudice to any other administrative or judicial appeal, you have the right to appeal to the CNIL, particularly in the Member State in which you reside, work or suspect an offense, if you consider that the processing of personal data Your personal information is contrary to the GDPR.

The CNIL with which the complaint has been lodged informs the complainant of the status and results of the complaint, including the possibility of a judicial appeal under Article 78 of the GDPR.

CNIL :

<http://www.cnil.fr>

Phone: +33(0) 1 53 73 22 22

Mail :

Commission Nationale de l'Informatique et des Libertés

*Adresse postale :*

3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07

### **SECURITY**

To ensure the security and confidentiality of Personal Data, PRADEO uses networks protected by standard devices such as firewalls.

When processing personal Data, PRADEO takes all reasonable steps to protect it against loss, misuse, unauthorized access, disclosure, alteration or destruction.

Our website is hosted at:

#### **OVH**

SAS with 10 069 020 € capital

RCS Lille Métropole 424 761 419 00045

Code APE 2620Z

N° TVA: FR 22 424 761 419

Head office: 2 rue Kellermann - 59100 Roubaix - France

The personal data collected through the forms of our website are processed through the services of HubSpot and Salesforce. As part of these partnerships, PRADEO has ensured the proper implementation of the principles of the General Regulations on Data Protection:

- [https://www.salesforce.com/company/privacy/full\\_privacy/](https://www.salesforce.com/company/privacy/full_privacy/)
- <https://legal.hubspot.com/fr/privacy-policy>

## Other important privacy information

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**Effective data:** 25 May 2018

### Contact details for the data protection officer

If you have any questions regarding this Privacy Policy or any request for your personal data, you may contact our Data Protection Officer at the following address:

- By sending an email to our data protection officer at: [dataprivacy@pradeo.com](mailto:dataprivacy@pradeo.com)

**The French version of this document must prevail over any translation with regard to all the concepts, definitions, turns of words and expressions related.**