

# PERSONAL DATA MANAGEMENT POLICY FOR SOLUTIONS IN SAAS MODE

Version: 12/12/2023

Please read the information below in full before transmitting any personal data to ENVEA and using one of our Solutions in SaaS mode.

This document is updated to take into account any changes in legal requirements.

All updates are available on <a href="https://www.envea.global/legal-notice/">https://www.envea.global/legal-notice/</a>

The following translation is provided for the client's convenience. The French version shall prevail in the event of any discrepancy, inconsistency or conflict between this translation and the French version.

#### 1. WITH REGARD TO THIS POLICY

This Policy applies when you access our Solutions and/or Services (hereinafter collectively referred to as the "Service(s)") in SaaS mode. This Policy may be complemented by additional elements detailed in all or part of a Service provided and especially in our General Terms and Conditions of Services.

Accessing one of our Services may result in you providing data (hereinafter referred to as "Personal Data" or "Data") especially when you fill out registration forms. We will then indicate what type of Personal Data is required.

### 2. PRESENTATION OF THE DATA PROCESSING CONTROLLER AND PUBLISHER OF THE SOLUTION IN SAAS MODE

The company ENVEA (hereinafter referred to as "ENVEA" or "We/Us"), which possesses and/or administers the Services, is the Controller in charge of Processing the Personal Data concerned.

- · Simplified joint stock company
- Registered office: 111 Boulevard Robespierre in POISSY (78300) France
- Share capital: 10,119,234 Euros
- Listed in Versailles Trade and Companies Register, France, under number RCS 313 997 223
- Email: info.fr@envea.global

## 3. DETAILS OF PERSONAL DATA PROCESSED BY US

We collect your Personal Data in different ways:

## 3.1. Data provided to us by you

The Personal Data that we collect directly from you depends on the relationship you have with the Service, and may include:

- Your contact details, such as your name, position, email address and telephone number.
- Login identifiers used to connect to the Service, such as user name, password and other information relating to the security of these identifiers.
- Other information relating to registration of the account and profile, such as the title of your position and/or your duties.
- Remarks and other information that you provide Us, and/or
- · your interests and communication preferences, including preferred language.

## 3.2. Data provided by your Business Entity

We may obtain your Personal Data from the business entity where you work (hereinafter referred to as your "Entity") in order to activate and manage your access and use of the Service to which your Entity has subscribed. These Personal Data may include:

- Contact details, such as name, email address and telephone number;
- Other account inscription data, such as position title, and/or
- · the Entity's user login identifier.

#### 3.3. Data from using the Service

The Service may automatically collect information about the way in which you interact with the Service, including:

- Information concerning the connection environment, namely the IP address, browser type and version, operating system, and other software installed in your environment, mobile platform, technical login identifiers, error reports and execution data;
- Usage data, such as the functionalities that you have used and the settings you have selected.

We collect these Data through our servers.





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#### 4. PURPOSE OF DATA COLLECTION AND DATA RETENTION PERIOD

#### 4.1. General information

ENVEA undertakes to adhere to the general principles relating to Data protection, especially purpose limitation, Data minimisation, limitation of Data retention periods, Data quality, Data protection by design and Data protection by default, the legal basis for processing, the processing of special categories of Data, measures to ensure Data security and requirements with regard to onward transfers to bodies that are not bound by binding corporate rules.

#### 4.2. Purpose

According to the way in which you interact with ENVEA and the Service, we may use your Personal Data to:

- Provide, activate and manage your access to the Service and its use;
- Process and respond to a request, a subscription or any other transaction;
- Provide technical support, a complementary service or product and thus enable the correct functioning of the Service and its protection;
- Respond to your requests, research, remarks and concerns;
- Notify you of modifications, updates and other information relating to the Service and other products and services;
- If you are the manager of the Entity subscribed to our Service, we will use your Data to communicate with you regarding your Entity's subscription. If you provide us with information regarding users in your Entity, you guarantee to us that you have obtained their approval so that we will be able to use their Personal Data in order to provide them with the Service;
- Comply with our legal obligations, resolve any disputes and enforce our contracts;
- Offer tailored content and other bespoke features to make the Service most appropriate to your interests and geographical location.

#### 4.3. Retention period

The Data are stored for a period that does not exceed the duration necessary for the purposes for which they have been collected.

We keep your Personal Data for as long as necessary in order to provide the Service and perform our contractual obligations or for other essential purposes such as compliance with our legal obligations, maintaining security, the detection and prevention of fraud and infringements.

If you access the Service through a subscription administered by your Entity, we keep your business contact data after your Entity's subscription has terminated in order to continue to communicate with you according to the terms of our Personal Data conservation policy.

The data collected for management of the contractual relationship are kept throughout the duration of this contractual relationship and are archived for a period of five (5) years following the end of the aforementioned relationship, when they are of administrative interest, especially for establishing proof of a right or contract.

## 5. RECIPIENTS OF PERSONAL DATA

#### 5.1. Your Business Entity

If you access the Service through a subscription administered by your Entity, your Personal Data and certain utilisation data collected by the Service may be accessible and shared with your Entity's subscription manager for the purposes of analysing use, subscription management, providing training and support.

## 5.2. Third-party application

If you access a third-party application interconnected to the Service, your Personal Data may be shared with the publisher of this third-party application so that the latter may provide you with access to the application, subject to the terms and conditions of their licence agreement and privacy policy.





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### 5.3. Companies in our group and our service providers

Depending on the services provided, we may share information with:

- our affiliated companies and certain ENVEA Group companies that provide you with the Service and other shared service functions:
- our service providers, suppliers, distributors, agents and representatives including, among others, our service support clients,

in order to process the information required to provide the Service or handle your request or otherwise on our behalf, based on our instructions and pursuant to this Policy and any other appropriate privacy and security measures.

## 5.4. Legal obligation

We will also disclose your Personal Data, should such disclosure be necessary in order to:

- comply with any law in effect as well as any regulation, legal proceedings or other legal obligation;
- · detect, investigate and prevent any problems of security, fraud or technical issues;
- · carry out a general transaction, such as transfer of an asset or acquisition through a merger with another company.

#### 6. LOCATION OF DATA STORAGE AND SECURITY ARRANGEMENTS

Your Personal Data are stored in servers situated in Europe.

We take all necessary precautions and implement appropriate technical and organisational measures in order to ensure the security of the Personal Data we process, especially to prevent the Data from becoming deformed or damaged, or being accessed by non-authorised third-parties.

#### 7. DATA SUBJECTS' RIGHTS

You have the right of access, rectification and erasure of your Personal Data, as well as the right to restrict processing and the right of portability of your Data.

You also have the right to object on legitimate grounds to the processing of your Personal Data, as well as the right to object to the processing of your Data for marketing purposes.

Finally, you have the right to lodge a complaint with data protection regulators at the relevant supervisory authority:

- In France, the supervisory authority is the Commission Nationale de l'Informatique et des Libertés [CNIL] 3 Place de Fontenoy TSA 80715 75334 Paris Cedex 07.
- The list of other supervisory authorities in each member state of the European Union is available on the following link: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index en.htm

You may exercise your rights at any time by sending your request by email to the data protection officer at <a href="mailto:rgpd@envea.global">rgpd@envea.global</a>, along with a photocopy of the identity document bearing the signature of the person concerned and detailing the address to which the response must be sent. The person concerned will be sent a response within a period of between one and three months following receipt of said request, depending on the complexity and/or volume of the requests.

## 8. CONTACT

If you have any remarks, questions or requests concerning this Policy or our processing of your Data, kindly contact us via our Data Protection Officer: <a href="mailto:c.meyer@envea.global">c.meyer@envea.global</a>.



