

PERSONAL DATA PROTECTION POLICY - SYSTANCIA

Table of Contents

1)	Introduction	2
2)	What is personal data?.....	2
3)	Who is responsible for the data management procedures on our site?	2
4)	When and how is your data collected?	3
5)	Why do we collect your data?.....	3
6)	How to stop receiving commercial offers by e-mail or SMS?	4
7)	Who has access to your personal data?.....	4
8)	What data is collected by cookies?	5
9)	How long is your data kept?.....	6
10)	How to exercise your rights regarding your data?	6
11)	How your data is used on social networks?	7
12)	What are the data protection security measures?	8
13)	What data is required when using SYSTANCIA products?	8

1)Introduction

This **Personal Data Protection Policy** provides you with information about the processing operations related to the use of your personal data within the framework of the General Data Protection Regulation (EU) 2016/679 and the Data Protection Act of 6 January 1978, as amended.

2)What is personal data?

Personal data is any information that directly or indirectly identifies an individual. Thus, the first name/surname, the postal or e-mail address, the telephone number or, for example, the IP address are personal data.

3)Who is responsible for the data management procedures on our site?

For the site, SYSTANCIA company,

Public limited company with a Management Board and Supervisory Board with a share capital of €2,547,831.33, Company's Headquarters: Actipolis III- 3, rue Paul Henri Spaak 68390 Sausheim

Phone: +33 (0)3 89 33 58 20

Fax: +33 (0)3 89 33 58 21

E-mail: commercial@systancia.com

Web site: www.systancia.com

R.C.S. Mulhouse TI B 419 687 231

Siret 419 687 231 00052 – Code APE 722C

SYSTANCIA has assigned a **Data Protection Officer (DPO)** who you can contact:

- E-mail address: DPO@systancia.com
- Postal address: SYSTANCIA DPO - 3, rue Paul Henri Spaak 68390 Sausheim

4)When and how is your data collected?

Your personal data is collected:

- When you browse the site using cookies.
- When you make an on-line request and fill in a contact form.

SYSTANCIA is authorised to collect cookies by erasing your consent by accepting cookies and navigating on our site.

5)Why do we collect your data?

The processing of personal data generated by the deposit and reading of cookies during your browsing on the site are used to:

- Ensure the operation of the site based on SYSTANCIA's legitimate interest to allow you to benefit from the functionalities of the site;
- Measure the site audience and establish visit statistics based on your consent, which you can withdraw at any time;
- Ensure the site's interactivity with social networks based on your consent, which you can withdraw at any time;
- Adapt the advertising content displayed to your interests based on your consent, which you can withdraw at any time. For more details, we invite you to refer to paragraph 8. Legal notices from our website;
- Respond to requests made via forms.

The processing operations generated when filling in a contact form are intended to fulfill the request made, in particular:

- Operations related to the management of requesting contacts;
- Operations relating to commercial prospecting.

6)How to stop receiving commercial offers by e-mail or SMS?

If you agree to receive commercial offers, you may at any time request that you no longer receive this type of information:

- by clicking on the unsubscribe link provided for this purpose in each e-mail you receive.

7)Who has access to your personal data?

The personal data collected on the site are intended, within the limit of their attributions, to SYSTANCIA's internal services (i) to its subcontractors (ii).

More specifically, the recipients of your personal data are the following:

While browsing the site:

- SYSTANCIA internal services to respond to requests (i);
- The companies hosting the site (ii);
- The companies operating the maintenance of the site (iii);
- The companies operating the tools to measure the site traffic or cookies (iv).

The user provides this information in full knowledge of the facts, particularly when he/she enters the information himself/herself. In any case, Systancia only collects personal information relating to the user for the purpose of providing certain services offered by the systancia.com web site. It is then specified to the user of the systancia.com web site whether or not it is mandatory to provide this information.

Only SYSTANCIA processes this data for commercial purposes. No company other than SYSTANCIA, including its subcontractors, is authorized to use the data collected for purposes other than those covered by their contractual roles and in compliance with laws and regulations.

Your personal data will not be subject to any external communications other than those provided for above, except to

meet SYSTANCIA's legal and regulatory obligations, in particular at the request of an administration or a judicial authority.

8)What data is collected by cookies?

Several types of cookies are stored, they can concern both navigation data reused for statistical purposes via the Act-On tool or for site functional reasons.

The types of cookies are the following:

- Temporary session cookies - Used to automatically connect and disconnect visitors to the Act-On platform;
- Permanent cookies - Used for statistical purposes via the Act-On Beacon tool;
- Functional cookies.

Once the cookie has been accepted, the following types of data can be collected: E-mail addresses; Pages visited on the web site; Web searches; Downloads; Interactions on visited advertising links; Interactions on social network links; Webinars visits; Completed forms.

The refusal to install a cookie may result in the inability to access certain services. However, the user can configure his computer as follows to refuse the installation of cookies:

- On Internet Explorer: tool / internet options. Click on Privacy and choose Block all cookies. Confirm by clicking Ok.
- On Safari: Preferences > Privacy > Cookies and web site data > Select the option you want: always block or allow only for this website or allow only authorized websites or always allow > Click on "Manage website data" for more preferences.
- On Firefox: Menu button > Select Options > Privacy and Security Panel > History > In the drop-down menu next to Storage Rules choose Use custom settings for history > Check the box Accept cookies to enable cookies, or uncheck it to disable them > Choose how long cookies can be stored.
- On Chrome: Plus > Settings > Advanced Settings > Privacy and Security > Click on Cookies and Content Settings > Enable or disable "Allow sites to save/read cookie data".

- On Opera: Preferences > Advanced > Cookies > Select the desired option > Accept cookies (all cookies are accepted (by default) or Accept only those on the site visited (cookies from third parties, from a domain outside the one I visit, are refused) or never accept cookies (all cookies are refused).
- On Netscape: edit / preferences. Click on Advanced and choose Disable cookies. Confirm by clicking Ok.

You can also use an online service for customized cookie management called Your Online Choices:

<http://www.youronlinechoices.com/uk/your-ad-choices/>

9)How long is your data kept?

Your personal data is kept for the time necessary to fulfill the purposes described above:

- 3 months for the connection logs of our sites;
- 13 months (in Europe) for cookies from the time they are placed on your computer or device;
- 3 years after the last contact of the customer in case of a message on the contact form of the site;
- If necessary, for the duration of the disputes and until all legal remedies have been exhausted.

10) How to exercise your rights regarding your data?

In accordance with the regulations in force, you have rights (access, rectification, deletion, opposition, etc.) to your personal data.

These rights can be exercised directly by mail with a copy of your identity card to SYSTANCIA at the following address: SYSTANCIA DPO – 3 rue Paul Henri Spaak – 68390 SAUSHEIM - FRANCE

You can also make your request by e-mail with a copy of an identity document via DPO@systancia.com.

Systancia undertakes to respond to these requests within one (1) month from their receipt.

The rights previously granted to you will lapse in the event of death. However, you have the right to define guidelines for the

storage, deletion and communication of your personal data in the event of death.

If your personal data is processed with your consent, you may withdraw it at any time. However, you are informed that the processing operations carried out prior to this revocation cannot be cancelled.

Any non-compliance with the Policy by SYSTANCIA gives you the right to file a claim (complaint) with the CNIL.

For more information, you can visit the web site of the "Commission Nationale de l'Informatique et des Libertés" (CNIL).

11) How your data is used on social networks?

The site uses social networks plug-ins, e.g. Twitter, YouTube etc.

If you interact on the site, for example by clicking the "Like" or "Share" buttons, information related to your browsing on the site and your membership to these social networks will be transmitted, recorded and processed on a server of the company operating the social network attached to your user account on that network, according to the conditions of use specific to the social network.

If you do not want your personal data to be transmitted from the site to social networks, we recommend that you:

- Do not interact with these social networks by clicking the buttons available on the site,
- Disable your connection to the social network in question before coming to browse our site,
- Navigate in "Private" mode via your browser.

12) What are the data protection security measures?

SYSTANCIA takes all necessary precautions to preserve the security and privacy of your data, in particular to prevent it from being distorted, damaged, disclosed or accessed by unauthorized third parties. SYSTANCIA keeps a personal data processing register at the disposal of the authorities, referring to the security measures that SYSTANCIA undertakes to follow.

13) What data is required when using SYSTANCIA products?

For any request on this subject, please refer your subscribed contracts or those related to the conditions of license and use of our products, in particular the sections on "Data Use Agreement". Our use of customer content and log technical data is subject to the terms of the contracts entered into and is not governed by this privacy policy

The terms for the transmission, recording or processing of data are stipulated in it.

You can also request information by e-mail via DPO@systancia.com.