
Privacy policy for clients, prospects and providers

Last update 06/20/2024

1. PURPOSE OF THE DOCUMENT

Deltamu values honesty and clarity and is committed to building strong and lasting relationships with our customers, based on trust and mutual interest.

In line with this philosophy, the protection of personal data and the respect of privacy are an important matter for our company. It is therefore important to us that you are informed, through this privacy policy, about how we collect and process your data, as well as the rights you can exercise.

We have appointed a Personal Data Officer to answer any questions you may have about the processing of your data. We invite you to contact him at the following address:

- Mr Nuno DOS REIS
- Address: 17 rue de Sarliève - 63800 Cournon d'Auvergne, France
- Mail: ndosreis@deltamu.com
- Telephone: 04.73.15.13.00

This document may be modified at any time, in order to ensure its conformity with the law in force. You will be informed of any changes by posting them on our website.

2. SCOPE OF APPLICATION

Our Privacy Policy is intended to apply to all of our customers, prospects, suppliers, service providers, subcontractors, partners, training learners and, in general, to all our co-contractors.

3. GENERAL PRINCIPLES OF DATA PROTECTION

Our company is committed to meeting the requirements set out in the European Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to personal data (GDPR), by respecting the following fundamental principles:

- Lawfulness of processing: we process your data only where permitted
- Purpose of processing: your data is collected for a defined and legitimate purpose
- Data minimization: we only collect data that is strictly necessary for the purpose
- Limited data retention: your data are archived, deleted, or anonymized once the purpose has been achieved
- Security obligation: we put in place measures to ensure the security of your data
- Transparency: you are informed about the use of your data
- Individual rights: you can retain control of your data

4. WHAT IS PERSONAL DATA AND PROCESSING PERSONAL DATA?

In France, personal data protection is governed by:

- The French Data Protection Act n°78-17 of 6 January 1978, amended by the laws of 6 August 2004, 16 October 2016 and 20 June 2018 ("Loi Informatique et Libertés"),
- The European Regulation on the protection of personal data n°2016/679 of 27 April 2016, which came into force on 25 May 2018 ("GDPR").

4.1 What is personal data?

Personal data is any information relating to a person directly or indirectly. For example, personal data may include an identifier, a name, an identification number, an IP address, a photograph, a telephone number, etc.

4.2 What is sensitive data?

Some personal data are particularly sensitive from the point of view of fundamental rights and freedoms, as they present a high risk for individuals. These include racial or ethnic origin, political, philosophical or religious opinions, trade union membership, health or sex life.

In principle, such sensitive data can only be collected and used with the person’s explicit consent.

4.3 What is data processing?

Personal data processing is defined as any operations applied to such data: collection, recording, organisation, structuring, storage, adaptation, modification, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

In short, it is any operations consisting of using and/or consulting your data.

5. WHAT DATA IS COLLECTED BY DELTAMU AND FOR WHAT PURPOSE?

In the context of your relationship with our company, you may have disclosed some of your personal data to us, particularly in the following cases:

Steps	Collected data	Purposes and objectives	Legal basis
Visiting websites	<u>Connection, geolocation and navigation data</u> : dates and times of connections, connection terminals, IP address, connection identifiers, browser type, server requests	Website display management (deltamu.com and mesuronsbienlebigdata.com)	Contractual necessity (execution of the contract between the user and the company, formalised by the

	and time, referring URL, access provider		general conditions of use of the site)
Use of cookies	<u>Connection, geolocation and navigation data</u> : cookies, tracers, audience measurement, pages visited, content consulted	Better knowledge of the traffic and audience of its websites	Consent of data subjects Legitimate interest of the company
Creation of a customer area on the deltamuu.com website	<u>Account data</u> : surname, first name, username, e-mail address, position, company, postal address, telephone number	Customer account management Communication of information (training schedule, access to company products)	Contractual necessity (execution of the contract between the client and the company)
Filling in a contact form	<u>Civil status and contact data</u> : surname, first name, e-mail address, telephone number, company, position, postcode	Management of user requests by re-contacting them	Consent of the persons concerned
Contact with the company	<u>Civil status and contact data</u> : surname, first name, e-mail address, telephone number, status (professional, private), company, function, postal address	Customer service management (requests, complaints from users via e-mail or telephone...) for the purpose of improving the quality of service	Consent of data subjects Legitimate interest of the company
E-mail communication of newsletters	<u>Contact data</u> : e-mail address, name, first name, company	Management of newsletters (newsletters, commercial or technical communications relating to the products and services offered by Deltamu)	Consent of the persons concerned
Commercial prospecting	<u>Identification data of the prospect</u> : surname, first name, e-mail address, telephone number, company, function, SIREN number, intra-community VAT number, postal address, country	Management of commercial relations (communication of information and commercial prospecting messages, sending presentations to partners, etc.)	Consent of the persons concerned
Payment, financial and accounting operations	<u>Economic, financial and accounting data</u> : payment data, means of payment used, surname, first name, e-mail address, telephone number, status, company, function, postal address, country, invoicing, tax and accounting data, SIREN number, intra-community VAT number, country	Management of payment operations (invoices, settlements, accounting, payment vouchers, accounts receivable) for customers, prospects, suppliers and partners Establishment of financial and supplier turnover statistics	Contractual necessity (execution of the contract between the customer, supplier, partner and the company)
		Communication in case of legitimate requests from public authorities (national security)	Legal obligation (tax and accounting)

		requirements, fight against fraud, law enforcement), for the management of litigation (recovery of unpaid debts)	from the Monetary and Financial Code
Administrative operations	<u>Administrative data</u> : surname, first name, position, e-mail address, telephone number, postal address, company, country	Management of administrative operations related to contracts and orders Management of supplier documentation	Contractual necessity (pre-contractual measures and performance of contracts)
Access to the OPTIMU eService platform	<u>Contact data</u> : surname, first name, e-mail address, login details, telephone number	Management of access to the platform, hotline Technical communication (alerts, bugs, etc.)	Contractual necessity (execution of the contract between the user and the company)
Access to the Optimu mobile application	<u>Contact data</u> : last name, first name, email address, identifiers, telephone number	Managing access to the mobile application Technical communication (alert, bug, etc.)	Contractual necessity (execution of the contract between the user and the company)
Access to customer databases	<u>Data</u> : name, first name, position, company, e-mail address, telephone number	Management of customer databases, management of measuring instruments (data recovery or maintenance operations)	Contractual necessity (execution of the contract between the client and the company)
Training activity Access to the e-learning platform	<u>Contact data</u> : surname, first name, e-mail address, telephone number, identifiers, company, function, postal address, billing data	Management of face-to-face and distance learning courses in digital learning (management of registrations, sending of documents relating to the course) Management of access to the digital learning platform	Contractual necessity (execution of the contract between the client and the company)

In accordance with the GDPR, we do not collect or process sensitive data.

In the case of processing other than those described above, the data subject will be notified in advance by Deltamu.

6. WHO HAS ACCESS TO MY DATA?

Our company ensures that only those who need to process your personal data for the fulfilment of their legal and contractual obligations have access to it, namely:

- The personal data managers,

- The administrative, HR and financial department: for data relating to administrative and financial operations, data relating to training,
- The sales department: for data relating to commercial prospecting, customer data, supplier data, sending of newsletters,
- The IT department: for data relating to websites, cookies,
- The technical support department: for data relating to customers, users of the digital learning platform, training learners, as well as data relating to the databases.

Some of Deltamu's service providers and subcontractors may receive personal data if it is strictly necessary for the performance of their services, which is notably the case:

- Legal entities in charge of implementing the above-mentioned activities: banks, insurance companies, consultants, accountants,
- The service providers that we have chosen and identified to carry out all or part of our activities on our behalf and also our technical service providers (AMEN hosting, IBO, Online SAS / e-learning platform editor 360 Learning), training providers (DIGIFORMA),
- Public control authorities: in the context of a legal obligation,
- Companies in our group.

In this respect, Deltamu undertakes to use only subcontractors and service providers who offer sufficient guarantees and who respect the commitments in terms of personal data protection.

In addition, operations with a service provider receiving personal data are subject to a contract in order to ensure the protection of your data and the respect of your rights.

7. HOW ARE THE SECURITY AND CONFIDENTIALITY OF MY DATA ENSURED?

Within our organisation, data privacy and security are everyone's responsibility.

We have taken all reasonable and necessary precautions to preserve the confidentiality and security of the personal data we process, and to protect your data from malicious intrusion, loss, destruction, alteration or access by unauthorised persons.

We will not sell, rent or share your personally identifiable information with third parties, except for compelling legal reasons (e.g., transmission to external services such as supervisory or prosecution authorities).

The premises in which the data is stored are locked and only accessible to authorised persons.

Access to IT tools is protected by passwords, which are changed regularly in accordance with our company's instructions.

All data collected is hosted on secure servers. It is also stored in encrypted form on secure physical servers and on external hard disks.

Regular updates are carried out on each computer workstation and server. Each workstation is equipped with a security solution to combat computer attacks.

A procedure has been put in place to analyse and evaluate the effectiveness of our strategy taken to ensure the security of processing.

Our employees who process personal data have signed a confidentiality agreement. Similarly, our main service providers and our subcontractors within the meaning of the RGPD have signed contracts with commitments in terms of security and confidentiality. For the others, the GTC are applied.

Finally, in the event of a violation presenting a risk to the rights and freedoms of individuals, Deltamu undertakes to notify the CNIL of the incident as soon as possible after it is discovered. This summary document enables our company to meet its internal documentation obligation. If this violation presents a high risk, the persons concerned will also be notified.

8. HOW LONG WILL MY DATA BE KEPT?

Processed data about you are kept only for the necessary period to achieve the purposes previously described. They are then subject to intermediate archiving, if they are still of administrative interest or if they must be kept to meet a legal obligation. In this case, the legal limitation periods vary according to the type of data collected.

For example, data relating to the customer's contact details or purchase data are kept for a period of five years from the end of the commercial relationship, unless the customer exercises his or her right to object.

Data relating to commercial actions are kept for a period of three years from the last contact or the end of the commercial relationship.

Connection logs are kept for one year and are then deleted, and cookies are kept for thirteen months from the time they are deposited on the user's terminal.

Customer databases are kept for a period of 5 years, unless otherwise specified by the customer.

The other data are only kept for the purposes of the execution of the services, and then for the duration of the legal requirements (5 years for contracts, 10 years for contracts concluded by electronic means and 10 years from the end of the financial year for accounting documents).

The collected data may also be subject to a process of anonymisation, in order to make it impossible to identify individuals. As a result, it will no longer be considered as personal data and may be kept freely by our company. This is the case for our providers on Digiforma and 360 Learning.

If you would like further information on how long we will keep your data, please contact our Data Protection Officer, whose contact details are given at the top of this document.

9. ARE MY DATA TRANSFERRED OUTSIDE THE EUROPEAN UNION?

As a matter of principle, the collected data are not transferred outside the European Union and is stored internally on our company's servers and externally on the servers of our hosting providers, located within the European Union.

In the event that a technical service provider or subcontractor processes any of your data on our behalf, we ensure that

- They do not transfer any personal data outside the European Union,

- Or, if they do, that the transfer is based on an adequacy finding with a country providing an adequate level of protection or, in the absence of such a finding, that it is made after implementing appropriate safeguards, such as standard contractual data protection clauses, binding internal company rules or specific contractual clauses.

10. WHAT ARE MY RIGHTS?

You have several rights to control your personal data, under the conditions and within the limits provided for by the GDPR:

- A right to information: through our Privacy Policy, you have clear information on the use of your data and the exercise of your rights
- A right of access, rectification and deletion: this allows you to know what data is being processed about you, to check its accuracy and to have it rectified or deleted if necessary
- A right to object: you can object at any time to our using some of your data for legitimate reasons or for any use for commercial prospecting. You can also unsubscribe from our mailing list.
- A right to portability: you can take a copy of your personal data for re-use elsewhere.
- A right to restrict processing: this allows you to freeze the use of your data while a request for rectification or opposition is being processed.
- A right to determine what happens to your data after your death: you can define general and specific directives concerning the retention, deletion and communication of your data after your death.

No automated individual decisions are taken from your personal information and no profiling is carried out on the basis of the data collected.

Where processing is based on your consent, you may withdraw it at any time.

This withdrawal of consent will only have effect for the future once we have been able to validate the lawfulness of your request.

We remind you that when data are collected for the execution of a contract and/or pre-contractual measures, it is mandatory due to a legal obligation. Any failure to provide such information will result in the exclusion of the right for which the data is collected.

11. HOW CAN I EXERCISE THEM?

Our company has no obligation to appoint a Data Protection Officer (DPO), as:

- It is not a public authority or public body,
- It does not carry out processing operations which, due to their nature, scope and/or purposes, require regular and systematic large-scale monitoring of the data subjects,
- Its core activities do not consist of large-scale processing of special categories of sensitive data or of personal data relating to criminal convictions and offences

Nevertheless, our company has chosen to designate a personal data referent, whose contact details are as follows:

- Postal address: DELTAMU - Centre d'affaires du Zénith - 17 RUE DE SARLIÈVE - 63800 COURNON D'AUVERGNE

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- E-mail address: contact@deltamu.com

You may contact him for any information concerning your rights, your data, including any request for translation of this information into another language, provided that you can demonstrate: 1) your interest in using our website, 2) your inability to understand one of the 3 languages offered (English, French, Italian) and 3) that your request is reasonable.

You can also exercise your rights by sending a letter to our company. As these rights are purely personal, you must enclose a photocopy of an identity document with your signature with your request. This will only be kept for the time necessary to verify your identity.

We undertake to respond to any request within a reasonable period of time, between one and three months, depending on the complexity of the request, from the date of receipt.

You also have the right to lodge a complaint with the competent supervisory authority, the CNIL, if you are established in France:

- By post: CNIL, 3 Place de Fontenoy, TSA 80715, 75334 PARIS Cedex 07
- Via the website: see the procedures on <https://www.cnil.fr/fr/agir> or <https://www.cnil.fr/fr/plaintes>

12. WHAT IS THE COOKIE POLICY?

Browsing one of the DELTAMU websites may result in the installation of cookie(s) on your browser, whether on a computer, tablet or mobile phone.

A cookie is a small file which does not allow the user to be identified, but which records information relating to the browsing of a computer on a site. The data obtained in this way is intended to facilitate subsequent navigation on the site and to allow various measures of frequentation.

Cookies that are strictly necessary for the provision of a service expressly requested by the user are exempt from consent. This is the case for operating cookies, allowing the use of the site's main functions, or those whose purpose is to measure the audience via anonymous statistical data.

However, the user's prior consent is mandatory in the event of the installation of cookies that are not strictly necessary, such as those linked to advertising operations. The period of validity of the consent thus obtained is one year. Once the period has expired, the user is again offered the acceptance or refusal banner.

The user may refuse to accept cookies.

In this case, the refusal to install a cookie may make it impossible to access certain services, functions, pages or areas of our websites. Our company declines all responsibility for any negative consequences on the slow operation of its services.