

# **Privacy Policy**

The protection of your personal data is an essential element of our relation, that you are a customer or an user of our services and sites. This relation is established on a principle of transparency to respect your private life according to the regulations in force in France and in Europe in particular in IT law enforcement and liberties and of the General Data Protection Regulation (GDPR), the "Regulations". The present policy informs you about the categories of personal data which we handle, the way we use them, the categories of addressees to whom we communicate them, as well as on the rights which you have.

## What data do we collect?

STEM ALPHA can collect directly with you or indirectly via third parties personal data. According to the principle of minimization, we collect only the necessary data with regard to the purposes for which they are treated.

The various categories of data collected within the framework of our professional and commercial relations are the following ones:

- Data of identification (in particular name, first name, customer's number);
- Data of contact (in particular professional or electronic mailing address);
- Data of custom (in particular web pages visited by the web site);
- Financial data (ways and history of payment);
- Commercial data (list of products and services from which you benefit);

#### For what use?

### Purposes

The personal data are only collected and treated on the basis of the legal foundations planned by the Regulations:

- 1. Within the framework of the execution of a contract:
- Management of customer account;
- Identification and authentification of the customer or the user;
- Communications with the customer (quotation, order forms, exchange of documents or commercial information);
- Management of predisputes, disputes and outstanding payments;
- Management of the rights and the requests of exercise of the rights of the people;
- 2. For purposes of justifiable interests or, where necessary, on the basis of your consent:
- Wrestling against the fraud and the prevention of outstanding payments;
- Enrichment and valuation of the customers base / prospects;
- Development of products and services of STEM ALPHA or third party and commercial aspect;
- 3. To insure the respect for our legal and statutory obligations such as defined by the legislation in force.

### Duration

We keep your data only during the duration necessary for the fulfillment of the purposes mentioned above or to allow us to answer our legal obligations.

The personal data used for purposes of canvassing can be kept for a maximal duration of five (5) the years as from the end of the commercial relation.

### Towards what addressees?

Your personal data can be treated by the authorized staff of STEM ALPHA, in a frame necessary for the fulfillment of the purposes mentioned above or to allow us to answer our legal obligations.

If these addressees are brought to process your data outside the European Union, transfers will be realized in the respect for the Regulations.

# What safety for your data?

We defined technical and organizational measures allowing protecting your data of way suited according to their nature, the area of the treatment and their accessibility. It can involve for example encryption of the data, management of access rights, secure flows ...

The respect for the safety and for the protection of your data is imperative upon the set of our collaborators as well as upon our provider.



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## About your rights

### What are your rights?

You can ask at any time for the access to the personal data concerning you, their rectification, their disappearance (as far as it does not prevent the good execution of the contract or the respect for the legal obligations of STEM ALPHA) and the limitation of one or several particular treatments of data concerning you, in the conditions planned by the Regulations.

You also have the right to modify or to remove, at any time, the consents which you granted us for the treatment of your personal data.

You have besides the right to oppose a treatment of your personal data and the right for their portability, in the conditions fixed by the Regulations.

Your personal data can be preserved or deleted after your death according to the Regulations. You have the right to give instruction to STEM ALPHA to communicate these data with a third party which you will beforehand have appointed.

## Updating of the transmitted data

It is important that the information which you transmit us is exact and up to date and that you informed us immediately about any significant change concerning you.

#### **Modalities**

You can send a post in:

STEM ALPHA SA La Chenevatière RD389 – 69610 Saint Genis l'Argentière - France

You have the possibility of seizing the NATIONAL COMMISSION FOR INFORMATION TECHNOLOGY AND CIVIL LIBERTIES (CNIL) at the following address:

CNIL – 3 place de Fontenoy – TSA 80715 – 75334 Paris cedex 07

### For any further information

REGULATION (EU) 2016/679 OF the EUROPEAN PARLIAMENT AND the COUNCIL of April 27th, 2016 Concerning the protection of the physical persons towards the personal data processing and concerning the free circulation of these data, and repealing the directive 95 / 46 / EC (general regulation on the data protection) <a href="http://rgpd-2018.eu/RGPD-definition.html">http://rgpd-2018.eu/RGPD-definition.html</a>

# GDPR and CNIL

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On May 25th, 2018, the European regulation will be applicable. Numerous formalities with the CNIL are going to disappear. In return, the responsibility of the bodies will be strengthened. They will indeed have to insure an optimal protection of the data all the time and be capable of demonstrating it by documenting their conformity.

## For more information, thank you for consulting:

https://www.cnil.fr/fr/principes-cles/reglement-europeen-se-preparer-en-6-etapeshttps://www.cnil.fr/fr/comprendre-le-reglement-europeen

### For the Belgian companies, thank you for consulting:

 $\underline{https://www.privacycommission.be/fr/reglement-general-sur-la-protection-des-donnees-0}$