

Privacy Policy and Personal Data Protection

The purpose of this Privacy Policy is to inform you about how we collect and use your Personal Data.

When you provide us with Personal Data, you authorize us to collect, store and use the data:

- a) To process your orders and meet our contractual obligations to you;
- b) According to our legitimate interest in processing your Personal Data, e.g. for internal administrative management, direct marketing, website usage statistics, fraud prevention; or
- c) Based on your consent, which you are entitled to withdraw at any time, as described in this Privacy Policy.

1. Scope:

This Privacy Policy applies to the processing of Personal Data that is collected through ERCOM websites (including www.ercom.fr, www.ercom.com and www.bleckwen.ai) and any other interaction, per this Privacy Policy. This Privacy Policy also applies to ERCOM marketing and advertising practices.

Rules associated with the processing of Personal Data as part of using our products and services are detailed in specific Privacy Policies, associated with each product and service, and provided in application stores or upon request by contacting ERCOM at: dpo@ercom.fr.

2. Personal Data you provide us with, or that is transmitted to us by third parties.

Q You may choose to provide us with Personal Data about you or any third party in the following situations:

❖ **Request for information, documentation, brochures:**

- You complete forms¹ online as part of requesting information, brochures, documentation or other communications (including callback requests), participating in surveys, contests or prize draws.
- You contact us offline, for example by telephone, fax, SMS, e-mail or mail, and we record the Personal Data you provide.

❖ **Purchasing products/Subscribing to services online:**

- You complete online forms* when you purchase our products and/or subscribe to our services online.

❖ **Job application:**

- You apply online and complete an online form*.

❖ **Establishing contact:**

- You provide us with your contact details during marketing and commercial operations such as professional events, trade shows, meet-ups, seminars, etc.
- You provide us with your e-mail address on our websites when you subscribe to our newsletter.

If you provide us with Personal Data about a third party, you must comply with applicable privacy regulations, and you are responsible for obtaining prior consent from these third parties. As such, in accordance with the applicable data protection regulations, you must have notified data subjects and obtained their express consent to provide us with their Personal Data, and have informed them of the manner in which we collect, use, disclose and retain Personal Data about them, or invite them to read our Privacy Policy.

Q Personal Data we collect from third-party sources

- We also obtain data from third parties. Third-party sources may vary over time, but these are sources we consider credible and that are allowed to share Personal Data. For example, information from our subsidiaries, affiliates and organizers of professional events such as trade shows and seminars.

Q Personal Data we collect depend on the context of your interactions with ERCOM, and the choices you make. We mainly collect:

- ❖ **Names and contact details.** Your first and last name, business e-mail address and telephone number, and other similar contact information, to communicate with you, and to provide you with the requested information and/or process your orders and provide you with the purchased products or services.
- ❖ **Payment data.** Data required to process your payment when you purchase/subscribe to our online services, such as your credit card number, are collected solely by our payment provider Stripe (in accordance with their privacy policy available at <https://stripe.com/privacy>), which uses the latest and most reliable security systems including

* On each form, ERCOM clearly identifies both mandatory and optional Personal Data.

the PCI DSS certification. Data is encrypted using the SSL protocol to ensure their security. As such, we do not collect or store your payment data.

- ❖ **Applications/Resumes.** Information you provide as part of an application for employment with Ercom by e-mail or by completing a form. ERCOM uses this information to evaluate your application and perform employment-related activities. You must not include sensitive Personal Data (race, religion, health status, political opinions, union affiliations, etc.) in your resume and cover letter.

3. Data we collect automatically when you use our websites:

We collect information about how you visit our websites and your browsing habits. This is detailed in section titled "Use of cookies" below.

4. How we use Personal Data:

We collect and process Personal Data for the following purposes:

- Answer your questions and communicate with you, and/or provide you with the information and documentation you request from us online;
- Enable you to purchase products/subscribe to services online, and provide you with the products you have purchased and the services you have subscribed to;
- For the purposes of commercial prospection, in particular:
 - Build and manage lists of sales leads;
 - Send offers and information about our products and services;
 - Send newsletters and commercial communications by e-mail.
- Receive and evaluate applications for employment and potentially contact you to offer you other employment opportunities within ERCOM and/or companies of ERCOM Group.
- Provide you with any required information in order to comply with our regulatory or legal obligations.
- In the event of a merger or an acquisition of ERCOM, or a substantial part of its assets, disclose or transfer Personal Data to the surviving entity or the buyer, respectively;

Please note that in order to proceed with the activities mentioned in this Privacy Policy, ERCOM requires your consent and considers its legitimate interest, which in turn requires ERCOM to ensure proper communication and exchange of information between you and ERCOM.

5. Marketing

We may occasionally use your information to contact you for the purpose of providing you with news and information about our applications, products and services that may be of interest to you. We may also share your information with other ERCOM companies so that they may (or we may) contact you and provide you with information about their products and services that may be of interest to you. To this end, you can be contacted by phone or e-mail. You have the right to ask us to stop contacting you for marketing purposes, at any time. As such you can unsubscribe from any marketing campaign, newsletter or RSS feed by clicking on the link included in the e-mails we send you.

6. How we share Personal Data:

We may share Personal Data with:

- ERCOM affiliates and subsidiaries to effectively manage our business operations (e.g. for global information management and customer relationship management, and for the purpose of providing you with information, applications, products or services that you have wished to receive);
- Our service providers and agents (including their vendors) or third parties to process information on our behalf (e.g. payment processors such as banks and other entities to process payments, and companies we use to help us with sending communications to you).
In such cases, these companies are under a contractual obligation to comply with our requirements to secure Personal Data, and are not authorized to use the Personal Data we provide them for any other purpose.
- Partners, resellers, distributors, who help us provide you with the applications, products, services and information that you have requested, or which, from our point of view, are likely to interest you;
- Another company, if we sell or buy a business or assets (or negotiate the sale or purchase of a business or assets);

We may also be required to provide your Personal Data in case of legal or regulatory obligation, or resulting from a decision of a relevant judicial or administrative authority.

We guarantee that Personal Data is neither sold nor transferred to third parties other than those mentioned above.

7. Location where we process and store Personal Data

Personal Data collected by ERCOM may be stored and processed in France, and/or may also be transferred to our subsidiaries, affiliated companies and ERCOM vendors outside the European Union. These transfers are carried out, in accordance with Articles 44 and seq. of the GDPR, based on a decision of adequacy or with appropriate safeguards, such as standard clauses adopted by the European Commission. In any case, recipients are prohibited from using Personal Data for any other purpose than to perform the services required by ERCOM.

Finally, ERCOM is committed to implementing technical and organizational measures ensuring a level of security based on risk. Only ERCOM staff and those of our subsidiaries, affiliates, and vendors are authorized to process information provided to ERCOM.

ERCOM ensures the persons authorized to process Personal Data are committed to preserving their confidentiality or are subject to an appropriate legal obligation of confidentiality.

8. Retention period of Personal Data.

❖ *Establishing contact and requesting information, documentation, brochures:*

Your Personal Data will be kept for a maximum of three years after their collection during your last enquiry.

However, if your data is used for commercial communication purposes or if you subscribe to one of our newsletters, your Personal Data will be kept for marketing purposes as long as necessary, as long as you have not expressed your desire to unsubscribe by clicking on the link included in the e-mails we send you.

❖ *Applications for employment:*

Personal Data contained in your application is kept for a period of two years from the date of your application.

❖ *Data collected automatically when you use websites (including cookies):*

Data we collect automatically when you use our websites, to ensure the security of our website and to understand how you browse our website, is kept for no longer than one year from the date of collection.

9. Your rights regarding your Personal Data

You have the right to access your Personal Data to check their accuracy and correct them as necessary. Your Personal Data may be updated, corrected or modified as appropriate. We will endeavor to fulfill your request as soon as possible, but this right should not be exercised in an exaggerated or abusive manner. You also have the right to request a copy of your Personal Data.

You also have the right to oppose or limit the processing of your Personal Data, to withdraw your consent to their processing, as well as request the deletion of your Personal Data.

You can exercise these rights in association with your data by contacting us by e-mail at: dpo@ercom.fr.

If, after contacting us, you believe the rights regarding your Personal Data have not been enforced or if you believe their processing does not comply with privacy protection rules, you may file a complaint with a supervisory authority, such as CNIL in France.

10. How do you consent?

By completing an online form, providing us with your details (e.g. registering your e-mail address on one of our websites, handing out a business card, etc.), and by applying for employment online, you agree that we may obtain and process the information you provide in accordance with the provisions of this Privacy Policy.

We may periodically update this Privacy Policy. In such case, we will publish the revised version here, along with the revision date. You agree to read these pages regularly to keep yourself informed and review such revisions. If we make material changes to our Privacy Policy, we may also notify you in other ways before such changes are implemented, by posting a notice on our websites or sending you a notification.

11. Use of Cookies

❖ *We use the following types of cookies:*

→ Performance and statistics cookies: These cookies collect information about how visitors use our websites (e.g. visit statistics, error messages). These cookies do not collect information that could identify a visitor. All information collected by these cookies is anonymous. We only use these cookies to improve our websites.

→ Web beacons and other tracking technologies: We also use other similar software, known as web beacons, to count the number of users who visited our website after clicking on one of our advertisements displayed on another website, on social media or in an e-mail. These web beacons collect limited information that does not allow identification of an

individual. You cannot refuse the use of web beacons. However, because they are used in association with cookies, you can effectively disable them by setting your browser to restrict or block cookies.

→ IP addresses and traffic data: We keep track of traffic data automatically recorded by our servers, such as your IP address, and information about your device. We are unable to identify an individual based on traffic data and site statistics.

❖ ***How to disable cookies***

You can configure your browser or our websites to limit cookies or block them entirely (usually under "Settings" or "Preferences"). However, you may find that disabling cookies will affect your ability to use certain parts of our websites.

12. How to contact us

If you have any questions, comments or requests regarding this Privacy Policy, please contact:

Ercom

6 rue Dewoitine, Immeuble Rubis

78140 Vélizy, France

Tel: +33 1 39 46 50 50

E-mail: dpo.ercom.fr

Last modification: 25/05/2018 (Version 1.0)