



PRIVACY POLICY – SENOLYS

1. WHO WE ARE

SENOLYS is a French simplified joint-stock company, with a capital of 10,000 euros, whose registered office is located at 6 allée du Levant - 69 890 LA TOUR-DE_SALVAGNY, registered with the Trade and Companies Register under number 909 677 536 RCS LYON, whose purpose, in France and abroad, is the design, development, publishing, production, marketing, purchasing, selling, renting, maintenance and after-sales service of software, digital solutions and/or hardware - Provision and sale of digital services, including the provision of online software solutions as a service and the provision and operation of the corresponding infrastructure - Marketing and provision of related support and consulting services.

2. SECURITY OF YOUR DATA, OUR COMMITMENTS

Your data transmitted during your use of the solutions published by SENOLYS is stored on servers at the French leader in data hosting: OVH. Your data is not indexed by search engines (Google, Bing, etc.) and is restricted to use only via private password-protected access. We prohibit any commercial use and any transfer of your usage data to third parties.

The data requested by our solutions, as part of their functionality, and which identifies projects or individuals in an organization, is encrypted to be anonymous, and we strive to keep our encryption technologies up to date.

We are committed to ensuring that our solutions do not require the entry of personal data in any way and that their functionality never depends on personal data.

Although our solutions can be used in SaaS technology, our databases and APIs are not accessible to third parties, and can only be queried through our own servers, which host our solutions and their features.

3. DATA PRIVACY

The purpose of this charter is to inform you about the means we use to process, collect and return your organisation's data and personal information, in strict compliance with your rights.

In this regard, we inform you that, in the collection and management of your personal data, we comply with Law No. 78-17 of 6 January 1978 relating to data processing, files and freedoms, in its current version (hereinafter referred to as the "Data Protection Act"), as well as Regulation (EU) 2016/679 of 27 April 2016 on the protection of personal data, with regard to its collection, processing, dissemination, storage and restitution (hereinafter referred to as "GDPR").

1) NATURE OF THE DATA COLLECTED BY SENOLYS

Our solutions can feature collaborative interfaces where users are free to enter and store information.

Our solutions may therefore collect data relating to the organization that uses them, such as project, technical or experience data, and may also collect personal data.

More generally, within our solutions, you are free to exchange and store information as you would by email, instant messaging and any other means of communication. However, if your company has a specific security



policy or guidelines (including the level of privacy and permission for web communication), you must comply with these rules and you may need to check with the appropriate person in your company.

Under no circumstances does SENOLYS solutions wish to process special categories of sensitive data (e.g., racial or ethnic origin, political opinion, religious or philosophical beliefs, genetic or biometric data, health data) or categories of data subject to breach notification laws.

2) DEFINITION AND NATURE OF PERSONAL DATA

When you use our solutions and/or websites and in the course of our business, we may also ask you to provide us with business or personal data about yourself, in order to use the services we offer (hereinafter, the "Services").

For the purposes of this policy, the term "personal data" means any data that can be used to identify an individual, including your first and last name, company name, position/position, business telephone number, business email address, and any other information you choose to provide to us about yourself.

3) IDENTITY OF THE DATA CONTROLLER

The company responsible for collecting your personal data is SENOLYS, in the person of its data controller, whose contact details are indicated below.

4) POINT OF CONTACT FOR THE PROTECTION OF PERSONAL DATA

We have appointed a contact point for the protection of personal data, whose contact details are as follows: jdecourselle@senolys.com

5) COLLECTION OF USAGE AND PERSONAL DATA

The proper functioning of our solutions does not require the prior communication of personal data. However, some collaborative functions may require the entry of personal data (e.g. last name, first name, projects, company name), which can be reused by users authorized to view them, in order to facilitate interfaces.

The legal basis for our collection of your data is limited to your legitimate interest when you voluntarily provide us with personal data when using our solutions, in which case your data is collected and stored to enable us to better respond to your experience using our solutions.

6) RECIPIENTS OF THE DATA COLLECTED

With the exception of users who collaborate with each other, only company personnel authorized to work on our solutions have access to your data.

7) TRANSFER OF PERSONAL DATA

Your personal data will not be sold, rented or traded to third parties.

8) RETENTION PERIOD OF PERSONAL DATA

Regarding data relating to the management of customers and prospects:

Your personal data will be kept for the time strictly necessary to manage our business relationship with you and your use of our solutions.

The personal data will always have been communicated on a declarative basis by the users and will not have been calculated beforehand.



Your data may be kept for a period of 3 (three) years from the end of the commercial relationship in the case of prospecting operations targeting you.

Data that allows us to establish proof of a right or contract, which must be retained to comply with a legal obligation, will be kept for the period provided for by the law in force.

Personal data relating to non-customer prospects may be kept for a period of 3 (three) years from the date of collection or the last contact with the prospect.

At the end of this 3 (three) year period, we may contact you again to find out if you wish to continue to receive commercial solicitations.

Regarding identity documents:

In the event of exercising the right of access or rectification, data relating to identity documents may be kept for the period provided for in Article 9 of the Code of Criminal Procedure, i.e. 1 (one) year. If you exercise your right to object, this data may be archived for a period of 3 (three) years.

Regarding the management of unsubscribe lists:

The information used to take into account your right to object will be kept for a minimum of 3 (three) years from the date on which you exercise your right to object.

9) SECURITY

We inform you that we take all necessary precautions and appropriate organisational and technical measures to ensure the security, integrity and confidentiality of your organisational and personal data, and in particular to prevent them from being distorted, damaged or accessed by unauthorised third parties.

10) HYBRID USE OF OUR SOLUTIONS

The use of our solutions may depend on third-party platforms (e.g., Microsoft).

SENOLYS is not responsible for any data that you may communicate outside of the use of its solutions, on these third-party platforms or applications that may complement your use of our solutions.

SENOLYS undertakes to ensure that all the functionalities made available by its solutions only involve digital services hosted in France or in a country that has been the subject of an adequacy decision by the European Commission, in accordance with Article 45 of the GDPR: in this case, this country ensures a level of protection deemed sufficient and adequate to the provisions of the GDPR;

11) ACCESS TO YOUR PERSONAL DATA

In accordance with the French law n° 78-17 of 6 January 1978 relating to data processing, files and freedoms, and the GDPR, you have the right to obtain communication and, if necessary, rectification or deletion of data concerning you. You can also contact:

E-mail address: jdecourselle@senolys.com

Postal address: SENOLYS, 6 allée du Levant, 69890 La Tour-de-Salvagny, France

Persons whose data is collected on the basis of our legitimate interest, as mentioned in the article "Collection of personal data", are reminded that they may object to the processing of their data at any time.

We may, however, continue to process the data if there are legitimate grounds for the processing which override your rights and freedoms, or if the processing is necessary to establish, exercise or defend our legal claims.



12) THE RIGHT TO SET INSTRUCTIONS FOR DATA PROCESSING AFTER YOUR DEATH

You have the right to set guidelines regarding the retention, deletion and disclosure of your personal data after your death.

These guidelines can be general, i.e. they cover all of your personal data. In this case, they must be registered with a trusted digital third party certified by the CNIL.

The instructions may also be specific to the data processed by our company. In this case, please send them to the following address:

E-mail address: jdecourselle@senolys.com

Postal address: SENOLYS, 6 allée du Levant, 69890 La Tour-de-Salvagny, France.

By sending us such instructions, you expressly consent to the storage, transmission and fulfilment of such instructions in accordance with the terms and conditions set forth herein.

In your directives, you can designate a person to carry them out. In the event of death, this person will then be entitled to read these guidelines and ask us to implement them.

If you do not appoint a person, your heirs will be entitled to read your instructions upon your death and ask us to implement them.

You may change or revoke your instructions at any time by writing to us at the address and telephone number mentioned above.

13) PORTABILITY OF YOUR PERSONAL DATA

The portability of your data is not an applicable case insofar as the solutions and services offered by SENOLYS are always specific.

14) LODGING A COMPLAINT WITH A SUPERVISORY AUTHORITY

You are also informed that you have the right to lodge a complaint with a competent supervisory authority (the Commission Nationale de l'Informatique et des Libertés pour la France), in the Member State where your habitual residence is located, your place of work or the place where the violation of your rights would have been committed, if you consider that the processing of your personal data subject to this charter constitutes a violation of the texts Applicable.

This remedy may be exercised independently of any other appeal before an administrative or judicial court. You also have the right to an effective administrative or judicial remedy if you believe that the processing of your personal data as described in this policy constitutes a violation of applicable laws.

15) RESTRICTION OF PROCESSING

You have the right to restrict the processing of your personal data in the following cases:

- During the verification period we carry out when you contest the accuracy of your personal data,
- Where the processing of your personal data is unlawful and you wish to restrict such processing rather than delete your data,
- When we no longer need your personal data, but you want us to keep it to exercise your rights,
- During the period of verification of legitimate grounds, when you have objected to the processing of your personal data.



16) CHANGES

We reserve the right, in our sole discretion, to modify this Policy, in whole or in part, at any time. These changes will take effect upon the publication of the new charter, which will be the subject of a specific notification to users.

Your use of the Sites and/or the Solution following the effective date of such changes constitutes acknowledgment and acceptance of the new policy. Otherwise, and if the new policy does not suit you, you must no longer access the Sites and/or the Solution.

17) EFFECTIVE DATE

This charter comes into force on 27/03/2024.