
Privacy policy for clients, prospects and providers

Last update 30/06/2020

1 Objective

The protection of personal data and privacy is a concern of our company and is everyone's concern. It is therefore important for us that you are informed about the actions that we put in place, those you must respect and the rights that you have.

If you have any questions regarding this regulation, we invite you to contact the following person:

Name	DOS REIS
First name	Nuno
Address	Company headquarters
Email	ndosreis@deltamu.com
Phone	+33 473151300

This document can be modified at any time due to legislative and regulatory changes. You will be informed through our website.

2 Scope of application

This privacy policy is applicable to:

- All our clients and prospects
- All our participants of the training
- All our providers
- All our service providers
- All our subcontractors
- In general, all our co-contractors

3 What is a personal information and a personal data processing?

As you know, data protection is governed by:

- The law on computing and freedom # 78-17 of 1978, January 6th, modified by the laws of 2004, August 6th and 2016, October 16th and 2018, June 20th ("Law Computing and Freedom")
- The European regulation on the data protection # 2016/679 of 2016, April 27th, come into effect on the 25th of May 2018 (« RGPD »)

3.1 What are personal data?

A personal data is an information directly or indirectly related to a natural person. For example, identifier, name, identification number, IP address, picture, phone number, etc. are considered as personal data.

3.2 What are sensible data?

Amongst personal data, we have sensible data. This includes racial or ethnic background, political opinions, religious or philosophical beliefs, trade-union membership, and data concerning health or sex life. In principle, sensible data cannot be collected and used without individuals' explicit consent.

3.3 What is a data processing?

Personal data processing is defined as all operations carried out on personal data such as the collection, collection, recording, organization, structure, storage, adaptation or modification, extraction, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise of making available, alignment or combination, blocking, erasure or destruction. To sum up, any operation using and/or viewing the data.

4 What data are collected by DELTAMU and for what purpose?

As part of your relationship with our company, you have given us some personal information, for the execution of our agreement and in respect of our legal obligations, especially for the following purposes:

File name	Legal basis	Legal basis
Client and prospect management	Carry out operations related to client management regarding pre-contracts, purchases, invoices, accounting and in particular management of customer accounts; management of inter-laboratory campaigns; the monitoring of the client relationship such as the hotline management, the access to the software, the commercial and technical communication (alert, bug, etc.), the claim management; carry out operations related to the commercial and technical prospection for services suggested by the company (for example management of technical operations for prospection such as url recovery of social network profile LinkedIn, Viadeo, and other social network; the selection of person to carry out loyalty actions, prospections, studies, survey; implementation of soliciting operations; development of commercial statistics; the cession, customer and prospect file rental or exchange; prospection file updates done by the organism in charge of the management of the list of opposition to called calling or any other organism; organization of promotion campaign); management of overdue payment and dispute; management of persons' view re the services or contents.	Execution of pre-contractual and contractual steps, re sending the newsletters, legitimate interest of enhance our company's services

File name	Legal basis	Legal basis
Training management (instructor-led or e-Learning)	Sending of convocation letter, conventions to trainings, registration management, attendance sheet, satisfaction survey, QCM and sending attendance certificate, managing e-learning training, managing E-learning access, managing the election of trainee representatives, managing the discipline and educational resources improvement	Contractual execution Legal Obligation legitimate interest
Client web space	Access to the Products of the company, to client account data, communication re training schedules	Contract execution
Optimu eService	Management of passwords, access to the Optimu eService platform, hotline management, commercial and technical communication (warning, bug, etc.)	Contract execution
Email communication through newsletters	Emailing commercial and technical newsletters related to products and services suggested by DELTAMU	Consent from involved people
Partners or providers management	Carry out administrative operations related to contracts, orders, receptions, invoices, regulations, accounting for supplier account management; establish a payment; establish financial statistics and sales revenue by supplier; Providing selected suppliers for the need of the company or organization; Maintaining a documentation on the suppliers; Partner search re the website http://www.mesuronsbienlebigdata.com/#introduction and sending presentations	Implementation of pre-contract actions and contract enforcement

5 Who can access my data?

Our company commits itself not to communicate and/or have your data accessible to people who need to know them, such as:

- Relevant managers,
- Persons in charge of customer management, re customer data,
- Persons in charge of supplier management, re supplier data,
- Sales and computing departments re commercial prospection and sending newsletters,
- Legal entities in charge of implementing the previous tasks: banks, mutual and social insurances, insurances,
- Our contractors that we have chosen and identified to carry out on our behalf all or part of our activities, advisers, accountants and technical contractors (web hosting companies AMEN, IBO et Online SAS), our E-learning platform publisher (360Learning)

-
- Public authority in the legal obligation framework,
 - Group companies

6 How are security and confidentiality of my data ensured?

Please, be aware that confidentiality and safety of data is everybody's responsibility in side of our company.

The premises where the employees' data are, are locked and accessible only to authorized persons. The access to computational tools is protected with passwords. These passwords will have to change regularly, in agreement with the instructions of the company DELTAMU.

All collected data are stored on a physical server regularly backed up. The backups are encrypted with password. Archived data are stored on an internal server and on external hard drives.

Updates are frequently carried out, anti-spyware runs regularly on computers, and antivirus are installed on each computer. Employees processing personal data have signed a confidentiality agreement within the framework of their work employment and are sensitized to personal data.

Our contractors are all signers of contracts with agreement in terms of security and confidentiality and/or are currently signing such agreements.

7 How long my data are saved?

Your data are retained within the contractual duration and will be archived during the legal limitation period. These limitation periods change depending on the type of data, if you require further information, do not hesitate to contact us.

For instance, data related to customer's details are, except if the latter has used his/her right of opposition, stored for the sake of prospection during 5 years from the end of the relationship.

Connection logs are stored one year and are then suppressed.

Other data are only stored during the realisation of the deliveries and are then archived during the legal limitation period (5 years for contracts, 10 years for electronic contracts, and 10 years from the end of the accounting year for the accounting documents)

If you require further information re the data storing duration, do not hesitate to contact our Data Protection Expert, whose contact data appear at the head of the presents.

8 Are my data transferred outside the European Union?

In principle, data are not transferred outside the European Union and are saved on in-house Deltamu servers, and externally, on our data hosting providers' servers.

In the case where a technical provider or a sub-contractor deals with data on our behalf, we assure one of the following:

- The latter does not transfer any data outside the European Union
- The transfer in another country is carried out with an Adequacy Decision
- The transfer is carried out after implementing appropriate safeguards, such as:
 - o Implementation of restrictive company policies
 - o Implementation of data protection rules

9 What are my rights?

You have several rights regarding your data: the right to require from the person in charge of the data processing, the access to your personal data, its correction or its deletion, or a limitation of the processing, or the right to object to the processing or the right to the portability of the data, in the conditions and the limits provided by the European regulation re personal data.

You have the right to define the general directives, especially the way you want these rights are applied after your death.

When the data processing is based on your consent, you have the right to withdraw your consent at any time. This withdrawal of consent will act as soon as we have validated the legality of your request.

You have the right to make a complaint to the relevant authority, which is the CNIL (<https://www.cnil.fr/fr/plaintes>) if you reside in France.

No automated decision is done from your information (profiling type).

We remind you that all collected information is essentially to fulfil the contract and/or to pursue a legitimate interest of our company (products and services optimization; security). Therefore, any lack of information would involve the exclusion of the right for which the data are collected.

10 Whom can I exercise my rights from?

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

- It is not a public authority or a public organism,
- It does not perform processing operations, such as the nature, the portability and/or the purposes require a regular and systematic large-scale monitoring of the people involved; and
- Its basic activities do not consist of a large-scale processing of specific categories of sensitive data or personal data related to criminal convictions and offences

Nevertheless, our company made the choice to appoint a Data Protection Officer, whose contact details appear at the head of the presents.

You may contact him/her for any information re your rights, your data and/or any related matter, as well as a request to translate this information in another language, provided that you show 1) your interest in using our website, 2) your inability to understand one of the 3 languages, and 3) that your request is reasonable.