

## PERSONAL DATA PROTECTION POLICY

The French version of this document prevails over any translation with regard to all the notions, definitions, turns of words and expressions related thereto.

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PRADEO SECURITY SYSTEMS (SAS, whose registered office is located at 71, Place Vauban, 34000 Montpellier, France), in its capacity of controller, attaches great importance to protecting and respecting your privacy.

PRADEO wishes to inform you through this policy of the manner in which is collected, processed and protected your personal data handled via the PRADEO SECURITY solution (hereinafter referred to as "solution"), including:

- the service platform accessible via the website [www.pradeo-security.com](http://www.pradeo-security.com) (hereinafter referred to as "platform");
- the public and dedicated PRADEO SECURITY mobile applications (hereinafter referred to as "applications");
- the PRADEO SECURITY security modules embedded in the applications of third parties, users of the associated service (hereinafter referred to as "modules").

PRADEO complies with all the French and European regulations and laws relating to the protection of personal data.

PRADEO is engaged in a continuous process of protecting the data of its users, in accordance with the Data Protection Act of 6 January 1978 (hereinafter "LIL") and the General (EU) Data Protection Regulation of 27 April 2016 (hereinafter "RGPD").

As such, PRADEO applies an extremely strict policy to ensure the protection of personal data processed in a transparent, confidential and secure manner.

This policy is intended to inform you of our practices regarding the collection and use of the personal data handled in connection with the provision of our solution.

PRADEO invites you to read this document carefully to know and understand its practices regarding the processing of personal data.

## The personal data PRADEO collects

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### SOLUTION USAGE FRAMEWORK

PRADEO opens accounts for the access and usage of its solution to customers, prospects or partners (hereinafter referred to as "third parties") upon explicit request.

During the first connection to the platform, the account administrator must accept Terms and Conditions. By accepting, the administrator guarantees to PRADEO that the data collected and processed by PRADEO have received the prior consent of the users.

### TYPES OF DATA COLLECTED

#### From PRADEO's platform

PRADEO collects the following data:

- On the administrators of the solution: Civility, last name, first name, professional e-mail, professional telephone number
- On the mobile devices protected by PRADEO's applications:
  - o Optional information to be field bythe administrators: last name, first name, function, professional email and phone number
  - o Synchronized information upon explicit third-party request through the implementation of the integration with one of PRADEO's mobile device management partners' solution:
    - Material information (IMEI number, IMSI number, serial number or UDID)
    - Information about the users: last name, first name, function, professional email and phone number

In case you connect to PRADEO's platform, PRADEO will have access to some data. During each of your visits, PRADEO may collect, in accordance with applicable legislation, if necessary, information about the devices on which you use its services or the networks from which you access its services, such as your IP addresses, connection information, types and versions of Internet browsers used, types and versions of your browser plugins, operating systems and platforms, data about your navigation path on PRADEO's site, including your journey on the various pages of our site, the content that you access or view, the search terms used, download errors, the duration of viewing certain pages, and the interactions with pages.

### From PRADEO's applications

PRADEO collects the following data on mobile devices protected by its solution:

- Hardware information (IMEI number, IMSI number, serial number or UDID)
- Data related to the security context of the device:
  - o List of applications and if required applications' executable files installed on the device.
  - o Tracking and logging of the on / off status of Bluetooth, NFC, Proxy, VPN, NFC, location, unknown sources, debug mode, accessibility, data encryption, security features, developer mode.
  - o Tracking and logging of host file changes or "root" status of the phone. Historization of the alert but not the file.
  - o SMS and files scanning (on the phone) and logging of alerts (but not SMS and files).
  - o Identification and logging of alerts for non-trusted certificates, installation of third-party certificates, outdated or vulnerable systems.
  - o Monitoring and logging of prohibited or risky WIFIs and suspicious cell towers.
  - o Location of the device (functionality not activated by default)
- Optional information to be manually field by the device's user: last name, first name, function, professional email and phone number

### From PRADEO's modules integrated within mobile applications

PRADEO collects the following data on the mobile devices hosting an application embedding one of its modules:

- Data related to the security context of the device:
  - o List of applications and if required applications' executable files installed on the device.
  - o Tracking and logging of the on / off status of Bluetooth, NFC, Proxy, VPN, NFC, location, unknown sources, debug mode, accessibility, data encryption, security features, developer mode.
  - o Tracking and logging of host file changes or "root" status of the phone. Historization of the alert but not the file.
  - o Identification and logging of alerts for non-trusted certificates, installation of third-party certificates, outdated or vulnerable systems.
  - o Monitoring and logging of prohibited or risky WIFIs and suspicious cell towers.

In order to be able to identify the device, the module locally generates a unique, non-reversible identifier to be associated with the collected security data. This method ensures the anonymization of the device and therefore the user in the context of the collection and processing of the information listed above and performed by the solution.

The third party, via the application embedding the module and / or the explicit request for the implementation of a data export can retrieve the unique identifier of the device generated by the module and potentially associate the device and the user of the device. The collection and processing of this information is the responsibility of the third party with regard to its intended purposes.

## Purpose of the personal data PRADEO collects

PRADEO uses the collected data to carry out its activities and ensure the provision of its solution. It uses them to improve its solution.

PRADEO may also use this data to communicate with you, for example, to provide you with information about security news, its latest content, and its solution.

PRADEO uses the data it collects in order to:

PURPOSE	LEGAL BASIS
Ensuring the provision of its services	This processing is necessary to fulfill its contractual obligations.
Share news and inform you of the changes made to its services;	This treatment is (i) based on a legitimate interest (promoting its services), (ii) necessary to comply with its legal obligations, and / or (iii) based on your consent.
manage its solution and perform internal technical operations for problem solving, data analysis, testing, research, analysis, studies and surveys;	This treatment is based on a legitimate interest (ensuring the security of the solution site and improving its characteristics).
improve and optimize its solution, especially to ensure that the display of its content is adapted to your device;	This treatment is based on a legitimate interest (provide adapted content).
help PRADEO preserve a safe and healthy environment for its solution;	This treatment is (i) based on a legitimate interest (ensuring the security of its solution), (ii) necessary to fulfill its legal obligations



## Who has access to the information PRADEO collects and why do they have access to your personal information?

Basic principle: **NON-COMMUNICATION OF PERSONAL DATA**

The Personal Data collected for an account is intended for the exclusive use of this account as part of the use of PRADEO's solution.

Account-specific Personal Data is not visible to other accounts.

Only authorized PRADEO production administrators, subject to a strict confidentiality clause, can access the data. Their accesses are logged and the actions performed are tracked.

Personal Data is not transmitted to commercial or advertising partners.

### **Exceptions to non-disclosure of personal data:**

- If Pradeo has the legal obligation to disclose personal data or if it believes in good faith that this is necessary to (i) respond to any claim against PRADEO, (ii) comply with any legal request.
- In the event that PRADEO sells or acquires a business or assets, in which case PRADEO reserves the right to share your Personal Data with the potential seller or buyer of this company or these assets. If necessary, new information will be sent to the persons concerned with regard to Article 32 III. of the Data Protection Act and Article 14 of the General Data Protection Regulation.

## What rights do you have on your personal data (article 12.1 of the GDPR)?

PRADEO invites you to contact the administrator of your account to exercise your rights to your personal data.

Failing this, on proof of your identity and if the conditions of exercise of these rights are fulfilled, you can exercise your right of access, right of rectification, right of cancellation, right to the limitation of the treatments, right of opposition, right to lodge a complaint with the CNIL or to directly contact PRADEO's delegate for the protection of your personal data, at the following email address: [dataprivacy@pradeo.com](mailto:dataprivacy@pradeo.com)

### Right to information

You have the right to receive a copy of your Personal Data in PRADEO's possession ("right of access") by directly contacting PRADEO's delegate for the protection of your personal data, at the following email address:

[dataprivacy@pradeo.com](mailto:dataprivacy@pradeo.com)

You can, by email, ask the delegate to confirm if PRADEO processes personal data belonging to you.

If such treatment has occurred, you can ask us for the following information:

- (1) the purposes for which the personal data are processed;
- (2) categories of personal data processed;
- (3) the recipients or categories of recipients to whom your personal data have been or are still disclosed;
- (4) the expected retention period of the personal data belonging to you or, if no specific information on this subject is possible, the criteria for determining the shelf life;
- (5) the existence of a right of rectification or deletion of your personal data, a right to limit treatment by the controller or a right to oppose such treatment;
- (6) the existence of a right of appeal to a supervisory authority;
- (7) any available information on the origin of the data if the personal data are not collected from the individual;
- (8) the existence of an automated decision-making process, including profiling in accordance with art. 22, al. 1 and 4 of the GDPR and - at least in these cases - useful information on the logic involved as well as the scope and expected effects of such treatment for the individual.

You have the right to ask if the personal data belonging to you are transferred to a third country or to an international organization. In this context, you can ask to be informed of the appropriate warranties in accordance with art. 46 of the GDPR as part of the transmission.

## Right of rectification

Whenever PRADEO processes Personal Data, PRADEO takes all reasonable steps to ensure the accuracy and appropriateness of the Personal Data in relation to the purposes for which PRADEO collects it.

If the User wishes to know how PRADEO uses his Personal Data, requests to rectify or oppose their treatment, the User may contact PRADEO in writing at the following email address: [dataprivacy@pradeo.com](mailto:dataprivacy@pradeo.com).

In this case, the User must indicate the Personal Data that he would like PRADEO to correct, update or delete by identifying himself with a copy of an identity document (identity card or passport). Requests for the deletion of Personal Data will be subject to the obligations that are imposed on PRADEO by law, particularly with regard to the preservation or archiving of documents.

You have a right of rectification and / or completion towards the controller if the personal data processed about you are incorrect or incomplete. The person responsible will proceed without delay with the correction.

## Right to limit treatment

You may request that the processing of your personal data be limited, under the following conditions:

- (1) if you dispute the accuracy of personal data about you during a period allowing PRADEO to verify the accuracy of personal data;
- (2) if the processing is illegal and you oppose the deletion of personal data and you instead ask that the use of personal data be limited;
- (3) if PRADEO no longer needs personal data for processing purposes, but you need it to assert, exercise or defend lawsuits, or
- (4) if you have opposed the treatment in accordance with art. 21, para. 1 of the GDPR and it has not yet been established whether PRADEO's justified reasons outweigh yours.

If the processing of your personal data has been limited, such data may be processed - apart from their storage - only with your consent or for the purpose of asserting, exercising or defending rights or protecting rights of another natural or legal person or for reasons of significant public interest of the Union or a Member State.

If the restriction of treatment has been limited in accordance with the above conditions, PRADEO will notify you before the restriction is lifted.

## **Right of deletion**

### **Shelf life of your data**

Your Personal Data is kept for the duration of the contract between PRADEO and the third party.

At the end of the said contract, the Personal Data are kept in accordance with the terms of the contract and within the limit of 3 years after which the data are deleted.

In the event that your account has been suspended or blocked, PRADEO keeps your data for a period ranging from 2 to 10 years from the suspension in order to avoid any circumvention by you of the rules in effect on its Platforms.

### **Obligation to delete**

You can also request the deletion of your Personal Data as well as the rectification of the erroneous or obsolete Personal Data ("right of cancellation and right of rectification"). Please note that PRADEO may retain certain information about you when required by law or when it has a legitimate reason to do so.

You may ask PRADEO to immediately delete your personal data and PRADEO is required to delete this data immediately as long as one of the following reasons applies:

- (1) Your personal data is no longer necessary for the purpose for which it was collected or processed.
- (2) You revoke your consent, on which the treatment was based under the terms of art. 6, al. 1, point a or art. 9, al. 2, point a of the GDPR, and the treatment is not based on any other legal basis.
- (3) You oppose treatment in accordance with art. 21, para. 1 of the GDPR and there are no compelling and legitimate reasons for the treatment, or you oppose treatment in accordance with art. 21, para. 2 of the GDPR.
- (4) Your personal data has been subject to unlawful processing.
- (5) The deletion of your personal data is necessary to fulfill a legal obligation under European Community law or the law of the Member States to which PRADEO is subject.

### **Exceptions**

The right of cancellation does not exist as long as the treatment is necessary

- (1) in order to allow the fulfillment of a legal obligation required for processing under European Community law or the Member States to which the controller is subject or the performance of a public-interest mission or in the exercise of the public authority conferred on the controller;
- (2) In order to assert, exercise or defend legal rights.



### **Right to portability of data**

You also have the right to the portability of your data, meaning you can receive the Personal Data that you have provided in a structured, commonly used and machine readable format, and the right to transmit this data to another controller ("right to portability"). You have the right to receive personal data about you that you have provided in a structured, common and machine readable format. You also have the right to transfer this data to another manager without our intervention, provided that

(1) the treatment is based on consent in accordance with art. 6, al. 1, point a of the GDPR or in art. 9, al. 2, point a of the GDPR or on a contract in accordance with art. 6, al. 1, point b of the GDPR

(2) the treatment is performed using automated methods.

By exercising this right, you also have the right to request that personal data about you be transferred directly from one controller to another, as far as technically possible. The freedoms and rights of others should not be affected.

### **Right of opposition**

You may at any time use your right of opposition, for reasons arising from your particular situation, to the processing of your personal data, pursuant to Article 6, para. 1, point e or f of the GDPR; this also applies to profiling on the basis of these provisions.

PRADEO will no longer process personal data belonging to you unless it can demonstrate compelling reasons for treatment protection that outweigh your interests, rights and freedoms, or if the treatment serves to assert, exercise or to defend legal rights.

If your personal data is processed for direct marketing purposes, you may object at any time to the processing of your personal data for advertising purposes; this also applies to profiling, insofar as it is associated with this type of direct marketing.

If you object to processing for direct marketing purposes, your personal data will no longer be processed for these purposes.

You have the opportunity to exercise your right of objection in the context of the use of information society services by means of automated procedures using technical specifications, notwithstanding Directive 2002/58 / EC.

You also have the right to object to the processing of your personal data for statistical purposes, in accordance with art. 89, para. 1 of the GDPR, for reasons arising from your particular situation.

### **Right to revoke consent to data processing**

You have the right to revoke your consent to data processing at any time. The revocation of consent does not affect the legality of the treatment on the basis of consent until the revocation.

### **Right of appeal to a supervisory authority**

Without prejudice to any other administrative or judicial remedy, you have the right to appeal to the CNIL, particularly in the Member State where you reside, work or suspect an offense, if you consider that the processing of personal data about you is against the GDPR.

The CNIL with which the complaint has been lodged informs the complainant of the status and results of the complaint, including the possibility of a judicial appeal under Article 78 of the GDPR.

### **CNIL**

<http://www.cnil.fr>

By phone on +33 (0) 1 53 73 22 22

By mail :

National Commission of Computing and Freedoms

Address :

3 Place Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07

### **SECURITY**

To ensure the security and confidentiality of Personal Data, PRADEO uses networks protected by standard devices such as firewalls.

When processing Personal Data, PRADEO takes all reasonable steps to protect it against loss, misuse, unauthorized access, disclosure, alteration or destruction.

PRADEO's platform is hosted at:

### **OVH**

SAS with capital of € 10,069,020

RCS Lille Métropole 424,761,419,00045

APE Code 2620Z

VAT number: FR 22 424 761 419

Headquarters: 2 rue Kellermann - 59100 Roubaix – France

**Effective date:** May 25, 2018



### Contact details for the data protection officer

If you have any questions regarding this Privacy Policy or any request for your personal data, you may contact PRADEO's Data Protection Officer at the following address:

[dataprivacy@pradeo.com](mailto:dataprivacy@pradeo.com)