



## KLAXOON PRIVACY POLICY

### Welcome to Klaxoon!

Here at Klaxoon, the confidentiality of your data is one of our principal concerns, which is why we want to explain to you, in a straightforward and transparent way, how we receive, collect, use, and share your data, but also how you can exercise your rights at any given time.

Our Privacy Policy applies to data we collect:

- whilst you are browsing our website; and
- whilst you are using our service, i.e. the Klaxoon cloud solution and all of its related products and services in connecting you to the Klaxoon application (hereafter referred to as the “**Services**”).

Our Privacy Policy does not apply to third-party applications or software integrated within our Services, nor does it apply to any other third-party product or service.

We must also inform you that our Services are not to be used by children under the age of 16, and as such, we do not voluntarily collect data relating to such individuals. If you are a parent or legal guardian and you have reason to believe that your child has provided us with data without your consent, please contact us so that we can erase this data from our systems.



### 1. What data do we collect?

We collect two broad kinds of data relating to you (the “**Data**”):

- ⇒ The **Data which you decide to share whilst you use our Services** (“**User Information**”). E.g. texts, images, videos, hyperlinks, etc.

⇒ The **other data we collect in order to be able to provide you our services** (“**Other Data**”), i.e. that data we collect:

- **For the management of your user account** (*creation and updates to your Klaxoon user account*): your surname, first name, email address and telephone number. You are also able to add to your profile and use an image or photo.
- **For the management of your contract**: your surname, first name, email address, postal address, telephone number, bank details or billing information. We may, for example, ask you for your credit card number or your billing address.
- **When you contact us for information or assistance**: your surname, first name, telephone number, email address.
- **When you participate in one of our events or when we host you at our premises**: your surname, first name, telephone number.
- **When you participate in our training sessions**: your surname, first name, postal address and email address.
- **When you apply for one of the job vacancies on our website**: your surname, first name, email address, telephone number.
- **When you visit our website** (“*Navigational Data*”):
  - ✓ identifier / content of cookie files stored by us on your device. (*For more information on our management of cookies, go to the “Cookies” article below*);
  - ✓ the IP address (Internet Protocol) of the device connected to the Internet;
  - ✓ the date and time of the connection of the device to the electronic communication service;
  - ✓ the type of operating system used by the device (Windows, MacOs, etc.);
  - ✓ the type/version of the web browser used by the device (Internet Explorer, Safari, Chrome, etc.);
  - ✓ the default language of the web browser used by the device.

This Navigational Data is collected via the installation of cookies on your device (computer, tablet, smartphone, etc.).



## 2. How do we use your data?

We assure you that your data is only used because it is strictly required in order to provide our Services (*legitimate interest*) or because you have given us your authorization (*consent*) when first connecting to the Services.

More precisely, we collect your data to:

- Create your user account to allow you to access our Services (*legitimate interest*);
- Host your User information and therefore enable the safe storage of all data you share via our Services (*legitimate interest*);
- Manage your contract and satisfy all applicable legal requirements (*legitimate interest*);
- Assist you and respond to your requests (*legitimate interest*);
- Enable continuous improvement in your user experience by informing you (*via sending newsletters or by telephone*) of new products or new features, and also by inviting you to participate in our events in order to be the first to receive information on the development of our Services (*consent*);
- Carry out statistical studies (*anonymized and aggregated*) and for the sole purpose of improving the quality of our Services (*legitimate interest*).



### 3. How do we share your data?

We are conscious that the sharing of Data is a key issue for our users. We share your Data:

#### ⇒ **Within our business**

- Firstly, we communicate your Data to our employees with the aim of being able to provide you our Services (*deal with questions regarding the use of your Data, and process your requests for access, removal and return of your Data, manage your contracts, etc.*). To do this, we make sure that our employees have undergone training in order to ensure the security and confidentiality of your Data.
- We may also communicate Other Data relating to you to our affiliates for the strict purposes of providing our Services.

#### ⇒ **Communication to third parties**

- We send your Data to our subcontractors so that they can carry out services we entrust to them (*e.g. hosting your User Information*);
- We also share Other Data relating to you with members of our network of certified partners for the strict purposes of the joint management of your contract (*if applicable*).

As the security and confidentiality of your Data remains our priority, we ensure that all of our subcontractors and partners comply fully with our Privacy Policy as well as all applicable legal requirements. To that end, we ensure that the contracts we put in

place with our subcontractors and our partners guarantee a level of protection that is equivalent to what we commit towards you. When your Data that is shared includes information of a personal nature (“**Personal Information**”), we put in place the necessary safeguards to ensure our compliance with the applicable regulations. For further information you can read our *Data Processing Addendum “DPA”* accessible via the following link: <https://static.klaxoon.com/website/pdf/dpa-en.pdf>

- We may also send your Data to services involved in controls (*commissioners or auditors, public authorities*). Subject to applicable law, we undertake to give you prior notice of your Data being shared with such agencies.

Finally, please be informed that we do not sell your data to the third parties, and we ensure that the sharing of your data is strictly necessary for the provision of our Services.



#### **4. How long do we keep your Data?**

The period of time your Data is kept depends on the kind of Data and what it is used for.

##### ⇒ **Your User Information:**

We keep your User Information for as long as necessary in order to provide you our Services, i.e. until the deletion of your user account.

We also hereby remind you that you yourself have the option of managing the period of time your User Information is kept by modifying and/or deleting, as and when you desire, your User Information direct from your user account.

For technical reasons (*automatic backups on the platform*), please note that your Data is permanently deleted within a maximum period of 60 days from the date of the deletion request.

##### ⇒ **Other Data relating to you**

We delete your Other Data upon expiration of your contract or upon the deletion of your user account. Nevertheless, we may retain some of your Data in order to comply with any applicable legal, accounting and fiscal requirements or to be able to attend to any request from any relevant authority, particularly in the event of a dispute or in the case of a compliance procedure (*whether legal or administrative*).

In regards to Other Data used for sending newsletters, we retain your Data for a period of 3 years from the point at which it is collected or from the point of your last contact with us.

If you no longer wish to receive our newsletters, it is quite simple! All you need to do is unsubscribe by clicking the hyperlink which appears in each newsletter you receive.



## 5. How do we protect your data?

We ensure that the technical measures we implement meet the highest applicable security standards.

To find out more, go to the page on our website specifically dedicated to security: <https://klaxoon.com/solutions-trust-center>



## 6. Where is your Data and how is it transferred?

Wherever you are, we guarantee the security and confidentiality of your Data.

Depending on the option selected, your Data is stored on servers based in the European Union or the United States. To find out more, go to the page on our website specifically dedicated to security <https://klaxoon.com/solutions-trust-center>

In order to provide you with our services, we may transfer your Data under the following conditions:

### Transfers outside the EU:

Any transfer of your Personal Data can only take place if strictly necessary for the provision of our Services or where we have obtained your consent. For any transfer of Personal Data to a country located outside of the European Union or to a country that has not had a favorable ruling of adequacy from the European Commission, we will ensure that such an operation is structured in accordance with the requirements of EU Regulation n°2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of individuals as regards to the processing of personal data as well as the free movement of such data “GDPR”. We also undertake to implement the standard contractual clauses of the European Commission with all recent amendments. For more information regarding transfers of your Personal Data, go to the following link: <https://static.klaxoon.com/website/pdf/dpa-en.pdf>

In any event, we undertake to structure any transfer of your Data via the use of appropriate security measures in order to ensure the integrity and confidentiality of your Data. For further information in this respect, please go to the security page on our website: <https://klaxoon.com/solutions-trust-center>



## 7. What are your rights?

⇒ **Your rights in respect of the General Data Protection Regulation “GDPR”:**

For all Personal Information we collect when you use our Services or while you browse our website, we allow you to exercise your rights at any given time. How to do this?

- **Directly via your Klaxoon user account:** you can amend, delete or recover you User Information directly via our Services at any time.

- **By contacting us:** if you wish to delete Other Data relating to you, collected as part of our Services, all you need to do is contact us via email at the following address: [legal@klaxoon.com](mailto:legal@klaxoon.com). We shall process your request as soon as possible and by no later than thirty days following receipt of your request.

⇒ **Your rights in respect of the California Consumer Privacy Act (CCPA)**

This subsection only applies if you reside in the United States, and more precisely, in the State of California. We tell you how we use, collect and share your Data as well as what rights you have.

As such, we guarantee you:

- **A right of access to your Data.** You may ask us to inform you about all data we collect, use and share (relating to you) within the most recent twelve-month period. We will make every effort to satisfy your request.
- **A right to delete your Data.** You can delete your User Information directly via your Klaxoon account or by contacting us for the deletion of Other Data we collect that relates to you. We will make every effort to satisfy this request. However, we reserve the right to refuse your request if we are obliged to retain your Data in order to comply with any legal requirements or where the retention of such Data is required to provide you with our Services.
- **A right of non-discrimination.** We will ensure that you are not discriminated against particularly in respect of your requests for access to your Data.
- **We should also inform you that we do not sell on your Data.**

You are hereby reminded that you can assert your rights via a representative acting on your behalf. In such a case, we will ask you to validate your request in writing (*by sending an email*). Please also note that we may request official documents from you in order to verify your identity and in order to be able to satisfy your request.

## 8. Cookies



We use cookies to identify you on two levels:

- ⇒ When you visit us on our website
- ⇒ When you use our Services

### What is a “cookie”?

A "cookie" is a small piece of data which may be transmitted to your browser by our website or our Services when you connect to them. Your web browser will retain the cookie for a certain period of time, and will resend it to our web server or our Services each time you connect to them. The cookies we use have several functions: they can

be used to store your customer ID, the content of your shopping cart, or even to help us carry out statistical studies or advertising research.

Several kinds of cookies exist:

- ⇒ **Functional cookies (used on our website and in our Services):** The cookies which relate to functionality enable you to interact with our site and our Services to provide access to core functions (*e.g. choice of language, display resolution, maintenance and improvement of the service, content of a shopping cart, caching of pages of our websites and Services for quicker access, etc*). They can also be used to ensure the security of our website and our Services. Given that these cookies are essential for the proper functioning of our website and our Services, you are not able to object to their use.
- ⇒ **Performance / analysis cookies:** These cookies enable us to establish statistics relating to our website and our Services (*number of visits, unique visitors, page views, sections/content viewed, clickstream data*). They also allow us to improve the interest and usability of our website and Services, or to even detect possible navigational issues. Finally, analysis cookies which are present only on our website additionally enable us to suggest editorial content tailored to your interests.

You can technically block these cookies via the settings in your browser, however your experience using the site may not be as smooth. You are also able to object to the use of website visitor tracking (that is not essential for the provision of Services) via the tab “Cookies” at the bottom of your screen. By default, non-essential tracking cookies are only stored on your device once we have obtained your authorization.

- ⇒ **Third-party cookies:** We may include on our website third-party cookies which enable you to share content from our website and/or our Services with other people. This is the case, for example, with the “Share”, “Like” buttons from social media networks such as “Facebook” “Twitter”, “LinkedIn”, etc. The social / media network which supplies this button may be able to identify you, even if you haven’t used the button during your visit to our website. Klaxoon does not have any control over the way in which these cookies are implemented, and as such we recommend that you take a look at the cookie policy of these social networks.

By default, no tracker is stored on your device if you have not granted your consent via the window “Management of cookies” appearing at the bottom of each page of the site, or directly via a contextual consent request, for example when you connect to our website.

To view the list of these cookies, click on the “Cookies” tab at the bottom of our website.

### **The lifespan of a cookie**

We keep cookies for a maximum duration of:

- 13 months - for cookies used to record site traffic - from the date they are initially deposited in the user terminal. For more information, click on the “Cookies” tab at the bottom of our webpage.
- 24 months for any essential cookies / performance cookies.

## **9. Third Party Sites**

Our Service may contain links to websites and functionalities belonging to third parties. This Privacy Policy is not intended to govern the terms of use of such third-party sites. For more information, please consult the terms of use of these third-party sites directly:

- Importing documents from Google drive: Our Service complies with the Google Services Users Data policy, including the Limited Use requirements. The use and transfer of data from Google's APIs implies acceptance of Google's terms of use, which can be accessed at the following link: [https://developers.google.com/terms/api-services-user-data-policy#additional\\_requirements\\_for\\_specific\\_api\\_scopes](https://developers.google.com/terms/api-services-user-data-policy#additional_requirements_for_specific_api_scopes)



## **10.Changes to our Privacy Policy**

Our Privacy Policy may change in order to make us compliant with any legal requirements or to enable us to adapt to the needs of our area of activity - which is constantly evolving. All of these changes will be accessible on our website so please check regularly our “**Privacy Policy**” webpage for any updates. In the event of any significant change to our Privacy Policy, we will make sure to inform you in writing when you connect to our website.



## **11. Contact us**

For any question or query relating to our Privacy Policy, please forward us your request in writing to the following email address: [legal@klaxoon.com](mailto:legal@klaxoon.com).



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