

PRIVACY POLICY SEER-CS

In its capacity as publisher of the software SEER-CS (the “**Software**”) available on the site www.seer-cs.com (hereinafter the “**Site**”), the company SEER-CS (“**the Publisher**”) undertakes to protect the confidentiality and security of personal data (“**Personal Data**”) relating to any user (hereinafter the “**User**”) and collected as part of the Site's activity.

The Publisher undertakes to process said data in compliance with applicable regulations such as the law of June 20, 2018 relating to data processing, files and freedoms and the General Regulation on the Protection of Personal Data (RGPD).

1. Responsible for processing Personal Data

For the collection and processing of Personal Data on the Site, the data controller is the company SEER-CS, SAS with a capital of 141,000 euros, registered in the Trade and Companies Register of Le Havre under number B 934 097 833, whose registered office is located at 88 Rue de Belfort, 76620 Le Havre, France, represented by Mr. Gwendal Toullec, in his capacity as Chairman.

As the party responsible for processing Personal Data, the Publisher takes all reasonable steps to ensure that Personal Data is accurate and relevant to the purposes for which it is processed on the Site.

2. Personal Data collected

Within the framework of the Site's activity, the Publisher may collect Personal Data transmitted:

- directly by the User: surname, first name, e-mail address, nickname, postal address, bank details, etc.;
- or indirectly: data relating to connection (type of connection used, IP address, cell phone operator, etc.), browsing (statistics on pages viewed, activity or inactivity rates, etc.), use of the functionalities offered on the Site.

The Publisher does not collect any so-called sensitive data within the meaning of the RGPD.

3. Purpose of collecting Personal Data

Personal Data is collected for the purposes of operating the Site and accessing the Site's services and the Software (hereinafter referred to as the “**Services**”), and in particular for:

- the administration of clients' accounts,
- providing and improving the Services,
- customer relations and personalization of Services,
- management of billing operations,
- satisfaction surveys,
- analysis statistics,
- the fight against fraud,
- Site security.

4. Rights

In accordance with current legislation and regulations, each User of the Site has the following rights:

1. **Right of inquiry:** the User has the right to know whether his or her Personal Data is processed, and in particular what data is collected, where it comes from, why and by whom it is processed.
2. **Right of access:** the User has the right to access the Personal Data collected from or about him. This includes the right to request and obtain a copy of the Personal Data collected.
3. **Right of rectification:** the User has the right to request rectification of inaccurate, incomplete, equivocal or out-of-date Personal Data.
4. **Right of deletion:** the User may request that his Personal Data be deleted, in the cases provided for by legislation and regulations and subject to the Publisher's legal retention obligations (accounting, tax, etc.).
5. **Right to restrict processing:** the User may request the restriction of the processing of his/her Personal Data in the cases provided for by legislation and regulations.
6. **Right to portability:** the User has the right to obtain his/her Personal Data in a machine-readable format or, if possible, in the form of a direct transfer from one controller to another.
7. **Right to withdraw consent:** the User has the right to withdraw any consent given for the processing of his/her Personal Data.
8. **Right to digital inheritance:** the User has the right to define directives (general or specific) concerning the fate of his/her Personal Data after his/her death.
9. **Right to object to processing:** the User has the right to object, at any time, for reasons relating to his/her particular situation, to the processing of his/her Personal Data whose legal basis is the Publisher's legitimate interest. In particular, the User has the right to object at any time to the use of his/her Personal Data for commercial prospecting purposes.

To exercise his/her rights, the User must send his/her request, accompanied by proof of identity, to the Publisher by e-mail to the following address contact@seer-cs.com or by post to the following address: SEER-CS SAS, 88 Rue de Belfort – 76620 Le Havre, France.

Requests for the deletion of Personal Data will be subject to the obligations imposed on the Publisher by law, in particular as regards the retention or archiving of documents.

In the event of a dispute, the User may lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (French Data Protection Authority) (www.cnil.fr), supervisory authority in charge of compliance with personal data protection obligations.

5. Recipients of Personal Data

Personal Data is primarily intended for use by the Publisher.

It may be transmitted to service providers (subcontractors) used by the Publisher to provide the Services for the aforementioned purposes.

In the event of illegal activities, suspicions of illegal activities, or for the purposes of investigations or judicial requisitions, Personal Data may be transmitted, on request, to the judicial or control authorities: police, gendarmerie, magistrate, tax or social services, etc.

Under no circumstances will Personal Data be used and/or shared with third parties for commercial purposes such as advertising targeting or electronic, telephone or postal canvassing.

6. Transfer of Personal Data outside the EU

The Publisher may transfer certain Personal Data outside the European Union. Transfers of Personal Data outside the European Union will only be made to countries whose level of Personal Data security is recognized by the European Union or by standard contractual provisions.

7. Security

The Publisher takes all necessary measures to ensure the security of the Personal Data it collects. The Personal Data collected is hosted by specialized subcontractors (web hosting, emailing). Access to the servers is restricted by a strong login and password, and by an encrypted connection of the ssl / https type. Servers are hosted in the authorized service provider's highly secure data centers, and administered by the said service provider.

8. Information in the event of theft of Personal Data

If, despite all the protection measures implemented by the Publisher and its subcontractors, some of the Personal Data should suffer a security breach, the Publisher undertakes to inform users within the legal time limits in force. This legal obligation to inform shall not be construed as an admission of liability or negligence on the part of the Publisher or its subcontractors.

9. Retention period for Personal Data

In order to comply with its legal obligations, or in order to have the elements necessary to assert its rights, the Publisher will archive Personal Data under the conditions provided for by the applicable regulations.

The lawfulness of the processing carried out by the Publisher results from (i) either the contract entered into with the User, in particular in the context of the Publisher's Services, (ii) or the User's express consent, which may be withdrawn at any time, (iii) or the Publisher's legitimate interest (commercial interest, justified, balanced and not infringing on the User's privacy), (iv) or the law.

The length of time Personal Data is kept varies according to the purpose for which it was collected.

Most Personal Data is kept for a period of 5 years from the User's last activity on the Site, then archived with restricted access, for an additional period, for specific reasons and authorized by law (payment, warranty, disputes...). They are then deleted.

10. Cookies

A "**cookie**" is a small information file sent to the Site User's browser and stored on the User's terminal (e.g. computer, smartphone). This file includes information such as the User's domain name, the User's Internet service provider, the User's operating system, and the date and time of access. In particular, it enables the Site to remember the User's actions and preferences (such as connection,

language, font size and other display preferences) over a given period, so that the User does not have to re-enter them each time he/she returns to the Site or navigates from one page to another.

Cookies are in no way likely to damage the User's terminal.

The Publisher may process information concerning the User's visit to the Site, such as the pages consulted and searches performed. This information enables the Publisher to improve the content of the Site and the User's browsing experience, and to personalize the offers the Publisher makes to the User.

Different types of cookies may be used on the Site:

Analytical or statistical cookies

Cookies that enable us to track the use and performance of the Site, to compile statistics and volumes of visits to and use of the various elements of the Site (content visited, routes taken) and to improve the interest and ergonomics of the information offered on the Site (pages or sections most frequently consulted, etc.). These cookies are also used to count visitors to a page.

Functional cookies (always active)

Cookies that enable the Site to function better. The Site uses these Cookies to temporarily record information about the User's session (visit to the Site), for example by remembering what the User has entered in a form. Some of these functional cookies are essential. This means that these cookies are necessary for the proper functioning of the Site. The User may not refuse or deactivate cookies deemed necessary.

Consent

The User must express his consent to the deposit of certain Cookies, the information of which is communicated to him/her in the cookie information banner visible on first connection to the Site.

The consent thus given is valid for a maximum period of six (6) months from the first deposit in the User's terminal equipment.

For statistical cookies exempt from consent, the maximum retention period is thirteen (13) months.

Each User has the option of refusing the installation of Cookies on his/her device. However, in the event of refusal, browsing and the User's experience may be limited.

Acceptance of Cookies facilitating connection and browsing of the Site can be modified at any time, by clicking on "Cookies Settings".

The User is informed that the Publisher's partners and any other third parties may place cookies on the Site. Only the sender of a cookie may read or modify the information contained therein, and the Publisher has no access to or control over cookies that third parties may use. The issue and use of cookies by third parties are subject to the privacy policies of such third parties in addition to the present. Consequently, the User is invited to visit the sites of these third parties for more information on the cookies they store and how to manage them.

11. Modification of the Privacy Policy

The Publisher reserves the right to modify the present Privacy Policy at any time, in particular in application of changes to applicable laws and regulations.