

# eurosign

## Privacy policy



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## 1. Privacy Policy

### 1.1 Controller and data protection officer

1. The following information is provided to you so that you may be aware of the commitments regarding the protection of personal data made by Eurosign (“Eurosign”).

2. Eurosign may act as the data controller (“Controller” or “we”) in the context of the processing it carries out on its own behalf for the purposes listed below. It also intervenes as a data processor in the context of the technical support, maintenance and hosting services provided for the SaaS services.

3. For any request concerning personal data, you can contact Eurosign:

- by mail to: Eurosign, 32, rue Fessart 92100 Boulogne Billancourt
- by email to: [contact@eurosign.com](mailto:contact@eurosign.com)

### 1.2 What personal data do we process?

#### 1.2.1 Personal data we process as a controller

4. In the context of the processing of personal data, the Controller collects and processes the following categories of data:

- signatory’s identification elements: surname and first name, means of authentication on the platform.

#### 1.2.2 Personal data we process as a processor

5. In the context of the processing of personal data, Eurosign collects and processes the following categories of data as a processor:

- signatory’s identification elements: surname and first name, emails, postal address;
- electronic documents, in particular contracts;
- professional elements: date of signature, telephone number for signature;
- financial data.

## 1.3 What are the purposes and legal basis of our data processing?

### 1.3.1 The purposes of our data processing

6. We are processing data for the following purposes:

- maintenance and support for the services;
- hosting of the data provided by the client, the users and signatories;
- data backup;
- reversibility of the services;
- management, creation and storage of electronic signatures.
- promotion of the aforementioned services and commercial prospecting.

### 1.3.2 The legal basis of our data processing

7. We are processing data only if at least one of the following conditions is met:

- the performance of a contract binding us to our client;
- the performance of terms of use binding us to you requires that we implement this processing of personal data;
- the existence of our legitimate interest, or that of a third party, which justify that we implement this processing of personal data.

### 1.3.3 The legitimate interests pursued

8. The legitimate interests which are pursued by the Controller may include in particular the improvement of the management of electronic documents and the electronic signature of these documents.

### 1.3.4 Who are the recipients of your data?

9. The personal data we collect, and those we obtained subsequently, are intended for the relevant department at Eurosign's.

10. We ensure that only authorised persons have access to this data. Our service providers (hosting providers, trusted service providers and electronic archiving service providers if applicable) can be recipients of these data to perform the services we entrust to them.

### 1.3.5 Do we transfer your data?

11. The personal data collected are hosted on servers located in France and will not be subject to any transfers of personal data to countries that are not European Union Member States, unless the data controller requests us to do so.

## 1.3.6 How long are we keeping your data?

12. Unless otherwise instructed by the controller where Eurosign acts as a processor, personal data is kept as long as you can access and use the platform and your account has not been deleted by yourself or Eurosign, and thereafter for the mandatory limitation periods or storage periods.

13. Where we are data controller, your personal data will be stored for [one year] after the date of last login of the user or signatory.

## 1.3.7 What are your rights?

14. Where your rights concern data we collected as a processor, your data subject requests will be forwarded to the controller.

### 1.3.7.1 How to exercise your rights?

15. You can exercise your rights by sending a request by email to the following email address: [contact@eurosign.com](mailto:contact@eurosign.com) or by mail to the following postal address: Eurosign, 32 rue Fessart, 92100 Boulogne Billancourt.

16. Your request must clearly indicate your surname(s) and first name(s) and the address to which you wish the response to be sent.

17. As a matter of principle, you can exercise all your rights free of charge. However, with respect to the right of access, you may be required to pay a reasonable fee taking into account the administrative costs of providing any additional copy of the data you request.

18. Regarding the right of information, the Controller will not be required to act on your request if you already have the information requested.

19. The Controller would like to inform you that if you fail to provide data or if you modify your data, this may have an impact on the processing of certain requests in the context of the performance of the contractual relationships, and that the request you send for the exercise of your rights will be kept for follow-up purposes for a period of six years from receipt of the request concerning the exercise of the right to object and for period of and one year from receipt of the request concerning the exercise of the other rights.

20. All of the rights that are granted to you are detailed below.

### **1.3.7.1 Your right of information**

21. You acknowledge that this privacy policy provides you with information about the purposes, the legal framework, the interests, the recipients or categories of recipients with whom your personal data are shared, and the possibility of a data transfer to a third country or international organisation.

22. In addition to the above information, and with the aim of ensuring fair and transparent processing, you further acknowledge that you have received additional information concerning:

- the period for which your personal data will be kept;
- the existence of the rights that are granted to you and how to exercise them.

23. If we decide to process data for purposes other than those indicated, all relevant information relating to those new purposes will be communicated to you.

### **1.3.7.2 Your right of access and to rectification**

24. By exercising this right, you have the confirmation as to whether or not your personal data are being processed and where this is the case, access to your data and the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipient, in particular recipients in third countries;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the Controller rectification or erasure of your personal data or restriction of processing of personal data concerning you or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subjects, any available information as to their source;
- the existence of automated decision-making, including profiling, and in this case, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subjects.

25. You may ask us, as the case may be, to rectify or complete your personal data that are inaccurate, incomplete, equivocal or expired.

### **1.3.7.3 Your right to erasure**

26. You have the right to ask us to erase your personal data where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw the consent you have previously given;

- you object to the processing of your personal data and there is no legal reason for such processing;
- the processing of personal data does not comply with the provisions of the applicable legislation and regulations;
- your personal data have been collected when you were a minor.

27. However, the exercise of this right will not be possible when the storage of your personal data is necessary for compliance with statutory or regulatory provisions and in particular for example for the establishment, exercise or defence of legal claims.

#### ***1.3.7.4 Your right to restriction of processing***

28. You have the right to request restriction of processing of your personal data in the cases provided for by laws and regulations.

#### ***1.3.7.5 Your right to object to processing (unsubscribe)***

29. You have the right to object to the processing of personal data concerning you when the processing is based on the legitimate interest of the Controller.

30. In the case of direct communication, this right may be exercised by any means, in particular by clicking on the unsubscribe links at the bottom of the communications sent.

#### ***1.3.7.6 Your right to data portability***

31. You have the right to portability of your personal data.

32. The data on which this right can be exercised are:

- only your personal data, which excludes anonymised personal data or data that does not concern you;
- declarative personal data and personal data relating to our functioning;
- personal data which do not adversely affect the rights and freedoms of others such as those protected by trade secrets.

33. This right is limited to processing based on consent or contract, as well as to personal data that you have personally generated.

34. This right does not include derived or inferred data, which are personal data created by the Controller.

### ***1.3.7.7 Your right to lodge a complaint***

35. You have the right to lodge a complaint with the French data protection authority (Cnil), competent authority on the French authority (3 place de Fontenoy 75007 Paris) without prejudice to any other administrative or judicial remedy.

### ***1.3.7.8 Your right to give post-mortem guidelines***

36. You have the possibility to define guidelines for the storage, deletion and communication of your personal data after your death with our services. These guidelines are general or specific and may only concern the processing carried out by us and will be limited to this scope only.

37. The general directives concern all personal data relating to the person concerned and may be recorded with a trusted digital third party certified by Cnil.

38. You also have the possibility of providing for special conditions that we may record.

## **1.4 Applicable law**

39. The applicable law is French law.