

# Privacy Policy

## What is the purpose of our Privacy Policy?

**Calvagone SAS, which manages the E-campsis website, attaches great importance to the protection and confidentiality of your personal data, which we consider to be a guarantee of our reliability and trustworthiness.**

As such, our Personal Data Privacy Policy clearly demonstrates our **commitment to ensuring compliance within Calvagone SAS with the applicable rules on personal data protection**, and in particular those of the General Data Protection Regulation ("GDPR").

In particular, our Privacy Policy aims to inform you about how and why we process your personal data in the context of **the services** we provide to you.

## Who is our Privacy Policy intended for?

Our Privacy Policy applies to **you**, regardless of your place of residence, provided that you are at least 15 years old whether you are **a customer, a candidate for a position at Calvagone, or a visitor** to the E-campsis website.

If you are under the legal age specified above, you are not authorised to use our services **without the prior and explicit consent** of one of your parents or the holder of parental authority, which must be sent to us by email at [dpo@calvagone.com](mailto:dpo@calvagone.com).

If you believe that we hold personal data about your children without your consent, please contact us at the dedicated address detailed above.

## Why do we process your personal data and on what basis?

We process your personal data primarily for the following reasons:

- **to browse our website, benefit from our services** and enable us **to respond to your requests** (e.g. requests for information, complaints, etc.) on the basis of our general terms and conditions of use and our legitimate interest in providing you with the best possible service.

- **stay informed of our latest offers and events by email**, based on our legitimate interest in retaining our customers and prospecting for new potential customers.
- **Follow us and comment on our social media posts** based on our legitimate interest in having a dedicated social media page.
- **play videos on our website** based on our legitimate interest in offering you content in video format.
- **allow the downloading of documents** based on our terms and conditions of use.

We also process personal data from the patients involved in the clinical studies of our clients. In doing so we act as data processor. To know more about the data processing carried out in this context, refer to the privacy policy of the data controller.

## How did we obtain your personal data?

Your data is collected **directly from you** when you are a customer of our services or a "simple" visitor to our website Calvagone, and we undertake to process your data only for the **reasons described above**.

It is also possible that your personal data may be processed indirectly in the context of trade shows or social networks (e.g. LinkedIn).

For professionals only, it is also possible that your personal data may be processed indirectly in the context of trade shows or social networks (e.g. LinkedIn).

However, when you voluntarily publish content on the pages we edit on social networks, you acknowledge that you are **entirely responsible** for any personal information you may transmit, regardless of the nature and origin of the information provided.

Regarding the clinical studies carried out for our clients, we obtained your pseudonymized data from the data controllers, which are our clients.

## What personal data do we process and for how long?

We have summarised below the **categories of personal data** and their **respective retention periods**:

- **Professional identification data** (e.g. surname, first name, position, company, etc.) and **contact details** (e.g. email address and work telephone number, etc.) are retained for the entire duration of the service provision, plus the statutory limitation periods, which are generally 5 years.

- **When there is confusion between the name of your organisation and your personal name (e.g. sole trader, micro-business, etc.), economic and financial data (e.g. bank account number, verification code, etc.)** are kept for the period necessary for the transaction and for managing invoicing and payments, plus the legal limitation periods, which are generally 5 to 10 years.
- **Email address used in our email marketing campaigns**, retained for a maximum period of 3 years from the last contact we had with you.
- **Connection data** (e.g. logs, IP address, etc.) stored for a period of 1 year.
- Cookies are generally stored for a maximum period of 13 months. For more details on how we use cookies, please refer to our cookie policy, which is available at any time on our website.

Once the applicable retention periods have expired, the deletion of your personal data is **irreversible** and we will no longer be able to communicate it to you after this period. At most, we can only retain anonymous data for **statistical** purposes.

Please also note that in the event of a **dispute**, we are obliged to retain **all** personal data concerning you for the entire duration of the case, even after the expiry of the retention periods described above.

We can process health data, and other sensitive data as data processor in the context of the clinical studies carried out for our clients. In this context, data are stored for the duration of the contract, and are deleted after, unless there's a legal obligation to store them for a longer period.

## What rights do you have to control the use of your personal data?

The applicable data protection regulations grant you **specific rights** that you can exercise **at any time** and **free of charge** in order to control how we use your data.

- Right to **access** and **copy** your personal data, provided that this request does not conflict with business secrecy, confidentiality or the secrecy of correspondence.
- Right to **rectify** personal data that is inaccurate, obsolete or incomplete.
- Right to **object** to the processing of your personal data for commercial prospecting purposes, as well as to processing based on our legitimate interest, unless legitimate and compelling reasons justify such processing and prevail over your interests, rights and freedoms.

- Right to request **the erasure** ("right to be forgotten") of your personal data that is not essential to the proper functioning of our services.
- Right to **restrict** your personal data, which allows you to photograph the use of your data in the event of a dispute over the legitimacy of processing.
- Right to data **portability**, which allows you to retrieve some of your personal data in order to store it or easily transfer it from one information system to another.
- Right to give **instructions** on the fate of your data in the event of death, either through you, a trusted third party or a beneficiary.

For a request to be **considered**, it must be made directly by **you or your representative** at the address [dpo@calvagone.com](mailto:dpo@calvagone.com).

Requests cannot be made by anyone other than you or your representative. We may therefore ask you to provide **proof of identity** if we have any doubts about the identity of the applicant, as well as proof of representation.

We will respond to your request **as soon as possible**, within a **maximum** of one month of receipt, unless the request is technically complex or we receive numerous requests at the same time. In this case, the response time may be up to three months.

Please note that we may **refuse** to respond to any **excessive or unfounded** requests, particularly if they are **repetitive** in nature.

## Who can access your personal data?

Your personal data is processed by **our teams** and **our technical service providers for the sole purpose of operating our service**.

We would like to point out that we **check all our technical service providers before recruiting them** to ensure that they strictly comply with the applicable rules on personal data protection.

**FURTHERMORE, WE GUARANTEE THAT WE WILL NEVER TRANSFER OR SELL YOUR DATA TO THIRD PARTIES OR BUSINESS PARTNERS.**

## Can your personal data be transferred outside the European Union?

The personal data processed by our website is hosted exclusively on servers located within the European Union.

Furthermore, we do our utmost to use only technical tools whose servers are also located within the European Union. If this is not the case, we scrupulously ensure that they implement the **appropriate safeguards required to ensure the confidentiality and protection of your personal data**.

## How do we protect your personal data?

We implement all the **technical and organisational measures required** to guarantee the **security** of your personal data on a daily basis and, in particular, to combat any risk of destruction, loss, alteration or disclosure.

## Do we use cookies when you browse our website?

However, we would like to inform you that we use statistical cookies when you browse our website. For more information, please see our Cookie Policy.

## Who can you contact for more information about the use of your personal data?

To best ensure the protection and integrity of your data, we have officially appointed an **independent Data Protection Officer (DPO)** to our supervisory authority.

You can contact our DPO at any time, free of charge, at [dpo@calvagone.com](mailto:dpo@calvagone.com) to obtain more information or details about how we process your data.

## How can you contact the?

You can contact the "**Commission nationale de l'informatique et des libertés**" or "**CNIL**" at any time at the following address: CNIL Complaints Department, 3 place de Fontenoy – TSA 80751, 75334 Paris Cedex 07 or by telephone on 01.53.73.22.22.

## Can the Privacy Policy be changed?

We may change our Privacy Policy at **any time** to adapt it to new **legal requirements** and to **new processing methods** that we may implement in the future.