# **Privacy Policy**

# What is the purpose of the policy ?

We attach great importance to the protection and confidentiality of your personal data, which represent for us a pledge of seriousness and trust.

The data confidentiality policy is precisely a testimony of **our will to ensure compliance with the applicable rules on data protection** and, in particular, those of the General Data Protection Regulation ("GDPR").

In particular, the Privacy Policy aims to inform you about how and why we process your data in connection with the **services** we provide.

## Who does this policy apply to?

The policy applies to **you**, regardless of where you live, as long as you are at least 15 years old and are a **user** of the platform Buyco.

The policy only applies to the processing we do **ourselves** to provide the Buyco service to you and not to the processing **you do using** our platform for which you are solely responsible.

## Why do we process your data ?

In the context of the services offered, we are necessarily required to process your personal data for the **following reasons and purposes** :

- To **benefit from the services and features offered by our platform** (e.g. booking and tracking of containers, etc.) on the basis of our general terms of use.
- To ensure the management of user accounts (e.g. account creation, access to the platform and account deletion) on the basis of our general terms of use.
- To guarantee and reinforce the security and quality of our services on a daily basis (e.g.: statistics, data security, etc.) on the basis of the legal obligations weighing on us, our general terms and conditions of sale and our legitimate interest in ensuring the proper functioning of our services.

• Finally, we may also install "**Cookies**" on your terminal. For more information on the use of "Cookies", we invite you to consult our "Cookies Policy".

Your data is collected **directly from you** when you use our platform and we undertake to process your data only for the **purposes described above.** 

# What data do we process and for how long ?

We have summarized the **categories of personal** data we collect and their **respective retention periods.** 

- **Professional identification data** (e.g. last name, first name, position, company, etc.) and **contact information** (e.g. personal or professional email address, Linkedin, etc.) kept for the duration of the provision of the service, plus the legal limitation periods, which are generally 5 years.
- **Connection data** (e.g. logs, IP address, etc.) kept for a period of 1 year.
- **Cookies** which are generally kept for a maximum of 13 months. For more details on the use we make of your cookies, you can consult our cookie policy, which is accessible at any time on our website.

If you would like to know more about the **retention periods** applicable to your data, you can contact us at: <u>privacy@buyco.co</u>. In any case, all your data is deleted when you request the deletion of your account with a maximum of 30 days.

The deletion of your personal data is **irreversible** and we will not be able to communicate them to you after this period. At most, we can only keep anonymous data for **statistical** purposes.

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

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

The applicable data protection regulations give you **specific rights** that you can exercise, at **any time and free of charge**, to control the use we make of your data.

- Right of **access** and **copy** of your personal data as long as this request is not in contradiction with business secrecy, confidentiality, or the secrecy of correspondence.
- Right to **rectify** personal data that are erroneous, obsolete or incomplete.
- The right to request the **deletion** ("right to be forgotten") of your personal data that are not essential to the proper functioning of our services.
- Right to the **limitation** of your personal data which allows to photograph the use of your data in case of dispute on the legitimacy of a processing.
- Right to the **portability** of your data which allows you to recover part of your personal data in order to store them or transmit them easily from one information system to another.
- The right to give **instructions** on what to do with your data in the event of your death, either through you, a trusted third party or a beneficiary.

For a request **to be taken into account**, it is imperative that it be made directly by **you** at <u>privacy@buyco.co</u>. Any request that is not made in this manner **cannot be processed**.

Requests cannot be made by anyone other than you. We may therefore ask you to provide **proof of identity** if there is any doubt about the identity of the requester.

We will respond to your request **as soon as possible**, but no later than **three months** after receipt, if the request is technically complex or if we receive many requests at the same time.

Please note that we can always **refuse** to respond to any **excessive or unfounded** request, particularly with regard to its **repetitive** nature.

#### Who can access your data?

We never communicate your data to partners. At the most, your data is transmitted to technical service providers to operate the platform (e.g.: host). Moreover, our teams never look at or access your data except, in the exceptional case, for maintenance.

#### How do we protect your data ?

We implement all the **technical and organizational means** required to guarantee the **security** of your data on a daily basis and, in particular, to fight against any risk of destruction, loss, alteration, or disclosure of your data that would not be authorized (e.g.:

encryption of passwords and communications, anti-bot system, monitoring, backup servers, training, access control, antivirus, etc.).

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

Unless strictly necessary and on an exceptional basis, we never transfer your data outside the **European Union** and your data is always hosted within the European Union. In addition, we make every effort to use only service providers who host your data within the European Union.

Should our service providers nevertheless transfer your personal data outside the European Union, we take great care to ensure that they implement **appropriate safeguards to ensure the confidentiality and protection of your data.** 

## Who can you contact for more information ?

Our **Data Protection Officer** ("DPO") is always available to explain in more detail how we process your data and to answer your questions on the subject at the following address : <u>privacy@buyco.co</u>.

## How can you contact the CNIL ?

You can contact **the French data protection supervisory authority** (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 at 01.53.73.22.22.

# Can the policy be modified ?

We may modify our privacy policy at **any time** to adapt it to new **legal requirements** and to **new processing** operations that we may implement in the future. You will, of course, be informed of any changes to this policy.

Certified compliant by Dipeeo ®