

PRIVACY POLICY



SHIRUDO

V.3

29 February 2020



SOKIEN BY GREEN IT ADDICT (hereinafter SOKIEN), agrees to fulfil all the obligations incumbent upon it under the regulations applicable to the processing of personal data, and in particular:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 applicable since 25 May 2018;
- The "Informatique et Libertés" Act (IT systems and private rights) No. 78-17 of 6 January 1978, as amended;
- The advice and recommendations of the Supervisory Authorities and the European Data Protection Board.

SOKIEN undertakes to allow for the protection of personal data as of the design stage of its products and services.

The present privacy policy sets out the principles and guidelines concerning the protection of personal data and the rights of the persons concerned.

PROCESSING MANAGER

Personal data are collected on the www.shirudo.eu website by SOKIEN, a limited liability company ("société à responsabilité limitée") whose head office is situated 30 Cité de Pruney 38420 Le Versoud (France), registered in the Grenoble Corporate and Trade Register under No. 531 400 125. The company has a registered capital of €13,000.

SOKIEN is in charge of processing the data collected on the www.shirudo.eu website.

For any questions relating to the management and use made of your personal data, you can contact SOKIEN at the following email address: contact@sokien.com.

PERSONS CONCERNED BY THE PROCESSING

The persons concerned by the processing are, in particular, the users of the www.shirudo.eu website, and customers and prospective customers.

TIME OF COLLECTION

The personal data are collected notably at the following times:

- navigation on our website, and the consultation and/or use of our products and services;
- a request for a quote;
- creation or modification of an account;
- contact with our customer service;
- downloading of any documentation relating to one of our products;
- participation in an event;
- a request to be contacted;



- placing an order or taking out a subscription;
- payment for an order or a subscription;
- a request for registration for the newsletter;
- an improvement in our services;
- a response to our administrative obligations;
- carrying out surveys or producing statistics.

The compulsory or optional nature of the data is indicated at the time of collection by an asterisk. Some data are collected automatically during your actions on the website.

DATA COLLECTED

The data that may be collected are:

- data concerning your identity (family name, first name, date and place of birth, etc.);
- your contact details (postal address, email address, telephone number(s), etc.);
- data concerning your occupation (job held, contact details of your employer, etc.);
- data concerning the management and securing of an account (identifiers, passwords) on the computer hardware used during navigation;
- bank data such as your bank details and card number for the payment of products and services;
- customer relationship management data: requests for information, hot-line management, history of communications;
- connection data and cookies (IP addresses, connection logs);
- where appropriate a copy of the national identity card, when exercising a right of access, correction or blocking or to comply with a legal obligation.

PROCESSING OF COLLECTED DATA

The various data may be collected for explicit, legitimate and defined purposes to enable:

- management of a request for a price quote;
- taking out a subscription for a service or product;
- buying a product;
- delivery management and invoicing of the services/products provided;
- monitoring, critical examination and improvement of the product and service offering;
- operation and improvement of the website and its functionalities;
- website security;
- management of registration for an event or training;
- management of subscription to the newsletter;
- the production of commercial statistics;
- management of requests for right of access, correction and blocking, removal, limitation and portability.



LEGAL FOUNDATIONS FOR PROCESSING PERSONAL DATA

SOKIEN collects personal data on the basis of:

- a contract to which the person concerned is a party (directly or as a legal representative);
- implementation of precontractual measures taken at the request of the person concerned, such as a request for a price quote;
- the explicit consent of the person concerned when said consent is compulsory;
- legal authorization;
- a legal obligation, especially for data retention and archiving;
- a legitimate interest;
- necessity: when data processing is necessary for the establishment, exercise or defence of a right in the courts.

PERSONAL DATA SECURITY

SOKIEN has adopted technical measures (a firewall) and organizational measures (identifiers and passwords, physical protective measures, etc.), notably to ensure privacy and data integrity.

Data concerning bank credit cards when placing an order are protected by an encryption technology ensuring transaction security.

DATA RECIPIENTS

Personal data are disclosed only to specified authorized recipients.

These recipients may have access to the data only to the extent needed to accomplish the purposes described above.

The recipients may be:

- SOKIEN inasmuch as processing manager;
- authorized personnel at SOKIEN;
- service providers and subcontractors performing services for SOKIEN;
- the duly authorized legal and/or administrative authorities;
- regulated professions (e.g. solicitors, lawyers and bailiffs).

SUBCONTRACTORS

SOKIEN may use subcontractors for processing personal data, notably for website hosting and maintenance. SOKIEN agrees to sign a written agreement with each of its subcontractors complying with the obligations regarding personal data.

SOKIEN agrees to use only subcontractors that are:

- established in a European Union country; or



- established in a country offering an adequate level of protection; and
- offering appropriate guarantees.

The list of subcontractors will be made available to website users, customers and prospective customers upon a written request.

RETENTION PERIOD

Personal data are stored in active databases, log files or other types of files, for the length of time needed for supply of the products and services.

They may be retained after this relationship, notably for us to comply with the applicable regulations, assert our rights or defend our interests.

The data may be archived for a longer period for the management of claims and/or disputes, to comply with regulatory obligations, or to meet the demands of duly authorized legal or administrative authorities.

Regarding customers, depending on their nature and the applicable legislation, the data may be archived for up to 10 years after the end of the relationship or the project.

Data concerning prospective customers may be retained for a period of three years after data collection or the last contact with said prospective customers.

In the case of cookies, the data are retained for a period of thirteen months after first being placed on the website user's computer.

When personal data are collected for several purposes, they are retained until the end of the retention or archiving period, whichever is longer.

DATA TRANSFER OUTSIDE THE EUROPEAN UNION

For certain specific services and for strictly regulated purposes, personal data may be transferred to a country located outside the European Union. They are protected by the existence of an adequacy decision issued by the European Commission which recognizes an adequate level of protection in the receiving country.

If the level of protection has not been recognized as equivalent by the European Commission, SOKIEN undertakes to put in place standard contractual provisions approved by the European Commission.

PERSONAL RIGHTS

Regarding the collection and processing of their personal data, the persons concerned shall have rights which may be exercised under the conditions laid down by the regulations in force, namely:

1. The right to be informed in an understandable, easily available manner concerning the data processing operations that are carried out.



2. The right of data access by requesting disclosure of the data.
3. The right to correct and obtain modifications to any data that might be inaccurate or incomplete.
4. The right to deletion of data, unless there are legal or other legitimate grounds for retaining them, in the following cases (restrictive list):
 - The data are no longer necessary for the purposes for which they were collected or processed in another manner;
 - The person concerned withdraws the consent on which the processing is based and there is no other legal justification for the processing;
 - The person concerned is opposed to processing and there is no compelling legitimate reason for the processing;
 - The person concerned is opposed to processing for prospecting purposes, including profiling;
 - The data have been processed unlawfully.
5. The right to oppose processing at any time except for legitimate, compelling reasons for the processing which prevail over the interests and the rights and liberties of the person concerned, or for the recognition, exercise or defence of rights in court, when this is based on the legitimate interest of the data processing manager.
6. The right, free of charge and without having to justify the request, to oppose use of the data for commercial prospecting purposes.
7. The right to limit the processing of personal data.
8. The right to portability of your data when processing is based on consent or the execution of contracts and when the processing is performed using automated processes.
9. The right to withdraw your consent at any time when the processing of your personal data is based on your consent.
10. The right to give specific or general instructions concerning the retention, deletion and disclosure of personal data, applicable after your death.

In case of death, and failing instructions from you, SOKIEN undertakes to destroy your data, unless their retention proves necessary to serve as evidence or to comply with a legal obligation.
11. The right to submit a claim to the French data protection agency Commission Nationale de l'Informatique et des Libertés (CNIL) 3 Place de Fontenoy TSA 80715 75334 PARIS CEDEX 07 or on the website www.cnil.fr/fr/plaintes.

All requests should be:

- sent to the email address contact@sokien.com;

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SIRET ID No. 531400125 00039 RCS Grenoble. APE activity code 6202A. VAT No. FR 52531400125



- accompanied by signed, up-to-date proof of identity; and should
- specify the address to which the reply should be sent to you.

SOKIEN undertakes to reply to any request for exercise of the rights of the persons concerned as soon as possible, and always in accordance with the legal provisions.

COOKIES

SOKIEN uses cookies. We invite you to refer to the "Cookies Policy" section to obtain detailed information on the use of cookies and the options available to you.