

Assutech Privacy Policy

Assutech collects certain Personal Data from its Users.

Owner and controller

ASSUTECH SAS

21 Boulevard Littré

78600 Le Mesnil Le Roi, France

Owner's contact email: contact@assutech.com

Types of Data collected

The types of Personal Data that Assutech collects directly or through third parties include: telephone number, various types of Data, Cookies, Usage Data, unique identification of the advertising device (e.g. Google or IDFA advertising ID), email address, first name, last name, VAT Code, company name, address, postal code, city and website.

Full details of each type of Personal Data collected are provided in the sections devoted to this Privacy Policy or in specific explanatory texts published prior to the collection of the Data, which may be freely provided by the User, or, in the case of Usage Data, automatically collected when you use Assutech's services,

unless otherwise specified, all Data requested by Assutech's services are mandatory and their absence may make the provision of the Services by Assutech impossible. In the event that Assutech specifies that certain Data is not mandatory, Users are free not to disclose it without affecting the availability or operation of the Service ; Users who have any doubts about the mandatory Personal Data are invited to contact the Owner ; any use of Cookies - or other tracking tools - by Assutech or by owners of third-party services used by Assutech is intended to provide the Service requested by the User, in addition to the other purposes described in this document and the Cookie Policy, where available.

Users are responsible for any Third Party Personal Data obtained, published or communicated through Assutech and confirm that they obtain the consent of the third party to provide the Data to the Owner.

Method and place of data processing

Processing methods

The Owner shall take appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of the Data

, and shall process the Data using computers or computer tools, following procedures and organizational methods closely related to the stated purposes. In addition to the Owner, the Data may be accessible, in some cases, to certain categories of persons in charge of Assutech's operations (administration, sales, marketing, legal, system administration) or to external parties (such as third party technical service providers, messaging services, hosting providers, IT companies, communication agencies) designated, as applicable, as Subcontractors by the Owner. The updated list of these parts may be requested from the Owner at any time.

Legal basis of the processing operation

The Owner may process Personal Data relating to Users if one of the following conditions applies:

- Users have given their consent for one or more specific purposes; Note: Under certain laws, the Owner may be allowed to process Personal Data until the User objects ("opt-out"), without having to rely on

consent or any of the following legal bases. However, this condition does not apply when the processing of Personal Data is subject to European data protection law;

- the provision of Data is necessary for the execution of an agreement with the User or for any pre-contractual obligation of the User;
- the processing is necessary to comply with a legal obligation to which the Owner is subject;
- the processing is related to a task carried out in the public interest or in the exercise of public authority vested in the Owner;
- the processing is necessary for the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help you to clarify the specific legal basis that applies to the processing, and in particular if the provision of Personal Data is a legal or contractual requirement, or a necessary requirement to conclude a contract.

Place of processing

The Data are processed at the Owner's headquarters and at all other places where the parties responsible for the processing are located

, depending on the location of the User, data transfers may result in the transfer of the User's Data to a country other than his own. To find out more about where this transferred Data is processed, Users can consult the section that contains details on the processing of Personal Data.

Users also have the right to know the legal basis for transfers of Data to a country outside the European Union or to any international organisation governed by public international law or created by two or more countries, such as the United Nations, as well as the security measures taken by the Owner to safeguard their Data.

If such a transfer occurs, Users may find out more by consulting the relevant sections of this document or contact the Owner using the information provided in the contact section.

Storage time

Personal Data is processed and stored as long as necessary for the purpose for which it was collected.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User must be retained until the contract is fully performed.
- Personal Data collected for the legitimate interests of the Owner must be retained for as long as necessary to achieve those purposes. Users can find specific information regarding the legitimate interests pursued by the Owner in the relevant sections of this document or by contacting the Owner.

The Owner may be permitted to retain Personal Data for a longer period of time whenever the User has given his consent to such processing, until such consent is withdrawn. In addition, the Owner may be required to retain Personal Data for longer periods of time whenever required to fulfil a legal obligation or by order of an authority.

Once the retention period has expired, the Personal Data will be deleted. Therefore, the right of access, the right of erasure, the right of rectification and the right to data portability cannot be applied after the expiry of the retention period.

Purposes of the processing operation

User Data is collected to enable the Owner to provide its Services, as well as for the following purposes: Access to third-party service accounts, Web hosting and backend infrastructure, Contacting the User, Data transfer

outside the EU, Analyses, Content display from external platforms, Tag management, Anti-SPAM protection, Remarketing and behavioural targeting, Advertising, Registration and authentication, Exchanges with social networks and external platforms and User database management.

Users can find further information on the purposes of this processing and on the specific Personal Data used for each purpose in the respective sections of this document.

Facebook permissions requested by Assutech telephony systems

Telephone systems may ask Facebook for permissions to perform actions on the User's Facebook account and extract information, including Personal Data. This service allows the telephone system to connect to the User's account on the Facebook social network, provided by Facebook Inc.

For more information about the following permissions, please refer to the [Facebook permissions documentation](#) and [Facebook's privacy policy](#).

The permissions required are as follows: Contact email, Basic information and Friends List.

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes using several services:

- Access to third-party service accounts

This type of service gives Assutech's services access to your Account Data on a third-party service and allows Assutech to perform actions with it. These services are not automatically activated but require the express authorization of the User.

Access to Facebook account

This service allows the Assutech telephone system to connect to the User's account on the Facebook social network, provided by Facebook, Inc.

Authorizations requested: Contact email and Friends List.

Place of processing: United States - Facebook [Privacy Policy](#). Participant in the data protection shield.

Access to Twitter account (Twitter, Inc.)

This service allows the Assutech telephone system to connect to the User's account on the Twitter social network, provided by Twitter, Inc.

Personal data collected: different types of Data indicated in the service's privacy policy.

Place of processing: United States - [Privacy Policy](#). Participant in the data protection shield.

Place of processing: United States - Twitter [Privacy Policy](#). Participant in the data protection shield.

- Analyses

The services contained in this section allow the Owner to monitor and analyze web traffic and track changes in User behaviour.

Extension of display advertising in Google Analytics (Google Inc.)

Google Analytics may use Google ads targeted at interests, third-party audience data and DoubleClick cookie information for Assutech to extend analyses to demographic, interest and advertising interaction data.

Personal data collected: Cookies and Usage Data.

Place of processing: United States - Google [Privacy Policy](#) - [Withdrawal option](#). Participant in the data protection shield.

IP Anonymization in Google Analytics (Google Inc.)

Google Analytics is a web analytics service provided by Google Inc. ("Google"). Google uses the Data collected to track and analyze the use of Assutech services, prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and customize ads in its own advertising network. This integration of Google Analytics makes your IP address anonymous. Users' IP addresses are in fact shortened within the Member States of the European Union or other States party to the Agreement on the European Economic Area. Only in exceptional cases is the full IP address transmitted to the Google server and abbreviated in the United States.

Personal data collected: Cookies and Usage Data.

Place of processing: United States - Google's [Privacy Policy](#) - [Withdrawal option](#). Participant in the data protection shield.

Tracking Google Ads conversions (Google Inc.)

Ads conversion tracking is an analysis service provided by Google Inc. that links Google Ads ad network data to actions performed on Wildix.

Personal data collected: Cookies and Usage Data.

Place of processing: United States - Google's [Privacy Policy](#). Participant in the data protection shield.

Tracking conversions of Facebook Ads (Facebook, Inc.)

Facebook Ads Conversion Tracking is an analysis service provided by Facebook, Inc. that links data from Facebook's ad network to actions performed on Wildix.

Personal data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#). Participant in the data protection shield.

- User database management Users

This type of service allows the Owner to create user profiles from an email address, a person's name or other information provided by the User to Assutech, and to track the User's activities through analytical features. This Personal Data may also be compared with publicly available information about the User, such as social network profiles, and used to create private profiles that the Owner can display and use to improve Assutech's services. Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on Assutech telephony systems.

Zoho

Zoho is a user database management service provided by Zoho, Inc.

Personal data collected: different types of Data indicated in the service's privacy policy.

Place of processing: United States - [Privacy Policy](#).

- Web hosting and backend infrastructure

These types of services are intended to host Data and files that allow Assutech's service to operate and be distributed and to provide a ready-made infrastructure for specific functions or parts of the Assutech services to operate

. some of these services operate through geographically dispersed servers, making it difficult to determine the actual location where Personal Data is stored.

Amazon Web Services (AWS) (Amazon Web Services, Inc.)

Amazon Web Services is a hosting and backend service provided by Amazon.com Inc.

Personal data collected: different types of Data indicated in the service's privacy policy.

Place of processing: United States - [Privacy Policy](#); Ireland - [Privacy Policy](#); Germany - [Privacy Policy](#);

Singapore - [Privacy Policy](#). Participant in the data protection shield.

Microsoft Azure (Microsoft Corporation)

Microsoft Azure is a hosting service provided by Microsoft Corporation.

Personal data collected: different types of Data indicated in the service's privacy policy.

Place of processing: United States - [Privacy Policy](#); India - [Privacy Policy](#); Germany - [Privacy Policy](#).
Participant in the data protection shield.

- **Anti-SPAM protection**

These types of services analyze Assutech's traffic, which potentially contains User Personal Data, in order to filter messages and content that are recognized as SPAM.

Google reCAPTCHA (Google Inc.)

Google reCAPTCHA is a spam protection service offered by Google Inc. reCAPTCHA's use is subject to Google's [privacy policy](#) and [terms of use](#).

Personal data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#). Participant in the data protection shield.

- **Remarketing and behavioural targeting**

This type of service allows Assutech and its partners to distribute, optimize and display ads based on the User's previous use of Assutech's services. This activity is carried out by monitoring the evolution of the Usage Data and by using Cookies. In

addition to any opt-out options offered by any of the services below, the User may decide to decline the use of cookies by third party services by visiting the [opt-out page of the Network Advertising Initiative](#).
Remarketing by Google Analytics for display advertising (Google Inc.)

Google Analytics for display advertising is a remarketing and behavioral retargeting service provided by Google Inc. that links the tracking activity performed by Google Analytics and its Cookies to the Adwords ad network and the Doubleclick Cookie.

Personal data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy policy](#) - [Withdrawal option](#). Participant in the data protection shield.
Facebook Custom Audience (Facebook, Inc.)

Facebook Custom Audience is a remarketing and behavioral retargeting service provided by Facebook, Inc. that links Wildix's activity to Facebook's advertising network.

Personal data collected: e-mail address and cookies.

Place of processing: United States - [Privacy policy](#) - [Withdrawal option](#). Participant in the data protection shield.
Remarketing of Facebook (Facebook, Inc.)

Facebook remarketing is a remarketing and behavioral targeting service provided by Facebook, Inc. that links Wildix's activity to Facebook's advertising network.

Personal data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy policy](#) - [Withdrawal option](#). Participant in the data protection shield.
Remarketing of AdWords (Google Inc.)

AdWords remarketing is a remarketing and behavioral targeting service provided by Google Inc. that links Wildix's business to the Adwords ad network and the Doubleclick Cookie.

Personal data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy policy](#) - [Withdrawal option](#).

- Exchanges with social networks and external platforms

This type of service allows exchanges with social networks or other external platforms directly from the pages of Assutech's services

, and exchanges and information obtained by Assutech's systems are always governed by the privacy settings defined by the User for each social network

, and if such a service is installed, it can always collect page traffic data, even if the User does not use it.
Facebook Like and Social Widgets button (Facebook, Inc.)

Facebook's Like button and social widgets are services that allow you to interact with the Facebook social network provided by Facebook, Inc.

Personal data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#). Participant in the data protection shield.

- Displaying content from external platforms

This type of service allows you to view and interact with content hosted on external platforms directly from Assutech pages. If such a service is installed, it can still collect web page traffic data, even if the User does not use it.

Google Site Search (Google Inc.)

Google Site Search is a search engine integration service provided by Google Inc. that allows Wildix to incorporate content of this nature on its pages.

Personal data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#). Participant in the data protection shield.

Google Fonts (Google Inc.)

Google Fonts is a font viewing service provided by Google Inc. that allows Assutech to embed such content on its pages.

Personal data collected: different types of Data indicated in the service's privacy policy and Usage Data.

Place of processing: United States - [Privacy Policy](#). Participant in the data protection shield.

Google Calendar widget (Google Inc.)

Google Calendar widget is a content viewing service provided by Google Inc. that allows Wildix to incorporate content of this nature on its pages.

Personal data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#). Participant in the data protection shield.

YouTube video widget (Google Inc.)

YouTube is a video content viewing service provided by Google Inc. that allows Assutech to integrate video content on its pages.

Personal data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#). Participant in the data protection shield.

- Contact the User

Telephone contact (Assutech)

Users who provide their telephone number may be contacted for commercial or promotional purposes about Assutech services or to respond to support requests.

Personal data collected: telephone number.

Contact form (Wildix)

By completing the contact form with their Data, the User authorizes Assutech to use this information to respond to requests for information, quotations or any other request as indicated in the form header.

Personal data collected: address, e-mail address, VAT code, postal code, family name, company name, telephone number, first name, website and city.

- Tag management

This type of service allows the Owner to manage the necessary tags or scripts on Assutech services centrally, so User Data flows through these services, which could result in the retention of this Data.

Google Tag Manager (Google LLC)

Google Tag Manager is a tag management service provided by Google LLC.

Personal data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#). Participant in the data protection shield.

Other information on Personal Data

- Wildix Kite and Zoho Online Chat

Supplier

This website

Objective

Contact the user

Personal data collected

First name

E-mail address

Privacy Policy

Users who have provided their name and/or email may be contacted for commercial or promotional purposes related to this website, as well as to respond to commercial or technical support requests.

- Personal data collected through sources other than the User

The Owner of Assutech services may have legitimately collected Personal Data relating to Users without their knowledge, by reusing them or by purchasing them from third parties for the reasons mentioned in the section specifying the legal basis for the processing.

Where the Owner has collected Personal Data in this way, Users may find specific information about the source in the relevant sections of this document or by contacting the Owner.

- OVH

Supplier

OVH

Objective

Hosting and backend infrastructure

Personal data collected

Different types of data

Privacy Policy

OVH offers hosting and backend services.

- Analysis and predictions based on User Data ("profiling")

The Owner may use the Personal and Usage Data collected by Assutech's services to create or update User profiles. This type of Data processing allows the Owner to evaluate the User's choices, preferences and behaviour for the purposes described in the corresponding section of this document.

User profiles can also be created through the use of automated tools such as algorithms, which can also be provided by third parties. To learn more about the profiling activities performed, Users can check the corresponding sections of this document.

The User always has the right to object to this type of profiling activity. To learn more about the User's rights and how to exercise them, the User is invited to consult the section of this document describing the User's rights.

Users' rights

Users may exercise certain rights with respect to their Data processed by the Owner.

In particular, Users have the right to do the following:

- **Withdraw their consent at any time.** Users have the right to withdraw their consent if they have already given their consent to the processing of their Personal Data.
- **Oppose the processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Details are added in the corresponding section below.
- **Access their Data.** Users have the right to know whether the Data is being processed by the Owner, to obtain information on certain aspects of the processing and to obtain a copy of the Data being processed.
- **Check and obtain a rectification.** Users have the right to verify the accuracy of their Data and to request that it be updated or corrected.
- **Limit the processing of their Data.** Users have the right, under certain conditions, to limit the processing of their Data. In this case, the Owner will process their Data only for storage purposes.
- **Have their Personal Data deleted or deleted.** Users have the right, under certain conditions, to obtain the deletion of their Data from the Owner.
- **Retrieve their Data and transfer them to another controller.** Users have the right to retrieve their Data in a structured, commonly used and machine-readable format and, if technically possible, to forward them to another controller without obstacles of any kind. This provision applies, provided that the Data are processed by automated means and that the processing is based on the User's consent, on a contract to which the User is a party or on pre-contractual obligations.
- **File a complaint.** Users have the right to file a complaint with their data protection authority.

Information concerning the right to object to processing

When Personal Data are processed in the public interest, in the exercise of official authority vested in the Owner or for the legitimate interests pursued by the Owner, Users may object to such processing by providing a reason related to their particular situation that should justify such objection.

Users should be aware, however, that if their Personal Data is processed for direct marketing purposes, they may object to such processing at any time without any justification. To find out whether the Owner processes Personal Data for direct marketing purposes, Users may refer to the corresponding sections of this document.

How to exercise these rights

Any request to exercise the User's rights may be addressed to the Owner using the contact details provided in this document. These requests can be exercised free of charge and will be examined by the Owner as soon as possible and always within one month.

Cookies Policy

Assutech's services use Cookies. For more information and a detailed explanation of cookies, the User may consult the [Cookies Policy](#).

Additional information on data processing and collection

Legal action

The User's Personal Data may be used for legal purposes by the Owner in court or in steps that may lead to legal action resulting from improper use of Assutech's services or related Services . the User is aware that the Owner may disclose Personal Data at the request of public authorities.

Additional information about the User's Personal Data

In addition to the information contained in this Privacy Policy, Wildix may provide the User with additional information and contextual information about particular services or the collection and processing of Personal Data.

System and maintenance logs

For operational and maintenance purposes, Assutech and any third party service may collect files that record interactions with Assutech (system logs) or use other Personal Data (such as IP address) for this purpose.

Information not included in this policy

Further information regarding the collection or processing of Personal Data may be requested from the Owner at any time. Please refer to the contact information at the beginning of this document.

How "Do not track" requests are handled

Assutech does not support "Do not track" requests , refer to the privacy policy of third-party services to determine whether or not they accept "Do not track" requests.

Changes to this Privacy Policy

The Owner reserves the right to make changes to this privacy policy at any time by informing its Users on this page and possibly in Assutech's services or - insofar as technically and legally possible - by sending a notification to Users via the contact details available to the Owner. It is strongly recommended to consult this page frequently, referring to the date of the last modification indicated at the bottom.

If the modifications affect the processing activities carried out on the basis of the User's consent, the Owner must obtain a new consent from the User when necessary.

- Definitions and legal references

Personal data (or Data)

Any information which, directly, indirectly or in connection with other information - including a personal identification number - allows the identification or identifiability of a natural person.

Usage data

Information automatically collected by Assutech services (or by third party services employed by Assutech), which may include IP addresses or domain names of computers used by Users who use Assutech, URI (Uniform Resource Identifier) addresses, time of request, method used to submit the request to the server, size of the file received in response, numerical code indicating the status of the server response (favorable result, error, etc.), the country of origin, the characteristics of the browser and operating system used by the User, the different details relating to the time per visit (e. g. time spent on each page in the Application) and details relating to the path followed in the Application with special reference to the sequence of pages visited, and other parameters relating to the User's operating system or computer environment.

User

The person using Assutech's services who, unless otherwise specified, corresponds to the Person concerned.

Person concerned

The natural person to whom the Personal Data refers.

Subcontractor (or Data Manager)

The natural or legal person, public authority, institution or other body that processes Personal Data on behalf of the Data Controller, as described in this Privacy Policy.

Data controller (or Owner)

The natural or legal person, public authority, institution or any other body which, alone or jointly with others, determines the purposes and means of processing Personal Data, including security measures concerning the operation and use of Assutech's services. Unless otherwise specified, the Data Controller is the Owner of Assutech.

Assutech's services (or this Application)

The means by which the User's Personal Data is collected and processed.

Service

The service provided by Assutech as described in the related terms and conditions (if any) and on this site/application.

European Union (or EU)

Unless otherwise indicated, all references in this document to the European Union include all current Member States of the European Union and the European Economic Area.

Cookies

Small piece of data stored in the User's device.

Legal information

This privacy policy has been prepared in accordance with the provisions of several laws, in particular Article 13/14 of European Regulation 2016/679 (General Data Protection Regulation).

This privacy policy applies only to Assutech, unless otherwise stated in this document.

Last update: May 29, 2018

