

CHARTER FOR THE USE OF PERSONAL DATA

- PIA-RGPD -

PREAMBLE

This Privacy Policy applies to all services provided by ATNOS and offered via its website <https://pia-rgpd.eu/>. Its purpose is to inform all Users of the Website and Customers of the products and services provided:

- How their personal data is collected and processed, if applicable;
- The rights they have concerning their data;
- The identity of the data controller;
- Where applicable, the transfer of or access to their data by third-party processors;
- Cookie management policy.

This Privacy Policy complements the Legal Notice and General Terms and Conditions of Use ("GTCU") proposed by ATNOS and available for consultation by Users¹ on the <https://pia-rgpd.eu/> website.

ATNOS undertakes to treat all data collected in accordance with :

- To Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, known as the "RGPD";
- To law no. 78-17 of January 6, 1978, known as the "Informatique et Libertés" law, as amended by law no. 2018-493 of June 20, 2018 on the protection of personal data.

ARTICLE 1 : The Data Controller and the Data Protection Officer

1.1. The data controller

Personal data are collected by :

¹ For the purposes hereof, the term User(s) refers to any individual or legal entity under private or public law accessing the Website as a Customer benefiting from ATNOS Services or as a simple visitor to the Website without having the status of Customer (within the meaning of the GTC).

ATNOS, a société par actions simplifiée (simplified joint-stock company) registered with the RCS of Carcassonne under number 811 548 528, whose head office is located at 35 place de Verdun in Castelnaudary (11400).

The data controller can be contacted by post at the following address:

ATNOS Company
35 place de Verdun
11400 CASTELNAUDARY

Or send an e-mail to contact@pia-rgpd.eu.

1.2. The Data Protection Officer (DPO)

The identity and contact details of the Data Protection Officer are as follows:

Mr Bruno PERLES
ATNOS
35 place de Verdun - 11400 CASTELNAUDARY

The Data Protection Officer can be contacted by sending an e-mail to: dpd@pia-rgpd.eu

ARTICLE 2 : Personal data collected and processed

As part of the operation of the <https://pia-rgpd.eu> website and the provision of its products and services, ATNOS collects personal data relating to Users.

2.1. General data is collected by ATNOS for the provision of its products and services and the operation of the <https://pia-rgpd.eu> website:

- When Users place orders and make payments ;
- When Users create a Customer Area on the Website for certain services;
- When Users consult and use the functionalities and services offered by the Website ;
- During exchanges between ATNOS and Users of the Website (in particular requests for contact or support).

Where required by applicable regulations, ATNOS undertakes to obtain the express, specific and prior consent of Users and/or to allow them to object to the use of their data for certain purposes. All Users have the right to withdraw their consent at any time.

2.2. Within the scope of the activities defined in 2.1, ATNOS may process the following data à personal data in accordance with the purposes described in Article 3 of this Charter:

- User identification data relating to the placing of an order and/or the creation or updating of a Customer Area by the User on the Site, such as surname, first name, company name and identification where applicable, postal address (street, town, state/country), e-mail address, etc. ;
- Order data, such as transaction number, purchase details, purchase amounts, invoice payment data (payments, outstanding payments, discounts);
- Data relating to billing information and means of payment used: payer identification (VAT number if applicable), registered credit card number ;
- Data required for loyalty and prospecting campaigns: history of services subscribed to;
- Data related to the operation of the Website, such as browsing information including consultation history, IP addresses of the computer you use to access the Services, browser settings;

These personal data are :

- voluntarily communicated to ATNOS by the Users concerned by the said data;
- or collected by ATNOS with the authorization of the Users concerned by the said data;
- or collected directly by ATNOS when the data has already been made public elsewhere.

2.3. ATNOS also has access to data stored and processed by Users when using the Services offered, such as application source code, databases used by applications, files generated by applications and User transaction history.

However, ATNOS does not own, transfer, share, control or govern the use of any such information under any conditions. Only Users may retrieve and govern the use of said information.

2.4. In addition, as part of their interactions with the <https://pia-rgpd.eu/> website, **certain** data is automatically collected from Users' devices or Internet browsers. Information on these practices is specified in Article 10 "Cookies" below. This data includes IP address and cookies.

ARTICLE 3: Purposes of processing

ATNOS, collects or processes Users' personal data in compliance with European and French data protection laws, if necessary:

- For the administration and provision of services to the User ;
- To comply with applicable law or any other legal obligation;
- To protect the security of systems, to detect and prevent fraud, or to ensure the legitimate interests of ATNOS, without disregarding the interests or fundamental rights and freedoms of Users requiring increased protection of their personal data.

Users have the right to withdraw their consent at any time, or to object to any processing of their personal data.

The User is informed that in the event of withdrawal of consent, access to all or part of the products and services offered by ATNOS may be rendered impossible.

Data is collected and processed for the following purposes:

- To access the <https://pia-rgpd.eu/> website and provide the functionalities offered.

When the User accesses the <https://pia-rgpd.eu/> website and/or its Customer Area, ATNOS collects and uses the personal information communicated to provide access to the Services requested by the User.

- Fulfill orders placed by Users, implement requested Services and ensure efficient technical service.

ATNOS may use the personal data of Users necessary for the proper performance of the contract binding ATNOS to its Customers.

- Manage payments.

By registering his/her billing information, the User consents to ATNOS issuing an invoice and charging the credit card provided. Credit card numbers are managed by Paddle (payment gateway). ATNOS will only charge the credit card provided for payment of products or services ordered by the User.

Payment services are subject to European legislation. As a third-party processor of billing information collected by ATNOS, and to ensure adequate protection of personal data, Paddle uses the European Commission's Standard Contractual Clauses ("SCC") to enable the lawful transfer of said data in accordance with the European Data Protection Regulation (EU) 2016/679, known as the "RGPD".

- To operate, maintain and improve the functionalities and services of the <https://pia-rgpd.eu/> website.

The personal data communicated by the User is used to operate the Site and the company's activities. It may be used for accounting and auditing purposes. Personal data relating to connection and access to the Site may also be used to detect technical or service problems and to administer the <https://pia-rgpd.eu/> Site.

- To improve the activities, products and services of the <https://pia-rgpd.eu/> website.

Personal data relating to the User's access to the Website's services may be used to understand the User's behaviour and preferences and to compile statistics with a view to improving the services offered by ATNOS via its Website and to developing new functionalities or services.

- Offer personalized content and navigation.

In order to make services and products more relevant to the interests of Users, subject to having obtained the explicit and prior consent of the User, ATNOS keeps track of Users' activities on the Website in order to determine their preferences and to be able to tailor the service(s) to their requirements and needs.

- To enable ATNOS to contact Users for sales and marketing purposes.

Users' personal data may be used by ATNOS to contact the User in order to ascertain his/her interest in the services provided, to offer him/her similar services to those previously ordered or other services. This is done for the legitimate purpose of ATNOS promoting its services to its Customers.

- To comply with legal obligations, prevent or detect fraud, abuse, illicit use, violations of the Terms and Conditions, and to comply with court orders and government requests.

In the event that personal data is further processed for purposes other than those for which the personal data was collected and as identified above, the Data Controller will provide the data subject with prior information about this other purpose and any other relevant information required by law.

ARTICLE 4: Legal basis and legitimate interest of processing

The legal bases for the processing of personal data by ATNOS are as follows:

- The Processing is necessary for the performance of the contractual relationship that the User wishes to enter into with ATNOS by using the Site <https://pia-rgpd.eu/> and/or the services offered by ATNOS, said personal data being necessary for the performance of the services;
- The Processing is necessary to protect the legitimate interests of ATNOS by enabling it to keep proof of transactions with the User and/or, where applicable, to proceed with collection;
- Processing is based on the consent of Users wishing to use the <https://pia-rgpd.eu/> website and/or the services offered by ATNOS. This consent may be revoked at any time by Users in accordance with the procedure defined in Articles 5 and 12 of this Charter;
- The Processing is administered in accordance with the provisions of Law no. 78-17 of January 6, 1978 and EU Regulation 2016/679 of April 27, 2016 (known as the "RGPD") and other legal provisions in force on the protection of personal data (hereinafter the "Regulations in force").

ARTICLE 5: Consent

When the User places an order and/or, for certain services, creates a Customer Area on the <https://pia-rgpd.eu/> website offered by ATNOS, the User is asked to fill in forms and provide personal data so that he/she can access and benefit from all the products and services offered by ATNOS.

ATNOS undertakes, when required by current applicable regulations, to obtain the explicit, specific and prior consent of the User, and/or to allow the User to oppose the use of his/her personal data for certain purposes, and/or to access and/or rectify information concerning him/her.

Article 6: Recipient of personal data

The recipient of personal data is exclusively ATNOS as the Data Controller and, where applicable, its subcontractors (see Article 7).

Personal data and other data are stored by ATNOS on the server and appropriate security measures are put in place to protect such data against unauthorized access, modification, disclosure and destruction. These measures include an internal audit of the data collected, storage and processing procedures, and physical security measures designed to protect such data against unauthorized access to the systems storing Users' personal data.

Article 7: Transmission of personal data to third parties

ATNOS does not transfer any personal data to partners for the purposes of commercial operations or for any other purposes that would not meet the needs of the purposes indicated in Article 3. Should ATNOS consider modifying its data transfer policy with a view to transferring data to partners, in particular commercial partners, this may only be done subject to having obtained the explicit and prior consent of the User.

Personal data collected by ATNOS is used exclusively by ATNOS and, where applicable, technicians, service providers, collaborators and other agents when necessary to support the development or improvement of services as well as in connection with the provision of services to Users. These entities and persons are bound by confidentiality obligations and, in the event of non-compliance with these obligations, will be subject to disciplinary measures, including termination of the agreement or contract and criminal sanctions.

Personal data collected by ATNOS may be transmitted to third-party companies under subcontracting agreements signed by ATNOS exclusively for the purposes indicated in Article 3.

Prior to transfers or access to data by service providers, ATNOS will take all necessary measures and guarantees to secure such transfers or access to data.

Data may be transferred to or accessed by service providers in connection with the creation and/or administration of the <https://pia-rgpd.eu/> website and/or the services offered by ATNOS, in particular for the following activities and services: IT development, website implementation, emailing management, statistical analyses.

In such cases, data processing is carried out in compliance with current regulations and under the responsibility of the data controller.

With the express agreement of the User, ATNOS may also transfer the User's contact information to the partner company selected by the User in order to enable the User to benefit from additional services.

Article 8: Hosting of personal data

The personal data collected and processed by ATNOS are hosted in data centers located in France by the companies :

- OUTSCALE, a société par actions simplifiée (simplified joint-stock company) registered in the Nanterre Trade and Companies Register under number 527 594 493, with its head office at 1 rue Royale, 319 bureaux de la Colline, 92210 Saint-Cloud.

Article 9: Data retention

Personal data is kept for the time necessary to achieve the purposes for which it is processed (see Article 3) and in accordance with the recommendations of the CNIL, based on simplified standard no. NS-048 relating to the automated processing of personal data concerning the management of customers and prospects.

As the User's personal data is necessary for ATNOS to provide the Services and/or for the administration of the Customer Area, it is kept for the entire duration of the User's account, until such time as the User has indicated his/her intention to close the Customer Area or to no longer have his/her personal data kept.

They may then be archived with restricted access for a further period for limited purposes authorized by law (payment, warranty, disputes, etc.).

Purpose of the treatment	Legality Legal basis	Base shelf life active	Archiving
Create and make operate the Space Customer on Site Production and/or administration Site and/or Services provided to the User by ATNOS	Conditions General Applications Legitimate interest for Services supplied by ATNOS	Space activation time Customer on Site Deleting data in 12 months after balance sheet date from the Customer Area or 15 days following the date of withdrawal of the consent notified to responsible for processing.	Not applicable
Ensuring history of past orders	Conditions General Applications	Anonymization of From date of order concerning data relating to the order (see Article 2)	Not applicable

	Legitimate interest for Services supplied by ATNOS		
Establishing proof a right and/or a contract Complying with the law applicable or any other obligation (including the holding the accounting and management Administrative ATNOS company)	Laws and regulations applicable	The data is stored in accordance with in force (in particular Commercial Code, Civil Code or Consumer Code, example: 10 years for accounting records and data billing)	Archived in accordance with at provisions in strength

Article 10: Cookies

When you visit the <https://pia-rgpd.eu/> website, cookies are placed on your computer, cell phone or tablet.

A cookie is a small text file or piece of code, often containing a unique identification code, stored in the browser of your terminal (computer, cell phone, tablet) when you visit a website, use a mobile application or view an advertisement. Its purpose is to collect information relating to your browsing or to send you services tailored to your terminal. The information collected through cookies and similar technologies may include the date and time of your visit and how you use a particular website or mobile application. Cookies are managed by your web browser.

10.1 The cookies used and their purpose

The <https://pia-rgpd.eu/> website uses different types of cookies:

- Cookies strictly necessary for the provision of online services: they are necessary for the proper functioning of the Site and enable online services to operate optimally. They are essential for browsing and accessing the services offered on the Site. In particular, the following actions can be performed using these cookies: saving your cookie preferences for the Site, saving language preferences, logging in to the Customer Area.
- Performance cookies for audience measurement: Google Tag Manager and Google Analytics. These cookies are used to collect statistical information on the use of the website (also known as analytical cookies), and to track the number and/or frequency of visitors to the site, in particular in order to

to ensure that the Site functions rapidly. They are used to analyze the Site's performance in order to improve its operation.

- Personalization cookies: these cookies enable us to analyze your browsing profile in order to personalize your experience as a User of the services offered by ATNOS. In this way, they enable us to offer and maintain personalized features.
- Advertising / tracking cookies: these cookies are set by external advertising partners and are used to profile and track data across multiple websites. If you accept these cookies, ATNOS may display advertisements on other websites according to your User profile and preferences. These cookies also record data on the number of visitors who have seen or clicked on ATNOS advertisements in order to optimize advertising campaigns.
- Functional cookies issued by third-party applications integrated into the Site. The <https://pia-rgpd.eu/> website may include computer applications from third parties that enable you to share content on the site with other people, or to inform these other people of your consultation or opinion concerning content on the site. This is notably the case for "Share" and "Like" buttons from social networks such as Facebook, Twitter, LinkedIn, etc. The social network providing such an application button is likely to identify you thanks to this button, even if you did not use this button when consulting our Site. Indeed, this type of application button may enable the social network concerned to track your browsing on our Site, simply because your account with the social network concerned was activated on your terminal (open session) during your browsing on our Site. **We do not control the process used by social networks to collect information relating to your browsing on our Site and associated with the Data they hold.** We invite you to consult the **privacy** protection policies of these social networks in order to learn about the purposes for which they use the browsing information they may collect through these application buttons. In particular, these protection policies should enable you to exercise your choices with respect to these social networks, notably by configuring your user accounts for each of these networks. To find out about the privacy policies of the above-mentioned social networks, click on the name of the social network of your choice: [Twitter](#), [LinkedIn](#), [etc.](#)

The cookies collected are not passed on to third parties, nor are they used for purposes other than those set out above.

10.2 Cookie configuration

There are several ways to manage cookies.

You can manage the configuration of your cookies at any time via a dedicated interface or via your browser by accessing the dedicated <https://pia-rgpd.eu/data-processing-agreement> page.

Settings via your browser :

You can refuse cookies at any time by configuring your browser. The configuration of each browser is different. You can find out how to modify your cookie settings in your browser's help menu.

Click on the link corresponding to the browser of your choice to access detailed instructions on how to set cookies:

- [Microsoft Edge](#)
- [Google Chrome](#)
- [Firefox](#)
- [Safari](#) and [Safari iOS](#)
- [CNIL's advice on controlling your browser](#)

Refuse audience measurement cookies :

Audience measurement tools offer an option for blocking the collection of information on our Site. To find out how to activate this option, follow the instructions provided on the websites of the tools concerned:

- [Google Tag Manager audience measurement](#)

Refuse social network cookies :

To refuse the cookies used by social networks, in particular through the sharing buttons, click on the link corresponding to the social network of your choice:

- [Facebook](#)
- [Twitter](#)
- [Linkedlin](#)
- [YouTube](#)

10.3 Consent

By browsing <https://pia-rgpd.eu/>, you accept the use of cookies to enable you to navigate and access personalized services.

At the time of your first navigation and registration, we informed you of the presence of cookies intended in particular to propose offers adapted to your centers of interest and to carry out statistics of visits and of the possibility of opposing you by reaching the present Charter of use of the personal data.

We inform you that the refusal of cookies, the deactivation of certain cookies or the deletion of those stored on your terminal may alter your browsing experience or prevent you from benefiting from a certain number of functions necessary for optimal access to the Site <https://pia-rgpd.eu/> as detailed above.

In order to manage cookies in the way that best suits you, we invite you to configure your browser according to the purpose of the cookies.

10.4 Rights of access, deletion and objection

As with other personal data, you have the same rights as specified above.
à Article 12 below.

10.5 Shelf life

The cookies collected are kept by ATNOS for the periods indicated in the tables above (10.2) without exceeding a maximum of 12 months. This period is not automatically extended when you visit the Site again. After this period, the data associated with an identifier is either deleted or rendered anonymous.

Article 11: Data security

To ensure the security of personal data, in particular to prevent it from being distorted, damaged or accessed by unauthorized third parties, ATNOS takes all precautions appropriate to the nature of the data and the risks presented by the processing (physical protection of premises, authentication process for our customers with personal and secure access via confidential identifiers and passwords, logging of connections, encryption of certain data, etc.).

Article 12: User rights

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and Law No. 78-17 of January 6, 1978 on data processing, data files and individual liberties, Users of the Website and services offered by ATNOS have the following rights:

- Right of access, rectification and opposition to data processing;
- Right to limit data processing;
- Right to data portability ;
- Right to erasure and digital forgetting.

Consequently, the User may ask the Data Controller :

- Confirmation as to whether or not personal data concerning him/her are being processed;
- Access to your personal data and any available information about your company. to their source;
- Rectification or deletion ;
- Limiting the processing of personal data;
- The portability of their personal data under the conditions of the Regulations in force, which stipulate in particular that the persons concerned must

by a processing of personal data have the right to receive the data in question.
à personal data concerning them which they have provided to a Data Controller, in a structured, commonly used and machine-readable format, and have the right to transmit such data to another Data Controller without the Data Controller to whom the personal data have been communicated hindering this, where: (i) the Processing is based on consent pursuant to the Regulations in Force, or on a contract pursuant to the Law in Force, or (ii) the Processing is based on a contract pursuant to the Law in Force.
Regulations in force and (ii) when Processing is carried out using automated procedures. It is specified that when the data subject exercises his/her right to the portability of his/her personal data, he/she has the right to have his/her data
à transmitted directly from one Data Controller to another, where technically possible.

The User may also submit to the Data Controller :

- His opposition to the processing of his personal data;
- His opposition at any time to the processing of his personal data for canvassing purposes, including profiling insofar as it is linked to such canvassing;
- Withdrawal, at any time, of consent to the processing of personal data (without affecting the lawfulness of processing based on consent and carried out prior to the withdrawal of consent).

It is however specified that the exercise by a User of his right to the deletion of his personal data and/or the exercise of his right to object to the processing of his personal data and/or the exercise of his right to a limitation of the processing of his personal data and/or his right to withdraw at any time his consent to the processing of his personal data may result in the impossibility for the User to access and/or use the ATNOS Website and/or the services offered by ATNOS.

The User may exercise his rights as identified in the present article at any time by addressing his request to the Data Protection Officer (DPO), Mr Bruno PERLES, via the e-mail address dpd@pia-rgpd.eu or by post to the following address :

Mr Bruno PERLES
ATNOS
35 place de Verdun
11400 CASTELNAUDARY

Article 13: Complaints to the CNIL

In the event of a breach relating to the processing of their personal data, Users are informed of their right to lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL) either by post: 3 Place de Fontenoy - TSA 80715 - 75334 Paris 07, or by lodging a complaint online at www.cnil.fr.

Article 14: Links to other websites

The <https://pia-rgpd.eu/> website may contain links to other third-party websites over which ATNOS has no control. ATNOS is in no way responsible for the data protection policies or practices of other websites that the User chooses to visit from the <https://pia-rgpd.eu/> website. We therefore invite you to read the data protection policies of these other sites in order to understand how they collect, use and share your data.

Article 15: Modifications

ATNOS reserves the right to modify or update this Privacy Policy at any time. These modifications will be published in this section. The User is invited to consult the Privacy Policy on a regular basis and to check whether any changes have been made.

Read more

For further information on the protection of personal data, please visit the website of the Commission Nationale Informatique et Libertés (www.cnil.fr).

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