



## Privacy Policy

### Definitions:

"Privacy Policy" means these terms, including the terms of the Cookies Policy, which govern UPPLY's use of personal data provided by Users and UPPLY's use of Cookies on the Website.

Any capitalized terms not defined herein will have the meaning ascribed to them in the Terms of Use.

#### **I) Personal data**

The User is informed that the personal data processed under the registration process are the object of a computerized processing under the responsibility of UPPLY, acting as data controller. In accordance with the Regulation on the protection of personal data 2016/679, UPPLY takes all the necessary technical and organizational security measures to respect Your privacy and protect personal data You are communicating, in order to keep them confidential.

Among these measures and for example, Users personal data are contained behind secured networks and are encrypted by UPPLY. In addition, UPPLY maintains relationships with industry recognized penetration testing service providers in order to identify and resolve foreseeable attack vectors and potential abuse scenarios.

The personal data collected under this section may include the following: Your first name, last name, Your professional e-mail address, Your IP address, Your country of residence, Your phone number and the name of Your company (hereinafter referred to as the referred as "Personal Data").

The User is informed that the provision of the first name, last name and e-mail address conditions the registration on the Website. Otherwise, the provision of the phone number, the name of Your company and the country is optional, a defect of answer will not prevent the User from accessing the requested Services.

UPPLY processes the Personal Data for the purposes listed below. These purposes each relate to a lawful basis for processing, as required under applicable law. The purposes include:

	<b>Purposes</b>	<b>Legal bases</b>
1	Allow You to access some of Our services proposed on the Website	This processing is necessary for the purpose of the legitimate interests pursued by UPPLY to provide the services You request.
2	Manage, protect, enhance and optimize the Website experience	This processing is necessary for the purpose of the legitimate interests pursued by UPPLY. UPPLY considers that it has a legitimate interest in improving the Services in order to preserve the business operations and grow the business.
3	Protect the Website and Your account from security incidents	This processing is necessary for the purpose of the legitimate interests pursued by UPPLY. UPPLY considers that it has a legitimate interest in protecting the Services in order to ensure the continuity of the business operations and maintain a good relationship with the Users.
4	Send You Services-related messages, updates, security alerts and account notifications	<p>This processing is necessary for the purpose of the legitimate interests pursued by UPPLY. UPPLY considers that it has a legitimate interest in updating its Users on any incidents that may affect them, in order to maintain a good relationship with Our Users.</p> <p>UPPLY may also in certain situations have a legal obligation to provide You with such information.</p>
5	Send You promotional notifications about our products and services, marketing communications and Our newsletter via the e-mail address communicated on the Website	<p>This processing is necessary for the purpose of the legitimate interests pursued by UPPLY. UPPLY considers that it has a legitimate interest in ensuring that the Users are kept up to date with information about Our products and services, as this helps Us to Our business operations and grow Our business.</p> <p>However, where We are required by law to obtain Your consent before sending you such information, We will rely upon such consent as our basis to proceed with processing.</p>

The User is informed that the Personal Data will be communicated to Our providers, acting as data processors, who contribute to the achievement of the purposes listed above (hosting, CRM provider...) The transfer and the storage of Your Personal Data shall occur in compliance with this Privacy Policy that is framed by contractual clauses that ensure sufficient level of protection of privacy and fundamental rights.

When the processing of Your Personal Data by Our providers involve transfers to non-EEA countries that are not recognized by the European Commission as providing an adequate level of data protection according to EEA standards, We have put in place adequate measures, such as by ensuring that the recipient is bound by European Commission standard contractual clauses. You may obtain a copy of these measures by contacting UPPLY.

Please note that the Personal Data that You may be led to communicate to UPPLY online are destined solely for use by persons authorized by UPPLY and in no event shall the data collected on the Website be sold to third parties.

UPPLY may disclose Your information, including Your Personal Data, to courts, governmental or law enforcement authorities or authorized third parties, if required or permitted by law.

These Personal Data will be kept for as long as needed or permitted in light of the purposes for which it was obtained and as outlined above. In particular, we will retain Your Personal Data for the length of time We have an ongoing relationship with You, and notably as long as You have an active account on the Website. In any case, We will retain Your Personal Data for 3 years from the end of Our relationship with You or from the last contact from You in accordance with the regulations in force concerning prospect activities. We may also retain Your Personal Data for longer periods if We are required to by law or if this is advisable in light of our legal position (such as in regard of the enforcement of the Terms of Use, applicable statutes of limitations, litigation or regulatory investigations).

The User undertakes to communicate accurate information. Each User is fully responsible for his login data concerning him. Unless proved otherwise, any connection to the Website or transmission of Personal Data made from the login information of the User, will be deemed to have been made by the latter.

In accordance with applicable data protection laws, Users are entitled to request access, rectification and/or erasure of Personal Data concerning them, as well as the right to request that We restrict the processing of their Personal Data. Each User is entitled to request the provision of their Personal Data to them or to a third party in machine readable format. Please note that, where We rely on consent for the use of your Personal Data, You can withdraw at any time Your consent by manage your preference in Your account or by sending Your request to UPPLY. You have the right to give Us directives relating to the use of your Personal Data after your death.

The User has the right to object at any time to the processing of his/her Personal Data where We process his/her Personal Data on the basis of Our legitimate interests or for direct marketing purposes.

Users may exercise their rights by writing to [dpo@upply.com](mailto:dpo@upply.com) or the following address:

**UPPLY**

Direction juridique  
26 Quai Charles Pasqua,  
Espace Seine,  
92300 Levallois-Perret, France

Please note that We may ask You to verify Your identity before taking any further action regarding Your request. We also reserve the right to charge a fee where permitted by law, for instance if Your request is manifestly unfounded or excessive.

Users have a right to lodge a complaint with a supervisory authority, such as the CNIL in France.

**II) Cookie Policy**

Cookies are text files deposited on the users' computer or mobile device whenever they visit the website. They are stored by their browser. Cookies contain information about the users' use (including IP address) of the website but do not identify them personally. The browser returns these cookies to the website when the User revisits the Website, so that the browser can recognize the computer or mobile device of the User and personalize and facilitate the navigation on the website. Cookies can only be read and/or modified by their issuer.

- **Cookies used by UPPLY (hereinafter referred to as "Cookies"):**

When the User connects to the Website, UPPLY may, subject to the choice of the User, install various Cookies on the User's terminal so that it is able to recognize the User's browser for the duration of the validity of the Cookie concerned. We use Cookies to personalize Your experience on the Website.

More specifically, Cookies are used to:

- Ensure security of the Website;
- Enable and facilitate User navigation;
- Enhance Website services;
- Measure the audience on the Website;
- Display personalized advertising content.

User can delete advertising and traffic measurement Cookies: these types of Cookies are not necessary to use the Website.

Cookies used by UPPLY on the Website are listed by purpose below:

#### Traffic measurement Cookies:

- Google analytics: Google analytics uses cookies to measure and analyze traffic on the Website. UPPLY use Google analytics to better understand how Users use the Website.
- Google Tag Manager: UPPLY uses Google Tag Manager to better understand User's experience to personalize the services on Website.
- Hubspot: traffic measurement. Hubspot and its partners use cookies or similar technologies to analyze trends on the Website. UPPLY use Hubspot to personalize User's experience and to administer the Website.
- Hotjar: traffic analysis & User feedback. Hotjar use cookies and other technologies to collect information on User's behavior on the Website. UPPLY use Hotjar to better understand User's experience and User's needs to be able to optimize the services with Users feedback.

Google, Hubspot and Hotjar also use cookies for their own purposes. For more information about how Google, Hubspot and Hotjar use cookies and how to decline them, please visit their privacy policies through the links below:

- Google : <https://policies.google.com/privacy>
- Huspot : <https://legal.hubspot.com/privacy-policy>
- Hotjar : <https://www.hotjar.com/legal/policies/privacy>

#### Advertising Cookies:

- Doubleclick: manages advertising campaigns. UPPLY use Doubleclick to display advertisements based on User interest.

By clicking on "I agree" in the cookie banner, the User accepts UPPLY's use of the Cookies listed above. If You wish to manage your choices, You can configure the Cookies deposit by proceeding the settings below. You are informed that You can modify Your choices at any time through these settings.

**Please note that the use of third party advertising cookies inserted by any third company is not covered by Our Privacy Policy. Please refer to such third party's own privacy policy for further information.**

- Configuration of cookies stored on a terminal

Any configuration that the User may undertake is likely to modify User's Internet browsing and conditions of access to certain services requiring the use of cookies. The User, at any time, may choose to express and modify its wishes with regard to cookies, by the means described below.

For http cookies, it is possible to configure the browser in such a way that the Cookies are systematically saved on the terminal or, on the contrary, rejected either systematically or according to their issuer. The User may also configure the browser in such a way that the acceptance or refusal of Cookies is proposed from time to time, before a cookie is likely to be saved on the terminal.

If the User refuses to save a Cookie, or deletes those that are saved there, the User may not benefit from a certain number of functionalities that are nevertheless necessary to browse in certain areas of the Website. In order to manage Cookies as close as possible to Your expectations, please configure Your browser taking into account the purpose of Cookies.

The configuration of cookies is different depending on the internet browser. In order to know how to configure the Cookies in their browser, Users must go to the "help" menu of their browser to find out how to modify their wishes with regard to Cookies. If the Users have accepted to save cookies on their terminal, the Cookies will be stored temporarily in a dedicated space on their terminal, for a maximum of 13 months.

For internet Explorer™: <http://windows.microsoft.com/fr-FR/windows-vista/Block-or-allow-cookies>

For Safari™: [https://support.apple.com/kb/PH21411?viewlocale=en\\_US&locale=en\\_US](https://support.apple.com/kb/PH21411?viewlocale=en_US&locale=en_US)

For Chrome™:

<http://support.google.com/chrome/bin/answer.py?hl=fr&hlrm=en&answer=95647>

For Firefox™:

<http://support.mozilla.org/fr/kb/Activer%20et%20d%C3%A9sactiver%20les%20cookies>

For Opera™: <https://www.opera.com/help/tutorials/security/privacy/>

For Google Analytics, in order to disable cookies related to the use of this tool, You can follow the following link provided by Google:

<http://tools.google.com/dlpage/gaoptout?hl=fr>.

### III) **Applicable law**

The Privacy Policy is subject to French law. This Privacy Policy constitutes the entire agreement between UPPLY and the User concerning the use of Users Personal Data by UPPLY and the use of Cookies by UPPLY on the Website. It supersedes and replaces all prior or contemporaneous understandings or agreements, written or oral, regarding such subject matter, and prevails over any conflicting terms.

The Privacy Policy is established in English and in French. In any case, the French language version of Privacy Policy shall prevail over any other version.

In the event of any dispute arising out of the validity, interpretation and/or performance of the Privacy Policy, UPPLY and the User agree to meet to try and find an amicable solution to their dispute.

In the event UPPLY and the User fail to reach an amicable solution, any dispute concerning the interpretation, validity, and/or performance of the Privacy Policy shall be submitted to the competent courts of Paris, including in the case of multiple defendants or introduction of a third party, for proceedings aiming to obtain urgency or protective measures, in summary proceedings or on application.

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