

Privacy Policy

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Scope

This Privacy Policy sets forth the principles and guidelines governing the protection of Personal Data including the Personal Data collected on or through the Sites or other any Sites associated or linked with EVERTRUST business partners.

EVERTRUST collects Personal Data either online (including via email) or offline and this Privacy Policy is applicable regardless of the means of collection or processing.

Personal data (“PII”) means any information relating to an identified or identifiable person.

An identifiable person is a person who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to the person.

Non-Personal Data means any information that can not result in the identification of a person.

Contents

1. DATA COLLECTED

a. Visitors

Visitors are individuals who visit the Sites without registering themselves. Their Personal Data likely includes:

- IP and/or MAC address
- Cookies (as described in section 10)
- any other Personal Data as may be relevant for the purposes listed below.

b. Users

Personal Data collected (including from those who visit Sites and enter information directly or through a Partner's Site) for the purposes listed below likely includes:

- title
- first and last name
- postal address
- email address
- telephone number(s)
- login and password
- university, degree and courses taken
- type of organization (company, school, university, etc.), organization name, organization size, department and job title
- industry and industry sub-industry sectors
- people to whom purchases are shipped
- financial data (credit card number and expiry date, name and address of the cardholder)
- IP and/or MAC address
- Cookies (as described in section 9)
- any other Personal Data as may be relevant for the purposes listed below

In all cases, however, the Personal Data gathered is limited to data necessary for the purposes described in Article 4 below.

For visitors and users of the Sites: in order to use certain functions and features of the Site, EVERTRUST requires that the users provide certain Personal Data when visiting or using the Site. you are free to decide whether or not to provide all or part of their Personal Data. However, if they choose not to provide all or part of this Personal Data, the purposes as described in Article 3 hereafter might not be achieved or not properly achieved, some areas and functions of the Sites may not function properly and/or they may be refused access to certain pages on the Site.

2. PURPOSES AND LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

Whether you are a visitor or a user, EVERTRUST collects your Personal Data for the following legal grounds and for the following purposes:

- Processing activities based on your consent:
 - To improve your user experience
 - To recognize that you have given a Personal Data so you do not need to do it for every web page requested
- Processing activities based on EVERTRUST's legitimate interest:
 - To enable EVERTRUST to manage surveys

In addition, when you are a user, Evetrust collects your Personal Data on the following legal grounds and for the following purposes:

- Processing activities based on your prior consent:
 - To enable you to request and receive information on Evetrust and EVERTRUST products and services from EVERTRUST
 - To ascertain your requirements and interests and provide you with the most suitable products and/or services
 - To enable EVERTRUST to manage its marketing activities
 - To enable you to register for a seminar, webinar, or event
- Processing based on EVERTRUST's legitimate interest:
 - To enable EVERTRUST to manage its marketing activities for similar products if you are already using EVERTRUST products and services
 - To manage the EVERTRUST obligations related to applicable export laws, trade sanctions, and embargoes issued, without limitation, by the European Union and its member states, and of the United States of America. This may include (i) automated checks of any user registration data as set out herein and other information you provide about your identity against applicable sanctioned-party lists; (ii) regular repetition of such checks whenever a sanctioned-party list is updated or when you update your information; (iii) blocking of access to EVERTRUST services and systems in case of a potential match; and (iv) contacting you to confirm your identity in case of a potential match
 - To manage EVERTRUST anti-piracy program.
- Processing based on the performance of a contract:
 - To provide you with a personalized interactive use of the Sites
 - To allow you to open and maintain an account in order to obtain specialized documentation and technical assistance
 - To access all the features and options offered by the Sites
 - To enable you to exchange with EVERTRUST representatives
 - To enable EVERTRUST to manage its business relationships, including sales opportunities, commercial offers, purchasing, contracts, orders, invoices, which may include conversational data triggered via chat functionalities on the Sites, contact forms, emails, and voice messaging data; and
 - To provide you with commercial or support-type services

Generally, when consent is not required, you cannot opt out of non-marketing related communications that are required for the relevant business relationship. With regard to marketing-related communications (e.g., emails and phone calls), EVERTRUST will (i) where legally required, only send you such communications after you have opted in, and (ii) provide you the opportunity to opt out of receiving further marketing-related communications from EVERTRUST.

When you register for an event organized by EVERTRUST, EVERTRUST may share your name, company, and email address with other participants and sponsors of the same event for the purpose of communication and the exchange of ideas.

Subject to applicable local law, by providing Personal Data such as but not limited to e-mail address, you hereby expressly authorize EVERTRUST and its affiliates and subsidiaries in the future to use it together with other relevant Personal Data to send you commercial or marketing communications. EVERTRUST might also use your email address for administrative or other non-marketing purposes (for example, to notify you of significant changes to the Sites).

3. PERSONAL DATA RETENTION PERIOD

EVERTRUST does not store your Personal Data for more time than necessary. Retention periods may vary depending on the data categories and the processing activities.

Where EVERTRUST is processing and using your Personal Data as permitted by law or under your consent, EVERTRUST will store your Personal Data (i) only as long as required to fulfill the purposes set out above, (ii) where EVERTRUST has a legitimate interest in using your Personal Data, until you object to EVERTRUST's use of your Personal Data, or (iii) where you gave your consent, until you withdraw it. However, where EVERTRUST is required by applicable law to retain your Personal Data longer or where your Personal Data is required to assert or defend against legal claims, EVERTRUST will retain your Personal Data until the end of the relevant retention period or until the claims in question have been settled.

4. TRANSFER OF PERSONAL DATA

If you are accessing the Sites from a location outside of the European Union, with laws or regulations governing data collection, use, and disclosure that differ from those of the European Union, please note that through your continued use of the Sites, which are governed by French law, the corresponding Terms of Use and this Privacy Policy, you are transferring your Personal Data to the European Union and you consent to that transfer.

Please note that EVERTRUST may transfer your Personal Data outside of the European Union, as long as before transferring your Personal Data, EVERTRUST has ascertained that non-European Union entities, offer an adequate level of protection in accordance with European legislation.

5. RIGHT TO ACCESS, TO RECTIFICATION AND OTHER RIGHTS

EVERTRUST will take reasonable steps to ensure that the Personal Data collected is used for the purposes stated in this Privacy Policy and that such Personal Data is correct and up to date.

You have a right to access your Personal Data. In addition, you have a right to request the rectification, completion, update or erasure of your Personal Data. you have a right to restrict processing. you also have a right to obtain a copy of your Personal Data stored by EVERTRUST. you have a right to object, in relation to specific processing of your Personal Data. Additionally, you may have a right to data portability.

If you have an account, you can exercise your rights by logging on to your account. Otherwise, you may exercise your rights by contacting us through the contact form available at www.evertrust.fr/

Depending on the scope of the request, Evetrust reserves the right to charge a reasonable fee to cover any out-of-pocket costs incurred in connection with such access, modification and deletion of Personal Data. EVERTRUST may deny access to Personal Data in limited circumstances, defined by applicable laws and regulations.

6. DATA RECIPIENTS

Your Personal Data may be disclosed to and used by a EVERTRUST affiliates in any, for the purposes stated in Article 3 of this Privacy Policy.

Where EVERTRUST has knowledge that a third-party to which EVERTRUST has provided Personal Data for the purposes listed in Article 3 above, is using or disclosing Personal Data contrary to this Privacy Policy or to applicable laws, EVERTRUST will take reasonable steps to prevent or stop such use or disclosure. EVERTRUST will also disclose your Personal Data to third-parties if EVERTRUST determines that such disclosure is necessary for technical reasons (such as hosting services by a third-party) or to protect EVERTRUST's legal interests (such as in the event of a sale of assets to a third company, or a change of control or a total or partial liquidation of EVERTRUST).

Additionally, EVERTRUST may share your personal Data with the reseller assigned to you or in the territory where you are located for the purpose of EVERTRUST business. EVERTRUST may also share your Personal Data with business partners when EVERTRUST and the business partner sponsor an event together or participate in a marketing promotion together and in which you engage.

EVERTRUST may also disclose your Personal Data if required by law or if EVERTRUST believes in good faith that such disclosure is reasonably necessary to comply with legal process (for example, a warrant, a subpoena, or other court order) or protect the rights, property, or personal safety of EVERTRUST, EVERTRUST's customers, or the public.

7. DATA SECURITY

EVERTRUST undertakes to ensure the protection and security of Personal Data that you choose to communicate, in order to ensure the confidentiality of your Personal Data and prevent your Personal Data from being distorted, damaged, destroyed or disclosed to unauthorized parties.

EVERTRUST maintains reasonable physical, electronic, and procedural safeguards to protect Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction. As part of those safeguards, EVERTRUST employs sophisticated technology designed to protect Personal Data during its transmission and prevent transmission errors or unauthorized acts of third-parties. However, while EVERTRUST strives to protect your Personal Data, in light of the inevitable risks of data transmission over the internet, EVERTRUST cannot guarantee full protection against any error occurring during the course of Personal Data transmission which is beyond EVERTRUST' reasonable control.

Since all Personal Data is confidential, access is limited to employees, contractors and agents of EVERTRUST who have a need to know such data in carrying out their tasks. All the people who have access to your Personal Data are bound by a duty of confidentiality and subject to legal actions and/or other sanctions if they fail to meet these obligations.

However, it is important for you to exercise caution to prevent unauthorized access to your Personal Data. you are responsible for the confidentiality of your password and information appearing on your account. Consequently, you must ensure that you log out of your session in the event of shared use of a computer.

8. COOKIES

The Sites may use cookies or other technologies serving the same or similar purpose (together referred to as “cookies”), that may collect or store Personal Data. Cookies are text files stored and used to record Non-Personal and Personal Data concerning your browsing and use of the Sites. Cookies can be either persistent (ie., remain after you logoff from the Sites in order to be used on your subsequent visits to the Sites) or transient (i.e., removed when you close the web browser).

EVERTRUST uses cookies in order to:

- improve your user experience through, for example:
 - enabling a service to recognize your device so you do not have to give the same information several times during one task
 - recognizing that you may already have given a username and password so you do not need to do so for every web page requested
- analyze traffic and data on the Sites to:
 - measure how many people are using the Sites, so the Sites can be made easier to use and navigate and to make sure there is enough capacity to ensure the Sites have adequate response times
 - help EVERTRUST understand how users interact with the Sites so EVERTRUST can improve their functionality and performance

EVERTRUST may also use third-party services to perform services on its behalf, in particular to:

- analyze your browsing habits and measure the Sites audience,
- analyze your interests and offer you targeted marketing or advertising,
- allow you to share content from the services with other people on social networks or to let these other people know what you are looking at or what you think (e.g., the “Like” button on Facebook)

In such a case, cookies provided by such third-party vendors may be used and stored. By transmitting the information generated by these cookies, the cookies’ settings ensure that an IP address is anonymized before geo-localization and before storage. Our providers will use this information for the evaluation of your use of the Sites, compiling reports on the Sites activity for EVERTRUST, to propose better services to you that are suited to your needs, and display advertisements you that are suited to your needs. Cookies will not associate your IP address with any other data they hold.

When you browse the Sites, cookies are enabled by default and data may be read from or stored locally on your device if your browser settings allow. you will be notified of the use of cookies the first time you access the Sites with a different device; EVERTRUST will not install any cookies before obtaining your explicit consent. you may decide to accept or refuse some or all cookies. you can configure your browser software to refuse all cookies (including cookies used for web analytics services); if you do so, however, some areas and features of the Sites may not function properly and/or you may not be able to access some parts or services of the Sites.

9. LINKS TO WEBSITES NOT CONTROLLED BY EVERTRUST OR ITS SUBSIDIARIES

The Sites might offer links to third-party websites that may be of interest to you.

EVERTRUST does not exercise any control over the content of third-party websites or the practices of these third-parties in connection with the protection of Personal Data that they might collect and are thus not in the control of EVERTRUST. Consequently, EVERTRUST shall have no liability for the content of third-party websites or the practices of these third-parties concerning the protection of Personal Data.

It is therefore your responsibility to inform yourself of the privacy policies of these third-party websites.

10. DISPUTE RESOLUTION

Although EVERTRUST has put in place reasonable safeguards to protect Personal Data, EVERTRUST recognizes that there is no method of transmitting or storing Personal Data that is completely secure.

However, EVERTRUST is committed to ensure the privacy of Personal Data: if you have a reason to believe that the security of your Personal Data has been compromised or misused, you should contact EVERTRUST Data Protection Officer through the contact form available at www.evertrust.fr/

EVERTRUST will investigate and attempt to resolve complaints regarding use and disclosure of Personal Data in accordance with the principles contained in this Privacy Policy.

Unauthorized access to Personal Data or the improper use of Personal Data may constitute offenses under local law.

If your usual place of residence is in European Union, Lichtenstein, Norway or Iceland, you have a right to file a complaint with your competent data protection authority.

11. CONTACT

For any additional question concerning this Privacy Policy, to opt out of receiving information from EVERTRUST or any request regarding your rights in your Personal Data you contact us through the contact form available at www.evertrust.fr/

12. DATE OF ENTRY INTO FORCE OF THE PRIVACY POLICY AND CHANGES TO IT

This Privacy Policy may be updated according to Eevrtrust’ requirements and circumstances, or where required by applicable laws and regulations so please check back periodically for updates.

If major changes occur to this Privacy Policy, EVERTRUST may inform you via email or via posting a notice on the Site.

Version History

Version	Date	Description	Author	Approved by
1.0	23/04/2024	Copy from evertrust.io/privacy/	Hugo MILAIR	Stéphane MARCEL