

Predictys Data Protection Policy (indirect collection)
Last updated on 05/22/2018

You are reading this document because you have received a commercial message from PREDICTYS or from a PREDICTYS-owned site.

We take the protection of your personal data very seriously.

This document will explain how your personal data has been collected by PREDICTYS and for what purposes it is used. You will also find our contact information if you have any questions or concerns regarding the processing of your personal data.

Who is the data controller?

The data controller is the company PREDICTYS SAS, with capital of 130,860 euros, registered with the Trade and Companies Register of Grenoble under number 499 332 682, at 1 rue des Méridiens 38130 ECHIROLLES, whose legal representative is Mrs Nathalie Quinette.

PREDICTYS' data protection officer is Mr. Josquin LOUVIER, from the law firm Leclère & Louvier Avocats, who can be contacted at jlouvier@leclerelouvier-avocats.com, or by post: 25 rue Pierre Sépard 38000 Grenoble, or by phone: 0476277350.

Where do you get my data from?

PREDICTYS has acquired your data from one of its business partners, which collected it directly from you, or indirectly from the company with which you were in contact, and to which you provided your data.

How is this legally possible?

When registering on the website of our partner, or at the time of the initial data collection, you consented to the data being passed on to third parties or partners of this company.

What personal data is processed?

PREDICTYS only processes the data that has been passed on by its partner, and which corresponds to that which you entered at the time of the initial collection of data (e.g. upon registration on the partner's website). In addition, PREDICTYS processes additional data related to your interaction with the messages sent to you (opening, clicking, visiting the home page, etc.), as well as your IP address.

PREDICTYS does not process any sensitive data about you (such as data relating to religious or trade union membership, political or philosophical beliefs, health data, lifestyle or sexual orientation).

What purposes is personal data used for?

Your data is processed:

- to send you commercial offers and proposals on behalf of our clients;
- to enrich your existing data in our databases (enrichment);
- to establish consumption profiles (see section on profiling).

Who is the recipient of the data collected?

The personal data collected by PREDICTYS in the framework of the contact form can either be stored internally by PREDICTYS, or pass on to its own customers or partners.

Is the personal data collected transferred to countries outside the European Union?

No, your data will not be transferred outside the European Union.

What is the retention period of the personal data collected?

Your data will be kept for as long as the expected duration of the initial data collection by our partner unless we receive a deletion request from you.

Data Security and Confidentiality

Predictys undertakes to guarantee the confidentiality and security of the data you entrust to it, and to implement any appropriate technical and organisational measures, on an on-going basis, to secure the Personal Data and to ensure a sufficient level of protection for it pursuant to Personal Data Regulations.

Profiling

PREDICTYS may be required to process the Data for the purpose of generating consumption profiles, for example based on your reaction to messages sent to you, as well as your connection data on the sites our messages are referred to; this is to define areas of interest.

What are your rights and how can you exercise them?

1°) The right of access to personal data

You can consult PREDICTYS to find out which data categories are affected, how long it is retained for, who the potential recipients of the data are, and to obtain a copy of this data in an accessible form.

2°) The right to rectify personal data

If you find that the personal data collected about you is inaccurate, you may ask PREDICTYS to rectify it.

3°) The right to obtain the deletion of personal data

You may at any time withdraw your consent to the processing of your data and ask PREDICTYS to cease using it, and to delete the personal data concerning you, without giving any particular reason, by sending an email to the address indicated below.

Unless explicitly requested by you, your data will be deleted from the processing for which it was collected. On the other hand, any personal data which may be included in other processes for which

PREDICTYS is the data controller or subcontractor will not be deleted, except in the case of a reasoned request accepted by PREDICTYS concerning these other processes.

4°) Contact details and exercising these rights

In order to exercise any of these rights, please write to: PREDICTYS 1 rue des méridiens, Batiment Pégase, 38120 Echirolles, or e-mail [droits\(AT\)predictys.fr](mailto:droits(AT)predictys.fr).

It is also possible to use the contact form to exercise one of these rights.

5°) The right to lodge a claim with the CNIL

In the event of a claim, this may be lodged with the Commission Nationale de l'Informatique et des Libertés, at the following address: <https://www.cnil.fr/fr/plaintes>.

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