

# Confidentiality and personal data protection policy

## Proximum SARL

### Introduction

As part of its activity, PROXIMUM SARL, company under French law, registered in the Trade Register of NANTERRE under number 424540441, with its head office located at 855 Avenue Roger SALENGRO in CHAVILLE (92370), carries out processing operations of the personal data in its database.

PROXIMUM SARL specialises in the organisation of trade shows: these are professional BtoB trade shows which offer individual business meetings which are scheduled in advance between the participants.

The founding principle of the events which we organise is to establish targeted relations between the principals and suppliers: unlike traditional trade shows that offer an exhibition area, we offer our participants the opportunity to identify their points of contact in advance through an online search engine which allows them to easily find their requirements and the types of expertise that they require.

PROXIMUM provides a management platform for its events called VIMEET which offers the following functionalities:

- Creating online registration forms for our various events
- Online store which allows the participants to choose their plan and pay online
- Event administration module for the organiser
- Data import and export module (list of participants, orders, invoicing, conference registrations, meeting requests and meetings organised, etc.)
- Search engine that allows establishing relations between the participants
- Algorithm for scheduling meetings between the participants
- Management of the event program and conferences
- Management of the participants' agenda
- Online invoicing for the participants
- Mailing tool for automatic notifications and reminder emails for the participants
- SMS mailing tool for automatic notifications concerning modifications to the agenda during the event

This tool was developed for our internal requirements and is also marketed to other event organisers who wish to use this tool to manage their event and organise business meetings.

Therefore, we have to process user data on behalf of third parties. As part of this activity, we offer traffic generation services for the event organisers: they provide us with a file containing prospects which we import on the platform, and our telephone operators call them to offer them the opportunity to participate in the event, and we send them emails to encourage them to register. We therefore work outside the purely transactional setting as regards the participants, who voluntarily register on the platform.

We have several employees who have administrator access to the platform to be able to carry out maintenance operations and to create the events. Which means that they have a fairly broad access to our database.

The Platform is hosted on exterior servers with a trusted service provider who is in charge of the facilities management.

We have opted to entrust the IT development of our platform to an external service provider.

This solution is provided to the Customers of PROXIMUM SARL. PROXIMUM SARL's customers thus exclusively consist of public or private organisations.

We have taken the necessary provisions to ensure the safety of your personal data, in keeping with and in accordance with the legislations as regards protection of personal data drafted by the National Commission on Informatics and Liberty (CNIL) and in particular law no. 78-17 dated 6 January 1978, called the "Computers and Liberties" law, and the new European regulation, the General Data Protection Regulation, or GDPR, no. 2016/79 dated 27 April 2016, applicable since 25 May 2018.

### **1. What type of personal data do we collect?**

We particularly collect and process your first name, last name, address, email address, mobile and landline telephone numbers, status, department and/or title, company, role, title, payment information, log-in information (dates and times of the log-ins, IP address) and browsing data, order history, preferences and centres of interest, products viewed, delivery incidents, complaints.

This concerns 3 types of data:

- Personal data of the customers/prospects/Users that appear in the CRM and internal management tools of PROXIMUM SARL.
- The personal data of its Customers/Users, generated by the Customer/User directly in the service or third-party data provided by the Customer/User directly in the service.
- The personal data of the partners and sub-contractors of PROXIMUM SARL.

### **2. When do we collect your personal data?**

We collect the information which you provide voluntary, particularly when:

- You create or modify your customer account or user account in your dedicated space on one of our sites;
- You place an order, or take a subscription, on our sites;
- You pay for an order, or a subscription;
- You browse our sites, view products, and use our services;
- You contact our customer department;
- You download your own documents or any documents related to one of our products;
- You request a product demonstration or quotation;
- You participate in an event or conference;
- You wish to be contacted by a sales person.

When you complete the fields, the mandatory nature of the information which you are required to provide is indicated by an asterisk, because this information is necessary to fulfil our obligations towards you, i.e. provide you with a service or ensure that you can purchase a product. If this mandatory information is not provided to us, we cannot provide you with the service which you expect from our services.

Certain information, particularly technical information (IP address of your computer) or concerning the browsing of the site as well as using its functionalities, is collected automatically through your actions on our site by using cookies. For more information, you can consult our cookies policy which is given in the General Conditions of Use of PROXIMUM SARL.

### **Data collection process**

To organise an event, it is important to create a prospection database.

All data concerning Users is collected:

- Professional online directories for which we outsource the input and qualification processes to a sub-contractor
- Catalogue of the exhibitors at the professional trade shows which we visit and which we then have a sub-contractor qualify
- Files provided by third parties, particularly by sponsors of the event, and also by partners
- Developments from our sales persons

- Information requests generated by our communication actions (advertising, event promotion website, emailing lists, etc.)

PROXIMUM SARL undertakes to ensure that all Users are able to oppose the use of their data for certain purposes, if it proves necessary. The Users are informed about the intended purposes for which their data is collected, particularly in terms of cookies management.

The data collection process is based on the following elements:

- Source of the collected data: direct collection from customers/prospects or our partners through telephone in keeping with the principle of prior notification as part of a BtoB operation of personal data
- Qualification of collected data
  - Initial qualification: All the collected data is verified (through telephone or by contacting the person concerned), directly with the decision-maker, or failing this, through a referent contact (assistant, communication department of the company if required)
  - Regular qualification: At least twice a year, PROXIMUM SARL verifies the non-obsolence of the personal data collected. This is done automatically by the administrative and customer support team. This verification is done through a telephone call made to the professional contact number of the decision-maker, which allows identifying changes in professional information and consequently updating the data if required. This may also be done via the PROXIMUM SARL platform by the end user who can update their personal information.

### **3. How do we use your personal data?**

#### **Purposes of collection of personal data.**

We use your personal data within the context of execution of the agreement binding us, for one or more of the following objectives:

- To provide you access to the information or services which you requested; and/or
- To collect information which may allow us to improve our Site, products, and services (particularly through cookies); and/or
- To be able to contact you concerning different events concerning PROXIMUM SARL, either through our forms, or through our online chat utility.

The collected data and its processing is intended for the organisation and management of the events offered by PROXIMUM SARL to its professional customers:

- Creation of online registration forms for our various events
- Creation and administration of the Online store which allows the participants to choose their plan and pay online
- Creation and management of an event administration module for the organiser
- Creation and management of the data import and export module (list of participants, orders, invoicing, conference registrations, meeting requests and meetings organised, etc.)
- Creation and management of a Search engine that allows establishing relations between the participants
- Creation and management of an Algorithm for scheduling meetings between the participants
- Management of the event program and conferences
- Management of the participants' agenda
- Online invoicing for the participants
- Creation and management of a mailing tool for automatic notifications and reminder emails for the participants
- Creation and management of an SMS mailing tool for automatic notifications concerning modifications to the agenda during the event
- Invoicing of the Users depending on the commercial agreement concluded with PROXIMUM SARL
- Sending information to you or executing the service which you have requested (like for example: sending Newsletters, commercial offers, etc.);
- Collection of information concerning you which may allow us to improve our Site, products, and services (particularly through integration of cookies);

- Contacting you for different events related to PROXIMUM SARL, particularly taking into account the updates of the products and customer support.

And more precisely:

- To carry out operations concerning the management of our commercial relations: contracts, orders, subscriptions, deliveries, invoices, accounting, management of your customer account, monitoring our customer relation, management of complaints, unpaid amounts, and disputes;
- Monitoring and ensuring the commercial follow-up of its customers and prospects through marketing, support, and communication operations
- Serving PROXIMUM SARL Customers, who have subscribed to our platform
- To improve our products and services by inviting you to participate in surveys, studies, satisfaction questionnaires, and product tests;
- To improve your user experience on our site to benefit from the functionalities and services of the site;
- To prepare commercial statistics;
- For marketing our own customers and prospects database, which is fed by information obtained from you;
- For analysing and establishment of statistics related to consultation and use of the site (number of pages viewed, number of visits, and activity) of our services (articles read) and advertisements displayed on the site;
- For sending information and personalised newsletters concerning our products and services and their developments, news related to us, and news related to your professional situation: certain information letters which we send you is directly associated with your subscriptions and this information is an integral part of your subscriptions. If you choose to unsubscribe from these newsletters, by contacting our customer department, the partial execution of the agreement binding us may not be opposed;
- For the characterisation of customer profiles and analysis of your purchase preferences; marketing analysis;
- For managing access, rectification, and opposition rights requests.

PROXIMUM SARL ensures that it updates the personal data of the customers/prospects throughout the duration of the processing operations so that the said data does not become obsolete.

Subject to the applicable local legislation, by providing its professional email, the customer has expressly authorised PROXIMUM SARL to use it along with other useful personal data from among the data cited in the previous paragraph to send it commercial messages or to provide support for its services.

PROXIMUM SARL is also likely to use the professional email of the decision-maker for administrative purposes or other objectives not related to marketing (for example, to offer it access to its personal data to update the same).

These purposes are communicated to the Data Protection Officer of PROXIMUM SARL who integrates them in his register.

#### **4. How is your personal data managed?**

You have an account to use our Services. You may access the account at any moment and modify your personal data. Your account is allocated by an administrator. It may happen that your administrator can access your account or deactivate it.

#### **Restricted access to personal data**

Only the recipients who are duly authorised can access, as part of an access management policy, the information necessary for their activity. PROXIMUM SARL defines the access and confidentiality rules applicable to the processed personal data. The access rights are granted in accordance with the role of the User and are updated in case of change of role. This is an internal company document which is appended to our internal regulations, and is available on simple request through letter to the PROXIMUM SARL processing manager.

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To protect your account, please ensure that your password is confidential. You are responsible for the activity of your account or performed using your account. Please do not use the same password as your account in third party applications. If you find that your password or account has been used without authorisation, you must immediately PROXIMUM SARM about the same: [cnil@proximumgroup.com](mailto:cnil@proximumgroup.com)

PROXIMUM SARM reserves the right to remove any registered User:

- In the event of non-compliance by the User with one of the clauses of these general conditions, or in case of excessive use of the service considered to likely be the result of illegal use,
- In case of a user request.

You may unsubscribe at any time from the newsletters and promotional offers which you no longer wish to receive by clicking on the unsubscribe link or by contacting the customer department: PROXIMUM – 855 Avenue Roger Salengro – 92370 CHAVILLE

Currently, we have several tools to manage this data:

- CRM: we have an online CRM including all our prospects for all our events. All our employees have access to this CRM with different processing rights.
- Emailing campaign: we use 2 different tools for sending promotional campaigns of our events.
- Online registration platform: we have developed an online registration platform called Vimeet. This platform is also used for prospection of certain events.
- We use Access to prepare our databases before incorporation in our CRM or in our mailing tools or our online registration platform (Vimeet)
- We use Excel for file transfers with our partners, customers, and sub-contractors.
- We use cloud solutions like Google Drive or OneDrive for sharing data with our partners and sub-contractors.
- We use the sub-contractor's services for mass telephoning with certain prospects

#### **Right of access and rectification of data**

PROXIMUM SARM implements the resources necessary to ensure for the customers/prospects/Users, the right of access, rectification, limitation, portability, and deletion of personal data concerning them when they so request. The data may be rectified, completed, updated, locked, or deleted when it is inaccurate, incomplete, ambiguous, expired, or when the collection, use, communication, or storage is prohibited. In compliance with the French law called "Information and Liberties" amended, and the GDPR, the customers/prospects/Users have the right to access, rectify, and oppose information concerning them by contacting the processing manager [cnil@proximumgroup.com](mailto:cnil@proximumgroup.com)

#### **5. Who shall receive your personal data?**

Your Personal Information is received only by PROXIMUM SARM. This Personal Information, regardless of whether it is individual or collective, is never communicated to a third party, except to sub-contractors which PROXIMUM SARM may rely on. Neither PROXIMUM SARM, nor any of its sub-contractors shall make commercial use of personal data of the visitors and users of its site.

PROXIMUM SARM undertakes to comply with the law dated 31 December 1975 concerning the sub-contracting and shall guarantee the correct execution of the services by its sub-contractors.

The sub-contractors authorised by PROXIMUM SARM to provide contractual services, including their role and their field of application for its sub-contracting and the geographical sub-contracting zone, are published on the list of sub-contractors available on request. These sub-contractor, in the capacity of data processors, must be authorised by any customer or partner of PROXIMUM SARM for carrying out all or part of the intended purposes. PROXIMUM SARM shall ensure that each sub-contractor provides guarantees concerning the protection of data which are at least equivalent to those that it has committed to, including these appendices insofar as they are applicable to the nature of the Services provided by this sub-contractor.

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In the event PROXIMUM SARL foresees the necessity of modifying or adding a sub-contractor, PROXIMUM SARL shall inform you about any change of sub-contractor which you have the right to oppose within a reasonable period. If you do not oppose this within this period, you shall be considered to have accepted this change. If there is a major material reason for such an opposition and in the absence of a mutual resolution between the parties, you shall have the right to terminate the agreement binding you to PROXIMUM SARL. PROXIMUM SARL shall ensure that each new sub-contractor is bound by the same applicable standards as the previously authorised sub-contractors.

Thus, the recipients of your personal data shall be:

- PROXIMUM SARL;
- The service providers with whom PROXIMUM SARL co-operates for the creation and management of online professional directories, catalogues of professional trade show exhibitors, and files provided by third parties (sponsors of the event organised by PROXIMUM, or partners of PROXIMUM), for the developments of its database, for the information requests generated by its communication actions (advertising, event promotion website, email lists, etc.) for the purposes stated above, and only insofar as necessary for the completion of the tasks entrusted to them. These service providers may have to contact you directly using the contact details provided by you. We strictly require our service providers to use your personal data only to manage the services which we request them to provide. We also request these service providers to always act in compliance with the laws applicable regarding the protection of personal data and specifically ensure the confidentiality and security of this data.

Your personal data may be communicated pursuant to a law, regulation, decision by a regulatory or judicial authority, and lastly, if necessary for PROXIMUM SARL to preserve its rights and interests.

#### **6. Where is your personal data stored and is it secure?**

Your personal data is stored in the database of our service providers, which are located within the European Union. We consider the security of your data to be an important matter. This is why we take all appropriate measures to prevent, as much as possible, any change or loss of your data or any unauthorised access of the same.

#### **7. Shall your personal data be transferred outside the European Union?**

PROXIMUM SARL informs you that it relies on authorised sub-contractors to facilitate the collection and processing of the data that you communicate to us. These service providers may be located outside the European Union even if PROXIMUM SARL carries out regular inspections and ensures that it only works with sub-contractors that are located within the European Union. PROXIMUM SARL firstly ensured that its service providers would provide sufficient guarantees and strictly comply with the conditions as regards confidentiality, use, and protection of data. In particular, it is ensured that there is a legal basis for all data transfers to a different country if such a transfer has to be made.

Consequently, and within the context of the purposes stated above, transfers outside the European Union may also take place within the context of the following activities: The creation and management of online professional directories, catalogues of professional trade show exhibitors, and files provided by third parties (sponsors of the event organised by PROXIMUM, or partners of PROXIMUM), for the developments of its database, for the information requests generated by its communication actions (advertising, event promotion website, email lists, etc.)

#### **Transfer of collected data concerning customers/prospects/users**

The personal data collected concerning the customers/prospects/Users are currently hosted within the European Union. All the data is processed by the employees of PROXIMUM SARL within the European Union.

In both abovementioned cases, PROXIMUM SARL uses the services of its sub-contractors located in France, for hosting all the data involved in its data processing operations. The latter also carries out a

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facilities management task among others; in fact its task is not strictly limited to hosting the personal data collected by PROXIMUM SARL, for which it is engaged in accordance with its obligations in terms of protection of personal data.

Whatever the circumstances, any Customer residing in the EU or the EEA, signatory of a commercial agreement with PROXIMUM SARL, has been duly informed, pursuant to the aforementioned agreement, and has given its contractual agreement:

- For the transfer of its personal data to PROXIMUM SARL via the VIMEET platform hosted in the EU.
- To ensure that its personal data, particularly the data related to this commercial agreement, may be consulted by any employee of PROXIMUM SARL, having proper authorisation, for the correct administration of its dossier to ensure the execution of the service offered by PROXIMUM SARL.

This access and consultation right constitutes, within the meaning of the GDPR, a data transfer from the hosting site located within the E.U. from where the User accounts of the PROXIMUM site are managed, to the country outside the EU where the partners and sub-contractors of PROXIMUM may be located.

The recipient and importer of Personal data is thus PROXIMUM SARL. PROXIMUM SARL confirms that there is no transfer of this Personal Data outside the European Union, except the necessary transfer of the Customer's personal data to the site of its sub-contractor, for the purpose of qualifying the catalogue of exhibitors at the professional trade shows where we are present.

PROXIMUM SARL has a legitimate interest, in view of the aforementioned purpose, for which it obtains the appropriate guarantees in terms of security and confidentiality and particularly the standard contractual clauses for transfer of personal data to sub-contractors established in a different country pursuant to directive 95/46/EC of the European Parliament and the Committee, constituting agreement by the Customer to such a transfer.

#### **Transfer of personal data outside the EU**

Any transfer outside the European Union is expressly subject to prior written agreement from the Customer, in accordance with the applicable law. The Customer's agreement is subject to verification that the level of guarantees in terms of security, access, and protection of the Personal Data stated in the Agreement shall be complied with in the case of such a transfer.

PROXIMUM SARL undertakes, whether owing to the Services which it executes or owing to the Services provided in the context of sub-contracting authorised as per the Agreement conditions, to not transfer the personal data processed within the context of this Agreement, outside of the European Union or the countries with "sufficient protection" without prior written authorisation from the Customer, and the latter is able to do the following prior to the transfer:

- Implement appropriate guarantees such as provided for by the regulations in terms of protection of personal data (BCR sub-contractors, standard data protection clauses adopted by the Committee responsible for the processing/sub-contractors, participation of the importer in the UE-US Privacy Shield arrangement, and approved code of conduct or certification mechanism),
- Complete the formalities and obtain, if necessary, prior authorisation for transfer of personal data based on a commitment of the importer of the personal data obtained within the context of an alternate personal data protection system accepted by the CNIL and,
- Inform the relevant persons.

Nevertheless, if PROXIMUM SARL is obligated to carry out such transfers pursuant to the applicable law, it undertakes to immediately inform the Customer, unless it is legally impossible.

#### **Security of personal data**

PROXIMUM SARL considers the security of its Data particularly important and implements all appropriate measures for restricting the risks of loss, deterioration, or incorrect use of the data.

To this end, PROXIMUM SARL ensures the security of the personal data belonging to the customers/prospects/Users/Customers/Prospects by implementing a data protection system strengthened by using physical and logical means of securement.

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PROXIMUM SARL has taken all useful precautions to ensure the safety of the personal data and, particularly, ensure that it is not distorted or damaged, and that unauthorised third parties cannot access it.

These security measures must be particularly as follows:

- Organisational measures
- Granting access to the employees of PROXIMUM SARL during the recruitment and revocation of access when they leave the company. The accesses include management of rights which limit access to data depending on the profile of the employee.
- External security audit carried out regularly by an expert service provider
- Inactivation of obsolete data over time
- Implementation of secure servers to carry out data exchanges

Logical safety measures

- Regular back-up of all its infrastructure
- Access to business applications controlled by a log-in/password with management of rights depending on the profiles
- Recording the mass data manipulations
- Recording all data consulted on our system
- Advanced authorisation management
- Securing the work stations (access to work stations after authentication through log-in/password) and access to the database (authentication via dedicated log-in/password)
- Restriction of access to business tools limited to the company premises
- Daily update of the work stations, antivirus software on all work stations
- Logging- in to the application tools have TLS or SSH encryption.

Physical security measures

- Each employee accesses the premises in defined time slots
- Building inaccessible at night

The data is stored on a cloud infrastructure and undergoes processing to provide the service subscribed to by the Customer and improve the services. The hosting servers where PROXIMUM SARL processes and stores the databases of its Customers / Users are exclusively located within the European Union.

## **8. What are your rights concerning your personal data?**

You have the right to access, rectify, and delete personal data concerning you, as well as the right to limit the processing and portability of your data. You also have the right to oppose, for legitimate reasons, the processing of your personal data and the right to oppose the processing of your data for prospection purposes.

You have the right to file a complaint with the National Commission on Informatics and Liberty: CNIL - 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07

You can exercise these rights at any moment by contacting our customer department:

- Through letter: PROXIMUM SARL, Service Client RGDP, 855 Avenue Roger SALENGRO, 92370 CHAVILLE
- Through email [cnil@proximumgroup.com](mailto:cnil@proximumgroup.com), with your customer reference.

Any request through mail or email must be signed and accompanied by the photocopy of an identity document bearing your signature and specifying the address where the response is to be sent. A response shall then be sent to you within a maximum period of one month following the date of receipt of your request.



### **9. What is the duration for which your personal data is stored?**

Your personal data is stored for a duration not exceeding the duration necessary for the purposes for which it is collected (event/professional trade show), which shall not in any event exceed 36 months.

Thus, your data shall be stored for the duration of our contractual relations and shall be archived for a period of five (5) years following the end of the said contractual relation, when it has an administrative interest, particularly for establishing proof of a right or contract (duration stated in the legal recommendation).

### **Reversibility of data**

PROXIMUM SARL shall delete your Personal Data upon the termination or expiration of the agreement binding you or upon receipt of your request within a period of 10 days.

### **10. Distribution of the data confidentiality policy**

The data confidentiality and protection policy is distributed:

- Internally to the employees as an appendix to the internal regulations of the company and on the server "Public \ Vie pratique \ Règlement intérieur"
- As part of the General conditions of use which can be viewed at any moment.

### **11. Modification of the Confidentiality Policy**

This policy may be thus modified depending on the legal and regulatory developments. It constitutes a commitment by PROXIMUM SARL, as regards respecting privacy and protection of personal data which is collected and processed during the use of the PROXIMUM SARL services under the conditions stated in the General Conditions of the PROXIMUM SARL services.

### **12. Processing manager - Data Protection Officer**

The processing manager is PROXIMUM SARL, represented by its current manager Mr. LAROSE Vincent.

PROXIMUM SARL has appointed Maître Odile Dussart, Lawyer at the Draguignan bar and residing at 95 avenue Victor HUGO in SAINT RAPHAEL (83700) as the Data Protection Officer - DPO.

This policy shall be renewed upon every new appointment of a DPO and failing this, every three years. Validation by Maître Odile Dussart in his capacity of Data protection Officer