

## **PERSONAL DATA PROCESSING POLICY**

(website, customers and prospects)

Cisbio Bioassays is a business-to-business (B2B) company and in most cases, the information we process concerns legal entities and not individuals.

Nevertheless, behind the companies, there are men and women. Respect for your privacy and the protection of your personal data is a priority and constant concern for Cisbio Bioassays, who have adopted a "privacy by design" approach. This notably implies that your personal data is protected by default both in terms of the system design and Cisbio Bioassays internal practices. Everyone in our company that is required to view or use personal data has been trained to respect the applicable law and the issues of confidentiality. Data processing is performed transparently within the rights granted to you by the laws and regulations, but also by this personal data processing policy. The protection of your privacy is ensured from end to end, from the design of the application to the erasure of your data.

Cisbio Bioassays ensures a high level of protection in accordance with the European standards for the protection of personal data to all its customers and users, whatever their country of origin and, subject to legal and regulatory obligations, regardless of where they access the services.

### **OUR PRINCIPLES, OUR ETHICS**

Our ethics on privacy protection and personal data is based on the following principles:

- **Transparency and loyalty:** you know what information is collected, by whom, by what means and for which use. At any moment you can also request details on the processing implemented by contacting our services.
- **Your interests are systematically privileged:** we plan strict and implicit measures to protect the privacy of customers and users, but also ergonomics and user experience, particularly in terms of information.
- **Accountability:** the activity of any person who accesses your data is stored and they may be held accountable for the reasons for this access.
- **Proportionality and legitimacy:** the processing of personal data that we implement tends towards the minimization of data collection and handling. We only collect personal data we actually need for our specific, explicit, legitimate purposes. The retention period of your data is also limited in time.
- **Anonymization:** as soon as it is no longer useful to have the information in an identifiable form, it is deleted or anonymized.
- **Relevance and Accuracy:** procedures for updating and correcting information are implemented and constantly maintained.

- **Security and Privacy:** we take all the necessary precautions regarding the nature of the data and the risks presented by processing to preserve the security of the data and, in particular, to prevent it from being distorted, damaged, or that unauthorized third parties gain access to it.

## **WHAT ARE WE TALKING ABOUT?**

### **Personal data (PD):**

**Personal data is any information relating to an identified or identifiable natural person** (hereinafter referred to as the "data subject"); deemed to be an "identifiable natural person" **a natural person who can be identified, directly or indirectly**, in particular by reference to an identifier such as a name, an identification number, location data, on-line identifier or to one or more factors specific to their physical, physiological, genetic, mental, economic, cultural or social identity.

### **Data processing:**

Private data processing includes **any operation or group of operations carried out or not by automated processes and applied to data or groups of personal data**, such as the collection, recording, organization, structuring, preservation, adaptation or modification, extraction, consultation, use, communication by transmission, distribution or any other form of provision, reconciliation or interconnection, limitation, erasure or destruction.

### **Data controllers:**

The data controller **is the natural or legal person**, public authority, service or other body, **who controls the procedures and purpose of data usage alone or jointly with others.**

### **Data processor:**

The data processor is the natural or legal person, public authority, service or other body that processes personal data on behalf of the controller.

### **Data recipients:**

The data recipient is the **natural or legal person, public authority, service or other body that receives personal data, whether a third party or not.** However, public authorities which may receive personal data in the course of a particular fact-finding mission in accordance with Union law or the law of a Member State shall not be considered as recipients; the processing of these data by the public authorities in question complies with the applicable data protection rules according to the purposes of the processing.

## **Data subject consent:**

In the context of the PD rights, consent refers to **free, specific, informed and unambiguous demonstration of the will by which the data subject accepts, by a statement or by a clear positive act, that the personal data concerning them are processed.**

## **Sensitive personal data/PD specific categories:**

Sensitive data means personal data consisting of information as to the data subject's **racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, health data or data concerning sex life or the sexual orientation.**

## **Storage limitation:**

Storage limitation consists in **marking PD in order to limit their future processing.**

## **Supervisory authorities:**

France's specific case: the Commission Nationale de l'Informatique et des Libertés (CNIL) is the independent administrative authority which ensures application of the legislation on personal data – [www.cnil.fr](http://www.cnil.fr) – We remind you that you have the right to lodge a complaint with this supervisory authority.

Some European and non-European countries have their equivalent agency which supervises the application of GDPR. We recommend to contact them for any question related to GDPR.

## **TRANSPARENCY:**

Cisbio Bioassays takes all the necessary measures so that you are informed in the most complete, but also the most intelligible way possible:

- on essential features for processing your PD;
- on the existence and conditions of exercise of your rights of access and rectification;
- on the existence and manner of exercising your "right to be forgotten";
- on the existence and manner of exercising your "right to storage limitations";
- on your right to be notified with respect to rectification or deletion of personal data or storage limitation;
- on the existence and manner of exercising your "right to data portability";
- on the existence and manner of exercising your "right to object to the processing of your PD";
- on the existence and manner in which you exercise your right not to be the subject of a decision based exclusively on automated processing.

## **WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?**

It is essential that we are able to account for the way we use your personal data.

In this context the data controller of PD processing that we implement is:

Cisbio Bioassays SAS  
Parc marcel Boiteux  
30200 Codolet  
SIRET: 51995498600013  
Represented by: Mr. Florent Monteleone

## **WHO TO CONTACT?**

Our data protection officer (DPO) is at your disposal. Feel free to contact them for any question relating to the protection of your personal data.

DPO contact information: Mr. Florent Monteleone, [DPO@cisbio.com](mailto:DPO@cisbio.com)

To exercise your right to data access and rectification please contact [DPO@cisbio.com](mailto:DPO@cisbio.com)

To exercise your right to data limitation please contact: [DPO@cisbio.com](mailto:DPO@cisbio.com)

To exercise your right to data portability please contact: [DPO@cisbio.com](mailto:DPO@cisbio.com)

To exercise your "right to be forgotten" please contact: [DPO@cisbio.com](mailto:DPO@cisbio.com)

To exercise your right to object please contact: [DPO@cisbio.com](mailto:DPO@cisbio.com)

## **WHAT IS YOUR PERSONAL DATA USED FOR?**

Cisbio Bioassays is aimed at professionals, it is essential to note that the data that concerns you and that we process is your professional data.

As a Cisbio Bioassays customer, we need certain information about you in the context of our business relationship management:

- contracts;
- orders;
- deliveries;
- invoices;

and

- for accounting and in particular the management of customer accounts;
- for loyalty programs;
- for the monitoring of customer relations, such as conducting satisfaction surveys, complaints management and after-sales service;
- for the selection of customers to conduct studies, surveys and product tests that do not appear except with your free, informed, specific and unambiguous consent of profiles likely to reveal sensitive data.

In the context of business development we can use your data for:

- the management of technical prospecting operations (which includes technical operations such as standardization, enrichment and deduplication);
- the selection of people to carry out loyalty and prospecting actions, surveys, product testing and promotion. which do not appear except with your free, informed, specific and unambiguous consent of profiles likely to reveal sensitive data;
- conduct canvassing operations.

The data we process can also be used for:

- **the development of business statistics; ;**
- **the organization of promotional operations;**
- **The management of right of access, rectification and opposition requests;**
- **the management of unpaid bills and litigation**, provided that it does not relate to offences and/or does not entail an exclusion of the person from the benefit of a right, a service or a contract
- **Management of people's opinion** on products, services or content.

Finally, we discuss the connection data to measure the audience to our website.

## **CONSENT**

### **Customers:**

As a customer we naturally need to know you, in order to prepare your orders, deliver them and invoice you. Your data is essential to the performance of our contractual obligations. In this context and in accordance with the General Data Protection Regulation (GDPR), French law and the CNIL Doctrine, as well as laws and agencies in place in other European countries, your consent is not required to process the data concerning you.

However, Cisbio Bioassays undertakes to inform you about the existence and essential characteristics for which your data is processed and to systematically put you in a position to exercise your rights, notably for the opposition, erasure and/or "right to be forgotten".

### **Prospects:**

Cisbio Bioassays is a Business-to-business (B2B) company and it only prospects you within the scope of your professional responsibilities. In this context and in accordance with the General Data Protection Regulation (GDPR), French law and the doctrine of the CNIL, as well as laws and agencies in place in other European countries, your consent is not required to process data concerning you.

However, Cisbio Bioassays undertakes to inform you about the existence and essential characteristics for which your data is processed and to systematically put you in a position to exercise your rights, notably for the opposition, erasure and/or "right to be forgotten".

We would like to remind you that, according to GDPR and the CNIL's doctrine, generic business addresses of the type (info@companyname.fr, contact@companyname.fr,

order@companyname.fr) are the coordinates of legal entities and are not subject to the principle of consent.

Besides, your consent is always required whenever we collect email addresses or phone numbers used for direct marketing purposes and when this data is transferred to partners.

When you contact us via our website [www.cisbio.com](http://www.cisbio.com) we collect your name and your email address so as to respond. In this context you may be required to consent to see your data processed in accordance with this policy. If you refuse, we will only use the data you have sent us for the purpose of responding to your request.

## **WHO HAS ACCESS TO YOUR DATA?**

Within the limits of their powers the people who work for Cisbio Bioassays will be able to access your data under the following conditions:

- **authorized company personnel:** marketing department, sales department, services responsible for customer relationship and prospecting, administrative services, logistical and IT services and their line managers.
- **authorized staff from the departments responsible for control:** the auditor, departments responsible for the internal control procedures, etc.
- **subcontractors authorized staff** when the contract signed between the subcontractors and the data controllers mentions the obligations incumbent on the subcontractors with regard to the protection of the security and confidentiality of the data and notably specifies the objectives to be reached.

Third parties to the company Cisbio Bioassays will be able to access your data in the following cases:

- **agencies, justice auxiliaries** and ministerial officers as part of their debt recovery mission.
- **the body in charge of managing the opposition list** to telephone canvassing.
- **partners, external companies or subsidiaries** of the same group of companies.

## **WHERE IS YOUR DATA STORED?**

Your data is processed in Hubspot, Salesforce and Agora (ERP) applications.

## **HOW LONG DO WE KEEP THE DATA?**

### **Principle:**

In principle, we only keep data that concerns you during the period strictly necessary for the management of the business relationship.

<b>Data</b>	<b>Purpose</b>	<b>The duration of conversation</b>
<b>Client</b>		
All data	Customer account management during a business relationship	The entire duration of the contractual relationship
Contract Execution	Customer account management, orders, deliveries, invoicing, payments	10 years
Identification and contact (form on Cisbio.com)	Sending information about our products and services	5 years after the last transaction - 10 years for the company's mailing address
<b>Prospects</b>		
All data	Prospecting	3 years from last contact without reply.

### **Evidence:**

The data used to establish proof of a law or a contract, or preserved under the compliance with a legal obligation may be subject to an intermediate archiving policy.

beyond the announced retention periods, irreversible anonymization does not prohibit the analysis or compilation of aggregated statistics.

### **Right of access, rectification and opposition:**

If you are not a customer, your data is kept in accordance with GDPR and the CNIL's doctrine for a period of three years. At the end of this period, we will contact you to find out if you wish to receive our messages or not.

If you apply for a right of access to the personal data that concerns you and that we process, we have the obligation to keep the information collected in this context for a period of one year.

If you send us a request for opposition or deletion of data concerning you, we are obliged to keep the information collected in this context for a period of three years.

### **Banking data:**

We delete this information when it is in our possession as soon as the payment is effective extended to the duration of a possible right of retraction.

If you paid with a credit card that is not in the name of a legal person, we keep information on the payment for 13 months if the card is immediate debit and 15 months if the card is deferred debit. We also keep the data that can only be used in the event of a transaction dispute in intermediate archive.

The visual pictogram is erased at the end of the transaction.

Data relating to bank cards whose validity period has expired is automatically deleted.

### **Web site audience measurement and "cookies":**

In the context of audience measurement of our website, we store data for a period of 13 months, this is not extended at each visit.

### **WHAT INFORMATION TO PROVIDE?**

Some information is required to provide the service requested. For example, we need to know your address to deliver our products or to respond to a request you have sent us. Sometimes, we may also have a legal obligation to store the data, for example for accounting purposes. In these contexts, if we do not have the information, we will not be able to answer your requests or respect our obligations.

However, If certain information is only incidental, you may refuse to allow the personal data concerning you to be processed without affecting our working relationship.

### **WHAT INFORMATION DO WE PROCESS?**

#### **Identity:**

Title, surname, first names, address, telephone number (landline and/or mobile), fax number, e-mail addresses, date of birth, internal processing code to identify the customer.

A copy of an identity document may be kept for the purpose of proving the exercise of a right of access, rectification or opposition or to fulfil a legal obligation.

#### **Means of payment:**

Statement of postal or banking identity, check number, credit card number, credit card expiration date, visual cryptogram.

#### **Transaction:**

Transaction number, purchase details, subscription of the goods or service purchased.

#### **Monitoring of the business relationship:**

Requests for documentation, test requests, product purchased, service or subscription subscribed, quantity, amount, periodicity, delivery address, history of purchases and services, return of products, origin of the sale (salesperson, representative, partner, affiliate) or the order, correspondence with the customer and after-sales service, exchanges and comments from customers and prospects, person(s) in charge of the customer relationship.

## **Invoices:**

Payment terms, discounts granted, receipts, unpaid balances not resulting in exclusion of the person from the benefit of a right, a service or contract.

Information on loans (amount and duration, the lender's name) can also be processed in the event of financing of the order by credit

## **Loyalty, prospecting, study, survey, product testing and promotion, selection of people:**

We only process the above-identified information.

## **Data from the website:**

Connection data (date, time, internet address, visitor's computer protocol, page consulted).

When you contact us via our website [www.cisbio.com](http://www.cisbio.com) we collect your name and your email.

## **Data from "cookies".**

Some features of this site (sharing of content on social networks, direct playback of videos) rely on services offered by third-party sites. These features deposit cookies that allow these sites to track your browsing. These cookies are only deposited if you give your consent. You can inform yourself about the nature of the cookies deposited, accept or reject them either globally for the entire site and all services, or service by service.

For more information on "cookies" see *below*.

## **RIGHT OF ACCESS AND RECTIFICATION:**

You have the right to contact us to find out if we are processing or not processing your personal data.

From the moment we process your personal data you have the right to know:

- why we process this information;
- what data is used;
- who the recipients of these data are;
- where possible, for how long the information is processed;
- that you have the right to request rectification or deletion of personal data, or a limitation of the processing of your personal data, or the right to oppose such processing;
- the right to lodge a complaint with a supervisory authority.

For obvious security reasons, notably related to the risk of identity theft, you must prove your identity to exercise your rights of access and rectification.

To exercise these rights you must contact the DPO by sending an email to [DPO@cisbio.com](mailto:DPO@cisbio.com).

## **RIGHT TO ERASURE, RIGHT OF OPPOSITION AND "RIGHT TO BE FORGOTTEN".**

You may request the erasure of your personal data if:

- the personal data is not necessary to the purpose for which it was collected or processed in another way;
- you withdraw your consent when it is required;
- if you object to data processing for legitimate reasons. However, in the context of direct marketing by electronic means, you do not have to justify legitimate reasons;
- the personal data has been unlawfully processed;
- erasure to comply with a legal obligation.

The right to be forgotten is then weighed against:

- the exercise of the right to freedom of expression and information,
- the respect of a legal obligation,
- reasons of public interest in the field of public health,
- the recognition, exercise or defense of a right in court,
- and archives in the public interest, for scientific or historical research purposes or for statistical purposes.

To exercise these rights you must contact the DPO by sending an email to [DPO@cisbio.com](mailto:DPO@cisbio.com).

## **RIGHT TO LIMITATION**

Limitation is the marking of stored personal data, in order to limit their future processing.

You can request data limitation if:

- the accuracy of the personal data is disputed by the data subject;
- the treatment is unlawful and the data subject opposes their erasure and instead requires the limitation of their use;
- the data controller no longer needs personal data for the purpose of processing but it is still necessary for the data subject to ascertain, exercise or defend legal rights;
- the data subject objected to the processing, during the verification as to whether the legitimate grounds pursued by the data controller take precedence over those of the data subject.

The data subject is informed by the controller of the lifting of the limitation.

If you believe you can benefit from the right to limitation you must contact the DPO by sending an email to [DPO@cisbio.com](mailto:DPO@cisbio.com).

## **DATA PORTABILITY**

You have the right to obtain the communication of your personal data in a structured, commonly used and machine readable format.

To exercise this right you must contact the DPO by sending an email to [DPO@cisbio.com](mailto:DPO@cisbio.com).

## **COOKIES**

When browsing our website <https://www.cisbio.com>, your web browser may be required to create cookies. It is a text file (.txt) in which some information is stored, including your display preferences or your connection terminal (computer, smartphone, tablet, etc.). The objective is to facilitate and enhance your browsing experience on the site <https://www.cisbio.com>.

Sometimes third-party sites may implant "cookies" during the display of advertisements. "Cookies" are a tool commonly used on the internet and we are only responsible for cookies identified as originating from <https://www.cisbio.com>.

We make every effort to ensure that these third-party sites strictly respect your right to privacy and the laws and regulations in force.

You can always view and delete all cookies on your login terminal.

You can also configure your web browser to be notified as soon as a "cookie" is created, and set up automatic rules defining a specific policy regarding cookies.

## **Management of "cookies" in the main browsers**

In order to manage "cookies" in the main browsers, you must refer to their editor instructions:

- **Microsoft Internet Explorer**

<https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>

- **Microsoft Edge**

<https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>

- **Apple Safari**

<https://support.apple.com/>

- **Google Chrome**

<https://support.google.com/chrome/answer/95647?hl=en&hlrm=en>

- **Mozilla Firefox**

<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

- **Opera**

<https://help.opera.com/en/latest/security-and-privacy/>

## Blocking trackers:

First of all you can set your browser to disable tracking:

- **Microsoft Internet Explorer**

<https://support.microsoft.com/en-us/help/17479/windows-internet-explorer-11-change-security-privacy-settings>

- **Microsoft Edge**

<https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>

- **Apple Safari**

<https://support.apple.com/kb/PH11952>

- **Google Chrome**

<https://support.google.com/chrome/answer/114836>

- **Mozilla Firefox**

<https://support.mozilla.org/en-US/kb/how-do-i-turn-do-not-track-feature>

- **Opera**

<https://help.opera.com/Windows/12.10/fr/notrack.html>

Secondly, you can install free extensions to block the various trackers.

Some examples:

- DoNotTrackMe: a simple extension to block trackers.
- Disconnect: a very complete extension blocking trackers and offering advanced features.
- Ghostery: this powerful extension blocks trackers.
- Adblock: goes beyond the protection of privacy and systematically blocks advertisements, including non-personalized ones, before they appear in your browser. However, these ads participate in the financing of websites including those that offer free services to the user. Consequently, this solution is only recommended as a last resort.
- uBlock Origin: a simple extension blocking trackers and ads

## Share or not share on social networks:

When you visit websites that have social network buttons, they are informed of your visit. Consequently, if you do not want to share the website you are visiting, it is recommended that you block this tracking. The blocking of social network buttons such as Facebook, Twitter, etc. can be obtained using an open source free software extension: Privacy badger.

For more information regarding laws applicable in France, please visit the CNIL website:

<https://www.cnil.fr/fr/cookies-les-outils-pour-les-maitriser>

## **Block audience measurement cookies:**

- **Cookies Google Analytics**

<https://tools.google.com/dlpage/gaoptout?hl=en>

- **Cookies ATInternet**

<https://www.atinternet.com/en/company/data-protection/>

- **Cookies Amplitude**

<https://amplitude.com/privacy>

- **Cookies Charbeat**

<https://chartbeat.com/privacy/>

## **EVOLUTION**

This Privacy Policy may change due to legislative and regulatory developments.

Renewal date October 2018.