



ALERTCYS

Personal data protection policy



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Version	Date	Modifications
2.0	20/01/2021	Adding the summary Addition of legal basis notices



Preamble

The security and confidentiality of your personal data being essential to us, we inform you through this Policy:

- categories of information we collect as part of our services ;
- how we use them ;
- the rights you have over your data.

This Policy is an integral part of the general conditions of use of the site.Alertcys of which you declare to have read and accepted the terms.

The Data Controller within the framework of this Policy, within the meaning of the regulations on the protection of personal data, is the company Concord.

This Policy applies not only to your personal data that you communicate to the Data Controller, but also to the personal data of any person that you communicate to the Data Controller.

1. Data collected to provide you with the services

ForCreate your account and meet regulatory obligations your identity (surname, first name) are optional data, but it is recommended to inform them.

Forcommunicate with you, are equally collected your email address, your link with the organization receiving the alert.

In order to process your file, identity and email address are collected but remain optional.

For the purposes of processing the dispute, other personal data is collected and processed:

- Elements concerning alert : letters, electronic messages, cookies.

Your data is collected via online registration forms or in paper format. You are informed that if you do not wish to provide one or more mandatory pieces of information, you will not be able to access certain services or features of the site.

Your data may also be collected following their provision by another user to allow the data controller to contact you.

We collect your data:

- for specific purposes: processing your registration or information request, identification to allow access to online services;
- On the legal basis of the legitimate interest of the Data Controller. All processing carried out by the Data Controller is necessary for the execution of its alert



processing activity, aimed at enabling its users to effectively implement their right or obligation to report an alert or to process an alert. an alert.

- for limited periods: your data is kept for the duration processing the mediation file. The data is then kept for a maximum period of 5 years after the file is closed.

Data is kept in secure storage spaces. In this regard, we take all useful and appropriate protection measures to ensure the confidentiality and security of your data and to prevent them from being destroyed, damaged, erased or destroyed, or that unauthorized third parties have access to it.

Only authorized persons from Concord and of the company targeted by the alert are recipients of your personal data to handle your alert.

All data communicated as part of an alert procedure is covered by the principle of confidentiality. The Data Controller and the parties processing the alert cannot process the personal data to which they have access due to the alert processing process. only as part of the course of the latter and for no other purpose. Consequently, in the event of refusal to process a party's alert, personal data is only processed to inform the parties of this refusal and archive the file.

The confidentiality of user data cannot be asserted against the certifying bodies.

You are further informed that:

- we may use technical subcontractors in the provision of our services;
- we never transmit your data to subcontractors for purposes commercial;
- your data is stored on French territory;
- we may transmit your data without your prior consent in order to comply with a legal requirement (e.g. judgment, order, request from a competent authority, etc.).

2. The particular case of the persons targeted

Most often, an alert involves one person, or even several people who also have rights related to the protection of personal data. These people can be a witness, a victim, or a defendant. These people are informed by the company of the processing of their personal data and their rights within 30 days of filing the alert.

However, the Data Controller may determine whether disclosure of the processing of these personal data presents a risk of loss of evidence. If this is the case, it informs the company of this risk and instructs it to only inform the people targeted by the alert of the



processing of their data and their rights after having taken the necessary measures to safeguard the evidence and having informed the Data Controller.

The Data Controller assesses the effectiveness of the measures adopted by the company and itself to safeguard evidence. If these measures are effective, the company immediately informs the persons concerned of the processing of their data and their rights in the form of an email. This email contains in particular a link redirecting to this data protection policy.

3. Your rights over the data you provide to us

You can at any time exercise your individual right of access, rectification, erasure, limitation, portability, consideration of your instructions in the event of death, and, where applicable, the right to object on the processing of personal data which concerns you by writing to the Data Protection Officer of the National Chamber of Commissioners of Justice:

- to the following email address: dpo@huissier-justice.fr
- to the following postal address: NATIONAL CHAMBER OF COMMISSIONERS OF JUSTICE, Data Protection Delegate -44, rue de Douai, 75009 PARIS.

You can also contact the Data Controller, Concord:

- to the following email address: contact@alertcys.io
- to the following postal address: 73 Boulevard de Clichy, 75009 Paris
- At the following telephone number: 01.49.70.15.93

You are however informed that in certain cases and by exception, you will not be able to exercise your rights of erasure and data portability. Your requests must be accompanied by a copy of a valid identity document.

You are also informed that you can contact the National Commission for Information Technology and Liberties by following the following link <https://www.cnil.fr/fr/cnil-direct/question/adresser-une-reclamation-plainte-la-cnil-que-elles-conditions-et-comment> or by writing a letter to the following address: CNIL - 3 Place de Fontenoy, TSA 80715 - 75334 PARIS CEDEX 07.

4. Your behavior when using our services

When you view and use the services that we make available to you, you must refrain from any collection, processing or misuse of personal data to which you may access. You must also refrain from any act likely to harm the privacy or reputation of individuals.

We remind you that we are not responsible for the content and information that you communicate to us via the forms.



5. We place cookies as part of our services

A cookie is a small text file that can be placed on the hard drive of your terminal (e.g. computer, tablet or mobile phone) when viewing our sites. This file allows us to identify the terminal in which it is recorded during the validity period of said cookie.

For your complete information, certain cookies are essential for the use of our sites, others allow us to optimize and personalize the content displayed.

We use the following cookies:

- Authentication cookies: they are installed once you connect to the sites. The next time you log in, the cookie identifies you as an existing user so you don't have to re-enter your username and password to log in.
- Statistics and audience measurement cookies: We use the Google Analytics tool on the alertcys.io website. We never use no audience measurement or statistical cookies on the app.alertcys.io alert management tool. The sole purpose of these cookies is to measure the audience of the site pages in order to produce anonymous traffic statistics. The use of these cookies does not allow you to be identified.

Statistics and audience measurement cookies store the following information anonymously:

- the number of visits of each user;
- the date of his first visit and his current visit;
- the length of time the user is connected to the site;
- when a visit begins and when it ends;
- the origin of the user (search keywords, links, search engines).

By using this site and clicking on the “Continue and Accept” tab which appears on the information banner on the homepage of the site, you expressly consent to the processing of the above-mentioned data, under the conditions and for the purposes described herein. -above.

The validity period of cookies is one (1) year maximum from their first insertion.

To accept or refuse the installation of cookies, you must configure your internet browser. The configuration of each browser is different. It is described in the help menu of each browser. We invite you to directly consult the help menu depending on the browser you are using.

You are warned that if you refuse cookies, access to certain pages of the site may be directly refused to you or lead to a deterioration in the use of the site.



We do not use cookies for profiling or advertising purposes.

6. Contact

For any questions or complaints relating to this Data Protection Policy, or if you wish to send us your comments or recommendations, you can contact us in writing at the following address:

- by post to the following address : Chambre Nationale des Commissaire de Justice Personal Data Protection Delegate - 44, rue de Douai, 75009 PARIS
- by email to the following address: dpo@huissier-justice.fr

7. Form for exercising your rights

To enable you to exercise your rights, we provide you with a form below which must be sent by email to contact@alertcys.io or by post to Concord at 73 Boulevard de Clichy 75009 Paris



Form for exercising the rights of data subjects

Subject of the form

This form allows you to contact Concord in order to exercise your rights over your personal data, as recognized by the European regulation n° 2016/679 of the European Parliament and of the Council dated April 27, 2016 relating to the protection of natural persons with regard to data processing of a personal nature and Law No. 78-17 of January 6, 1978 relating to data processing, files and freedoms. Your request will be answered within a maximum of 30 days as part of a simple request. However, if the request is complex in view of the Data Controller's resources, this period is extended to 90 days.

This form must be sent to Concord either by email or by post to the following contact details:

Mail : contact@alertcys.io

Address: Concord
73 Boulevard de Clichy
75009 Paris

It is necessary for your request to be granted that a copy of your identity card or any element proving your identity be communicated, attached to this form.

Authorization to process the data provided in the form

- I give my consent to the processing of the data provided on this form and for the following purposes: verification of my identity, study of my request and response to this same request.
- I confirm that I have read and understood the Concord data protection policy.

Information about the data subject

First name and last name/Company name: _____

Address : _____



Mail address : _____

Status with respect to Concord:

- Client
- Partner
- Employee
- Tiers
- Other (explain, list) : _____

Information on the right exercised

Right exercised:

- Right of access (Article 15 GDPR)
- Right of rectification (Article 16 GDPR)
- Right to erasure (Article 17 GDPR)

Motif d'effacement applicable :

- The mediation file is closed.
- Erasure is necessary to comply with a legal obligation.
- The processing has been recognized as unlawful by a court decision or a supervisory authority.
- The data was collected before you came of age.
- A previous opposition request was granted.
- Right to limitation (Article 18 GDPR)

Applicable reason for limitation:

- The processing has been recognized as unlawful by a court decision or a supervisory authority.
- A request for rectification was previously sent and has not yet received a response.
- A request for opposition was previously sent and has not yet received a response.
- It is necessary to retain the data for the exercise of legal rights.
- Right to portability (Article 20 GDPR)
- Right of opposition (Article 21 GDPR)

Legitimate reason for the opposition request:



Description of the request:

Categories of data concerned:

Special conditions for exercising law:

(The Data Controller reserves the right not to apply them if their implementation represents a disproportionate cost compared to the legitimate interest of the data subject.)

Made in _____

The _____