

## Personal data protection policy

website [www.etrepaye.fr](http://www.etrepaye.fr) and [www.creditmanagement-tools.com](http://www.creditmanagement-tools.com)

### Personal Data – website management

The administration of website [www.etrepaye.fr](http://www.etrepaye.fr) and [www.creditmanagement-tools.com](http://www.creditmanagement-tools.com) requires personal data processing, managed by **P2B SOLUTIONS**.

### What is the policy on the use of personal data?

In this policy, you will find information about the characteristics of these processing operations and your rights regarding your personal data.

This policy does not apply to the processing of personal data which the company **P2B SOLUTIONS** carries out as part of the **My DSO Manager** activity. This activity is subject to different rules, which you will find on the website [www.mydsomanager.com](http://www.mydsomanager.com)

### Who is responsible for the policy?

#### **P2B SOLUTIONS**

A limited liability company with share capital of €180,000, whose registered office is located at 140 Chemin de Billerey 38330 Biviers Registered in Grenoble under registration number 811 828 987, and whose legal representative is Mr Bertrand Mazuir.

**P2B SOLUTIONS** is the data controller.

This Confidentiality Policy has been drawn up in accordance with the provisions of Law No. 78-17 of 6 January 1978 (the “Data Protection Act” or “LIL”) and General Data Protection Regulation (“GDPR”) No. 2016/679.

### To whom does this policy apply?

This policy is intended for site users.

It also applies to:

- users who create an account on the site
- subscribers to our newsletter
- our on-line store’s customer subscribers
- the personnel of our service providers in charge of site management
- our site administration personnel
- those who write or participate in the drafting of the site's content

### End-purposes (how the collected data are used)

These processing operations enable the management of the site administered by **P2B SOLUTIONS**.

These processing operations enable:

- technical management of the site in conjunction with service providers (site hosting)
- site security management

- management of Internet user requests made using the contact form
- online account management
- management of newsletter subscriptions
- management of customer subscription orders in the on-line store
- management of reviews and comments left on-line
- the production of statistics for the site audience and the use of the services
- management of content-sharing on social networks
- management of the site's editorial content
- management of the list of objections to the processing of personal data

## Legal basis for processing operations: grounds entitling us to process your data

The legal bases for processing are as follows:

- for the technical management of the site: legitimate interest (providing an on-line service, preventing fraud)
- for site security management: a legal obligation and legitimate interest
- for the management of Internet user requests via the contact form: legitimate interest (enabling on-line communication) or the execution of pre-contractual measures (drawing up quotes at the request of users)
- for the management of on-line accounts: Internet user consent
- for the management of newsletter subscriptions: subscriber consent
- for the management of customer subscription orders in the on-line store: contract signed with customers
- for the management of on-line reviews and comments: legitimate interest (enable on-line communication)
- for the production of statistics for the site audience and the use of services: the consent of the Internet user
- for the management of content sharing on social media: Internet user consent
- for the management of the site's editorial content: individual consent
- for the management of the list of objections to the processing of personal data: compliance with a legal obligation

## Data retention periods

Data subject to processing are stored for a period not exceeding that necessary for the purposes for which they were recorded (principle of minimising processing operations).

These periods are as follows:

- for site technical management: 5 years from the end of the contract with the service provider concerned
- for site security management: log data (connections logs) are retained for 3 months
- for the management of Internet user requests made using the contact form: 3 years
- for on-line account management: as long as the account is active, then for 3 years
- for the management of newsletter subscriptions: the email address is kept as long as the person concerned does not unsubscribe (via the unsubscribe link included in the newsletters)
- for the management of customer subscription orders in the on-line store: 5 years from date of order
- for the management of reviews and comments left on-line: 5 years from date of publication
- for the production of statistics for the site audience and the use of services: thirteen months, unless the user opposes
- for the management of content sharing on social media: thirteen months, unless the user opposes
- for the management of the site's editorial content: 5 years from date of publication
- for the management of the list of objections to the processing of personal data: 3 years from registration on the list

## Data processed

The Data Controller processes the following categories of data:

- Identity, functions, company, email and postal contact details, telephone
- Data relating to browsing on the site and, where applicable, on social media platforms via sharing buttons (cookies and other trackers)
- Data relating to publication management
- Data relating to the management of technical services
- Statistics on the website audience and use of the proposed on-line services
- Data relating to on-line orders
- Data relating to reviews and comments left on-line

## Mandatory or optional nature of data collection

The data collected are mandatory for the purposes of processing, except in certain cases: Some of the data collected at the time of on-line account creation are optional (company, function, telephone number, address).

## Data sources

Data are sent directly by the data subject

## Data recipients

Depending on their respective needs, all or part of the data is sent to:

- the personnel of the data controller
- the personnel of the service providers in charge of site management (hosting)
- the site users
- the on-line payment service provider

## What are the security measures are in place?

The Data Controller implements the appropriate technical and organisational measures to ensure a level of security appropriate to the risk.

The Data Controller takes measures to ensure that any natural person acting under the latter's authority or that of the processor, and who has access to personal data, does not process it, except when instructed to do so by the Data Controller, unless required to do so.

The following specific safety measures have been taken:

- Secure log-in to server
- audit carried out every month to detect any security flaws

## The existence or not of data transfer to a country outside the European Union and associated guarantees

The data controller transfers personal data outside the European Union.

The data controller undertakes to ensure that these transfers are carried out:

- to countries with a so-called adequate level of protection within the meaning of the European data protection authorities or
- with appropriate safeguards under Article 46 of the GDPR or
- in compliance with Article 49 of the GDPR.

## Automated Decision Making

The processing does not provide for automated decision-making.

## What happens to personal data after death - Right of access, rectification, deletion and portability of data

The data subject concerned by a processing operation may define guidelines relating to the retention, erasure and communication of his or her personal data after his or her death. These guidelines may be general or specific.

The data subject is also entitled to access, oppose, rectify, delete and, under certain conditions, transfer his/her personal data. The data subject has the right to withdraw consent at any time if consent is the legal basis for processing. The request must state the surname and first name, email or postal address, of the person concerned, and be signed and accompanied by a valid proof of identity.

The data subject may exercise these rights by contacting:

**P2B SOLUTIONS** 140, Chemin de Billerey 38330 Biviers - Email: [dpo@mysomanager.com](mailto:dpo@mysomanager.com)

## Complaint

The person concerned by a processing operation has the right to lodge a complaint with the supervisory authority (CNIL): <https://www.cnil.fr/fr/webform/adresser-une-plainte>

## Management of Cookies

A cookie is a small text file (a tracker) that is placed or stored on the user's device (computer, tablet or mobile device) when they visit the website. The cookie allows the site to recognise the user, to help them navigate from page to page on a website, to provide them with secure connections, and to remember their preferences on future visits.

Before placing or reading a cookie, the data controller undertakes to:

- - inform the website user of the purpose of the cookies
- - obtain their consent
- - provide a means of refusing them

The period of validity of the user's consent is a maximum of 13 months.

The prior consent requirement does not apply if access to information stored in the user terminal, or the recording of information in the user terminal:

- - has the exclusive purpose of enabling or facilitating communication by electronic means or
- - is strictly necessary for the provision of an online communication service at the express request of the user.

However, the user's consent will be required for the functionalities of audience measurement and the sharing of content on social networks.

The user is informed that any such functionalities may be based on services offered by third parties (Twitter, Facebook, and LinkedIn).

If the user gives his/her consent, these third parties will place cookies allowing him/her to view content hosted by these third parties directly on the site or to share our content.

Via these cookies, these third parties will collect and use the user's browsing data for their own purposes, in accordance with their privacy policy.

The user can give and withdraw consent, either globally or on a purpose-by-purpose basis, from the cookie banner on the site.

In order to exercise his/her rights over the data collected by third parties or for any questions about these processing operations, the user may contact these third parties directly.