

TEHTRIS PRIVACY POLICY

Last Updated 22nd, August 2018

As cybersecurity services and products' Creator, TEHTRIS pays special attention to Your privacy protection. We commit ourselves to protect our website visitors' privacy and our products and services' users with respect to the processing of their personal data.

This Privacy Policy provides You an overview of how TEHTRIS, via our websites, products and services, handles Your privacy. We explain how we use the information and the choice You can make about our use of the information. We also describe the measures we take to protect the information and how You can contact us about our privacy practices.

In connection with specific products or services offered by TEHTRIS, You are provided with the agreements, terms of use and statements that supplement this Privacy Policy relating to data handling. This policy may change because of changes in legislation, the requirements of the authorities or to reflect changes in our practices, concerning the processing of personal data. The revised policy will be effective immediately upon being posted to our website: https://tehtris.com/pdf/Privacy_notice_online.pdf

Our Services are not directed to children younger than 18, and access and use of our services is only offered to users 18 years of age or older. If You are under 18 years old, please do not register to use our Services. Any person who registers as a user or provides its personal information to our Services represents that him/her is 18 years of age or older.

What this Privacy Policy covers ?

This Privacy Policy describes the following general aspects of our collection and processing of Your personal Data:

- [When our Privacy Policy Applies](#)
- [How we use Your personal data](#)
- [Why does TEHTRIS need to collect Your personal data](#)
- [How does TEHTRIS store Your personal data](#)
- [How long TEHTRIS retain Your personal data](#)
- [Will TEHTRIS share Your personal data to third parties](#)
- [How does TEHTRIS maintain Your personal data security](#)
- [What are Your rights as Data subject](#)
- [Children](#)
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Please refer to our complementary product and service privacy notices for additional detail specific to those products and service.

Personal data is defined as any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

When our Privacy Policy applies ?

This Privacy Policy applies to :

- Online activities: any personal data collected from You when You visit our websites or use our products or services;
- Phone and/or email contacts: any personal data collected from You when You call us or contact us by email for service, or customer support;

However, TEHTRIS' websites or mobile apps may include links to other websites that are not covered by this Privacy Policy but instead are governed by the privacy policies of third parties who provide those links. We are not responsible for the privacy practices of third parties. Your use of a third-party site will be governed by the terms and conditions, privacy policy, and data security policy of the third-party site.

You will always know what kind of information You provide to TEHTRIS before You start to use the products and services or confirm with Your consent. The data which You provide depends on the services, products, and features You use. TEHTRIS recommends You to carefully read the agreements and related statements accepted during installation or usage of software or service. Furthermore, additional information on our personal data practices may be provided in offer descriptions, contractual terms, supplemental privacy statements, or notices provided prior to or at the time of data collection. Certain TEHTRIS' products and services may have additional specific privacy notices that describe how we handle Your personal data for those products and services. If any other privacy notice conflicts with this Privacy Statement, such specific notice will take precedence.

How we use Your personal data?

TEHTRIS will process (collect, use and store) the information provided in a compatible way with the EU General Data Protection Regulation (GDPR). TEHTRIS will endeavor to keep Your information accurate and up to date and will not keep it for longer than necessary.

When we collect and process Your personal data, we will limit the collection and retention to what is adequate, relevant and necessary for our purposes and it will be kept in a form which allows for Your identification no longer than necessary for the purpose for which we process Your personal data. We refer to this as data minimization.

The personal data we collect may come directly from You or we may obtain it from other sources, such as our services providers. We want You to understand the types of personal data we process and if we do not obtain Your personal data directly from You, the source we used and the specific data collected.

If You choose not to provide data that is necessary in order for a product or feature to work, You may not be able to use that product or feature to work. This obligatory data is listed in specific end user license agreement.

Through its products and services, TEHTRIS never process "sensitive" personal data, such as religion, political views, sexual preference, or health, or other special categories of personal data. We do not wish to receive any such data and will not request it from You.

Why does TEHTRIS need to collect Your personal data?

TEHTRIS will only process personal data for particular, pre-determined purposes that are legitimate with regard to applicable law and that are relevant to TEHTRIS' business:

- **Subscription to TEHTRIS' products and services and prospects management;**

Looking for more information about eGambit product in order to get eGambit? To perform information searches about eGambit product or service, You do not have to give us any personal information. Nevertheless, to get eGambit, You will need to contact TEHTRIS. You will need to provide Your personal name/ email address / phone number.

In providing TEHTRIS with Your personal data information, You give TEHTRIS Your consent to process Your personal data for the following purposes: prospect request management and correspondence purposes.

TEHTRIS is committed to limit Your personal data access only to TEHTRIS' Business Department and IT Department.

TEHTRIS will store Your personal data for the time necessary for prospection and for a retention period of 3 years from the last contact with the prospect.

You may withdraw consent at any time and exercise Your data subject's rights by contact TEHTRIS' Data Privacy Officer in the "Contact us" section.

- **Registration to TEHTRIS' newsletter and correspondence purposes;**

Interesting by TEHTRIS' actuality? To perform news searches about TEHTRIS' company, You not have to give us any personal information. Nevertheless, to subscribe to TEHTRIS' newsletter You will need to provide TEHTRIS with Your personal name/ email address/ phone number/ company.

In providing TEHTRIS with Your personal data information, You give TEHTRIS Your consent to process Your personal data for the following purposes: management newsletter subscriber; correspondence; send TEHTRIS' news and information.

TEHTRIS is committed to limit Your personal data access only to TEHTRIS' Business Department.

TEHTRIS will store Your personal data for as long as You will to receive TEHTRIS' newsletter.

You may withdraw consent at any time and exercise Your data subject's rights by contact TEHTRIS' Data Privacy Officer in the "Contact us" section.

- **Inscription to TEHTRIS' events and event management;**

Attending to TEHTRIS' event? To perform TEHTRIS' event searches, You do not have to give us any personal information. Nevertheless, to inscribe Yourself to any TEHTRIS' event, You will need to provide Your personal name/ email address / company / function.

In providing TEHTRIS with Your personal data information, You give TEHTRIS Your consent to process Your personal data for the event participants' management and correspondence purposes.

You may also consent TEHTRIS to provide you information about future TEHTRIS' event.

TEHTRIS is committed to limit Your personal data access only to TEHTRIS' Business Department. For some event, the event participants' management is processing by TEHTRIS' subcontractors. In that case, the event inscription form will mention the subcontractor concerned.

TEHTRIS will store Your personal data for the time necessary for event participation management. Your personal data will be stored for a retention period of 2 years after the event.

You may withdraw consent at any time and exercise Your data subject's rights by contact TEHTRIS' Data Privacy Officer in the "Contact us" section.

- **Job Requests;**

Looking for a job at TEHTRIS company? To perform job searches You do not have to give us any personal information. Nevertheless, to apply for a job, You might need to provide Your personal username/email address and Your CV via external website, like Taleez.com. We strongly suggest that Your CV should not contain data relating to Your racial or ethnic origin, political beliefs, philosophical or religious beliefs, trade union or political party membership, physical or mental health, sexual life or the criminal offences or proceedings commission. If Your CV does contain such data then You agree TEHTRIS may retain this information and use it in accordance with this Statement.

If You give Your consent to such a disclosure, TEHTRIS may disclose such information to the Human Resources Department, either because You are considered for a job You applied for or because You made Your CV available for further job opportunities contacts.

TEHTRIS is committed to limit Your CV's access only to TEHTRIS' Human Resources professionals involved in recruitment activities.

TEHTRIS will store Your CV data for the time necessary to reply of Your request recruitment.

This data must be destroyed by TEHTRIS until 2 years after the last contact with You.

You may remove Your CV from TEHTRIS' database at any time by contacting TEHTRIS' DPO, under the Contact Us section.

If You provide TEHTRIS with referee details, it is Your responsibility to ensure the concerned person is aware and has consented in writing for You to forward his/her details.

- **Complains;**

Having a false positive or false negative issues with Virus Total through our eGambit A.I. engine ? To perform program analyses on VirusTotal site, Your data processing is bound by VirusTotal Data Privacy politic. Nevertheless, to contact TEHTRIS for submitting potential false positive or false negative issues, You will need to provide Your personal name/ email address/ log You submitted which can contain personal data.

In providing TEHTRIS with Your personal data information, You give TEHTRIS Your consent to process Your personal data for Your request management and correspondence purposes.

TEHTRIS is committed to limit Your personal data access only to TEHTRIS' IT Department. TEHTRIS uses a subcontractor, ZENDESK for the request form management. The technical request response is processing by TEHTRIS' IT experts.

TEHTRIS will store Your personal data for the time necessary to reply to Your request. These personal data will be stored for a retention period of 6 months after the last contact with You. You may withdraw consent at any time and exercise Your data subject's rights by contact TEHTRIS' Data Privacy Officer in the "Contact us" section.

- **TEHTRIS' website visit**

When You visit TEHTRIS' websites, our web server automatically records standard technical details related to Your usage of our web services, such as:

- Your IP address;
- The website from which You visit us;
- TEHTRIS websites pages You visit;
- Your visit date and duration.

In the case we would use Cookies, they would not be used to track Your behavior but to recognize You during a session where we would need to follow Your web crawling. This implies that You can destroy potential cookies from our web services whenever You would need it. By default we do not use cookies to track end users on our web services, meaning that You have no active cookies features when it is not needed. These personal data will be stored for a retention period of 6 months.

How will TEHTRIS store Your personal data ?

For security and technical organization reasons, TEHTRIS may store Your personal data at its unique sub-contractor's datacenter: OVH.

By default, when we process personal data, everything is protected and ciphered, meaning that OVH cannot read Your data, thanks to a strong internal security by design model. Whenever data is processed, we use the highest level of standards for data protection and apply a variety of legal measures in order to protect user data, guarantee safety and confidentiality, and ensure users' rights.

This sub-contractor keeps Your details only for secure storage purposes. When TEHTRIS no longer needs Your data to fulfil its service, the sub-contractor will dispose of the details in line with TEHTRIS' procedures.

The servers that are part of this infrastructure are located in France. TEHTRIS does not transfer Your personal data outside France.

The data on our servers can only be accessed from our physical premises, or via encrypted virtual private network ("VPN"). Access is limited to authorized personnel only, and company networks are password protected, and subject to additional policies and procedures for security, such as ISO 27001 requirements.

We or our subcontractors, or any third party who is working on our behalf must agree to observe the privacy of our user, and to protect the confidentiality of their personal information. This means Your personal data cannot be shared with others, and there must be no direct marketing by the third parties.

How long TEHTRIS retain Your personal data ?

We retain data for limited periods when it needs to be kept for legitimate business or legal purposes. We collect data when You purchase and as You use our service. What we collect, why we collect it and how You can manage Your information are described in this Privacy Policy. For certain services or products, others documents related to Your data processing may supply this Privacy Policy.

For each type of data, we set retention timeframes based on the reason for its collection and processing. Some data is deleted automatically as soon as we do not need it for our legitimate business or legal purposes. We also take steps to anonymize certain data within set time periods. We may also amend the personal data we keep in such a way that You cannot be identified, for example, by hashing. We may retain a "key" to the hashing, but we will securely store it separately from the based data.

When the data is deleted, we remove it from our servers or retain it only in anonymized form.

We have business and legal requirements that require we retain certain personal data, for specific purposes, for an extended period of time. For example, when our authorized partner processes a payment for You, or when You make a payment, Your data will be retained for as long as required for tax or accounting purposes. Reasons we might retain some data for longer periods of time include:

- Security, fraud & abuse prevention
- Financial record-keeping
- Complying with legal or regulatory obligations, including for investigations, enforcement, or when legally actionable
- Ensuring the continuity of our services
- Direct communication with You and our authorized partners, such as for service activation, billing, support, and marketing.

Will TEHTRIS share my personal data with anyone else?

We are required to disclose Your personal data to unrelated third parties in limited circumstances:

- Where necessary to satisfy a legitimate government request or order;
- In compliance with a legal requirement or with legal process;
- For the public interest, to protect users or the public safety.
- If necessary, when we hire a contractor to perform a service for us;
- If we obtain Your permission; or
- If necessary to defend ourselves or our users

We reserve the right to store and use the information collected by our software and to share such information among TEHTRIS' divisions to improve our current and future products and services ,to help use to develop new products and services.

Exceptionally, TEHTRIS may use subcontractors for specific cases. In any case, TEHTRIS will mention in the form the subcontractor used. TEHTRIS' sub-contractors and third parties are bound to respect confidentiality agreement.

Security:

Information security is TEHTRIS' core business. All data and all information provided by You is confidential by default. TEHTRIS therefore always applies technical and organizational data security measures for the protection of personal data that are adequate and appropriate, taking into account the concrete risks resulting from the processing of personal data as well as up-to-date security standards and procedures.

TEHTRIS also maintains physical, electronic and procedural safeguards to protect the information against loss, misuse, damage or modification and unauthorized access or disclosure.

Access to the personal data of our users is limited to authorized personnel who have a legitimate need to know based on their job descriptions, for example, employees who provide technical support to end users, or who service user accounts. In the case of third-party contractor who process personal information on our behalf, similar requirements are imposed. These third parties are contractually bound by confidentiality clauses, even when they leave.

We store Your personal information in our database using the protections described above. In addition, we utilize up-to-date firewall protection for an additional layer of security. We use high-quality antivirus and anti-malware software, and regularly update our virus definitions.

We do not collect more personal data from You than is required by the purpose for which we collect it (data minimization and proportionality principles).

In the unlikely event of a breach in the security of personal data, we will notify all users who are actually or potentially affected.

We may tailor the method of notice depending on the circumstances. Where the only contact information that we have for You is an email address, then the notification will necessarily be by email. We may also elect to give You notice via our in-product messaging system. Where we

believe there are affected users for which we have no contact information on file, we may give notice via publication on our company website. We reserve the right to delay notification if we are asked to do so by law enforcement or other authorities, or if we believe that giving notice immediately will increase the risk of harm to our user body overall.

What are my rights as data subject?

You have certain rights regarding Your personal data. We also offer You certain options about what personal data You provide to us, how we use that information and how we communicate with You. You may also refrain from submitting information directly to us. However if You do not provide personal data when requested, You may not be able to benefit from the full range of TEHTRIS products and services and we may not be able to provide You with information about products, services and promotions.

You have the **right to access** Your personal data TEHTRIS holds. At Your request, TEHTRIS can confirm which information it holds about You and how it is processed. If TEHTRIS does hold Your personal data, You may request the following information:

- Identification and contact details of the person or organization that has determined how and why processing with Your data;
- Data Protection Officer contact details, where applicable;
- The processing purpose as well as the processing legal basis;
- The personal data collected categories, stored and processed;
- Recipient(s) or recipients' categories that data is/will be disclosed to;
- For how long the data will be stored;
- Details of Your rights to correct, erase, restrict or object to such processing;
- Information about Your right to withdraw consent at any time;
- How to lodge a complaint with the supervisory authority;
- Whether the personal data provision is a statutory or contractual requirement, a necessary requirement to enter into an agreement, as well as whether You are required to provide the personal data and the possible consequences of failing to provide such data.

You have the **right to rectify** Your personal data that TEHTRIS holds. You are entitled to require TEHTRIS to rectify any error in Your personal data. At You request TEHTRIS must ensure that inaccurate or incomplete personal data is erased or rectified.

You have the **right of erasure (or the right to be forgotten)**. That means You are entitled to require TEHTRIS for deleting Your personal data if the data processing pursuit is not justified. At Your request, TEHTRIS must erase Your personal data if:

- The data is no longer needed for its original purpose;
- The lawful basis for the processing is the data subject's consent, and no other lawful ground exists;
- The data subject uses its right to object and the controller has no overriding grounds for continuing the processing;
- The data has been processed unlawfully; or
- Erasure is necessary for compliance with EU law or the national law of the relevant Member State.

You have the **right to restrict** the processing when You may not be entitled to require TEHTRIS to erase Your personal data but You may be entitled to limit the purposes for which TEHTRIS can process this data. At Your request TEHTRIS may only hold data and may only use data for limited purposes if:

- The data accuracy is contested (and only for as long as it takes to verify that accuracy);
- The processing is unlawful and the data subject requests restriction (as opposed to exercising the right to erasure);
- TEHTRIS no longer needs the data for its original purpose but the data is still required to establish, exercise or defend legal rights; or
- In an erasure request context if overriding grounds verification is pending.

You have the **right to data portability** which means You have the right to transfer Your personal data between controllers. You have the right to:

- Receive a personal data copy in a structured, commonly used, machine-readable format that supports re-use;
- Transfer Your personal data from one controller to another.

You have the **right to object** to Your personal data processing on grounds relating to Your particular situation; where the basis for that processing is either:

- Public interest; or
- TEHTRIS' legitimate interests.

TEHTRIS must cease such processing unless TEHTRIS:

- Demonstrates compelling legitimate grounds for the processing which overrides the data subject interests, rights and freedoms; or
- Requires the data to establish, exercise or defend legal rights.

Children:

TEHTRIS does not knowingly collect children personal data without insisting they seek prior parental consent as it is required by applicable law. The definition of “child” or “children” should take into account applicable laws as well as national and regional cultural customs.

Our Services are not directed to children younger than 18, and access and use of our services is only offered to users 18 years of age or older. If You are under 18 years old, please do not register to use our services. Any person who registers as a user or provides his/her personal information to our services represents that he/she is 18 years of age or older.

Contact us :

You can contact us at any time if You have any questions, queries or requests about Your personal data and, if European law applies to the processing of Your data, about Your right to request access to, modify, remove or export Your data, or object to our processing of Your data. We appreciate if You reach out to us first before You approach any supervisory authorities or courts.

Should You have any question regarding Your personal data processing or exercise Your data subject’s rights, You can refer to TEHTRIS’ **Data Protection Officer**. She/he is also available for enquiries, suggestions or complaints.

Please contact our DPO from TEHTRIS’ website [CONTACT US](#) section.

In the event You wish to make a complaint about how Your personal data is processed by TEHTRIS, You have the **right to lodge a complaint** directly to the supervisory authority:

Commission Nationale de l’Informatique et des Libertés

Service des plaintes
8 rue de Vivienne
CS 30223
75083 Paris Cedex 02
www.cnil.fr
01 53 73 22 22

Policy changes

Updates to our Privacy Policy will occur from time to time and we publish these changes on our website. We suggest that You check our Privacy Policy every so often to keep Yourself informed. Where the changes are major, we will notify You by email or by in-product messaging.

This Privacy Statement was last updated on 22nd August, 2018.