

TEHTRIS DATA PRIVACY STATEMENT

TEHTRIS appreciates your visit to its websites and your interest in its products and services. Your privacy is important to us and we want you to feel comfortable visiting our websites.

Your privacy protection in the processing of your personal data is an important concern to which TEHTRIS pays special attention. Personal data collected during visits to our websites are processed according to the legal provisions valid for the countries in which the websites are maintained. However, TEHTRIS websites may include links to other websites that are not covered by this privacy statement.

This privacy notice describes which information is collected, why it is collected and how TEHTRIS uses it.

TEHTRIS respects your privacy and your personal data.

What is a personal data?

Under the EU General Data Protection Regulation (GDPR) 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”.

How we use your personal data?

Each form or online service limits the personal data collection to strictly necessary (data minimization principle) and indicates in particular:

- Which are the personal data collection objectives (purposes);
- If these data are compulsory or optional for your request management;
- Who is dealing with your personal data (TEHTRIS in principle, exception precision in the form when a transmission in a third party is necessary for your request management);

- Your data subject's rights and freedoms and how we are able to exercise them to TEHTRIS.

Either way, TEHTRIS is committed to ensure the information collected and used is appropriate for this purpose and does not constitute an invasion of your privacy.

Why does TEHTRIS need to collect and store personal data?

In order for TEHTRIS to provide you with the best service possible, TEHTRIS needs to collect personal data for and only to the extent necessary in each following specific case:

- **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.

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 1 year 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.

Will TEHTRIS share my personal data with anyone else?

Generally, 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. 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.

TEHTRIS will only disclose your data to governmental authorities in case it is required by law or if TEHTRIS believes in good faith that such action is necessary to:

- Conform to legal requirements or comply with legal processes;
- Prevent a crime or protect national security;
- Protect users or the public safety.

TEHTRIS' employees and sub-contractor are bound to respect confidentiality.

Exceptionally, TEHTRIS may use other subcontractors for specific cases. In any case, TEHTRIS will mention in the form the subcontractor used.

How will TEHTRIS use the personal data it collects about me?

TEHTRIS will process (collect, store and use) 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. TEHTRIS is required to retain information in accordance with the law, such as income tax and audit information. For how long certain kind of personal data should be kept may be governed by specific business-sector requirements and agreements. Personal data may be held for a longer period of time depending on individual business needs.

Security:

To protect data, TEHTRIS uses all technical and organizational security measures in its power to minimize accidental or intentional manipulation risks, loss, destruction and unauthorized persons access. TEHTRIS' security measures and procedures are continually enhanced as new technology becomes available.

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.

Under which circumstances will TEHTRIS contact me?

TEHTRIS’ aim is not to be intrusive and we undertake not to ask irrelevant or unnecessary questions. For other than services purposes you requested, TEHTRIS will only contact you if a data breach occurs that can violate your rights and freedoms.

What are my rights as data subject?

As data controller, TEHTRIS has a legal obligation to give effect to the data subjects rights.

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 your 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.

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

Data Protection Officer contact details:

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.

This Privacy Statement was last updated in May 2018.