

## Privacy Policy

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Data confidentiality and safety is highly important for ePressPack and their clients and we will do our best to make sure that our technical and organizational measures respect your data protection rights.

This Privacy Policy describes within the European Regulation 2016/ dated 27 April 2016 « Règlement Général sur la Protection des Données » called RGPD, our rules regarding management, processing and storage of personal data as submitted in our services.

### Details of Data Processor

ePressPack provides a solution enabling Data Processors (ePressPack Client), or the person working for them, to process data – including personal data.

This person's details can be sent to you upon request at [services@epresspack.com](mailto:services@epresspack.com).

### Your rights to data correction

In accordance with the modified law n° 78-17 dated 6 January 1978 relating to data-processing, files and civil liberties and with the Regulation of the European Union on Data Protection 2016 / 679 (RGPD), you have the right to access, alter and delete your personal data.

You may exercise this right by sending a recommended letter to « Correspondant Données Personnelles » to the above address.

Your requests shall be processed within 30 days.

We may ask you to add to your request a copy of identity or authority evidence.

### Definitions

Understanding the real and precise objectives of a European regulation is not always that easy, especially with 99 articles, 173 recitals and many guidelines to explain its interpretation. However, this is essential to avoid any risk resulting from a too broad or imprecise interpretation of statutory obligations relating to personal data processing. Fair understanding of the few terms defined below is therefore crucial.

#### *Personal Data*

Any information relating to an identified or identifiable natural person. A natural person is deemed to be an identifiable natural person who can be identified, directly or indirectly upon reference to an identifier or to one or more elements specific to it.

## *Processing*

Any operation or set of operations achieved with or without automated processes and applied to personal data or personal data sets (collection, recording, transmission, storage, retention, extraction, consultation, use, interconnection, etc.).

## *Data Controller*

Natural or legal persons, public authorities, department or any other body which, alone or jointly with others, sets the purposes and means of processing.

## *Data Processor*

Natural or legal persons, public authorities, department or any other body processing personal data on behalf of the Data Controller.

ePressPack works as a Data Processor on behalf and for the client account.

## *Consent*

By subscribing to a service or filling a contact form on our website, you agree and accept that the Data Processor may collect, process, store and/or use personal data submitted in accordance with the rules mentioned hereafter.

By providing us your consent, you also keep the right to rectification, the right to oblivion and/or the right to deletion of your personal data.

## **Data collected on the website**

By accessing our website anonymously, the following data may be collected and processed: IP address(es) and browsing data, download history. Some data is collected automatically via your actions on the website (see paragraph relating to cookies below).

When you subscribe to our website, the following extra data may be collected and processed: email, civility, first name, surname, country, company and function if needed, password, postal address, telephone number, domain name, etc. (see subscribing form for comprehensive list if needed).

Data submitted to ePressPack must not include sensitive personal data, such as administrative identifiers (as social security numbers, driving license, or taxpayer identification number), complete credit card numbers or personal bank account numbers, medical records or information relating to healthcare demands associated to some people.

## **Technical Cookies / Tracking Cookies**

In general, ePressPack uses cookies in order to secure access to some parts of the website (technical cookies) and/or to measure its traffic (traffic tracking cookies).

Cookies are files recorded on your computer hard drive when browsing on the Internet and particularly on the website. A cookie is not used to collect personal data without your knowledge but to record information relating to your browsing on the website that can be read directly by ePressPack during your visits and further requests on the website.

If you choose to refuse all cookies, your browsing may be limited to access some pages of the website, namely access to secured pages via login and password will not be possible.

Traffic cookies used by ePressPack aim at providing traffic analysis like Google Analytics put at disposal by ePressPack to Data Processors, while ensuring to recognize users at their next visit.

### **Processing purposes**

The main objective for collecting and processing personal data is to offer you a safe optimal, efficient and customized service of:

- - Management and publishing/diffusion/share of multimedia content, for Data Processors (ePressPack Client);
- - Access to such information, with close attention (via login/password) or anonymous, for all.

To this end, you accept that we may use your personal data to:

- - Provide our services and ease their running, including checking such personal data to do so;
- - Solve possible problems to improve our website use, with the support of ePressPack teams;
- - Customize, assess, improve our services, contents and literature;
- - Analyze the volume and history of your use of our services;
- - Prevent, detect and investigate on all activities potentially forbidden and illegal or contrary to good practices, and ensure compliance with our terms and conditions of use
- - Meet our legal and regulatory obligations.

Data Processors, but also ePressPack on behalf of the Data Processor, process and use personal data submitted on the website solely in accordance with the current legislation on data protection. Their employees and suppliers have the obligation to respect data privacy.

### **Data recipients**

Personal data collected on the website is exclusively intended to Data Processors.

It may be transmitted to ePressPack or subcontracting companies to which ePressPack may turn to only for technical reasons, for the running of its services. ePressPack ensures compliance with data protection requirements for all its subcontracting companies.

ePressPack shall in no case sell or rent your personal data to third parties for marketing purposes.

Furthermore, ePressPack shall not disclose your personal data to third parties, except if (1) the Data Processor (or the account administrator acting on your behalf) so requests or authorizes disclosure; (2) ePressPack is compelled to do so by a governing authority or a regulatory authority, upon judicial requirement, summon, or any other similar governmental or judicial request, or to establish or support a legal request.

## **Emailings**

ePressPack offers their clients some solutions including both Internet publishing tools, and distribution by emailing.

Such emailing distribution tools enable Data Processors to have access to and handle personal data, while respecting some rules.

### ***Distribution Lists***

When using this service, namely create emailing campaigns and distribution lists, ePressPack has access to all the information contained in email's distribution lists created by the Data Processor, together with the object and content of emails sent via ePressPack services. Data is stored in secure servers and only a few limited persons may have access to distribution lists, especially for support service purposes.

Data processors can easily retrieve distribution lists from their ePressPack account at any time. They can also modify or delete their contacts at any time from their account.

ePressPack shall in no case sell, share or rent your distribution lists to third parties, nor shall use them for purposes other than those mentioned herein. ePressPack uses information of distribution lists solely for legal requirements, to invoice as to provide the best possible client support.

As creator of distribution lists and associated emailing campaigns, ePressPack client is the Data Processor as meant in RGPD, and ePressPack acts only as service provider. As such, it is the Data Processor's liability to:

- - Proceed to all requested declarations with CNIL or other supervising authority
- - Comply with any current regulation
- - Collect the express consent and freely of the people concerned during the collection of their personal data
- - Ensure they have the authorization to use collected personal data in compliance with targeted purposes and refrain from all unauthorized use.

### ***Emails Tracking***

ePressPack analyzes and tracks opening rates and click-through rates and the number of emails sent in order to measure the performance of your emailing campaigns and report it to the Data Processor.

### ***Unsubscribing***

An unsubscribe link is included in each newsletter and email sent via ePressPack solutions.

Thus, final recipients may easily unsubscribe by following unsubscribe links featuring in each email.

## **Safety**

Within its services, ePressPack attaches the utmost importance to security and integrity of their clients' personal data.

Thereby, in compliance with RGPD, ePressPack commit themselves to take all useful precautions to preserve data security and especially protect it from any accidental or illicit destruction, accidental loss, alteration, distribution or unauthorized access, also against any illicit other processing form or communication to unauthorized persons.

To this end, ePressPack implements standard security measures for the industry to protect personal data from unauthorized disclosure.

Besides, in order to avoid any unauthorized access in particular, and to guarantee that data accuracy and fair use is maintained, ePressPack has set up electronic, physical and framing appropriate procedures in order to backup and preserve data collected through its services.

Still, no one should consider themselves as being completely safe from hackers' attacks. Therefore, should a security failure be detected, ePressPack shall inform the Data Processor quickly and do their best to take all possible measure to neutralize the intrusion and minimize its impacts.

It should be borne in mind that any user, client or hacker discovering a security breach and exploiting it will be subject to criminal sanctions and that ePressPack shall take all measures, including filing a case and/or undertaking legal proceedings, to preserve data and rights of their users and theirs and to limit the impact at most.

## **Data Retention**

Data Processors and ePressPack for the exclusive account of Data Processors collect your personal data for fulfilling their contractual obligations, together with information on the way and frequency use of its services, and keep such data in active database, log files or any other types of files, and in accordance with the current regulation.

However, ePressPack shall not store such data indefinitely. Data Processors may have access to some data as long as they hold an active account (ePressPack client) and for a variable duration according to data types, but in no way more than 3 months after their account's closure. Data may be deleted at any time during the active use of their account, in accordance with the provisions listed above.

## **Data storage place and transfers**

Taking into account the services linked to the website and ePressPack solutions, your personal data is located in France exclusively, except from:

- Videos, hosted at our technological partners: Vimeo, Youtube, Dailymotion, Brightcove in various world areas, including the United States of America.
- Analysis data from Google Analytics, in various world areas, including the United States of America.

ePressPack commit themselves to immediately inform Data Processors, providing they are legally authorized to do so, in case of request issued from an administrative or judiciary authority regarding your data.

### **Other points specific to this website**

#### *CNIL Declaration*

Information automatic processing is submitted to CNIL declarations under the number 1967984.

You are entitled the right to file a complaint for breach of your data protection, with this supervising authority.

### **Modification of Privacy Policy**

Data Processors and ePressPack reserve the right to bring changes to this Privacy Policy at any time, especially pursuant to changes enacted in the laws and regulations in force.

Such modifications shall be notified via the website, wherever possible thirty (30) days at least before they enter into force. We recommend you to check those rules now and then to remain informed of our procedures and rules regarding your personal details.