

Privacy policy

What is the purpose of our Privacy Policy?

Nexway SASU, which manages the website www.nexway.com, attaches great importance to the protection and confidentiality of your personal data, which we take seriously.

As such, our Privacy Policy is a clear demonstration of our **willingness to ensure that Nexway SASU complies with the applicable rules on the protection of personal data** and, more specifically, those of the General Data Protection Regulation (« GDPR »).

In particular, our Privacy Policy aims to inform you about how and why we process your personal data in the context of the **services** we provide to you.

Who should read our Privacy Policy?

Our Privacy Policy is addressed to **you**, wherever you are domiciled, provided that you are at least 15 years of age, whether you are one of our **clients** or a **visitor** to the website www.nexway.com.

If you are under the legal age detailed above, you are not authorised to use our services **without the prior and explicit consent** of one of your parents or the holder of parental authority, which must be sent to us by email at dpo@nexway.com.

If you believe that we are holding personal data about your children without your consent, please contact us at the dedicated address detailed above.

Does our Privacy Policy apply to job applicants?

If you are a **candidate** for a position with **Nexway SASU**, you should consult our **Candidates Policy** which is accessible at all times on our dedicated page on www.nexway.com and which details the processing carried out as part of our recruitment process.

Why do we process your personal data and on what basis?

We process your personal data primarily for the following purposes:

- **Navigate our website, benefit from our services** and so that we can **respond to your requests** (e.g. requests for information, complaints, etc.) on the basis of our general terms of use and our legitimate interest in providing you with the best possible service.
- **Manage our customer service** on the basis of the performance of the contract and our legitimate interest in responding to your requests and complaints as effectively as possible.
- **Stay informed of our latest offers and events by email**, based on our legitimate interest in retaining our Clients and prospecting potential new Clients.

- **Manage billing and any outstanding debts**, on the basis of our legitimate interest in obtaining consideration for the provision of our service and on the basis of our terms and conditions.
- **Follow us and comment on our publications on social networks** on the basis of our legitimate interest in having a dedicated page on social networks.
- **Receive our newsletter** which informs you of all the latest news about our services on the basis of our legitimate interest in retaining our clients and on the basis of your consent if you are not yet a client of our services.
- **Operate the videos on our website** on the basis of our legitimate interest in providing you with content in video format.
- **Allow the download of documents** on the basis of our general terms and conditions of use.
- **To record the conversations we have with you in order to improve our customer service**, based on your prior consent and our legitimate interest in improving the quality of our service and training our staff.
- **Send satisfaction surveys** on the basis of our legitimate interest in improving our services.

How did we obtain your personal data?

Your data is collected **directly from you** when you are a Client of our services or a "simple" visitor to our website www.nexway.com and we undertake to process your data only for the **reasons described above**.

For professionals only, your personal data may also be processed indirectly in the context of trade fairs or social networks (e.g. LinkedIn).

On the other hand, when you voluntarily publish content on the pages that we publish on social networks, you acknowledge that you are **fully responsible** for any personal information that you may transmit, whatever the nature and origin of the information provided.

What personal data do we process and for how long?

We have summarised below the **categories of personal data** and their respective **retention periods** :

- **For private individuals, personal identification data** (e.g. surname, first name) and **contact details** (e.g. email address) are retained for the duration of the provision of the service, plus the statutory limitation periods, which are generally 5 years.
- **For professionals, personal identification data** (e.g. surname, first name, position, company, department, etc.) and **contact details** (e.g. email address and

business telephone number, etc.) retained for the entire duration of the provision of the service, plus the statutory limitation periods, which are generally 5 years.

- **For private individuals, data of an economic and financial nature** (e.g. bank account number, verification code, etc.) retained for the period required for the transaction and for the management of invoicing and payments, plus the statutory limitation periods, which are generally 5 to 10 years.
- **For professionals, where there is confusion between the name of your organisation and your personal name (e.g.: self-employed business, very small business, etc.), economic and financial data** (e.g.: bank account number, verification code, etc.) retained for the period required for the transaction and for managing invoicing and payments, plus the statutory limitation periods, which are generally 5 to 10 years.
- **Email address**, retained for a maximum of 3 years from the last contact we had with you **as part of our email prospecting campaigns**, and retained until the end of your newsletter subscription **to receive our newsletter**.
- **Statistical data relating to the viewing of our videos** which are anonymised and retained indefinitely.
- **Connection data** (e.g. logs, IP address, etc.) retained for 1 year.
- **Cookies** are generally retained for a maximum of 13 months. For more details on how we use your cookies, you can consult our Cookies Policy, which can be accessed at any time on our website.
- **Voice** recorded during telephone conversations and retained for a maximum of 6 months, with the exception of calls used to justify the conclusion of a contract, in which case it is retained for the statutory limitation period, which is generally 5 years.

Once the applicable retention periods have expired, the deletion of your personal data is **irreversible** and we will no longer be able to communicate it to you after this period. At most, we may only retain anonymous data for **statistical** purposes.

Please also note that in the event of **litigation**, we are obliged to retain **all** of your personal data throughout the processing of the case, even after the expiry of the retention periods described above.

What rights do you have to control the use of your personal data?

The applicable data protection regulations give you **specific rights** which you may exercise, **at any time** and **free of charge**, in order to control the use we make of your data.

- The right to **access** and **copy** your personal data, provided that this request does not conflict with business secrecy, confidentiality or the confidentiality of correspondence.
- Right of **rectification** of personal data that is erroneous, obsolete or incomplete.

- Right to **oppose** the processing of your personal data carried out for the purposes of commercial canvassing, as well as processing based on our legitimate interests unless there are legitimate and compelling grounds for such processing which override your interests, rights and freedoms.
- The right to request the **deletion** ("right to be forgotten") of personal data that is not essential to the proper functioning of our services.
- Right to **limitation** of your personal data which allows you to photograph the use of your data in the event of a dispute over the legitimacy of processing.
- Right to **portability** of your data which allows you to retrieve part of your personal data so that it can be easily stored or transmitted from one information system to another.
- The right to give **directives** on the fate of your data in the event of your death either through you or through a trusted third-party or successor in title.

In order for a request to be considered, it must be made directly by **you, or your representative** to the address dpo@nexway.com.

Requests cannot come from anyone other than you or your representative. We may therefore ask you to provide **proof of identity** if there is any doubt about the identity of the applicant, as well as proof of representation.

We will respond to your request as quickly as possible, with a maximum response time of one month from receipt, unless the request is technically complex or we receive many requests at the same time. In this case, the response time may be up to three months.

Please note that we can always **refuse** to respond to any **excessive or unfounded** request, particularly if it is **repetitive**.

Who can access your personal data?

Your personal data is processed by **our teams** and by **our technical service providers for the sole purpose of operating our service**.

We specify that we **check all our technical service providers before recruiting them** to ensure that they scrupulously comply with the applicable rules on the protection of personal data.

In addition, we guarantee that we will never transfer or sell your data to third parties or business partners.

Can your personal data be transferred outside the European Union?

The personal data processed by our website is exclusively hosted on servers located within the European Union.

Furthermore, we do our utmost to use only technical tools whose servers are also located within the European Union. If this is not the case, we scrupulously ensure that they implement the appropriate **guarantees required to ensure the confidentiality and protection of your personal data**.

How do we protect your personal data?

We implement all the technical and organisational measures required to guarantee the security of your personal data on a day-to-day basis and, in particular, to combat any risk of destruction, loss, alteration or disclosure.

Do we use cookies when you browse our website?

Please be aware that we use cookies when you browse our website. For more information, please consult our Cookies Policy.

Who can you contact for more information about the use of your personal data?

To best ensure the protection and integrity of your data, we have officially appointed an **Data protection officer ("DPO") independent** from our Supervisory authority.

You may at any time and free of charge contact our DPO at dpo@nexway.com to obtain further information or details on how we process your data.

How can you contact the CNIL (French Data Protection Authority)?

You may at any time contact the "**Commission nationale de l'informatique et des libertés**" or "**CNIL (French Data Protection Authority)**" at the following contact details: CNIL (French Data Protection Authority) complaints department, 3 place de Fontenoy - TSA 80751, 75334 Paris Cedex 07 or by telephone on +33 1 53 73 22 22

Can the Privacy Policy be modified?

We may modify our Privacy Policy at any time to adapt it to new **legal requirements** as well as to **new processing** that we may implement in the future.