

# DATA PROTECTION POLICY

Capsule is committed, within its activities and in accordance with the regulations applicable in France and Europe, including the REGULATION (EU) 2016/679 on the protection of natural persons regarding the processing of personal data, to ensure the protection, confidentiality, and security of the personal data of its users, customers, prospects, and suppliers, as well as to respect their privacy.

The Privacy Policy applies to data collection and processing on Capsule's websites (the "Sites") as well as the use of our online services or content.

The Privacy Policy may be modified. Capsule may, at any time, change the Policy for instance to adapt it to the new rules and regulations. Putting these changes online is sufficient for users to be aware of them. We recommend that you read the then-current online version regularly.

The Personal Data Protection Policy sets out the principles and procedures for data processing.

## **Data protection and privacy principles**

### **1. Fair collection of personal data of its customers, prospects and Web users**

Personal data are collected fairly and transparently. Capsule does not collect personal data without first informing data subjects, including on uses of their personal data.

Capsule collects this personal data in order to:

- Provide the services requested by its Web users and customers,
- Manage the needs of its web users, customers and prospects.

Capsule informs web users on the deposit of cookies and other tracers on its sites, their purposes, the legal basis and the possibility of opposing it.

For more information: Click here.

<https://capsuletech.com/privacy>

<https://capsuletech.com/fr/privacy>

<https://capsuletech.com/de/privacy>

<https://capsuletech.com/ja/privacy>

### **2. The use of personal data of its customers, prospects and web users**

Capsule uses personal data for authentication, service delivery and offer proposals adapted to the specific needs of each customer, prospect and web user. For this, Capsule may carry out statistics from this data.

Capsule respects the current legal framework regarding the protection of personal data, security and confidentiality conditions. Capsule only discloses personal data to its authorized staff and providers and ensures that they comply with strict conditions of confidentiality, use and protection of personal data.

Capsule does not disclose personal data to business partners without informing its customers, prospects and web users, and without offering them the opportunity to exercise their right of objection.

### **3. Measures to ensure the security of personal data of its customers, prospects and Web users.**

Capsule provides data protection, from the design and throughout the lifecycle of services or sites.

- It implements security measures appropriated to the level of data sensitivity to protect personal data from malicious intrusion, loss, tampering or disclosure to unauthorized third parties.
- The information system, datacenters and networks it uses to process and store personal data are protected by security and protection systems (data encryption, firewall, redundancy, backup, etc.).
- It establishes permissions to access the information system only to those who need it to perform their functions.
- It makes its employees aware of the protection of the personal data they process and ensures that they comply with the applicable rules and the company's ethics.
- It requires its suppliers to comply with these same principles of protection.

## **Data protection at Capsule**

### **1. What personal data are collected and how?**

By browsing our Sites or using our Services, Capsule, its service providers or business partners may collect personal data based on your prior consent.

Some personal data are communicated directly by you such as your names, country and state, email address, company names, password, desk phone and mobile phone number, the pages you are visiting, claims or comments that you may share with us.

This information is provided when:

- You create an account on the customer portal or on our Sites.
- You contact us and complete a form.
- You download documents on our Sites.
- You download tools on the customer portal.
- You write a comment.
- You surf on our pages, thanks to cookies.

Some personal data, subject to your prior consent, may be automatically collected as a result of your actions on Sites using cookies or similar technologies such as IP address, login and browsing data, your preferences and interests, general geographic location.

This information is shared every time you browse our Sites.

### **2. What are the purposes of the data collected on you?**

We use the personal data collected to:

- Provide content and services including:
  - Recognize you when you return to browse our Sites.
  - Manage and update your user accounts and services.
  - Answer to your requests on our Sites, including through forms.
  - Offer services and content in adequation with your general geography situation (country)
  - Allow you to write comments about the content of our Sites.
- Advertise our content and services, and those of our partners, including:
  - Offer content in adequation with your interests and provide targeted advertising.
  - Address communications and analyze their effectiveness.
- Conduct studies and analyses of our content and services to:
  - Better understand users of our Sites and Apps
  - Perform data analytics and statistics to improve our Sites.

- To communicate with you by email, thanks to the contact form
- To inform you on our products' versions and advise you on the evolutions and new available updates or upgrades, on the customer portal.
- To ensure the security of your data

3. **Who are the recipients of the personal data collected?**

The personal data collected on the Sites are intended for Capsule.

They can be transmitted or accessible by Capsule's service providers, including for instance its IT providers, when it is strictly required for the execution of data processing, commercial prospection and analysis services or IT services.

Capsule requires its service providers to use your personal data only to manage the entrusted services, in compliance with applicable data protection and data privacy regulations.

4. **Where is your personal data stored?**

Your personal data is stored in the European Union and United States, in our databases or in the databases of our processors.

In some cases, and mainly for technical reasons, databases may be stored in datacenters outside the European Union.

5. **Transfer of data outside the EU**

Due to the international cover of Capsule, some of our partners are located outside the European Union. The personal data collected can be transferred to non-EU countries, whose data protection regulations differ from those of the European Union.

In this case, Capsule implements legal and contractual measures to ensure the security and confidentiality of personal data and ensures that these transfers respect the legal framework:

- transfer to a country providing a sufficient level of protection,
- signing contractual clauses issued by the European Commission.
- or any other regulatory or contractual means to guarantee a sufficient level of protection.

Capsule strictly requires its partners to use your personal data only to manage or provide the requested services and asks its partners to always act in accordance with applicable privacy laws and to pay particular attention to the confidentiality of that personal data.

Transfers outside the European Union can be made for the instance in the context of our following activities:

- Commercial activities
- IT services and/or support activities on products.

6. **How and how long is your personal data stored?**

Capsule implements all administrative, technical and physical means to ensure the protection of personal data.

Personal data are kept for the duration necessary for the purposes of processing, except for cases where the retention for a longer period is the result of the law, regulation or trial purposes.

Examples:

Purpose(s)	Data	Retention period
Commercial contacts	Name, first name, company, email address, message	13 months from the date of the last contact
Alert on a problem, forward a comment or a suggestion on the Site	Name, first name, company, email address, name and version of the used Internet browser, message	13 months from the date of the last contact
Receive the newsletter	Name, first name, email address, message	13 months from the date of the last contact

## 7. **What are your rights?**

Capsule is committed to respect the exercise of all rights of its customers, prospects and web users, in terms of access, rectification, complementary information, opposition, limitation, portability and erasure (right to be forgotten).

Individuals can exercise their rights by applying with proof of identity:

- By mail to

Capsule Tech, inc  
Attn: Privacy management

300 Brickstone Square, Suite 203      OR  
Andover, MA 01810 USA

CapsuleTech, SAS

Attn: Privacy management

76-78 avenue de France  
CS21416  
75644 Paris Cedex 13

- Or by emailing: [privacy@capsuletech.com](mailto:privacy@capsuletech.com)

For information on the protection of personal data, you can visit the Cnil website: <http://www.cnil.fr/>