

IEXEC PRIVACY POLICY

(VISITORS TO THE WEBSITE)

Protecting your personal data and complying with our obligations in this area are of utmost importance to us.

As Visitors, partners, or future employees, we protect your personal data when you use the iExec website www.iEx.ec (hereinafter the “Website”).

The Website is published by the Data Controller of iExec, a simplified joint-stock company, registered under number SIREN 823070925, on the Trade and Companies Register of Lyon, and its registered office is located in Lyon, France, Rue Jules Valensaut 69008.

This Privacy Policy (hereinafter the “Policy”) covers you as a visitor to the Website (it does not govern the data processing operations for users of our services available on the Blockchain).

The aim of the Policy is to present to you the content of the Personal Data processing operations implemented on the Website.

As a reminder:

The regulations that apply to personal data protection are as follows:

- European regulation no. 2016/679 relating to the protection of Personal Data (GDPR)
- The amended French Data Protection Act (loi informatique et libertés, LIL), and any other related regulation.

As the Data Controller, iExec undertakes to comply with the following three essential principles:

- Fairness and transparency.
- The principle of restricting the collection of visitors’ data to what is strictly necessary.
- The principle of security and privacy.

Article 1 - Definitions

- **Personal Data/Data:** any information directly or indirectly related to a natural person (an identifier such as a name, identification number, an identity card number, a salary, bank account details, driving or consumer habits, localisation Data, an online identifier, etc.).
- **Data Protection Officer- DPO:** the person responsible for the proper management of Personal Data protection at iExec.
- **Data Controller:** is the entity that determines the means and purposes of a personal data processing operation.

- **Data Processor:** is the person who processes the personal data on behalf of the Data Controller, who acts under the authority of and under the instruction of the Data Controller.
- **Processing:** any operation or set of operations carried out; or not, using automated processes and applied to the Personal Data, such as the collection, registration, copying, transfer, retention, storage, cross-referencing, modification, structuring, provision, disclosure, or destruction, whether carried out automatically, semi-automatically or otherwise.
- **Website:** contains all iExec web pages, the content and services offered on these pages, with the exception of anything covered by the Blockchain, which has a separate policy.
- **User/Visitor:** is any person who accesses and browses the Website either as a simple visitor or a potential customer, Service customer, partner or future employee.
- **Blockchain:** technology enabling the establishment of a database (a ledger) distributed between the nodes of a peer-to-peer network, without a central control organisation. This ledger comprises transaction blocks, linked to each other forming a chain, visible to all users. The Blockchain is not purpose-based data processing, but is technology intended to support data processing operations.

Article 2 - Data processing purposes and legal basis for processing your data

Your Data is likely to be collected by iExec for explicit, legitimate and designated purposes.

All of your personal data is collected via forms that you fill in, when you use the various features of the Website (questions linked to our services) or when you interact with us via our partner websites (collected indirectly in this case).

Below, we outline the reasons why we collect your data (purposes) and the legal basis that gives us the right to collect this data.

PURPOSES	LEGAL BASIS
Request for contact / quote	Consent
Preparation and publication of content	Legitimate interest
Management of website security	Contractual fulfilment

PURPOSES	LEGAL BASIS
Interactions with platform users	Consent
Technical administration of accounts	Legitimate interest
Newsletter management	Consent
Recruitment management	Contractual fulfilment
Compilation of activity statistics	Legitimate interest
Management of any request relating to the website, or iExec services	Legitimate interest
Proper operation, security and improvement of the Website and its operation	Fulfilment of a contract or pre-contractual measures
Management of social media accounts	Legitimate interest
Technical administration of social media accounts	Fulfilment of a contract or pre-contractual measures
Interactions (public or private message) with subscribers and other users of platforms not related to recruitment	Consent
Website management (administration and technical)	Legitimate interest
Management of our business relations	Fulfilment of a contract or pre-contractual measures

Article 3 - Collection and processing of personal data

When visitors use the Website and/or wish to make contact with iExec, iExec may be required to collect some personal data from Visitors.

The data is then processed in accordance with the purposes for which it was collected.

The data collected and processed by iExec for the aforementioned purposes cover:

- **Identification data:** last name, first name, email address, telephone number, blank area for writing a message

- **Newsletter management data:** subscription data, statistics about this service
- **Content publication data:** purpose, deliverable, activity, etc.
- **Browsing data** (time stamp, users' IP address)
- **Data linked to the management of social media accounts:** last name, first name, username, photo, lifestyle, family situation)
- **Data linked to the preparation and publication of content:** identity, purpose of the publication, professional activity

iExec undertakes to inform you of the purposes of the processing and the recipients of your data.

Article 4 - Data recipients

Only the authorized and designated individuals outlined below may have access to Data from website Visitors:

- Authorized iExec staff.
- iExec data processors, such as the website host, and the partner website for career management.
- The relevant courts, mediators, accountants, statutory auditors, bailiffs, lawyers, debt collection companies.

Your Data is not disclosed, exchanged, sold or leased to any other person.

Article 5 - Data retention period

iExec undertakes to ensure that the data collected is retained for a period that does not exceed the time required for the purposes outlined above.

However, Data may be processed for the justification of a right or a contract. This Data may also be retained in order to comply with a legal obligation or kept in files in accordance with the applicable laws and regulations.

More specific information about the retention period:

To reply to a contact request via the website

The information provided on the website or during subsequent exchanges is retained for **the time required** to reply to you and meet your request.

Request for a quote via the online contact form or by telephone or post	<p>1 year after the request if the quote is not taken any further</p> <p>The contractual retention period if the quote is taken further</p> <p>5 years following the end of contractual relations in the event of litigation and in the legitimate interest of iExec</p>
Recruitment management	The data is retained for the time required to recruit the employee. Unless the applicant objects, the data is then retained for a maximum period of two (2) years from the last point of contact.
Partner management	The data is retained for five years after the agreement ceases to be valid.
Email address to send the newsletter	This is retained for as long as the data subject remains a subscriber.

Article 6 - Your rights

In accordance with the LIL and the GDPR, you have the following rights:

- Right of access (**GDPR Article 15**), right to rectification (**GDPR Article 16**), right to update, or complete your data
- Right to erase your personal data (**GDPR Article 17**), if the data is inaccurate, incomplete, out of date or whose collection or use is prohibited.
- Right to withdraw your consent at any time (**GDPR Article 13-2c**)
- Right to restriction of data processing (**GDPR Article 18**)
- Right to object to the processing of your data (**GDPR Article 21**)
- Right to data portability, in particular if the data is subject to automated processing based on your consent or a contract (**GDPR Article 20**)
- Right to lodge a complaint with a supervisory authority (CNIL in France) (**GDPR Article 77**)
- Right to define the fate of your data after your death. In the event of death, and in the absence of any instructions from you, we undertake to destroy your data, unless the data has to be retained due to a legal obligation or for evidential purposes.

These rights may be exercised upon request by email to the address security@iexec.ec, or by post to iExec Blockchain, Rue Jules Valensaut, 69008 Lyon, France, providing your contact details (last name, first name, address, along with a copy of a signed identity document) and a reason specific to your situation.

To gain a better understanding of your rights, and if you were not satisfied with our exchanges, you can also contact the French Data Protection Agency (CNIL), at the following address: <http://cnil.fr>.

Article 7 - Security

iExec and any data processors undertake to implement all technical and organizational measures to ensure the security and privacy of your personal data during processing, pursuant to the French Data Protection Act (LIL) and the European Data Protection Regulation (GDPR) and law no. 2018-133 of 26 February 2018 “introducing various provisions to adapt to European Union law regarding security”.

As such, iExec takes all precautions to ensure the security of your Data and, in particular, to prevent your data from being distorted, damaged or accessed by unauthorized third parties, such as:

- Providing information to all iExec employees required to process personal data, and technical measures such as:
 - The implementation of an IT Charter,
 - Secure management of access to data,
 - The implementation of a cryptographic feature
 - Secure access management policies, authorizations
 - The implementation of a firewall and anti-virus systems
 - Secure servers
 - Secure websites (TLS protocol, access control)
 - Physical protection of our premises

Article 8 - Cookies

On its Website, iExec uses **cookies**, i.e. small files stored on the Visitor’s computer when browsing, which enable us to make use of audience measurements and statistics on the pages viewed on the Website.

Most of our cookies come from Google Analytics and are used to compile statistics and distinguish between users of the Website. This enables us to measure and improve the performance of our Website. This also means that transfers to the USA are possible.

There are also cookies required for the operation of the Website, which adapt the display to your terminal.

Other cookies include targeted marketing cookies. They are temporary and expire when you leave the website.

Before placing these cookies, we request your consent, which means you can refuse them.

The cookies and other tracers placed by the tools on our website are detailed below:

PARTNERS	COOKIES	DOMAIN	PERIOD	DESCRIPTION
Google Analytics	Gat_gtag	iex.ec	A few seconds	Audience Statistics performance cookies
Google Analytics	gat	iex.ec	A few seconds	Audience Statistics performance cookies
Google Analytics	_ga	iex.ec	2 years	Audience Statistics performance cookies
Google Analytics	_ga	iex.ec	2 years	Audience Statistics performance cookies
Google Analytics	_gid	iex.ec	1 day	Audience Statistics performance cookies
Google Analytics	_gat	iex.ec	A few seconds	Audience Statistics performance cookies
	ays	iex.ec	A few seconds	
	-Ce.s	iex.ec	1 year	
	cebsp	iex.ec	Session	
	cebs	iex.ec	Session	

At any time, as a Visitor, you can “control” your consent to the placing of these cookies. You can also configure your computer’s browser yourself to systematically reject or accept only the cookies you have selected.

The configuration for each browser is different:

- for **Internet Explorer**
- for **Microsoft Edge**
- for **Chrome**
- for **Safari**
- for **Firefox**
- for **Opera**

Article 9 - Transfer of data outside the EU

Using solutions and data processors that comply with the GDPR is of utmost importance to iExec.

When processing the Data of Visitors to the website, iExec uses partners outside the EU. However, iExec informs Data Subjects by indicating the measures taken to regulate and control this transfer and ensure the privacy and security of your Data.

In the event of transfers, they are carried out under the supervision of our Data Protection Officer (DPO), who ensures the legality of these transfers by analyzing the appropriate guarantees offered by the data processors, and the measures to be taken to ensure an adequate and sufficient level of security and privacy for the data, in accordance with the requirements of the GDPR and the French Data Protection Act.

Article 10 - Data Protection Officer

iExec's DPO may be contacted at the following address: security@iex.ec

Article 11 - Social media and partner websites

It is possible for the Visitor to click on specific social media icons on the Website such as Twitter, Facebook, YouTube, medium, discord, iExec rlc, and reddit.

The Visitor may access the company's specific page. As such, the terms and conditions of use of the various platforms/networks apply.

As part of our recruitment management purpose, you can apply directly via the LinkedIn professional network and our specific page.

You can input your personal data on this platform, which can be accessed by iExec, which you expressly authorize by voluntarily making them public on this Platform.

You can refuse access to your personal information using the means provided by LinkedIn to limit access to your data.

We also make use of the "Welcome to the jungle" medium, which you can use to apply for job offers published by iExec.