



PRIVACY AND DATA PROTECTION POLICY 4.3.1

AprovaLL, whose contact details can be found in the "The Company" section of this site, is required to process certain personal data in its capacity as data controller for its own needs and as a processor on behalf of its clients.

AprovaLL attaches great importance to the data it processes and makes every effort to ensure its confidentiality, integrity, availability and traceability. Since 2018, its information security management system (ISMS) has been certified to the ISO 27001 standard and since 2021 to the ISO 27701 standard, fully integrating privacy protection.

This privacy and data protection policy aims to inform you about the data we collect about you and how we process it. This policy may be updated from time to time and we recommend that you refer to it regularly.

Personal data processed in connection with the use of our websites, applications and APIs

- Identity of the data controller

In its capacity as a processor, AprovaLL collects the data and compliance documents of its third parties on behalf of its client principals. Each client is considered individually as the data controller.

With regard to the processing of cookies, AprovaLL acts as the Data Controller.

- Purposes and lawful basis

In its capacity as a processor, AprovaLL collects information and compliance documents from its third parties and the related proofs on behalf of its clients. The latter determine the purposes and lawful basis for the processing.

As the Data Controller, AprovaLL collects cookies that are strictly necessary for the provision of our services and for audience measurement purposes and processes the professional details of its users. The lawful bases for these processing operations are respectively the satisfaction of e-Attestations.com's legitimate interests, the user's consent and the satisfaction of third parties' interests.

- Data collected

The personal data concerning the users of the AprovaLL sites and solutions AprovaLL sites and solutions are :

- Cookies that are strictly necessary for the provision of our services;
- Audience measurement cookies ;
- The email addresses provided by the controller;
- The professional contact details and job title you have given us;
- Traces of your activity on websites and portals collected for evidential and/or security purposes
- Information that can be made available to the public by the Commercial Code
- Data transmitted to our customers

- **Shelf life**

The personal data contained in the documents collected are kept for the time the document is kept, which varies according to its nature and legal framework.

User data for the use of e-Attestations.com applications and APIs is retained for the duration of active use of our services.

The logs are kept for 6 months and your exchanges with our support service are recorded for 3 years.

- **Recipient of the data**

The personal data collected is intended for the exclusive use of :

- Authorised users at the principals' premises in the context of the assessment of the third parties concerned;
- Authorised users at registrants' premises in the context of assessment requests;
- Authorised Aprovall staff to ensure the proper functioning of the services;
- Authorised personnel of our partners in the context of the use of API.

e-Attestations.com ensures that only authorised persons have access to the personal data of the persons concerned and when this is necessary for the performance of their tasks.

Users' personal data is not used for any other purpose than those indicated above and is not passed on, rented or given to commercial or advertising actors.

When Aprovall uses processors, the data is processed in full compliance with the principle set out above, exclusively in order to achieve the purposes of this policy.

As a matter of principle, Aprovall undertakes to choose processors who meet the best quality and security criteria and who offer sufficient guarantees in terms of reliability, security and resources for the implementation of technical and organisational measures.

- **Processors**

Name	Goals	Location of FCDs	Certifications
AWS	Hébergement, emailing	France	ISO 27001 ISO 9001
YouSign	Signature électronique	France	I
Zoho	Support	Europe	ISO 27001

Personal data processed in the context of the management of our customers and prospects, partners and applicants

- **Identity of the data controller**

e-Attestations.com acts as the data controller.

- **Purposes and lawful basis**

We process this data in the context of customer and partner management, canvassing, business statistics and recruitment management.

- **Data collected**

The personal data collected in the context of the management of our prospects, clients and partners are :

- The professional and functional details of our Client-Prospect-Partner file
- Personal details and position of the applicant
- Exchanges and documents transmitted by e-mail, ticket or secure platform

- **Shelf life**

For applicants, personal data is kept for a period of 2 years after the application has been rejected. In other situations, personal data is kept for a period of 3 years from the last contact.

- **Recipient of the data**

The personal data collected is intended for the exclusive use of authorised Aprovall employees e-Attestations.com ensures that only authorised persons have access to the personal data of the persons concerned and when this is necessary for the performance of their tasks.

Users' personal data is not passed on, rented or given to commercial or advertising actors.

However, it may be hosted and/or transferred to a third country outside the European Union and the European Economic Area.

Contact, right of access, rectification and opposition

Any question concerning Aprovall's Privacy Policy or any request to exercise the rights of access, rectification, erasure, portability, object or restriction may be addressed to Aprovall' Data Protection Officer :

Mr Clément Bourasseau

- by email to: privacy@aprovall.com
- by contact form from our websites and portals
- by mail to: **Aprovall**
27 avenue Carnot
91300 Massy - France