

QUORTEX Privacy Policy

QUORTEX (hereinafter, "**QUORTEX**") publishes and makes available to Users the QUORTEX'S WEBSITE displaying the services provided by QUORTEX in the field of OTT.

The protection of your personal data is fundamental to QUORTEX, that ensures their confidentiality and integrity by implementing the necessary means to guarantee their protection, non-alteration, availability and security.

It is within this framework that the QUORTEX's privacy policy has been drafted (hereinafter, the "**Privacy Policy**").

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1. **OBJECT OF THE PRIVACY POLICY**

1.1. **Definitions**

For the purposes of the Privacy Policy, the following capitalized terms shall have the following definitions:

"**Applicable Regulation**" means EU Regulation n°2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data known as the "**GDPR**", and any other applicable regulation in France.

"**Personal Data**" means any information relating to a natural person who is identified or can be identified, directly or indirectly, by reference to one or more factors specific to him or her, in accordance with the Applicable Regulation. Common examples include name, username, an online identifier, telephone number, postal or email address.

"**User(s)**": means any user of the QUORTEX'S WEBSITE also referred to as "you".

"**QUORTEX'S WEBSITE**": means any website implemented by QUORTEX and made available to Users, such as the websites available via the following URL: <https://www.quortex.io/> and <https://www.welcome.quortex.io/>.

1.2 **Scope of the Privacy Policy**

This Privacy Policy applies to QUORTEX's policy regarding the collection and use of your Personal Data when using the QUORTEX'S WEBSITE.

However, any processing of your Personal Data by QUORTEX in connection with the use of QUORTEX's products and/or services is governed by the applicable QUORTEX's terms and conditions, which you may have previously accepted.

This Privacy Policy explains (I) the origin and nature of the Personal Data that QUORTEX collects, (II) the reason for their collection, (III) the way QUORTEX uses them and (IV) the rights you have on these Personal Data in accordance with the Applicable Regulation.

The Privacy Policy is of twofold importance to ensure you a positive and confident experience when using the QUORTEX'S WEBSITE and to enable QUORTEX to accurately and completely answer your questions about the collection and use of your Personal Data.

The Privacy Policy does not apply to any third-party websites to which you may be redirected while using the QUORTEX'S WEBSITE. QUORTEX invites you to consult the legal notices and privacy policies of these websites.

Finally, taking into account the fast evolution of web technologies, QUORTEX reserves the right to regularly make modifications to the Privacy Policy. At any time, you may request from QUORTEX, by email to the following address: contact@quortex.io, the transmission of the Privacy Policy in force.

By using the QUORTEX'S WEBSITE, you declare that you understand and agree to the terms of the Privacy Policy without reservation.

2. COLLECTION OF YOUR PERSONAL DATA

2.1. Obtaining your consent

You are hereby informed of the terms and conditions under which QUORTEX processes your Personal Data.

You may express your prior and express consent to the collection and processing of your Personal Data by QUORTEX, when using the QUORTEX'S WEBSITE in accordance with the provisions of the Applicable Regulation (in particular by means of check boxes).

2.2. Personal Data collected directly by QUORTEX

QUORTEX may collect directly from you, during the use of the QUORTEX'S WEBSITE, the following Personal Data:

- your first and last name ;
- your professional postal address;
- your email address ;
- your company name.

When we collect Personal Data through our form(s), we indicate the Personal Data that are required to be collected by a (*) in front of the box to be filled in the form or by any other device.

You acknowledge that the processing of such Personal Data is necessary for the use of the QUORTEX'S WEBSITE.

3. COLLECTION OF BROWSER DATA / TRACKING

The browser data concerns in particular:

- the identifier and content of a cookie file stored by us in your terminal;
- the Internet Protocol (IP) address of the terminal connected to the Internet;
- the date and time of connection of a terminal to an electronic communication service;
- the type of operating system used by the terminal (Windows, MacOs, etc.);
- the type and version of the browser software used by a terminal (Safari, Chrome, etc.);
- the language of the browser software used by the terminal.

Browser data is collected by the installation of cookies on your terminal (computer, tablet, smartphone, etc.).

You are invited to consult the information page on the use of cookies available on the QUORTEX'S WEBSITE to learn about the type of cookies used by QUORTEX, their purpose and how to set your preferences.

4. USE OF YOUR PERSONAL DATA BY QUORTEX

The Personal Data that QUORTEX collects directly from you may be processed for the following purposes (hereafter, the "**Purposes**"):

Purposes	Legal basis	Categories of Personal Data
Responding to Users' requests	User consent	first and last name; professional postal address; email address; company name
Sending the QUORTEX's newsletter (if any) to Users provided that the User accepts it by ticking the appropriate box.	User consent	email address;
Understanding, diagnosing, and fixing issues with QUORTEX 'website	Legitimate Interest	usage data
Evaluating and developing new features, technologies, and improvements to the QUORTEX 'website	Legitimate Interest	usage data
Complying with legal obligations and law enforcement requests.	Legitimate Interest	User and usage data

5. SHARING OF PERSONAL DATA

QUORTEX ensures the confidentiality of your Personal Data but may disclose Personal Data to the following third-parties:

- QUORTEX staff in charge of the marketing department, the technical department in charge of the deployment of the QUORTEX'S WEBSITE, the department in charge of

- customer relations, the administrative departments, the departments in charge of internal procedures of control, the logistics and IT departments and their supervisors;
- Subcontractors under signed contracts (i) mentioning their obligations in terms of security and confidentiality of Personal Data under the Applicable Regulation and (ii) specifying in particular the security objectives to be achieved;
 - QUORTEX's current and future subsidiaries;
 - Any company within the scope of a transfer of control of QUORTEX (acquisition of a majority stake, partial contribution of assets, sale of business, merger and acquisition, etc.);
 - Law enforcement and government agency;
 - The *Commission Nationale de l'Informatique et des Libertés* of France (CNIL) and/or any competent data protection authority or administration.

6. RETENTION PERIOD

Personal Data is stored by QUORTEX for the time necessary to fulfil the above-mentioned Purposes, unless a longer storage period is required in accordance with to any legal, accounting, tax or judicial obligations of QUORTEX.

This conservation beyond the duration of the Purposes is necessary to carry out your requests for opposition, limitation of the processing operations and deletion of your Personal Data and to comply with any legal, accounting or tax obligation of conservation of the Personal Data (in particular for purposes of proof) or communication to authorized authorities (administration, police services, etc.).

For as long as the Personal Data are kept, QUORTEX undertakes to maintain a high level of security and confidentiality of the Personal Data, to restrict access to them to authorized persons only and not to process them for purposes other than those agreed to herein.

7. INFORMATION AND EXERCISE OF YOUR RIGHTS

In accordance with the provisions of the Applicable Regulation and in particular Articles 15 to 22 of the GDPR, you may:

- send us any request for information about the Privacy Policy and the processing of your Personal Data;
- access information about the processing of your Personal Data (category of data, purposes, etc.);
- correct or update Personal Data that are inaccurate by contacting us by email;
- delete your Personal Data by contacting us by email;
- limit the processing operations of your Personal Data that we carry out, when you contest the accuracy of the Personal Data (limitation for a period of time allowing us to verify the accuracy of your Personal Data), or the lawfulness of the processing (but that you authorize us to continue), by contacting us by mail ;
- receive a copy of the Personal Data you have provided directly to us, in a structured, commonly used and machine-readable format, by contacting us by email; being specified that any request for a copy beyond the first one may generate administrative processing costs that will be charged to you. You are informed that the Personal Data that are derived, calculated or inferred by us from the data you provide to us are excluded from the right to portability, insofar as they are not provided by you, but created by us;
- decide not to be subject to automated decision making: the right not to be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similar significant effect;

- file a complaint with the *Commission Nationale de l'Informatique et des Libertés* of France, 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07 (France).

In the event of excessive requests from you, in particular because of their repetitive nature, we reserve the right to refuse to comply.

Your requests must be sent in writing or by email to the address below, signed and accompanied by a photocopy of an identity document bearing the signature of the holder. The request must specify the address to which the reply should be sent. We will have a period of one (1) month to respond following receipt of the request. If necessary, this period may be extended for a period of two (2) months, depending on the complexity and number of requests.

QUORTEX:

✉ : 1137 A Avenue des Champs Blancs - 35510 CESSON-SEVIGNE (FRANCE)

@ : contact@quortex.io

8. SECURITY AND PROTECTION OF PERSONAL DATA

QUORTEX implements organizational and technical security measures to ensure the confidentiality and integrity of your Personal Data.

Security measures for the QUORTEX's operating and management environment:

All Personal Data stored on QUORTEX's servers are protected by the following measures:

- QUORTEX's dedicated network;
- Access rights management;
- Password policy and password lockout;
- Firewall protecting each network zone.

User Environment Security Measures:

All Personal Data stored on QUORTEX's servers are protected by the following measures:

- Hosting of Personal Data in a datacenter within the European Union;
- Cloud provider with numerous security certifications;
- Access management;
- Verification of the email address of the Users, in case of fraud or suspicious form, the access can be suspended manually.

However, due to the nature of the public network that is the Internet, you acknowledge and agree that the security of transmissions via the Internet and the integrity of Personal Data cannot be guaranteed.

If a security breach resulting in a violation of Personal Data were to occur, we would inform you of the nature of the breach and any likely consequences resulting from it.

We undertake to implement corrective measures as soon as possible and to notify the CNIL of any such violation, unless the violation in question is not likely to result in a risk to the rights and freedoms of natural persons, in accordance with the provisions of the Applicable Regulation.

9. STORAGE AND CROSS BORDER TRANSFER OF PERSONAL DATA

QUORTEX hosts your Personal Data and has them hosted in the European Union.

If the processing and Purposes require the transfer of Personal Data outside the European Union, QUORTEX will ensure that your Personal Data are effectively protected.

Thus, all transfers would be made to recipients located:

- in countries having, according to the criteria established by the European Commission, an adequate level of protection for personal data; or
- in countries to which the transfer is governed by standard contractual clauses issued by the European Commission or by the adoption of *binding corporate rules*.

10. CHANGES IN THE PRIVACY POLICY

We may change this Privacy Policy at any time and, if we make material changes, we will notify you by means of a notice displayed when using the QUORTEX'S WEBSITE, to give you an opportunity to review the changes before they take effect.

If you continue to use the QUORTEX'S WEBSITE following the posting of or notice of changes in, this Privacy Policy, it means that you accept the updated Privacy Policy without reservation.

12. CONTACT US

If you have any questions or comments about this Privacy Policy, please send them to the following email address: contact@quortex.io

Privacy Policy updated on 22nd June 2021.