

# Privacy Policy for CQFlexMon

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## This Privacy Policy

- deals with the principles that are being followed by personal data processing. Specifically following the principles defined in EU General Data Protection Regulation (GDPR).
- aims to inform Users of the Application on the use of their personal Data by the Administrator and on their rights.
- is subject to changes with respect to legislation changes or evolution.
- is last modified: 25-May-2018

## Definitions

- **Application:** means the application Symetri developed;
- **Data:** means all data, personal or not, broadcasted, transferred or inserted by the users through the application (text, pictures, video,...);
- **Personal Data:** means all data which can identify directly or indirectly a physical person;
- **Data subject:** means the physical persons (ie User) registered into the application, from an industrial workforce or a production workforce. The Data subject must be of age;
- **Administrator:** means the individual in charge of the personal data in the exact context of this data privacy charter. He/She is the contact for anybody to request the execution of User rights according to the law of the user country;
- **Services:** means all services proposed by the Application. The Services enable the connection of an industrial workforce with a production workforce with whom they have an existing contractual relationship in order to optimize the performance of production.
- **Data Processor:** The company or legal person who is processing Personal Data on behalf of Data Controller;

- **Data Controller:** The company or legal person who is hosting this application and is seen as responsible of possessing personal data.

## **Data controller**

Customer Name, Customer Address, Customer Country acts as data controller for the person using CQFlexMon. Data controller is responsible for personal data and how to manage it. CQFlexMon is an application that is installed and managed in Customer environment. Customer is responsible to follow EU General Data Protection Regulation (GDPR). This document can be used as a template for Privacy Policy regulation.

## **What personal Data are collected?**

The Application does not collect any sensible data. Data considered sensible are Data such as the one defined by law, all sensible data relative to sexual orientation, health political philosophical or religious opinions, and alliance to work unions.

Data collected are:

- Windows UserID
- Computer Name

Optional additional data can be pulled from Customer Active Directory (decided and configured by Customer). Data can be encrypted. The Data controller is committed to deploy all means to ensure the entire security of the Data. For desktop applications personal data are stored locally, but not accessible by Symetri.

## **Personal Data usage**

Collected Data are only made for professional reasons and in accordance of the proposed Services by the Application.

Data are used to monitor and analyze license usage, internal invoicing of license usage in Customer environment.

## **Regular disclosure of information**

Personal Data are made available to any professionals to whom the User agreed to collaborate with in order to operate the production performance.

Data are shared to suppliers who are committed to ensure Data Privacy with regards to the applicable law. In case of litigation, Data might be transferred to legal administration on formal request.

Internally Data are treated only by authorised professionals (user management, IT, customer support).

## **Transfer of data outside the EU or the European Economic Area**

Up to Data controller to clarify:

Personal data is not transposed regularly outside the EU and the European Economic Area. / If data is transferred from within the EEA to a jurisdiction outside the EEA, it is done so under a Data Transfer Agreement, which contain standard data protection contract clauses. The European Commission has adopted standard data protection contract clauses (known as the Model Clauses) which provide safeguards for personal information that is transferred outside of Europe. We use Model Clauses when transferring personal data outside of Europe.

## **Retention of Personal information**

Up to Data controller to clarify:

Personal Data are stored for the mandated duration required for their treatment in respect to the law.

Data are kept while the account is active or frozen. When the account is deleted, all Data are deleted or anonymized, except for when there are legal justifications to keep data.

An account will be closed and Data will be deleted or anonymized for inactivity, if any activity is realized within the Application for a duration of two (2) years, except for when there are legal justifications to keep data.

## **User Rights**

Each User have, in respect to the Law, a right to access, oppose and modify the Data which have been collected by the Application. The request to exercise the rights must be declared by mail on the contact Customer Data Controller (e-mail)

In respect of the Law, the Administrator can refuse demands which are qualified as abusive, especially by their numbers, their frequent or systematic occurrences.

These are the user rights in detail:

- the right to be informed about the collection and use of your personal data
- the right of access your personal data
- the right to rectification of inaccurate personal data
- the right to erasure of your personal data

- the right to restrict processing of your personal data
- the right to data portability so that you can obtain and reuse your personal data for your own purposes across different services
- the right to object to the processing of your personal data in certain circumstances if you can show that you have a compelling reason for doing so

## **Changes to our Privacy Policy**

We may change this privacy policy from time to time. We will post any privacy policy changes on this page. We encourage you to review our privacy policy on a regular basis to stay informed about our information practices and the ways you can help protect your privacy. Contact [privacy@nnnn.com](mailto:privacy@nnnn.com) if you have any comments or questions to this Privacy Policy

## **Applicable Law**

The applicable Law for the Data Privacy is the EU Law.