

Privacy Policy

Effective as of 15/08/2019

For the purpose of this Privacy Policy:

- **"data controller"** and **"personal data"** have the meaning given in the European Union General Data Protection Regulation 2016/679 (GDPR).
- **"Impact Track"**, **"we"**, **"us"** and **"our"** mean Impact Track SAS, with its registered office located at 20, rue des Olivettes, 44000 Nantes, France.
- **"Policy"** means this Privacy Policy.
- **"Services"** means the services provided by Impact Track SAS under the Terms of Service.
- **"Terms of Service"** means our terms of service available at <https://impacttrack.org/tos-en.pdf>.
- **"Website"** means our website available at <https://www.impacttrack.org>.
- **"You"** means any user of our Services or any visitor of our Website.
- **"Your Personal Data"** means your personal data listed in section 2.1 of this Policy.

1. Your Privacy

- 1.1 In the course of our dealings with you, we will collect and process personal data about you.
- 1.2 As the data controller for the personal data collected from you, we are committed to protecting your privacy and using Your Personal Data in accordance with all applicable laws and regulations relating to data protection and privacy, including the GDPR.
- 1.3 This Policy may be updated from time to time, in particular in order to comply with applicable laws and technical changes. We will duly notify you of any material or substantive changes or updates of the Policy. The latest version of the Policy will be posted on our Website.

2. What personal data do we collect from you and how long do we keep it?

- 2.1 You can find below the personal data that we collect from you when you register with us or when you visit our Website as well as our retention period for each category of Your Personal Data:

Your Personal Data	Retention period
Identification information (e.g. first and last name, postal address, email address, telephone number, login details)	For our customers: 3 years from the end of the contractual relationship For our prospects: 3 years from the collection
Information related to your working life (e.g. your company name)	For our customers: 3 years from the end of the contractual relationship For our prospects: 3 years from the collection
Financial information (e.g. credit card, bank account)	Such data will be deleted once the transaction has been completed, unless otherwise required or permitted by laws (e.g. defense of claims).
Contractual and billing information (e.g. subscription order, invoice)	10 years from the termination of our Services
Cookies	13 months from the collection
Connection and traffic logs (e.g. IP address, access time/date, type of device)	1 year from the collection

2.2 You can browse our Website without providing us with Your Personal Data. When you place an order or request further information about our Services (e.g. arrange a demonstration) via the Website, we ask you to register or login by providing Your Personal Data so we can proceed with your order and/or request.

2.3 To the extent permitted by the law, we will process Your Personal Data for marketing purposes. Such marketing communications can be unsubscribed at any time by clicking on the unsubscribe link displayed at the bottom of our emails or by emailing us contact@impacttrack.org.

3. How do we use Your Personal Data

We have set out below the purposes for which we use Your Personal Data as well as on what grounds we are allowed to use Your Personal Data (“legal basis for processing”).

Purpose of processing	Our legal basis
<p>Carry out our obligations under any contracts entered into between you and us:</p> <p><i>For example, we will use Your Personal Data to fulfil your order(s) and to communicate with you about your order.</i></p>	<p>Contractual necessity – we use Your Personal Data in order to meet our obligations under our contract with you.</p>
<p>Administer your subscription to any subscription plan and manage your account:</p> <p><i>For example, we will keep a record of your subscription of our Services and use Your Personal Data to ensure that you receive the benefits of that subscription plan.</i></p>	<p>Contractual necessity – we use Your Personal Data in order to meet our obligations under our contract with you.</p>
<p>Contact you about leaving a review on our Services or providing feedback once your order has been completed or our Services have been provided.</p>	<p>Legitimate interests – we use Your Personal Data to obtain your advice and feedback so as to improve our Services.</p>
<p>Notify you about changes to our Services and our legal documents, such as this Policy and our Terms of Service, and respond to any of your queries submitted to us.</p>	<p>Legitimate interests – we use Your Personal Data to keep you up to date with information about our Services and to respond to your queries.</p>
<p>Send you marketing communications about our Services, including special offers and discounts.</p>	<p>Legitimate interests – we use Your Personal Data to promote our Services.</p>
<p>Comply with any legal obligation:</p> <p><i>For example, we may disclose Your Personal Data to law enforcement agencies or in connection with a court order.</i></p>	<p>Compliance with legal obligation – we process Your Personal Data to comply with our legal obligations.</p>
<p>Enforce or apply our Terms of Service or other agreements entered into between you and us or to protect our rights, legitimate interests, property or safety or those of our customers, employees or other third parties.</p>	<p>Legitimate interests – We use Your Personal Data for the purpose of the establishment, exercise or defense of legal claims.</p>

4. Where do we share Your Personal Data with?

- 4.1 We use third parties to carry out certain activities on our behalf that involve the processing of Your Personal Data.

4.2 For example, we may engage third party service providers to fulfil orders, maintain and update our databases of customer details, provide marketing assistance, process online payments, carry out surveys, provide customer service and handle claims.

5. **Where will Your Personal Data be processed?**

5.1 We store and process Your Personal Data in any country in which we engage service providers. If one service provider is established outside the European Economic Area (EEA), including in countries which do not provide equivalent protection for personal data, we will ensure that the service provider at issue abide by any lawful mechanism for the data transfer as approved by the European Commission, including but not limited to the EU Standard Contractual Clauses and the EU-US privacy shield framework.

5.2 Please contact us using the details below if you want further information on the specific safeguards used by us when transferring Your Personal Data out of the EEA.

6. **How do we protect Your Personal Data?**

6.1 We take all appropriate security measure to protect Your Personal Data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access.

6.2 More details regarding our security measures are available at <https://impacttrack.org/agreement-en.pdf>.

7. **How can you exercise your rights?**

7.1 In accordance with the GDPR, you have the following rights:

- **The right to access** – confirm what personal data we hold about you and provide you with a copy of that data;
- **The right to rectify** – correct any of Your Personal Data that is inaccurate and, where applicable, to complete Your Personal Data;
- **The right to erase** – remove any of Your Personal Data where there is no good reason for us to continue to hold that data;
- **The right to restrict the processing** – request any of Your Personal Data to be held in limbo whilst complaints (for example, about accuracy) are resolved;
- **The right to data portability** – provide you with Your Personal Data in a structured and commonly-used electronic format, or transmit that data directly to another company if this is technically feasible;
- **The right to object** – stop using Your Personal Data to send you marketing materials.

7.2 You can contact us at the contact details set out below to exercise the aforementioned rights.

7.3 If you are not happy with how we've handled Your Personal Data, you also have the right to lodge a complaint with the French Data Protection Authority:

- By submitting an online complaint: <https://www.cnil.fr/fr/plaintes>
- By mail: CNIL - 3 Place de Fontenoy - TSA 80715 - 75334 Paris Cedex 07 - France

8. **How can you contact us?**

By mail: Ricardo Scacchetti - Impact Track SAS - 20 rue des Olivettes - 44000 Nantes – France or email

By email: contact@impacttrack.org