

Privacy Policy

1. Who are we?

- Name: Canyon LTS SAS ("**we**", "**us/our**")
- Seat: 9 rue Ambroise Thomas, 75009 Paris, France
- Company number: 882 721 855
- Software: Canyon (the "**Software**")
- Service: the provision of the Software (the "**Service**")
- Website: www.canyonlegal.com (the "**Website**")
- Contact details of the contact person for data protection matters: adrien.vandenbranden@canyonlegal.com

2. Who are the data subjects?

2.1. We process personal data from:

- our customers' representatives;
- users who use the Software made available by our customers as part of the Service;
- our suppliers' representatives;
- candidates for employment with us;
- visitors to our Website and work premises; and
- other data subjects, (the "**data subjects**", "**you/your**").

2.2. This privacy policy (the "**Policy**") applies to any processing of your personal data by us.

3. What is our commitment regarding data protection?

3.1. We undertake to use our best efforts to bring our personal data processing activities into compliance with applicable data protection law including Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (the "**GDPR**") and the French Data Protection Act of 6 January 1978, as amended, supplemented or replaced from time to time (the "**Applicable Data Protection Law**").

4. For which purposes do we process your personal data?

4.1. If you are a representative of one of our customers, we process:

- your personal identification data, professional identification data and contact data for the activation, management and continuation of the commercial relationship with our customers;
 - your personal identification data and professional identification data to enable us to follow-up on the invoicing of our customers;
 - if applicable, your bank details to follow-up on the payment of invoices related to our Service;
 - if applicable, your personal identification data, professional identification data and contact data for sending communications for marketing purposes.
- 4.2. If you are a user of the Software, we process the following categories of personal data, in particular for the purposes described below:
- your electronic identification data to authenticate yourself on the Software, for the activation, suspension and withdrawal of user accounts, for the detection and prevention of fraud and computer security breaches and for logging access to the Software;
 - your contact information to allow our support team to contact you in the context of support activities.
- 4.3. If you are a representative of one of our suppliers, we process your personal identification data, professional identification data and contact data for the management of our commercial relationship with our suppliers.
- 4.4. If you are a candidate for employment with us, we process your personal identification data, professional identification data, contact data, data relating to your professional life (skills, qualifications, experience, etc.) and personal data contained in your curriculum vitae to assess your profile in relation to our recruitment needs.
- 4.5. If you visit our Website, we may process your electronic identification data in aggregate form to measure the frequency on our Website, improve your browsing experience and to detect and prevent fraud and computer security breaches.
- 4.6. If our workplaces are equipped with surveillance cameras, we are able to request access to images about you only when such access is necessary to pursue our legitimate interest in detecting offences or incivilities and to the extent permitted by applicable law.
- 4.7. We may also process some of your personal data for the following purposes:
- conduct operations to restructure our activities;
 - carry out internal and external audits;
 - manage disputes with data subjects and where processing is necessary for the establishment, exercise or defence of a legal claim.
- 4.8. We do not subject the data subjects to decisions based exclusively on automated processing that produces legal effects concerning them or that affect them in a similarly significant way.

5. In what capacity do we process your personal data?

- 5.1. We process your personal data in a capacity of controller, except for the personal data that we are processing on the Software on behalf of our customers (we process such personal data in a capacity of processor on behalf of our customers).
- 5.2. However, we process the electronic identification data of the users of the Software in a capacity of controller for the purpose of authenticating users on the Software, for the activation, suspension and withdrawal of their accounts and for the detection and prevention of fraud and computer security breaches. We process the contact information of the users of the Software in a capacity of controller for the purpose of carrying out our support activities.

6. On which basis do we process your personal data?

- 6.1. The provision of your personal data may be necessary:
 - for the performance of a contract to which the data subject is a party or for the performance of pre-contractual steps taken at your request (for example, in the event of a request to work with us);
 - for compliance with a legal obligation applicable to us (e.g. accounting, taxation, etc.);
 - to pursue our legitimate interests (or those of a data recipient) provided that these interests prevail over your fundamental rights and freedoms.
- 6.2. We ask for your prior, free and informed consent before processing some of your personal data (for example, whenever the processing of your data involves a transfer of your image rights).
- 6.3. The provision of some of your personal data (e.g. your personal identification data, etc.) may be a condition to enable us to provide you with our services or perform our activities.
- 6.4. The possible consequences of not providing your personal data may include our inability to provide you with our services or perform our activities or a breach by us of one or more obligations under applicable laws (e.g. accounting and tax laws).

7. Where do we source your personal data from?

- 7.1. The personal data we process come from the following sources:
 - directly from you, e.g. during the first contact we make with you;
 - from publicly available information (on the Internet), e.g. when we check the profile of candidates for employment with us.

8. Who has access to your personal data?

- 8.1. The following recipients may receive or have access to some of your personal data (only if necessary for the performance of their tasks):

- the members of our staff tasked with commercial and administrative follow-up have access to the personal identification data, professional identification data and contact data of our customers' representatives;
- the members of our staff tasked with monitoring our suppliers have access to personal identification data, professional identification data and contact data of our suppliers' representatives;
- our legal advisors and lawyers have access to certain personal data of data subjects in the context of the restructuring of our activities or litigation;
- like most software companies, a limited number of nominally designated members of our technical staff must have access to certain personal data stored through the Software on a strict need-to-know basis and only when required by law or if strictly necessary for the purposes of correction and/or maintenance of the Software.

8.2. We entrust the processing of some of your personal data to processors only to the extent necessary to carry out their tasks and in accordance with our written instructions and with Applicable Data Protection Law.

8.3. In the case of a restructuring of our activities (e.g. a financing operation), we may transfer certain personal data concerning a limited number of data subjects to a third party involved in the operation (e.g. a bank) in accordance with Applicable Data Protection Law.

9. How do we manage our processors?

9.1. We take appropriate measures to ensure that our processors process your personal data in accordance with Applicable Data Protection Law.

9.2. Among other things, we ensure that our processors undertake to process personal data only on our instructions, not to hire subprocessors without our prior authorisation, to take appropriate technical and organisational measures to guarantee the security of personal data, to ensure that persons authorised to access personal data are subject to adequate obligations of confidentiality, to return and/or delete the personal data they process at the end of their services, to comply with audits and to provide us with assistance in following up requests from data subjects for the exercise of their rights regarding their personal data.

10. Where do we process your personal data?

10.1. Some recipients of personal data may be organisations whose headquarters are located in a country outside the European Economic Area ("**EEA**") or may process certain personal data from a country outside the EEA.

10.2. In the event that certain of your personal data are transferred to countries outside the EEA, we will ensure that we take the following safeguards:

- the country where the personal data are transferred to has benefitted from an adequacy decision from the European Commission pursuant to article 45 of the GDPR and the transfer falls within the scope of such adequacy decision;

- we have concluded a contract with the recipient of personal data that contains the standard data protection clauses adopted by the European Commission pursuant to Article 47 of the GDPR; or
- in the event of a transfer to the United States, the recipient of personal data has been certified under the EU-US Privacy Shield programme established pursuant to Article 45 of the GDPR and the transfer falls within the scope of the EU-US Privacy Shield programme.

11. What are the applicable retention periods?

- 11.1. We ensure that your personal data are only kept for as long as necessary for the purposes for which they are processed.
- 11.2. We keep invoices and other accounting documents (which may include some of your personal data) for a period of seven (7) years from the end date of the accounting year when they were issued in accordance with accounting laws. These accounting documents may, where applicable, contain certain personal identification data, professional identification data and contact data.
- 11.3. We also use the following criteria to determine the retention periods of personal data according to the context and purposes of each processing activity:
- the date of our last contact;
 - security reasons (for example, the security of our information systems);
 - any current or potential dispute or litigation with a data subject;
 - any legal obligation to retain or delete personal data (for example, a retention obligation imposed by accounting or tax laws).

12. What are your rights?

- 12.1. Subject to Applicable Data Protection Law, you have the right to be informed, the rights of access, rectification and erasure of your personal data, the right to object to or limit the processing of your personal data, the right to data portability and the right to withdraw your consent.
- 12.2. Please see below a table describing each of your rights in more detail:

Right	Description
Right to be informed	You have the right to obtain clear, transparent and understandable information about how we process your personal data and how to exercise your rights. This information is contained in the Policy. If such information is not clear enough, we invite you to contact us (via our contact details set out in the Policy).
Right of access	You have the right to obtain confirmation that we process your personal data and, if affirmative, the right to access such personal

	data. You have the right to obtain a copy of your personal data, unless the exercise of this right infringes on the rights and freedoms of other data subjects.
Right to rectification	You have the right to have your personal data rectified if they are inaccurate. You also have the right to have your personal data completed if they are incomplete.
Right to erasure ("right to be forgotten")	You have the right to have your personal data erased. However, the right to erasure (or the "right to be forgotten") is not absolute and is subject to certain conditions. We may retain some of your personal data to the extent permitted by applicable law and in particular when their processing remains necessary for us to comply with a legal obligation applicable to us or for the establishment, exercise or defence of a legal claim.
Right to object	You have the right to object to certain types of processing (e.g. when the processing is based on our legitimate interests and, taking into account your particular situation, your interests or fundamental rights and freedoms prevail).
Right to object processing for marketing purposes	You have the right to object at any time to the processing of your personal data when we process such data for marketing purposes.
Right to restriction of processing	You have the right to obtain the restriction of processing in certain circumstances (e.g. when we no longer need your personal data but they are still necessary for the establishment, exercise or defence of a legal claim).
Right to data portability	You have the right, in certain circumstances, to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and to transmit such data to another controller.
The right to set post-mortem guidelines	You have the right to define general or specific guidelines for the storage, erasure and communication of your personal data after your death.
Right to withdraw consent	If you have given us your consent for the processing of your personal data, you have the right to withdraw it at any time.

- 12.3. Please forward any request relating to the exercise of your rights regarding your personal data that we process in our capacity as controller to our contact person for data protection matters using his or her contact details as set out in the Policy. We undertake

to respond to your request as soon as practically possible and always within the timeframes set forth by Applicable Data Protection Law. Please note that we may retain your personal data for certain purposes when required or permitted by law. Finally, please note that we may, in the event of doubt as to your identity, ask you for proof of identity in order to prevent any unauthorised access to your personal data.

- 12.4. Please note that you may exercise your rights vis-à-vis the Company only to the extent that we process your personal data in a capacity of controller. We will forward to the controller concerned any request to exercise your rights with regard to your personal data if the request concerns a processing operation for which we act as a processor.

13. What level of security do we ensure?

- 13.1. We take appropriate technical and organisational measures to ensure a level of security appropriate to the risks associated with the processing of your personal data.
- 13.2. We follow industry best practices to ensure that personal data are not accidentally or unlawfully destroyed, lost, altered, altered, disclosed in an unauthorized manner or accessed in an unauthorized manner.

14. Do you have any questions or complaints?

- 14.1. If you have any questions or complaints about the way we process your personal data, please contact our contact person for any data protection questions in advance using the contact details provided in the Policy.
- 14.2. You have the right to lodge a complaint with the competent supervisory authority. The competent authority for France is: Commission Nationale de l'Informatique et des Libertés, 3 Place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07, France, phone: +33 (0)1.53.73.22.22.

15. Anything else?

- 15.1. We reserve the right to update the Policy from time to time. We inform you of any changes we may make to the Policy.
- 15.2. In the event of a conflict or inconsistency between a provision of the Policy and a provision of another policy or document relating to the processing of personal data, the provision of the Policy prevails.