

# Privacy Policy- INNOVHEM

## Purpose and scope of the Policy

INNOVHEM attaches the greatest importance and care to the protection of privacy and personal data, whether for its customers, partners, or employees, and to compliance with the relevant legal provisions.

The European Regulation on the protection of personal data states that personal data must be processed lawfully, fairly and transparently. Thus, this privacy policy (hereinafter "Policy") aims to provide you with simple, clear information on the processing of personal data concerning you, in the context of your browsing and the operations carried out on our website.

## Definitions

All terms relating to the protection of personal data used in this document and identified by capital letters, used in the singular or plural, must be interpreted in accordance with the General Data Protection Regulation 2016/679 of 27 April 2016 repealing Directive 95/46/EC (hereinafter "the EU Regulation").

The term "Data", used in the singular or plural, refers to Personal Data whose processing is carried out by INNOVHEM in its capacity as Data Controller and Subcontractor.

The user who is the Data Subject within the meaning of the European Regulation is the natural person who consults the site and who creates a user account, where applicable, in order to use the service for the needs of his or her business.

- Login: Login and password to access the User's online accounts of the service.
- Service: All the services provided by INNOVHEM to Users, in particular the processing of ESG questionnaires.

## Data Controller

As part of your activity on the <https://www.innovhem.fr/> website, the website is provided by the company INNOVHEM, a simplified joint stock company with a capital of 5,000 Euros, registered in the EVRY Trade and Companies Register under SIREN number 877815522, whose registered office is located at 04 Rue Pierre Fontaine, 91000 EVRY-COURCOURONNES

# 1. Subcontractor

- Investigative and clinical research for our clients

## 2. What data do we collect and how?

When you use our site or website, you provide us with information about yourself, some of which may identify you ("Personal Information"). This is the case when you browse our site.

The nature and quality of the Personal Data collected about you varies. It is mainly:

- **Identification data:** Name, First names, Email address
- **User Data:** refers to the data of the User and the Company for which he/she works (including personal and sensitive Data), mentioned by the User on his/her User Account, shared by the User with the company INNOVHEM on any medium whatsoever, processed by INNOVHEM, with the aim of providing the Services and/or any document of any nature whatsoever, uploaded, distributed, collected or put online by a User on the INNOVHEM Platform.

## 3. Why we collect your personal data and how?

We collect your personal data for specific purposes and on different legal grounds.

Purposes	Personal data collected	Legal basis	Duration Saved
Website navigation	Management of traffic statistics on the website and the Service (IP anonymised)	Legitimate interest	13 months
Processing of your request	Identification data, data, content of your request	Consent	Duration necessary to process your request and 3 years from the last contact.
Maintenance of our Service and follow-up of user requests	Pseudonymised traces of connection identifiers, navigation data, connection history	Legitimate interest	13 months

## 4. Management of cookies

A cookie is a small file stored on your computer that allows you to move from one Internet page to another while keeping your browsing parameters.

The INNOVHEM site only uses functional cookies that are strictly necessary for its operation. This information is provided to you when you enter the site via an information banner. It is however possible to configure and block these cookies directly via your Internet browser. To find out more about the configuration to be followed, consult the dedicated page on the CNIL website

(<https://www.cnil.fr/fr/cookies-les-outils-pour-les-maitriser>). However, blocking these functional cookies could considerably limit or even prevent your navigation on the site and access to the Service.

Cookie Name	Editor	Category	Duration of Stockage
svSession	Innovhem	Strictly Necessary	1 year
Ssr-craching			Session
hs			Session
Fedops.logger.defaultOverrides			Session
bSession			Session
TS01467789			Session
TS01e85bed			Session
XSRF-TOKEN			Session
IDE	DoubleClick.net	Marketing	1 month
JSESSIONID	Nr-data.net	Strictly Necessary	Session
_ga	Powr.io	Marketing	1 year
_gat_powr_apps			Session
_gid			1 day
POWR_PRODUCTION		Strictly Necessary	Session
_cflb		Strictly Necessary	1 week
Ahoy_unique_31604848		Strictly Necessary	Session
Ahoy_visit		Strictly Necessary	Session
Ahoy_visitor		Strictly Necessary	1 year
editables		Strictly Necessary	Session
src		Strictly Necessary	1 month
Unique_id		Strictly Necessary	Session
Wix_premium_user	Strictly Necessary	Session	

## 5. Do we share your personal data?

For certain processing purposes, we may share your data with the service providers we use to carry out a range of operations and tasks:

- Service hosting provider: OVH

Only the information they need to carry out the Service is communicated to these service providers. They shall refrain from using the data for purposes other than those initially intended. We make every effort to ensure that these third parties preserve the confidentiality and security of your data.

Finally, your data may also be transmitted to legal or regulatory authorities in order to comply with our legal obligations. In this case, only the necessary data is provided. We make every effort to keep your data confidential and secure.

We do not sell your data.

## 6. Is your data transferred to other countries?

The INNOVHEM site that processes Personal Data is hosted on servers in Europe.

In case of transfer of your data outside the European Union, we guarantee that the transfer is carried out:

- Either to a country providing an adequate level of protection, i.e. a level of protection equivalent to that required by European regulations;
- Or it is governed by standard contractual clauses.

## 7. How long do we keep your data?

We keep your personal data only for as long as is necessary to fulfil the purpose for which we hold it, to meet your needs or to comply with our legal obligations.

Retention periods vary depending on several factors, such as:

- The needs of INNOVHEM's business
- Contractual requirements
- Legal obligations
- Recommendations from supervisory authorities

Please refer to the table in Article 4 for more details on the retention periods by type of data.

## 8. How we ensure the security of your data?

INNOVHEM is committed to protecting the personal data that we collect, or that we process, against any loss, destruction, alteration, disclosure or unauthorised access.

Thus, we implement all appropriate technical and organisational measures, according to the nature of the data and the risks that their processing entails. These measures must preserve the security and confidentiality of your personal data. These measures may include practices such as limiting access to personal data to authorised persons by virtue of their position.

In addition, our practices and policies and/or physical and/or logical security measures (e.g. secure access, authentication procedures, back-up, software, etc.) are regularly reviewed and updated as necessary.

## 9. What are your rights?

On the personal data we collect/process, you can exercise the following rights:

- **A right of access:** you have the right to request access to the personal data we hold about you, and you may request a copy of that data;
- **A right of rectification:** you may request rectification of any inaccurate data held about you;
- **A right to deletion:** you may request the deletion of your personal data in certain circumstances;

- **A right to portability:** under certain conditions you can receive any personal data you have provided to us in a structured format. You also have the right to request that we transfer it, where possible, to another controller;
- **A right to object** to processing in certain circumstances;
- **A right to withdraw** consent at any time;
- **A right to restrict** processing: you have the right to restrict the processing of your data if:
  - You dispute the accuracy of your data, until we verify its accuracy;
  - The processing is unlawful but you do not want us to delete your data;
  - We no longer need your personal data for the purposes of the processing but you need your data in order to bring, assert or defend against legal claims;
  - You object to the processing on related grounds pending verification of whether our compelling legitimate grounds for further processing override those interests;

If such personal data is subject to such limitations, we will only process your data with your consent, or for the purpose of bringing, enforcing or defending against legal claims;

#### **A right to determine what happens to your personal data after your death.**

To exercise your rights, you can contact the Data Protection Officer (DPO) of INNOVHEM [dpo@innovhem.life](mailto:dpo@innovhem.life) or DPO Consulting, Service DPO externalisé, 18 rue Pasquier, 75008 Paris.

When you send us a request to exercise a right, you are asked to specify as far as possible the scope of the request, the type of right exercised, the personal data processing concerned, and any other useful element, in order to facilitate the examination of your request. In addition, you may be asked to prove your identity.

In any case, you have the right to make a complaint to the CNIL via the following link: <https://www.cnil.fr/fr/plaintes>.

## 10. Updating of this Policy

This policy may be updated from time to time to take account of changes in the regulations relating to personal data.

Last Updated : 10 October 2022