

P2B Solutions' policy in respect of the use of personal data

What is the policy on the use of personal data?

This policy on the use of personal data relates to:

- client orders relating to the My DSO Manager software solution (online order or order after quotation) and client relationship management
- the management of the <https://www.mydsomanager.com/> website ("Site");
- the relationships we have with newsletter subscribers, suppliers, prospects and members of our business networks

For these different personal data processing operations, P2B Solutions acts as data controller.

P2B Solutions Corporate Identity:

A limited liability company with share capital of €180,000, whose registered office is located at 140 Chemin de Billerey 38330 Biviers

Registered in Grenoble under registration number 811 828 987, of which the legal representative is Mr Bertrand Mazuir.

This Policy is made in accordance with the provisions of Law No. 78-17 of 6 January 1978 (the "Data Protection Act" or "LIL") and General Data Protection Regulation ("GDPR") No. 2016/679.

Who is this policy intended for?

This policy is intended for:

- Site users
- Subscribers to our newsletter
- My DSO Manager Solution clients
- Our prospects and members of our business networks
- The personnel of our P2B Solutions suppliers

(Hereinafter the "Data Subjects").

This policy does not apply to the processing of personal data that P2B Solutions carries out as a processor on behalf of its clients. The rules relating to these processing operations are included in the contracts concluded with our clients.

This policy also does not apply to the [etrepaye.fr](http://www.etrepaye.fr) activity which is subject to different rules, which you can consult on the www.etrepaye.fr website

What are the characteristics of the processing of personal data carried out by P2B Solutions?

Categories of data processed

The Data Controller processes the following categories of data:

- Data relating to identification (surname, first name, employer, e-mail, address, telephone),
- Data relating to browsing on the site and, where applicable, on social media platforms via sharing buttons (cookies and other trackers)
- Statistics on the website audience and use of the proposed online services
- Data relating to online orders

Mandatory or optional nature of data collection

Some of the data collected are mandatory for the purposes of processing

Origin of the data collection

P2B Solutions collects data directly from Data Subjects.

Nature of the processing

The data processing carried out may be the collection, recording, organisation, conservation, adaptation, modification, extraction, consultation, use, communication by transmission or dissemination or any other form of provision, reconciliation

Purposes of the processing (P2B Solutions' objectives when processing the data)

P2B Solutions collects data for the following specified, explicit and legitimate purposes:

- (i) management of free trials and orders from My DSO Manager
- (ii) online account management
- (iii) client relationship management
- (iv) managing Internet user requests using the contact form
- (v) managing the newsletter
- (vi) technical management of the site in conjunction with service providers (site hosting)
- (vii) site security management
- (viii) the production of statistics for the site audience and the use of the services
- (ix) managing content sharing on social networks
- (x) managing client files, prospects, members of business networks, suppliers
- (xi) managing the list of objections to the processing of personal data

Legal basis for processing (which gives us the right to process your data)

The legal bases for processing are as follows:

- For the management of My DSO Manager free trials and orders: the sales contract concluded with the client or the execution of pre-contractual measures
- For the management of online accounts: the consent of the Internet user
- For customer relationship management: the sales contract concluded with the client
- For the management of Internet user requests via the contact form: legitimate interest (allowing online communication) or the execution of pre-contractual measures (drawing up quotes at the request of users)
- For managing the newsletter: the consent of the subscriber
- For the technical management of the site in connection with service providers (site hosting): legitimate interest (providing an online service, preventing fraud)
- For site security management: a legal obligation and legitimate interest

- For the production of statistics for the site audience and the use of services: the consent of the Internet user
- For the management of content sharing on social networks: the consent of the Internet user
- For the management of customer, prospect, business network member and supplier files: legitimate interest
- For the management of the list of objections to the processing of personal data: compliance with a legal obligation

Data Retention Periods

Personal data subject to processing are retained by P2B Solutions for no longer than is necessary for the purposes for which they have been recorded.

PURPOSE	RETENTION PERIOD
Management of free trials and My DSO Manager orders	The data are kept for the duration of the contractual relationship and then for the duration of the limitation period For trial periods that do not lead to an order: the data are kept for 3 months
Management of online accounts	Data are retained as long as the account is active then for a period of 3 years
Client Relationship Management	The data are retained for the duration of the contractual relationship, then for the limitation period of the liability = 5 years
Creation and management of files of Clients, suppliers, prospects, members of business networks	The data are retained for the duration of the relationship. For prospects, the data are retained for 3 years from their collection or from the last contact with the person concerned
Newsletter management	Until the subscriber unsubscribes
Management of Internet user requests using the contact form	3 years
Production of statistics on site audience and the use of services	IP addresses are retained for 12 months
Management of content sharing on social networks	IP addresses are retained for 12 months
Technical management of the site in conjunction with service providers (site hosting)	5 years from the end of the contract with the service provider concerned
Site Security Management	-IP addresses are retained for 12 months -the log in logs to the Site are retained for 3 months
Management of an objections list	3 years from registration on the list

Who receives the data?

Depending on their respective needs, all or part of the data are sent to:

- the personnel of the data controller
- the personnel of the service providers in charge of site management (hosting)
- the online payment service provider

What security measures does P2B Solutions implement?

P2B Solutions implements appropriate technical and organizational measures to ensure a level of security appropriate to the risk.

P2B Solutions takes measures to ensure that any natural person acting under their authority or that of the processor, who has access to personal data, does not process it, except when instructed to do so by P2B Solutions, unless required to do so.

The following specific safety measures have been taken:

- Secure log in to the server
- audit carried out every month to detect any security flaws

The existence or not of data transfer to a country outside the European Union and associated guarantees

The data controller transfers personal data outside the European Union.

The data controller undertakes to ensure that these transfers are carried out:

- to countries with a so-called adequate level of protection within the meaning of the European data protection authorities or
- with appropriate safeguards under Article 46 of the GDPR or
- in compliance with Article 49 of the GDPR.

Automated Decision Making

The processing does not provide for automated decision-making.

What happens to personal data after death

Right of access, rectification, deletion and portability of data

The data subject concerned by a processing operation may define guidelines relating to the retention, erasure and communication of his or her personal data after his or her death. These guidelines may be general or specific.

The data subject is also entitled to access, oppose, rectify, delete and, under certain conditions, transfer his/her personal data. The data subject has the right to withdraw consent at any time if consent is the legal basis for processing.

The request must state the surname and first name, email or postal address, of the person concerned, and be signed and accompanied by a valid proof of identity.

The data subject may exercise these rights by contacting:

P2B Solutions 140 Chemin de Billerey 38330 Biviers - Email: dpo@mydsomanager.com

Complaint

The person concerned by a processing operation has the right to lodge a complaint with the supervisory authority (CNIL): <https://www.cnil.fr/fr/webform/adresser-une-plainte>

Management of Cookies



A cookie is a small text file (a tracker) that is placed or stored on the user's device (computer, tablet or mobile device) when they visit the website. The cookie allows the site to recognise the user, to help them navigate from page to page on a website, to provide them with secure connections, and to remember their preferences on future visits.

Before placing or reading a cookie, the data controller undertakes to:

- inform the website user of the purpose of the cookies
- obtain their consent
- provide a means of refusing them

The period of validity of the user's consent is a maximum of 13 months.

The prior consent requirement does not apply if access to information stored in the user terminal, or the recording of information in the user terminal:

- has the exclusive purpose of enabling or facilitating communication by electronic means or
- is strictly necessary for the provision of an online communication service at the express request of the user.

However, the user's consent will be required for the functionalities of audience measurement and the sharing of content on social networks.

The user is informed that any such functionalities may be based on services offered by third parties (Twitter, Facebook, LinkedIn).

If the user gives his/her consent, these third parties will place cookies allowing him/her to view content hosted by these third parties directly on the site or to share our content.

Via these cookies, these third parties will collect and use the user's browsing data for their own purposes, in accordance with their privacy policy.

The user can give and withdraw consent, either globally or on a purpose-by-purpose basis, from the cookie banner on the site.

In order to exercise his/her rights over the data collected by third parties or for any questions about these processing operations, the user may contact these third parties directly.