



# Netkin Privacy and Data Protection Policy

*Last update : 11/07/2022*

Within the framework of its services and in particular the services accessible on its website (hereinafter referred to as the "Site"), the company NETKIN, registered with the Paris Trade and Companies Register under number 533 790 242, and whose registered office is located at 6-8 rue de Milan 75009 in Paris (hereinafter referred to as the "Company"), as the data controller, is likely to collect and process personal data concerning you (hereinafter referred to as the "User"). "NETKIN", as data controller, may collect and process personal data concerning you (hereinafter "Users"). This Privacy Policy explains how Netkin uses your personal data when you visit our site, interact with us via netkin.io, via our telephone support, regardless of the number, or via any email address ending with @netkin.co.uk, and more generally when you purchase our products and services. It is important that you read this privacy policy and any other privacy policy we provide to you, so that you are aware of why and how we use your data.

## Summary

All correspondence between you and us is archived in our customer management platform netkin.io (developed and hosted by us at OVH in France), whenever: you contact us by phone, by social network, you write to support@netkin.fr, or are copied on such an email, you contact us via the form on <https://netkin.fr> or via any form on <https://netkin.io>. These data are necessary for the good progress of the present or future services which we carry out for you, and in order to inform you of our innovations or of any other offer or partnership being able to supplement our service. It is used exclusively for this purpose by Netkin, its parent company AJCM, or its subsidiaries. We never share your data with any third party, except technical service providers. It is kept for 3 years after the last exchange between you and us. In accordance with current legislation, you have the right to access, rectify, delete (right to be forgotten), limit the processing, portability of data, and oppose the processing of your data, which you can exercise by writing to the following email address: [dpo@netkin.fr](mailto:dpo@netkin.fr) NETKIN's commitments in terms of data protection.

Pursuant to Article 4 of the French Data Protection Act of January 6, 1978, and Article 5 of the General Data Protection Regulation of May 25, 2018 (the "GDPR"), NETKIN undertakes to guarantee a high level of protection for the personal data of its Users whose personal data it processes. NETKIN undertakes to comply with the regulations applicable to all the personal data processing it implements. In particular, the company undertakes to respect the following principles: Your personal data is processed in a lawful, fair and transparent manner (lawfulness, fairness, transparency). Your personal data is collected for specific, explicit and legitimate purposes and is not further processed in a way that is incompatible with these purposes (purpose limitation). Your personal data is kept adequate, relevant and limited to



what is necessary for the purposes for which it is processed (data minimization). Your personal data is accurate, kept up to date and all reasonable steps are taken to ensure that inaccurate data, having regard to the purposes for which it is processed, is erased or rectified without delay (data accuracy).

### The personal data we collect about you

Personal data, or personal information, means any information about an individual that can be used to identify that individual. It does not include information where the identity is hidden (anonymous data). We collect a variety of information about our customers and visitors to netkin.com or netkin.io. This personal data falls into different categories: Identity Data includes title, first name, last name, username or similar identifier, and an encrypted version of your login/password. If you interact with us via social networks, your username on those networks may be included. Contact Data includes billing address, shipping address, email address and phone numbers. Financial Data includes your payment card details, if you have provided them to us Usage Data includes information about how you use our website, products and services. Tracking Data includes information we or anyone else collect about you from cookies and similar tracking technologies, such as web beacons, pixel tags or mobile identifiers. Transaction Data includes details about your payments and refunds, and the products and services you have purchased from us. Profile Data includes your username and password, your purchases or orders, your preferences, any interactions you have had via phone support, email or netkin.io, your feedback and survey responses, and any profile data we have added (for example, through the use of analytics and profiling tools). Technical Data includes your IP address, login data, browser type and version, time zone and location, browser plug-in types and versions, operating system and platform, and other technologies on the devices you use to access this website.

Marketing and Communication Data includes your preferences regarding whether or not to receive advertisements from us, and your communication preferences.

In accordance with Article 6 of the French Data Protection Act of January 6, 1978, NETKIN undertakes not to process sensitive Data. Indeed, we do not collect special categories of personal data (this includes details of your race or ethnicity, your religious or philosophical beliefs, your sex life, your sexual orientation, your political opinions, your trade union membership, information relating to your health, genetic or biometric data). We also do not collect information relating to criminal offences or convictions. If you use this type of personal data on sites or applications that you make via our platform, we will not know about it.

### How is your personal information collected?

We use a variety of methods to collect information about you, including Direct Interactions. You can provide us with your Identity Data, Contact Data and Financial Data by filling out our forms or by contacting us by mail, phone, email, chat or social network. Third Party or Publicly Available Sources: We may receive Personal Data about you from various types of third parties, including: Technical Data and/or Tracking Data from analytics providers, ad



networks and information providers; Financial Data, Contact Data and Transaction Data from payment service providers and fraud prevention services; Identity Data and Contact Data from data partners; and data from any third party authorized by law to share your personal data with us or to whom you have given permission, such as social networks or review sites.

### **Legal basis for data processing**

When not based on the performance of the contract with NETKIN, such processing is based on the consent of the data subjects or is justified by legitimate interests of NETKIN.

### **The purposes of the data processing**

#### **Mandatory or optional nature**

All mandatory or optional fields are marked with an asterisk. In the case of compulsory data, if the Internet user does not respond, NETKIN may not be able to provide the products and services requested. The other information is optional and allows us to get to know you better and improve our communications and services to you.

#### **Purposes of processing**

We may process your personal data collected when you create an account and/or use our services for the following purposes To manage your account and the smooth running of present or future services. In the absence of such information, they will be unable to properly provide the products and services. To send promotional offers to the customer, for statistical and anti-fraud purposes, for their legitimate interest in business development, technical improvement of their systems and knowledge of their customers and, finally, if necessary with the customer's consent, to personalize the Services.

### **How long we keep your data**

The customer's data is kept for the duration of the commercial relationship that binds him to them and, beyond that, for a period of 3 years for commercial purposes, as well as for purposes of proof and accounting obligations, for a period not exceeding the applicable legal prescription periods.

### **The recipients of your personal data**

NETKIN collects and processes your personal data solely for its own purposes and does not sell it to third parties under any circumstances. Your personal data may only be disclosed to the following recipients or categories of recipients, within the limits of their respective responsibilities and insofar as such disclosure is strictly necessary to accomplish the intended purpose. Netkin's technical service providers. Netkin's parent, sister or child companies.



## Security obligation

We have implemented appropriate security measures to prevent your personal data from being accidentally lost, used, altered, disclosed or accessed without authorization. In addition, access to your personal data is limited to employees, agents, contractors and other third parties on a need-to-know basis. They will process your personal data in accordance with our instructions and are subject to the obligation of confidentiality. We have procedures in place to deal with any suspected breach of personal data. You and any relevant regulator will be notified of such a breach where required by law.

## What are your rights?

For processing carried out by and/or on behalf of Netkin and its parent, sister or child companies, the customer has, if necessary after providing valid identification, the right to access, where appropriate to portability, modification, limitation and deletion of data concerning him or her as well as the right to object, possibly subject to legitimate and compelling reasons, to the processing of such data. He can also define directives relating to the fate of his personal data in the event of death. These rights can be exercised directly with Netkin by e-mail to [dpo@netkin.fr](mailto:dpo@netkin.fr) or by mail to the following address Netkin SAS, 6-8 rue de Milan, 75009 PARIS.

## Links to third party sites

The [netkin.co.uk](http://netkin.co.uk) website or the [netkin.io](http://netkin.io) platform may contain links to third party sites, plug-ins and applications (including the ability to log in via Facebook). Clicking on these links or enabling connections may allow third parties to collect or share data about you. We do not control these third-party sites and are not responsible for their privacy statements. When you leave our site, we encourage you to read the privacy policy of each site you visit.

## Personal Data concerning minors

NETKIN does not collect or process personal data relating to children under the age of 15 without the prior consent of the parents or holders of parental responsibility for the child. If personal data concerning children is collected via the Site, parents or holders of parental authority have the opportunity to object. Furthermore, any person who was under the age of majority at the time of the collection of his or her personal data may obtain its deletion as soon as possible.

## Cookies

NETKIN places only operational and security cookies on the registration platforms which do not require the consent of the Users. The cookies we deposit do not collect any information. Their sole purpose is to allow or facilitate the user's navigation on the Site. More precisely, they allow : - to maintain the proper functioning of the site, - to memorize the selected language version of the site, - to maintain the user's connection when navigating from one page to another, - to reinforce security during navigation. These cookies are deleted when



users log out of the platform (session cookies). In addition, we use cookies with CSRF security (protection to prevent hackers from using these cookies). Changes to the privacy policy The CNIL continues to issue new advice to companies to comply with the RGPD. As such, you may see small updates to our privacy policy over the next few months. Check it out and read it from time to time. Thank you.

### Contact Us

If you have any questions about NETKIN's Privacy Policy and practices regarding the protection of personal data, or if you wish to exercise your rights, please do not hesitate to contact us by email at [dpo@netkin.fr](mailto:dpo@netkin.fr) or by phone at +33 1 86 95 08 08 or by mail at 6-8 rue de Milan 75009 PARIS.