



# Privacy Policy

**Last updated:** 15 May 2022

Welcome to our website Privaworld.com (the “Site”). We appreciate your interest in our company, PrivaWorld SAS (“company”, “we”, “us”, or “our”).

The protection of your personal data, such as date of birth, name, phone number, address, etc., is important to us. If you have any questions or concerns about our policy, or our practices with regards to your personal data, please contact us to the contact details outlined at the end of this privacy policy (“**Privacy Policy**”).

The purpose of this Privacy Policy is to inform you about processing of your information, which we collect when you visit our Site. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this Privacy Policy that you do not agree with, please discontinue use of our site and our services.

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the “Last Updated” date of this Privacy Policy. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on the Site, and you waive the right to receive specific notice of each such change or modification.

## What Information We Collect

The information we collect about you may include details such as:

- Personal data / personal information: personally identifiable information, such as name, postal address, telephone number, and email address. You are under no obligation to provide us with personal data of any kind, however your refusal to do so may prevent you from using certain features of the Site;
- Business information: such as your company name and your job title;
- Information you submit as a job applicant in connection with a career opportunity;
- Technical data: data and information of the access device (e.g. computer, mobile phone, tablet, etc.): that our systems automatically records every time our Site is called up, such as: (1) information about the browser type and the version used; (2) operating system of the access device; (3) name of the accessing host; (4) IP address of the access device; (5) date and time of access; (6) Websites and resources (images, files, other site contents) accessed on our Site; (7) websites from which the user's system accessed our Site (referrer tracking); (8) confirmation whether retrieval was successful; and (9) transferred data volume.
- Access data: IP address, website from which the file was accessed, name of the file, date and time of access, amount of data transferred and report on the success of the access (so-called web log). We use this access data exclusively in non-personalized form for the continuous improvement of our Internet offering and for statistical purposes.
- Financial information, such as data related to your payment method (e.g. valid credit card number, card brand, expiration date) that we may collect when you purchase, order, return, exchange, or request information about our services from the Site;
- Other information you choose to provide, such as when you visit the “Contact Us” page of our Site.

## How We Collect Your Information



We may collect information about you in various ways, such as when you:

- Visit our Site, including mobile website(collectively, the “Site”);
- Fill out a form on the Site;
- Sign-up to receive direct marketing communications on the Site;
- Sign-up to a feature that we offer on the Site and you provide your information in connection with that feature;
- Attend an event that we or one of our affiliates or partners has organized;
- Communicate with us (for example, by telephone or by sending us an email);
- Submit your CV or any other information when applying for a career opportunity through the Site; or
- Otherwise voluntarily provide us with information about you.

## Use of Your Information

We may use the information we collect about you for various purposes, including to:

- Provide goods or services;
- Process business transactions and related activities;
- Manage our relationships with our customers, suppliers and vendors;
- Market our products and services;
- Manage our career opportunities;
- Respond to your inquiries;
- Operate, evaluate and improve our business (including managing the Site; enhancing and improving our products and services; managing our communications; analyzing our products and services; performing data analytics; and performing auditing and other internal functions);
- Customize your experience with our Site; and
- Comply with and enforce applicable legal requirements, industry standards and Phoenix policies and terms.

We also may use the information in other ways for which we provide specific notice at the time of collection.

We use the information about you for the purposes described above because we have a legitimate interest in providing products and services to our customers and other interested individuals that is not overridden by your interests, rights and freedoms in respect of your information.

We may use your information to fulfill a contract, or take steps linked to a contract, protect against and prevent fraud, claims, and other liabilities and to comply with or enforce applicable legal requirements, industry standards, and our policies and terms. We use information for these purposes when it is necessary to protect, exercise or defend our legal rights, or when we are required to do so by law.

We may also rely on consent through your consent, a free, unambiguous and clear confirming action or behaviour whereby you agree to the processing of your personal data for a given purpose (“consent”) as a legal basis for processing your personal information. For example, where required by applicable law, we will obtain your consent to send you marketing communications about our products and services and invite you to events. Where we rely on consent, we will inform you of the purposes for which we require your personal information at the point at which we obtain such personal information. Where you have provided your consent, you have the right to withdraw such consent at any time by contacting us as detailed in this Privacy Policy.



## Disclosure of Your Information

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

- **By Law or to Protect Rights**

If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

- **Third-Party Service Providers**

We may share your information with third parties that perform services for us or on our behalf, including payment processing, data analysis, email delivery, hosting services, customer service, and marketing assistance. See below additional details on third party service providers.

- **Affiliates**

We may share your information with our affiliates, in which case we will require those affiliates to honour this Privacy Policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

- **Business Partners**

We may share your information with our business partners to offer you certain products, services or promotions.

- **Other Third Parties**

We may share your information with advertisers and investors for the purpose of conducting general business analysis. We may also share your information with such third parties for marketing purposes, as permitted by law.

## Your Rights

- **Right To Access**

You are entitled to request a confirmation of whether we process your personal data. If this is the case, you have the right to access the information as long as the rights and freedoms of others are not adversely affected. We are glad to provide you a copy of this information.

- **Right To Rectification**

You are entitled to obtain the rectification of inaccurate personal data any time. You may also request any time to have incomplete personal data completed. A corresponding adjustment is made immediately.



- **Right To Erasure**

You are entitled to request from us the erasure of your personal data if:

- ✓ data are no longer required;
- ✓ there is no longer any legal ground for processing because you withdraw your consent;
- ✓ you object to the processing and there are not any legitimate grounds for the processing;
- ✓ your data have been unlawfully processed;
- ✓ this is required for compliance with a legal obligation.

However, you cannot exercise this right if:

- ✓ processing is necessary for exercising the right of freedom of expression and information;
- ✓ your data have been collected on the grounds of a legal duty;
- ✓ processing is required for reasons in the public interest;
- ✓ data are required for the enforcement, exercise or defence of legal claims.

- **Right To Restriction Of Processing**

You have the right to restrict the processing of your personal data in certain cases.

This applies if:

- ✓ the accuracy of the personal data is contested by you;
- ✓ processing is unlawful and you oppose the erasure;
- ✓ data are no longer required for the purpose of processing, but the collected data are used for enforcement, exercise or defence of legal claims;
- ✓ an objection to processing has been made and the verification whether the legitimate grounds of whom override is still pending.

- **Right To Withdraw Your Consent**

If you have given us your explicit consent to the processing of your personal data, you may withdraw it any time. Please note that this does not affect the lawfulness of the processing carried out on the basis of your consent until you withdraw your consent.

- **Right To Object**

You have the right to object at any time to processing of your personal data, which were collected based on the grounds of a legitimate interest. You only have this right if particular circumstances speak against storage and processing.

- **How Do You Exercise Your Rights?**

You may exercise your rights any time by contacting us as follows:

PrivaWorld SAS  
10 Boulevard Marius Vivier Merle,  
69003 Lyon,  
FRANCE  
E-Mail: [info@privaboard.com](mailto:info@privaboard.com)



## Data Safety and Data Protection, Communication by e-mail

Your personal data will be protected by technical and organisational measures during collection, storage and processing so that third parties cannot access them. In case of unencrypted communication by e-mail, data security during transfer to our IT systems cannot be guaranteed in full by us so that we recommend to send information with a high need for confidentiality in encrypted form or by post.

## Provision of Our Site and Creation of Log Files

Every time our website is called up, our system automatically records data and information of the access device and other technical data as further described above..

Technical data is stored in our system's log files. Technical data is not stored together with the personal data of a specific user so that it is not possible to identify individual users of the website.

### The Legal Basis for the Processing of Personal Data, Contained In the Technical Data

Legitimate interest is to guarantee that the purpose described below is achieved.

#### Purpose of Data Processing

The temporary (automated) storage of technical data is only required during the Site visit so that the Site can be provided. Storage and processing of technical data is also required to maintain compatibility of our Site for all visitors, as far as possible, and to combat misuse and eliminate faults. It is necessary to log technical data of the accessing computer to be able to react promptly to incorrect visualisation, attacks to our IT systems and/or lack of functionality of our website. Furthermore, this data is used to optimise the website and to generally safeguard the security of our IT systems.

#### Length of Time in Storage

The above-mentioned technical data are erased as soon as they are no longer needed to guarantee compatibility of the website for all visitors but at the latest 3 months after you have visited our Site.

## Special Functions of the Site

Our Site offers you various functions, during the use of which personal data is collected, processed and stored by us. Below we explain what happens with this data:

### Contact form(s)

#### What Personal Data Is Collected and To Which Extent Will It Be Processed?

The personal data you entered in our contact forms, which you entered in the input mask of the contact form.



## The Legal Basis for the Processing Of Personal Data

Your consent.

### Purpose of Data Processing

We will use the information collected via our contact form or contact forms only for processing the specific contact request received through the contact form. Please note that in order to fulfill your contact request, we may also send you e-mails to the address provided. The purpose of this is so that you can receive confirmation from us that your request has been correctly forwarded. However, the sending of this confirmation e-mail is not obligatory for us and is only for your information.

### Length of Time in Storage

After processing your request, the personal data will be deleted immediately, unless there are legal retention periods.

### The Need to Provide Personal Data

The use of the contact forms is on a voluntary basis and is neither contractually nor legally required. You are not obliged to contact us via the contact form, but can also use the other contact options provided on our site. If you wish to use our contact form, you have to fill in the fields marked as mandatory. If you do not fill out the required information of the contact form, you can either not send the request or we can unfortunately not process your request.

## Integration of External Web Services and Processing of Personal Data Outside The EU

On our Site, we use active content from external third-party providers, so-called web services. When you visit our Site, these external third-party providers may receive personal information about your visit to our Site. This may involve the processing of personal data outside the EU. You can prevent this by installing an appropriate browser plug-in or disabling the execution of scripts in your browser. This may result in some functional restrictions on the websites that you visit.

We use the following external web services:

- **CloudFlare**

We use on our Site the service CloudFlare of the company Cloudflare, Inc, 101 Townsend St, 94107 San Francisco, United States, email: [support@cloudflare.com](mailto:support@cloudflare.com), website: <https://www.cloudflare.com/de-de/>. The processing also takes place in a third country for which there is no Commission adequacy decision. Therefore, the usual level of protection for the GDPR cannot be guaranteed for the transfer, as it cannot be ruled out that in the third country, e.g. authorities can access the collected data.

The legal basis for the transmission of personal data is our legitimate interest in the processing. Our legitimate interest lies in the achievement of the purpose described above.

Cloudflare is a so-called Content Delivery Network, which provides security features in addition to splitting the website across multiple servers. In addition, Cloudflare acts as a reverse proxy for our website.

For more information on the handling of transmitted data, please refer to the provider's privacy policy at <https://www.cloudflare.com/privacypolicy/>.



- **Google Fonts**

We use on our Site the service Google Fonts of the company Google LLC, 1600 Amphitheatre Parkway, 94043 Mountain View, United States of America, e-mail: [support-de@google.com](mailto:support-de@google.com), website: <http://www.google.com/>. The processing also takes place in a third country for which there is no Commission adequacy decision. Therefore, the usual level of protection for the GDPR cannot be guaranteed for the transfer, as it cannot be ruled out that in the third country, authorities can access the collected data.

The legal basis for the transmission of personal data is your consent.

Fonts are reloaded on our site via the Google Fonts service in order to be able to display the site in a visually better version.

For more information on the handling of transmitted data, please refer to the provider's privacy policy at <https://policies.google.com/privacy>.

- **Google APIS**

We use on our Site the service Google APIS of the company Google LLC, 1600 Amphitheatre Parkway, 94043 Mountain View, United States of America, e-mail: [support-de@google.com](mailto:support-de@google.com), website: <http://www.google.com/>. The processing also takes place in a third country for which there is no Commission adequacy decision. Therefore, the usual level of protection for the GDPR cannot be guaranteed for the transfer, as it cannot be ruled out that in the third country, authorities can access the collected data.

The legal basis for the transmission of personal data is your consent.

We use Google APIS to be able to reload additional services from Google on the website. Google Apis is a collection of interfaces for communication between the various Google services that are used on your website.

The service or we collect the following data for processing: IP address.

For more information on the handling of transmitted data, please refer to the provider's privacy policy at <https://policies.google.com/privacy>.

- **Gstatic**

We use on our Site the service Gstatic of the company Google LLC, 1600 Amphitheatre Parkway, 94043 Mountain View, United States of America, e-mail: [support-de@google.com](mailto:support-de@google.com), website: <http://www.google.com/>. The processing also takes place in a third country for which there is no Commission adequacy decision. Therefore, the usual level of protection for the GDPR cannot be guaranteed for the transfer, as it cannot be ruled out that in the third country, authorities can access the collected data.

The legal basis for the transmission of personal data is your consent.

Gstatic is a service used by Google to retrieve static content in order to reduce bandwidth usage and to preload required catalogue files.



For more information on the handling of transmitted data, please refer to the provider's privacy policy at <https://policies.google.com/privacy>.

- **Jsdelivr**

We use on our Site the service Jsdelivr of the company Prospect One Sp., Krolweska 65A, 30-081 Krakow, Poland, e-mail: [hello@prospectone.io](mailto:hello@prospectone.io), website: <https://prospectone.io/>. The transfer and processing of personal data takes place exclusively on servers in the European Union.

The legal basis for the transmission of personal data is our legitimate interest in the processing. Our legitimate interest lies in the achievement of the purpose described above.

JSDelivr is a content delivery network that mirrors our content across multiple servers to ensure optimal accessibility worldwide.

For more information on the handling of transmitted data, please refer to the provider's privacy policy at <https://www.jsdelivr.com/privacy-policy-jsdelivr-com>.

- **Font Awesome**

We use on our website the Font Awesome service provided by Fonticons, 6 Porter Road, Apartment 3R, MA 02140 Cambridge, United States, email: [hello@fontawesome.com](mailto:hello@fontawesome.com), website: <https://fontawesome.com/>. The processing also takes place in a third country for which there is no Commission adequacy decision. Therefore, the usual level of protection for the GDPR cannot be guaranteed for the transfer, as it cannot be ruled out that in the third country, e.g. authorities can access the collected data.

The legal basis for the transmission of personal data is your consent.

Through the Font Awesome service, fonts are reloaded on our website to provide you with a more visually appealing version of the site.

For more information on the handling of transmitted data, please refer to the provider's privacy policy at <https://fontawesome.com/privacy>.

## Information About the Use of Cookies

None used

## Additional Information for EU Visitors

### Right to Data Portability

Under Art. 20 of the GDPR, you have the right to have your personal data transferred to you. We provide your personal data in a structured, commonly used and machine-readable format. The data can either be transferred to you or a controller you specify.

On request, we provide you the following data acc. to Art. 20 para. 1 of the GDPR:

- data collected based on an explicit consent pursuant to Art. 6 para. 1 lit. a or Art. 9 para. 2 lit. a GDPR;





- data we have received from you for the performance of a contract acc. to Art. 6 para. 1 lit. b GDPR;
- data having been processed in automated procedures.

We will transfer the personal data directly to a controller specified by you insofar as this is technically feasible. Please note that according to Art. 20 para. 4 GDPR we may not transfer data which adversely affect the rights and freedoms of others.

## **Right to Complain To Supervisory Authority Pursuant To Art. 77 Para. 1 of the GDPR**

Insofar as you suspect that your data are being processed unlawfully on our Site, you may, of course, bring about a judicial clarification of the issue at any time. In addition, any other legal option is open to you. Irrespective of that, you may contact a supervisory authority based on Art. 77 para. 1 of the GDPR. You have a right to lodge a complaint pursuant to Art. 77 of the GDPR in the Member State of your habitual residence, place of work or place of the alleged infringement, i.e. you can choose the supervisory authority of one of the above-mentioned places. The supervisory authority with whom the complaint is lodged shall notify you of the status and outcomes of your complaint, including your right to an effective judicial remedy based on Art. 78 of the GDPR.

## **Additional Information for Brazilian Visitors**

### **Additional Exceptions to the Right to Erasure**

In addition to the exceptions outlined above, according to Art. 16 of the LGPD, you also do not have this right if:

- processing is necessary due to controller need to comply with a legal or regulatory obligation;
- there is in place a study by a research entity, ensuring, whenever possible, the anonymization of the personal data;
- data was transferred by controller to third parties, provided that the requirements for data processing as provided in the LGPD are obeyed; and
- data is used exclusively by the controller, with access by third parties being prohibited, and provided the data has been anonymized.

### **Right To Restriction of Processing**

Refer to the circumstances provided in Art. 15 of the LGPD.

### **Right To Data Portability**

Under Art. 11, para 4, I; Art. 18, V; and Art. 18, para 7 of the LGPD, you have the right to have your personal data transferred to you. We provide your personal data in a structured, commonly used and machine-readable format. The data can either be transferred to you or a controller you specify.

On request, we provide you the following data:

- data collected based on an explicit consent;
- data we have received from you for the performance of a contract;
- data having been processed in automated procedures.



We will transfer the personal data directly to a controller specified by you insofar as this is technically feasible. Please note that we may not transfer data which adversely affect the rights and freedoms of others.

Under Art. 18, V of the LGPD, you may at any time and by means of request, has the right to obtain portability of your data to another service provider or product provider, by the means of an express request, pursuant with the regulations of the national authority, and subject to commercial and industrial secrets. If it is impossible to immediately adopt the request mentioned above, we will send you a reply communicating we are not the data processing agent and indicate, whenever possible, who the agent is; or we will indicate the reasons of fact or of law that prevent the immediate adoption of such request.

The right of portability referred to above does not include your data that have already been anonymized by us.

### **Right To Complain To Supervisory Authority Pursuant To Art. 18, I Of The LGPD.**

Insofar as you suspect that your data are being processed unlawfully on ourSite, you may, of course, bring about a judicial clarification of the issue at any time. In addition, any other legal option is open to you. Irrespective of that, you may contact a supervisory authority based on Art. 18, I of the LGPD.

You have a right to lodge a complaint. The supervisory authority with whom the complaint is lodged shall notify you of the status and outcomes of your complaint, including your right to an effective judicial remedy.

## **Additional Information for California visitors**

### **Sources of Personal Information**

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us.
- Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services to them.
- Directly and indirectly from activity on our Site. For example, from submissions through our website portal or website usage details collected automatically.
- From third-parties that interact with us in connection with the services we perform.

### **Sale of Personal Information**

In the preceding twelve (12) months, we have not sold any personal information. We will not sell your personal information to any party. If in the future, we anticipate selling your personal information to any third party, we will provide you with the opt-out rights required under CCPA.

### **Your Rights and Choices**

- **Access to Specific Information and Data Portability Rights**

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:



- ✓ The categories of personal information we collected about you.
- ✓ The categories of sources for the personal information we collected about you.
- ✓ Our business or commercial purpose for collecting or selling that personal information.
- ✓ The categories of third parties with whom we share that personal information.
- ✓ The specific pieces of personal information we collected about you (also called a data portability request).
- ✓ Sales (if any), identifying the personal information categories that each category of recipient purchased; and
- ✓ disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

To exercise these rights, please contact us. Please refer to the contact details at the bottom of this Privacy Policy.

- **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- ✓ Deny you goods or services.
- ✓ Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- ✓ Provide you a different level or quality of goods or services.
- ✓ Suggest that you may receive a different.

- **Controls For Do-Not-Track Features**

Most web browsers and some mobile operating systems include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy. Most web browsers and some mobile operating systems include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. If you set the DNT signal on your browser, we will respond to such DNT browser signals.

## Our contact details

PrivaWorld SAS  
10 Boulevard Marius Vivier Merle,  
69003 Lyon,  
FRANCE  
E-Mail: [info@privaboard.com](mailto:info@privaboard.com)