

# PRIVACY POLICY

Updated on 01/03/2021

This privacy policy explains how Delta Dore collect and use your personal data when you use the services provided on our Developer Portal or interact with us.

## 1. DEFINITIONS

**“Data controller”** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

**“Data processor”** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller

**“Developer account”** means the account created for the Developer which enable him to access the API through our Delta Dore Developer Portal

**“Developer Portal”** means the website or the part of the Delta Dore website made available by Delta Dore for the purpose of the use of Delta Dore’s APIs.

**“Personal data”** means any information relating to an identified or identifiable natural person (“data subject”) which is considered personal data in accordance with applicable laws and regulations related to data privacy.

**“Processing”** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

## 2. WHO WE ARE

Delta Dore, a limited liability company (SA), whose registered office is at Le Vieux Chêne, 35270 Bonnemain, registered in the Commercial Register of Saint Malo under number 897 080 289 (“Delta Dore”), is the Data controller. This means that we are responsible for deciding how and why we hold and use your Personal data.

## 3. PERSONAL DATA COLLECTED AND WHY

We collect your Personal data when you contact us through the contact form. The data collected is your email address. This address allows us to contact you in return.

We also collect your Personal data when you want to create a Developer account. This data is necessary to create your account. This personal data is:

- Your first and last name
- Your email address
- Your company

Also, we collect your technical connection logs to suppress the inactive account and to make technical audits.

#### **4. LAWFULNESS OF THE PROCESSING**

The Processing of your Personal data is necessary for the performance of the contract to which you are party when we create your account, and in order to take steps to entering into a contract when you contact us through the contact form.

The Processing of your technical logs is necessary for the purposes of the legitimate interests pursued by Delta Dore to secure the services and to delete inactive account.

#### **5. DURATION OF STORAGE OF YOUR DATA**

When we create your account, we use your first and last name, your email address and the name of your company. We keep these data during the life of your account.

If you don't use your account for a period of 11 months and 7 days, we send you an email to inform you that we will delete your account. In case of inactivity for more than 12 months, your account and your data are automatically deleted.

The connection logs on the Development Portal are kept for 7 days. To detect the inactivity, we keep your date of last connection for 12 months in a dedicated base.

#### **6. WHO RECEIVES YOUR DATA**

Your Personal data is accessible to any Delta Dore employee within the limits of their functions, and to its data processors.

Your data may be processed by the following department within Delta Dore:

- The sales department for the contract conclusion and for your account creation;
- The support and technical department for the support process;
- The legal department and general direction to organize our defense in case of a litigation or in case of a control or a procedure initiated by a supervisory authority.

#### **7. DATA TRANSFERS**

Your Personal data is forwarded to other controllers only if required for the fulfillment of a contractual obligation, or if we or a third party, have a legitimate interest in the data transfer, or if you have given your consent. Data may be transferred to other controllers when we are obliged to do so due to statutory regulations or enforceable administrative or judicial orders.

We also use service providers for data hosting.

In the event of such a transfer, we ensure that the Processing is governed by standard contractual clauses that guarantee a sufficient level of protection for your personal data.

#### **8. COOKIES**

Delta Dore uses technical cookies to permit your login to the portal.

A cookie is a small file, or tracker, placed on the hard drive of your computer, tablet or smartphone and is read when you visit a website or use an application. Its purpose is to collect and store information relating to your browsing on the Internet, this information may or may not constitute personal data.

Delta Dore only uses session cookies in its portal. Session cookies are only stored temporarily in the browser's memory, and are destroyed when it is closed down, although they will survive navigating away from the website they came from. Many websites use session cookies for essential site functions, and to make sure pages are sent to the browser as quickly and efficiently as possible. Those cookies are exempt of consent.

Delta Dore uses the cookies bellow:

Name	Domain	Expiration	Purpose
x-ms-cpim-admin	main.b2cadmin.ext.azure.com	End of browser session	Holds user membership data across tenants (Admin or User).
x-ms-cpim-slice	b2clogin.com, login.microsoftonline.com , branded domain	End of browser session	Used to route requests to the appropriate production instance.
x-ms-cpim-trans	b2clogin.com, login.microsoftonline.com , branded domain	End of browser session	Used for tracking the transactions (number of authentication requests to Azure AD B2C) and the current transaction.
x-ms-cpim-sso:{Id}	b2clogin.com, login.microsoftonline.com , branded domain	End of browser session	Used for maintaining the SSO session.
x-ms-cpim-cache:{id}_n	b2clogin.com, login.microsoftonline.com , branded domain	End of browser session, successful authentication	Used for maintaining the request state.
x-ms-cpim-csrf	b2clogin.com, login.microsoftonline.com , branded domain	End of browser session	Cross-Site Request Forgery token used for CSRF protection.
x-ms-cpim-dc	b2clogin.com, login.microsoftonline.com , branded domain	End of browser session	Used for Azure AD B2C network routing.
x-ms-cpim-ctx	b2clogin.com, login.microsoftonline.com , branded domain	End of browser session	Context
x-ms-cpim-rp	b2clogin.com, login.microsoftonline.com , branded domain	End of browser session	Used for storing membership data for the resource provider tenant.
x-ms-cpim-rc	b2clogin.com, login.microsoftonline.com , branded domain	End of browser session	Used for storing the relay cookie.

## 9. DATA OF YOUR CLIENT

Delta Dore is not the Data controller for the processing of your client's Personal data.

By using our services, you may process Personal data of your own clients. In this case, you guarantee that you have authorization to do so in accordance with the applicable laws and regulations, and to allow Delta Dore to perform the services.

Delta Dore is acting as a Data processor on behalf of you, who are the Data controller. This constitutes a processing on behalf of a controller. This means that the processing shall be subject to an agreement between Delta Dore and you.

## **10. YOUR RIGHTS**

According to the GDPR, you may exercise the following rights. To exercise it, you can contact us by following the article 11 "Contact us".

### **10.1 RIGHT OF ACCESS, OF RECTIFICATION, OF DELETION AND OF LIMITATION**

According to the GDPR, any data subject has a right of access to data concerning him, a right to the deletion of such information, a right of rectification, a right to limit the processing and right to define general and specific guidelines stipulating the manner in which he intends to exercise these rights after his death.

### **10.2 RIGHT TO RESTRICTION OF PROCESSING**

The data subject also has the right to restriction of data processing for legitimate reasons, and a right to object to the use of his data for commercial prospection.

### **10.3 RIGHT TO DATA PORTABILITY**

The data subject has the right to data portability. It means that the data subject has the right to receive the personal data about it, in a structured, commonly used, machine-readable format, and has the right to send this data to another controller.

### **10.4 RIGHT TO LODGE COMPLAINT WITH SUPERVISORY AUTHORITY**

Also, the data subject can lodge a complaint with supervisory authority.

Before doing that, the data subject may contact Delta Dore to try to resolve any problems.

## **11. CHANGES**

This privacy policy is the only enforceable policy until a new version is created.

This privacy policy is subject to change, and we reserve the right to update or modify it at any time without notice. You are therefore advised to consult it regularly.

This privacy policy applies only to Delta Dore.

## 12. CONTACT US

In case you want to contact us to have more information or to exercise your rights, you can contact us in the following ways:

- By sending us a letter to the following address:  
Delta Dore  
Délégué à la Protection des Données  
Le Vieux Chêne  
35270 BONNEMAIN  
FRANCE
- By mail to [privacy@deltadore.com](mailto:privacy@deltadore.com)