

Privacy Policy

1. Introduction

This Privacy Policy applies to the **Keran** website.

The purpose of this Privacy Policy is to inform users about:

- How their personal data is collected and processed (personal data is any data that can be used to identify a user)
- The rights users have regarding their data
- Who is responsible for processing the personal data that we collect and process
- Who has access to users' personal data.

2. General Data Collection and Processing Principles

Keran attaches the utmost importance and care to the protection of privacy and personal data, as well as to compliance with the provisions of the applicable legislation.

Regulation (EU) 2016/679 of 27 April 2016 on the Protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter "GDPR") states that personal data must be processed lawfully, fairly, and transparently. The purpose of this Privacy Policy (hereinafter referred to as the "Policy") is to provide you with clear and simple information on the processing of your personal data when you browse and perform operations on our website.

In accordance with the provisions of Article 5 of the GDPR, the collection and processing of site users' data shall respect the following principles:

- Legality, fairness and transparency: data may only be collected and processed with the consent of the user who owns the data. Whenever personal data is collected, the user will be informed that his or her data is being collected and for what purpose the data is being collected.
- Limited purposes: data is collected and processed for one or more of the purposes set out in these general terms and conditions of use.
- Minimisation of data collection and processing: only the data necessary for the proper execution of the objectives pursued by the site are collected.
- Conservation of data for the shortest time possible: data is kept for a limited period, of which the user is informed. Where this information cannot be provided, the user is informed of the criteria used to determine the retention period.
- Integrity and confidentiality of the data collected and processed: the Data Controller undertakes to guarantee the integrity and confidentiality of the data collected.

In order to be lawful, and in accordance with the requirements of Article 6 of the GDPR, personal data may only be collected and processed if at least one of the following conditions is met:

- The user has expressly consented to the processing
- The processing is necessary for the proper performance of a contract
- The processing is carried out in compliance with a legal obligation
- The processing is necessary in order to safeguard the vital interests of the data subject or of another natural person
- The processing may be necessary for the performance of a task carried out in the public interest or in the exercise of official authority

- The processing and collection of personal data is necessary for the purposes of the legitimate and private interests pursued by the controller or by a third party.

3. Data Controller

In the course of our business, we collect and use personal data in connection with your unsolicited job applications.

We act as a controller within the meaning of the regulations on personal data, and in particular Regulation (EU) 2016/679 on the Protection of individuals with regard to the processing of personal data and on the free movement of such data.

The Data Controller undertakes to protect the personal data collected, not to pass it on to third parties without the user's knowledge and to respect the purposes for which the data was collected.

The website has an SSL certificate to guarantee that information and data transfer via the site is secure.

The purpose of an SSL certificate is to secure the data exchanged between the user and the site.

In addition, the Data Controller undertakes to notify users in the event of rectification or deletion of the data, unless this would entail disproportionate formalities, costs or action for them.

In the event that the integrity, confidentiality or security of the user's personal data is compromised, the Data Controller undertakes to inform the user by any means necessary.

Users are also informed that a Data Protection Officer has been appointed.

The role of the Data Protection Officer is to ensure that national and supranational provisions relating to the collection and processing of personal data are properly implemented. S/he is sometimes referred to as the DPO. To contact the DPO, please use the following address: rgpd@groupe-keran.com.

4. What Personal Data Do We Collect and How?

In using our website, you provide us with a certain amount of information about yourself, some of which may identify you ("personal data"). This is the case when you fill in the unsolicited job application form.

- **Identifying data:** this includes all information that would enable us to identify you, such as your surname, first name, e-mail address, telephone number, geographical area, years of professional experience, salary expectations, CV and cover letter.
- **Connection data:** we collect your IP address for maintenance and statistical purposes.
- **Information relating to your browsing:** by browsing our website, you interact with it. As a result, certain information relating to your browsing is collected, i.e. your browsing activity and geographical location. Information relating to the user's computer, its connection method, such as the type and version of the internet browser, the operating system, the OS of the mobile or tablet, as well as the unique device identifier ("UDID") and other technical identifiers.
- **Data collected automatically:**

A cookie is a small computer file or “tracker”, which is deposited and read when a website is consulted, an e-mail is read, or software or a mobile application is installed or used, regardless of the type of terminal used (computer, smartphone, e-reader, video games console connected to the Internet, etc.).

The website may send its own cookie if the user’s browser preferences so allow. Cookies record information about the user’s preferences and enable **Keran** to adapt them in the user's interest.

Users can set their browser to accept all cookies, to be notified when a cookie is sent, or not to receive cookies. If the latter case is implemented by the user, certain personalised features of the site may not be provided and consequently the user may not be able to take full advantage of all the site's functionalities.

The information provided by cookies may enable **Keran** to better analyse the user’s navigation on the site and provide a better “user experience”.

The terms “cookie” or “tracker” cover:

- HTTP cookies,
- Flash cookies,
- Web bugs.

Two types of cookies are used:

- Session cookies are temporary and are deleted when the user closes the browser.
- Persistent cookies remain until the user deletes them or they expire.

The sole purpose of cookies is to enable or facilitate communication by electronic means. They are strictly necessary for the provision of online communication services at the express request of the user. In summary, here are the types of data that **Keran** collects with its cookies on the website:

– Page setup preferences; Click stream; Server identifier; Security; Browsing facilitation; Welcome message.

As each browser is different, **Keran** invites the user to consult the Help menu of their browser to find out the preference rules concerning cookies. If the user blocks cookies, they will not be able to make full use of the site. Users can also use their mobile phone settings to manage their privacy options.

Emails in HTML format can contain a web tag to indicate whether they have been opened and to check all clicks made on links in the e-mail. **Keran** can use this information to determine which e-mails have caught the user's attention. The web tag will be deleted when the user deletes the e-mail. Plain text e-mails do not include a web tag.

For information, users can find out how to configure their browser software to prevent cookies being stored at the following addresses:

- Chrome: <https://support.google.com/accounts/answer/61416?hl=fr>
- Firefox: <https://support.mozilla.org/fr/kb/enable-and-disable-cookies-website-preferences>
- Safari: <http://www.apple.com/legal/privacy/fr-ww/>
- Internet Explorer: <https://support.microsoft.com/fr-fr/help/17442/windows-internet-explorer-delete-manage-cookies>
- Opera: <http://www.opera.com/help/tutorials/security/cookies/>

If users decide to deactivate cookies, they will be able to continue browsing the site. However, any malfunction of the site caused by this action cannot be considered to be the fault of the site publisher.

Keran uses and communicates this data for the purposes identified in the section below.

5. Why Do We Collect Your Personal Data and How?

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

On the basis of your consent, your data will be processed for the following purposes:

- Transmission of your data to the Human Resources Department (job offer response form only).

Your data is processed within the legitimate interests of **Keran** for the following purposes:

- To provide and improve usage of the site and provide users with any technical support they may require
- To enable users to personalise the site and select the content that they wish to access or share with a third party
- To analyse user data in order to improve the site, identify user usage trends and determine the effectiveness of analysis tools
- To prevent and detect possible threats to the security of the site, fraud or any other illicit activity
- For recruitment and processing applications.

6. Do We Share Your Personal Data?

The recipients who may, within the limits of their respective authorisations, have access to the user's personal data are:

- People in charge of the marketing department, departments responsible for customer relations and prospecting, IT departments and their line managers

The site may also provide the user with access to features from social media, forums, chat rooms, blogs (e.g. Facebook profile pages, etc.), and other services for which the user is able to post personal data.

- Service providers and subcontractors we use to carry out a range of operations and tasks on our behalf, particularly the Bakasable web agency
- Duly authorised public authorities (e.g. judicial or supervisory bodies), as part of our legal and regulatory obligations
- Regulated professions (e.g. lawyers, bailiffs, etc.) which may intervene as part of the implementation of guarantees, debt collection or litigation.

When your data is communicated to our subsidiaries and subcontractors, they are also asked not to use the data for purposes other than those initially intended. We make every effort to ensure that these third parties maintain the confidentiality and security of your data.

In all cases, only the necessary data is supplied. We make every effort to ensure that your data is communicated or transmitted securely.

We do not sell your data.

7. Data Hosting

The **Keran** website is hosted by: OVH, whose registered office is located at the following address:

2, Rue Kellermann, 59100 Roubaix, France

The host can be contacted by e-mail at: <https://www.ovhcloud.com/fr/contact/>

The data collected and processed by the site is exclusively hosted and processed in France.

8. How Long Do We Keep Your Personal Data?

Keran stores personal data in France.

We keep your personal data for as long as is necessary to comply with the applicable regulations, or for a period defined with regard to the purposes mentioned above, such as the management of the customer/prospect relationship or the operation of the site, as well as to respond to legal requests or requests from authorities and regulators, where applicable.

We store data relating to cookies in accordance with the regulations in force.

9. How Do We Guarantee the Security of Your Personal Data?

We at **Keran** are committed to protecting the personal data that we collect or process, against loss, destruction, alteration, unauthorised access or disclosure.

We implement all appropriate technical and organisational measures, depending on the nature of the data and the risks involved in processing it. These measures are designed to protect the security and confidentiality of your personal data. They may include practices such as limited access to personal data by authorised persons, by virtue of their functions, pseudonymisation or encryption.

In addition, our practices and policies and/or physical and/or logical security measures (secure access, authentication process, back-up copy, software, etc.) are regularly checked and updated if necessary.

10. What Rights do You Have?

The GDPR provides data subjects with rights that they can exercise. The following provisions are made:

1. **Right to information:** the right to clear, accurate and complete information on the use of personal data by **Keran**.
2. **Right to access:** the right for the requester to obtain a copy of the personal data that the Data Controller holds on them.
3. **Right of rectification:** the right to have personal data rectified if they are inaccurate or obsolete and/or to have them supplemented if they are incomplete.
4. **Right to erasure/right to be forgotten:** the right, under certain conditions, to have data erased or deleted, unless **Keran** has a legitimate interest in keeping it.
5. **Right to object:** the right to object to the processing of personal data by **Keran** for reasons relating to the particular situation of the requester (subject to conditions).

6. **Right to withdraw consent:** the right at any time to withdraw consent where processing is based on consent.
7. **Right to restrict processing:** the right, under certain conditions, to request that the processing of personal data be temporarily suspended.
8. **Right to data portability:** the right to request that personal data be transmitted in a reusable format so that it can be used in another database.
9. **Right not to be subject to an automated decision:** the right for the requester to refuse fully automated decision-making and/or to exercise the additional safeguards offered in this respect.
10. **Right to define post-mortem directives:** the right for the requester to define directives concerning the fate of personal data after his/her death.

Additional rights may be granted by local legislation to the persons concerned.

To this end, **Keran** has implemented a **procedure for managing the rights** of individuals that complies with the requirements of the applicable legislation. This procedure establishes:

- Standards to be respected to ensure transparent information for data subjects
- Legal requirements that must be met
- Authorised means of submitting a request for each right, depending on the category of person concerned
- The operational processes for handling these requests in accordance with the above requirements
- The parties involved in these processes, their roles and responsibilities.

To exercise your rights, please contact the Data Protection Officer (DPO): rgpd@groupe-keran.com.

When you send us a request to exercise a right, we ask you 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 information, in order to facilitate the examination of your request. In addition, where there is reasonable doubt, you may be asked to provide proof of your identity.

You also have the right to complain to the Commission Nationale de l'Informatique et des Libertés (CNIL), 3 Place de Fontenoy – TSA 80715 – 75334 PARIS CEDEX 07, France, about the way in which **Keran** collects and processes your data.

11. Updating this Policy

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

Last update September 2023.