

# **Policy of personal data processing applied to contacts, clients, prospects and users of online services.**

The following policy applies to the personal data processing carried out by **ASCPM SAS – DPO : Pierre Gougeon**

## **1- General provisions**

The following provisions relate to every processing of personal data carried out by the processor, unless otherwise specified by specific provisions.

### **➤ Legal framework – compliance with GDPR and with French law**

The processor declares that he carries out the personal data processing in accordance with the (EU) regulations 2016/679 of the European Parliament and Council of 27 April 2016, concerning the protection of natural persons with respect to the processing of personal data and the free circulation of the latter (hereafter referred to as GDPR) and to the French law n° 78-17 of 6 January 1978 concerning information technology, files and freedom (modified).

### **➤ The responsible for processing and other interveners**

The processor is identified above. His contact details are:

**ASCPM SAS**

**Pierre GOUGEON**

**5, Avenue du Général de Gaulle – 94160 SAINT MANDE – France**

**Mail : [infos@ascpm.fr](mailto:infos@ascpm.fr)**

### **➤ Recipients of personal data**

Categories of the recipient of the data are **affiliate agencies, companies who generate leads and companies in search of customer acquisition and/or online visibility.**

### **➤ Data transmission**

The processor does not intend to perform personal data transfer to a third country and or to an international organization.

### **➤ Duration of storage of personal data**

Personal data are stored until the person whose data is collected unsubscribes herself.

## ➤ **Rights of the individual whose data is collected**

The individual whose data is being collected has the right to:

- Ask the processor the access to the personal data, the rectification or erasure of these, or a limitation of the processing concerning the data subject
- To object to processing of personal data
- The data portability
- To submit a claim to a supervisory authority
- To withdraw his or her consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal, this right existing solely where the processing is based on point a) of Article 6(1), or on point a) Article 9(2) of GDPR, namely if the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

## **2- Specific provisions**

The following provisions are specific for every kind of personal data's processing operations.

### ➤ **Management of the relationship with our data subjects and prospects**

Processed personal data – We process the following personal data: **civility, first name, surname, telephone number, email address, postal address, employment.**

Purposes – Personal data processing is intended for the management of the relationship with our data subjects and prospects. In particular, the processing aims to **provide the data subject concerned information regarding economic news, exclusive offers and services related to his or her company's business sector.**

Legal basis – The personal data processing is based on the data subject's consent (GDPR point (f) of Article 6(1)). The request for data is contractual in nature. The data subject concerned is not obliged to provide these data. If the data subject concerned does not provide the data or withdraw his or her consent to the processing of data, he or she cannot **receive any information regarding economic news, exclusive offers and services related to his or her company's business sector.**

### ➤ **Marketing and advertising messages**

Processed personal data - We process the following personal data: **first name, surname, telephone number, email address, employment and information related to the opened messages and the followed link (including the date and time of the consultation).**

Purposes – The data processing is intended to improve our communication and to send you relevant content at appropriate times, **in accordance with the moments (hours/day) that suit you best.**

Automated decision-making – profiling – Automated decisions will be taken based on collected data. The logic underlying these automated decisions is as follow: **we will be able to plan the sending of exclusive offers according on your needs.** The importance and expected consequence of the processing for the data subject concerned is to **receive offers that suit you.**

Legal basis – The processing is based on the consent of the data subject concerned (GDPR point (a) of Article 6(1)) and it is necessary for the purpose of the legitimate interests that we are pursuing, which consist in the enhancement of our communication and in avoiding sending inappropriate notifications (GDPR point (f) of Article 6(1)). The request for data is contractual in nature. The data subject concerned is not obliged to provide these data and he or she may object to the processing at any time. If the data subject concerned does not provide the data or withdraw his or her consent to the processing of data, he or she cannot **receive suitable communications.**

➤ **Safety and prevention of illicit activities**

Processed personal data - We process the following personal data: **company name, first name, surname, email address, telephone number, postal address, employment, site internet.**

Purposes – The processing is intended to ensure our products and services' security and to prevent any illicit activity related to them.

Legal basis – This processing is required to comply with legal obligations the processor is submitted to (GDPR point (c) of Article 6(1)) and it is necessary for the purpose of the legitimate interests that we are pursuing, which consist in ensure our products and services' security and to prevent any illicit activity related to them (GDPR point (f) of Article 6(1)). The data request is in accordance with applicable legal and regulatory provisions. The data subject concerned is required to provide these data whether he or she wishes to benefit from our products and services. If the data subject concerned does not provide them, he or she cannot receive our communications and benefit from our exclusive offers.