

PRIVACY POLICY – CLSView

1. INTRODUCTION

The application CLSView has by nature a professional purpose, it is therefore intended to be used in principle on a professional device (phone and/or tablet) (hereinafter the "phone"). However, because we are concerned about the protection of your personal data and given the fact that this application can be downloaded freely on any ANDROID or APPLE phone (or tablet), and therefore possibly on a personal phone, we wished to reinforce, within this Privacy Policy, our requirements as well as the definition of our commitments in terms of personal data protection.

Within the framework of the installation and use of the application CLSView, we are therefore led to collect and process data considered as personal by the applicable standards and in particular the European regulation GDPR.

The CLSView application is necessarily linked to the others software solution offered by CLS (as Argos, THEMIS, Catsat...) which consist of SaaS platforms accessible via the Internet. Therefore, the CLSView application shall use information from CLS' solutions aggregated in the CLSView application.

We undertake to collect only the data we need to provide you with the best possible service, to ensure its confidentiality and security, including when we use service providers, and to facilitate the exercise of your rights with regard to your data.

We thus comply with all applicable provisions on the protection of privacy and personal data, in particular the amended Act of January 6th, 1978, relating to data processing, files and freedoms, as well as the EU Regulation 2016/679 of April 27th, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

This privacy policy describes the personal data we collect, how it is used and your rights in this regard. It applies to any user who accesses the application and uses the services offered on the application.

We reserve the right to change this Privacy Policy at any time. The most current version of this policy governs our use of your information and will always be available on the App or upon request from CLS.

If we make any material changes to this Privacy Policy, we will notify you via your email address.

2. DATA PROCESSOR IDENTITY

COLLECTE LOCALISATION SATELLITES

Simply joint stock company

Parc Technologique du Canal, 11 rue Hermès, 31250 Ramonville-Saint-Agne

Represented by Christophe VASSAL its President

3. COLLECTED DATA

First of all, because of the way the CLSView application works, based on the aggregation of user accounts of other CLS' services, the CLSView application does not collect any data related to these services.

In the course of using our services and browsing our application, CLS collects several categories of data which are detailed below.

- Information you provide to us when you register on our application.

Due to the way the application works, there is no specific account for the CLSView application. As a result, CLS does not collect such information and does not retain, specifically for the CLSView application, data from the user accounts of other CLS services aggregated in the application.

- Phone localisation data

We ask for your permission to collect accurate location data from your cell phone on our application via the authorization system that your cell phone's operating system uses. If you allow the collection of this data, you can later reverse your choice by changing the location settings on your cell phone. However, this will limit your ability to use certain features of our services.

The collection of geolocation data is only done in real time, no history is made by CLS. Your data is therefore not stored.

- Navigation data and metadata

CLS may collect only functional cookies in order to improve access to CLSView application and your user experience.

No activity log is collected by CLS.

- Device storage files

As part of the operation of the application and associated services, we ask you for permission to access the storage spaces on your device so that the application can store information and so that it can read the information related to the remaining available memory. The application only has access to information that are strictly necessary in order to find out if your device has enough memory to perform the exports you want. CLS doesn't keep this information.

Note:

We do not process special categories of data (sensitive data) such as data listed in Article 9 of the GDPR that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic data, biometric data, data concerning health or data concerning the sex life or sexual orientation of persons.

4. PURPOSES

CLS processes your personal data for specific, legitimate purposes and solely for the purpose of operating the application and associated services (other CLS' applications aggregated in the CLSView application).

In particular, this data is intended for:

- Managing your account(s);
- Use of CLS' services through the aggregation of your other user accounts;
- Securing the application;
- Respond to an injunction from the legal authorities and in particular to fight against fraud and more generally against any criminally reprehensible activity.

5. LEGAL BASIS OF THE PROCESSING

CLS processes most of your personal data as part of the contract you entered into when you registered on the application and as part of the contractualisation of the services offered by CLS. We may also process certain data about you on the basis of your consent, due to legal obligations or to meet our legitimate interest in processing it.

6. RECIPIENTS OR CATEGORIES OF RECIPIENTS

CLS is the sole recipient of the personal data collected.

We may also share certain information for legal purposes or in the event of litigation.

We will retain or disclose your information if we believe it is reasonably necessary to satisfy any legal or regulatory obligation, legal process or administrative request, to protect the safety of any person, to address any fraudulent, security or technical issues, or to protect the rights or property of our users.

CLS does not resell your data and will never pass on your personal data to any third party who may use it for their own purposes, including commercial and/or direct advertising purposes, without your express consent. Therefore, CLS does not disclose personal information outside the situations described in this privacy policy.

7. TRANSFER OF DATA OUTSIDE THE EU

All our servers on which your data is stored and those of the service providers used to exchange and store this data are located in France. CLS therefore does not transfer any data outside the European Union.

8. DATA RETENTION PERIOD

No is stored by CLS when using the CLSView application.

9. DATA SECURITY

CLS has implemented appropriate technical and organizational measures to ensure the security, confidentiality, integrity and availability of the services and to protect data against destruction, loss, alteration, unauthorized disclosure of or access to personal data transmitted, stored or otherwise processed.

CLS undertakes to use all available means to ensure the security and confidentiality of such data, in particular:

- We are using https technology;
- Access to your account is by means of a secure login and password;
- Access to personal data is strictly limited to those CLS employees or employees of CLS' subcontractors who need to access it in order to process it on our behalf. These individuals are subject to strict confidentiality obligations.

10. YOUR RIGHTS

In accordance with the regulations on personal data, you have a right:

- of access (article 15 of the GDPR),
- of rectification (article 16 of the GDPR),
- erasure (article 17 of the GDPR),
- limitation of processing (article 18 of the GDPR),
- of portability (article 20 of the GDPR),
- of opposition (article 21 and 22 of the GDPR),

Access right

You may obtain from CLS confirmation as to whether or not your data is being processed and, if so, access to your data and the following information:

- the purposes of the processing ;
- the categories of data;
- the recipients or categories of recipients to whom the data have been or will be disclosed;
- where possible, the period for which the data will be kept or, where this is not possible, the criteria used to determine this period
- the existence of the right to request from CLS the rectification or deletion of data, or a limitation of the processing of your data, or the right to object to such processing;
- the right to lodge a complaint with the CNIL;
- where the data is not collected from you, any available information as to its source; the existence of automated decision-making, including profiling, and, at least in such cases, useful information about the underlying logic, as well as the significance and intended consequences of such processing for you.

Where data is transferred to a third country or to an international organization, you have the right to be informed of the appropriate safeguards with respect to such transfer.

Your right to obtain a copy of your data must be reasonable and must not infringe the rights and freedoms of others.

Right of rectification

You have the right to obtain from CLS, as soon as possible, the rectification of data concerning you that are inaccurate. You also have the right to have incomplete data completed, including by providing an additional declaration.

In order to make it as easy as possible for you to exercise this right, we invite you to make these changes and additions directly in your account. If you believe that other data concerning you

should be modified or completed and you are unable to make this change yourself, we invite you to make the request directly to us by contacting us.

Erasure rights

You have the right to obtain from CLS the deletion of data concerning you as soon as possible if one of the following reasons applies:

- the data is no longer necessary for the purposes for which it was collected or otherwise processed by CLS;
- you have withdrawn your consent to the processing of the data and there is no other legal basis for the processing;
- you exercise your right to object under the conditions set out below and there is no compelling legitimate reason for the processing;
- the data has been processed unlawfully;
- the data must be deleted to comply with a legal obligation;

Right to limitation

You have the right to request CLS to restrict the processing of your data if one of the following reasons applies:

- CLS verifies the accuracy of the data following your objection to the accuracy of the data
- the processing is unlawful and you object to the deletion of the data and demand instead the restriction of their use;
- CLS no longer needs the data for the purpose of processing, but the data is still required by you for the establishment, exercise or defense of legal claims;
- You have objected to the processing under the conditions set out below and CLS will check whether the legitimate reasons for the processing outweigh the reasons you have stated.

We remind you that CLS collects only data strictly necessary to the functioning of the application, so your possibility of limitation is very restricted, CLS can not make the application work properly without one of the categories of data defined above.

Right to data portability

To the extent possible and for data not deleted at the time of your request, you have the option of receiving your data from CLS in a structured, commonly used and machine-readable format.

Your right to have your data transferred by CLS to a data controller designated by you is technically impossible in this context.

Your right to data portability must not infringe on the rights and freedoms of others.

Right of opposition

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your data based on the legitimate interests of CLS. CLS will then no longer process the data, unless it can demonstrate compelling legitimate grounds for the processing which override your interests and rights and freedoms, or may retain the data for the establishment, exercise or defence of legal claims.

This right to object is limited by the need for CLS to process some of your personal data for the operation of the application. Some requests for opposition may therefore make it impossible to provide the associated services.

Note that you do not need to pay a fee to access your personal data or exercise your rights. However, we may charge a reasonable fee if your request is manifestly unfounded, repetitive or excessive.

We may also contact you to request additional information about your request in order to respond to you. Any answer will be brought to you within one month. Exceptionally, it would be possible for us to exceed this one-month period if your request was particularly complex.

11. RIGHT TO APPEAL TO A SUPERVISORY AUTHORITY

The supervisory authority competent to deal with any request concerning us is the Commission Nationale de l'Informatique et des Libertés (CNIL). If you wish to contact the CNIL, you will find below the contact details:

CNIL (COMMISSION NATIONALE DE L'INFORMATIQUE ET DES LIBERTÉS)

3 Place de Fontenoy – TSA 80715 – 75334 PARIS CEDEX 07

Tel. : 01 53 73 22 22

Fax : 01 53 73 22 00

If you wish to file a complaint with the CNIL, you can fill out the online complaint form available at the following address: <https://www.cnil.fr/fr/plaintes>.

If you have a question about your rights regarding data processing and liberties, you can consult the CNIL website: www.cnil.fr.