

1. PURPOSE OF DATA PROCESSING

1.1. TREATMENT NAME

MANAGEMENT OF EXTERNAL THIRD PARTIES

1.2. AIMS

The purpose of the processing is to manage the suppliers and customers of Eurofeedback

- It allows you to manage accounting, deliveries, purchases, after-sales service and associated documents
- It enables correspondence with Eurofeedback suppliers and customers
- It allows you to manage commercial contracts
- It allows to have a follow-up of the different suppliers and Eurofeedback customers

1.3. LEGAL BASIS

Article 6 of the General Data Protection Regulation - GDPR

This data processing is in the legitimate interest of Eurofeedback to want to manage and monitor these suppliers and customers.

2. DATA PROCESSED

2.1. CATEGORIES OF DATA PROCESSED

Name, first name, telephone, physical address and e-mail address of the supplier's contact person or of the customer's contact person.

3. PERSONS CONCERNED

The data processing concerns contact persons of suppliers, and customers (distributors, beauticians, doctors) of the company Eurofeedback.

4. RECIPIENTS OF DATA

4.1. DATA FROM A RESIDENT OF THE EUROPEAN UNION

- Categories of recipients:
 - Supplier data: the purchasing department, the accounting and financial department and the quality department
 - Customer data: EU distributors, the sales department, the ADV department, the accounting and financial department, the quality department and the after-sales service-Customer support
- Data transfer: No data transfer outside the European Union is made.

4.2. DATA COMING FROM A RESIDENT OUTSIDE THE EUROPEAN UNION

- Categories of recipients:
 - Supplier data: the purchasing department, the accounting and financial department and the quality department
 - Customer data: distributors outside the EU, the sales department, the ADV department, the accounting and financial department, the quality department and the after-sales service-Customer support
- Data transfer: data transfer outside the European Union is made.

5. DATA CONSERVATION PERIOD

Data retention is defined as follows:

Throughout the duration of the contractual relationship, the following data is kept:

- Purchase orders, delivery notes, receipt notes
- Book and accounting register
- Invoices issued or received
- All correspondence with suppliers or customers
- Register of distributors and customers (Sylob).

At the end of the contractual period:

- Purchase orders, delivery notes, delivery notes: 25 years
- Book and accounting register: 25 years
- Invoices issued or received: 25 years
- Electronic contract for an amount greater than 120 euros: 25 years from delivery or service.
- Correspondence with suppliers or customers: 25 years
- Register of distributors and customers (Sylob): 25 years.

At the end of 25 years after the end of the contractual period

All the following data is archived, and can no longer be easily consulted. They must first be unarchived before consultation.

The DPO, will give the authorization of unarchiving.

6. SAFETY

In order to avoid or reduce the possible risks associated with the processing of computer data, Eurofeedback has implemented security measures adapted to the company and to the data it processes.

The security measures implemented by Eurofeedback concerning this data are:

Physical measurements:

- Securing of the room containing the servers: the room is accessible only to people authorized to enter it.
- Securing of the Eurofeedback company: the company is secured by an access control and fire alarm system.

Logical measures:

- User access control: Eurofeedback has set up a password and unique identifier system for each employee to secure the opening of his session on the workstations. The central management system requires a password renewal every 60 days. The workstation session is automatically locked after 30 minutes of non-use.
- Software protection measures: A virus and intrusion protection solution is used to secure data on the Eurofeedback network. Updating the virus signature lists is managed automatically by the server to the client workstations every hour. Data contained on the Company's mobile workstations (laptops) is encrypted.
- Data backup: A backup of the data modified during the day on the main servers is performed each (by copy). A data backup for all servers is performed on weekends to removable media and is referred to as a "weekly backup". The last backup of the month is referred to as a "monthly backup"
- Retention of backed up data: All backup tapes are kept in the company safe. The penultimate weekly backup tape is stored offsite. The latest Weekly backup tape is present on-site during office hours, and is stored off site outside of office hours. The tapes are kept for a minimum of 1 year.
- Data restoration: The data is restored by the IT Manager from one of the backups of the previous period.

Organizational measures:

- An IT charter is provided to the employee on their first day of work. This charter describes the rules for using the IT resources made available to it, as well as the rights and duties relating thereto.
- A GDPR procedure has been created to describe the different steps to follow when personal data is processed by Eurofeedback
- A GDPR awareness charter has been created to warn EUROFEEDBACK employees of the importance of complying with the requirements of this regulation.
- Internal audits of each sector within Eurofeedback are planned each year

7. YOUR RIGHTS ON DATA CONCERNING YOU

You can access and obtain a copy of the data concerning you, oppose the processing of this data, have them rectified or have them deleted. You also have a right to limit the processing of your data.

Understand your IT rights and freedoms:

- <https://www.cnil.fr/fr/les-droits-pour-maitriser-vos-donnees-personnelles>

7.1. EXERCISE YOUR RIGHTS

the Data Protection Officer (DPO), is your contact for any request to exercise your rights to this processing. You can contact the DPO by electronic means, by post, by telephone at the following coordinates:

e-mail : dpo@eurofeedback.com

Tel : +33 160 863 545

Adress : 3 rue de l'Aubrac Z.I la petite montagne sud LISSES

7.2. COMPLAINT (COMPLAINT) WITH THE CNIL

If you feel, after contacting us, that your rights over your data have not been respected, you can submit a complaint (complaint) to the CNIL via this link:

- <https://www.cnil.fr/fr/webform/adresser-une-plainte>