

CYNBIOSE PRIVACY POLICY
(Last updated: May 2022)

DEFINITIONS

"Personal Data " means any information relating to an identified or identifiable natural person as defined by Regulation (EU) No. 2016/679 of 27 April 2016 and any subsequent equivalent regulation.

"Applicable Data Protection Laws" or "Applicable Law(s)": means Regulation (EU) 2016/679 of 27 April 2016 (applicable since 25 May 2018), Law n°78-17 of 6 January 1978 relating to information technology, files and freedoms as amended by Law n°2004-801 of 6 August 2004 relating to the computerized processing of personal data, by Law for a Digital Republic n°2016-1321 of 8 October 2016, Law n°2018-493 of 20 June 2018 relating to the protection of personal data, and any subsequent equivalent regulation, and/or any applicable law or applicable and current regulation relating to Personal Data protection.

"Third Country" means any country outside the European Union that does not have adequate legislation concerning the Processing of Personal Data as decided by the European Commission.

"Data Controller":

CYNBIOSE - Simplified joint stock company registered in the Lyon Trade and Companies Register, with registered office in avenue Bourgelat, 69280 Marcy L'Etoile, France. SIRET n° 508 907 086

"Processing": any operation or set of operations carried out or not by means of automated processes and applied to Personal Data or sets of Personal Data, such as, for example, the collection, recording, organization, structuring, storage, communication by transmission, dissemination, retrieval, consultation of Personal Data and defined by Regulation (EU) No. 2016/679 of 27 April 2016 and any subsequent equivalent regulations.

"Data Processor": refers to the third party that processes Personal Data on behalf of the Data Controller.

User of the Site": means any person who connects to the Site and who uses or not the services available there.



This Privacy Policy applies to the website www.cynbiose.com published by the company CYNBIOSE (hereinafter referred to as the "Site").

The Data Controller undertakes to comply with the applicable Laws in the context of the Processing of Personal Data carried out on the Site.

The Personal Data collected via the Site are processed in a lawful, fair and transparent manner.

The Personal Data collected is adequate, relevant and limited to what is strictly necessary for the purposes of the Processing.

1. Purposes of the Processing of Personal Data

a) Processing n°1: the purpose of the Processing is to manage the Site.

The Data Controller collects the personal data of the User of the Site for:

- Preparation and publication of content;
- Technical administration of the Site in conjunction with the technical service providers (hosting, domain name registrar, etc.);

- Site security management (equipment and security logs) ;
- The elaboration of statistics of the visits of the Site.

Legal basis of the Processing :

Article 6 (1) f) of the GDPR: Processing is necessary for the purposes of the legitimate interests pursued by the Data Controller.

Categories of Personal Data processed :

- Connection data: IP addresses, event logs and necessary cookies.

Persons concerned :

The Users of the Site.

Automated decision making :

The Processing does not involve automated decision-making.

b) Processing No. 2: The purpose of the Processing is to respond to a User's request made via the "Contact" tab on the Site

It allows to :

- Respond to a request sent directly via the contact form available on the Site

Legal basis of the processing

Article 6 (1) a) of the GDPR: the Data Subject has consented to the Processing of his/her Personal Data

Categories of Personal Data processed :

- Last name, first name
- Company
- E-mail address
- Any information provided by the Data Subject (free fields).

Persons concerned :

The Users.

The Personal Data collected for this purpose are collected in a mandatory way.

Automated decision making :

The Processing does not involve automated decision-making.

c) Processing No. 3: The purpose of the Processing is to respond to a User's request made via the "Newsletter" tab on the Site

It allows to :

- Subscribe the person to the newsletter mailing list

Legal basis of the processing

Article 6 (1) a) of the GDPR: the Data Subject has consented to the Processing of his/her Personal Data

Categories of Personal Data processed:

- Professional e-mail address

Persons concerned :

The Users.

The Personal Data collected for this purpose are collected in a mandatory way.

Automated decision making:

The Processing does not involve automated decision-making.

d) Processing No. 4: The purpose of the Processing is to respond to a User's request made via the "Career" page on the Site

It allows to :

- Manage the candidate's application for employment
- Keep in the Cv library

Legal basis of the processing

Article 6 (1) a) of the GDPR: the Data Subject has consented to the Processing of his/her Personal Data

Categories of Personal Data processed :

- Professional e-mail address
- CV
- Motivation letter

Persons concerned :

The Users.

The Personal Data collected for this purpose are collected in a mandatory way.

Automated decision making :

The Processing does not involve automated decision-making.

2. Duration of retention of Personal Data

The Data Controller will keep the information and Personal Data for the maximum legal or regulatory period applicable according to the purpose of the Processing:

- The Personal Data collected following a request made on the Site are kept for a maximum of twelve years from the last contact from the Data Subject, due to nature of the Data Controller's activity (preclinical services and their renewal time);
- The Personal Data collected for the distribution of the newsletter are kept until the person unsubscribes via the unsubscribe link provided in each newsletter;
- The Personal Data collected following a request made via the Career application are kept for a maximum of two years from the date the request has been sent;
- Cookies whose deposit is subject to the consent of the User are kept for thirteen months.

3. Commitment of the Data Controller

The Data Controller undertakes to:

- process Personal Data only for the purposes described above,
- process Personal Data in accordance with applicable Laws,
- in case of transfer of Personal Data to a Third Country or to an international organization, inform the User beforehand,
- guarantee the confidentiality of Personal Data by taking all appropriate technical and organizational measures to (i) prevent access to Personal Data by unauthorized persons, (ii) by carrying out identity and access controls via an authentication system and a password policy, (iii) by opting for an authorization management system and (iiii) processes and devices enabling all actions carried out on its information system to be traced and to carry out, in accordance with the applicable Laws, reporting actions in the event of an incident impacting the Personal Data
- ensure that persons authorized to process Personal Data are committed to confidentiality or are subject to an obligation of confidentiality and receive the necessary training in the protection of Personal Data,
- to take into account, with regard to its tools, applications or services, the principles of protection of Personal Data from the design stage,
- erase, anonymize or archive Personal Data at the end of the retention period,

The Data Controller shall not be liable for any security incidents related to the use of the Internet, in particular in the event of loss, alteration, destruction, disclosure or unauthorized access to the User's data or information.

4. Recipients/Data Processors/Contractors

The Personal Data shall be transmitted to the internal services of CYNBIOSE competent to manage the request in question.

Furthermore, the User of the Site accepts that the Personal Data concerning him/her collected by the Data Controller may be transmitted to the Data Processors/Service Providers with whom it has a contractual relationship for the sole purpose of carrying out the above-mentioned purposes, provided that these third party recipients of the Personal Data are subject to regulations guaranteeing an appropriate and suitable level of protection as defined by the applicable Law (in particular the Site host).

5. Exercise of the rights of the User of the Site and collection of consent

The User of the Site gives his consent to the collection and Processing of his Personal Data by checking the appropriate boxes on the Site.

The following rights are guaranteed by the Data Controller to the User of the Site: right of access, rectification, erasure and opposition, right to the limitation of the Processing, right to data portability, right not to be subject to an automated individual decision (including profiling).

The User of the Site may obtain a copy of his Personal Data, upon written request to the Data Controller.

By sending a written request, and at any time, the User of the Site can obtain a correction or a deletion of his Personal Data.

All requests should be sent in writing to the following address: [privacy\(at\)cynbiose.com](mailto:privacy(at)cynbiose.com)

If the User of the Site considers that CYNBIOSE has not respected its obligations in terms of data protection, he/she may file a complaint with a national data protection authority, in France the CNIL.

6. Security and confidentiality of Personal Data - Notification

The Data Controller undertakes to implement:

- (a) physical security measures to prevent access to Personal Data by unauthorized persons,
- (b) identity and access controls via an authentication system and password policy,
- (c) processes and devices allowing to trace all the actions carried out on its information system and to carry out, in accordance with the Applicable Laws, reporting actions in case of an incident impacting Personal Data.

Thus, in terms of computer security, the Data Controller endeavours to apply the recommendations made by the CNIL in this respect: password policy coupled with a second authentication, regular modification of passwords, etc.

When the applicable Laws provides for it, the Data Controller shall notify the User of the Site and the competent supervisory authority of any violation of Personal Data within a maximum period of 72 hours after becoming aware of it by e-mail to the e-mail address at its disposal. This notification shall be accompanied by any useful documentation.

7. Documentation

The Data Controller shall establish and maintain the necessary documentation to demonstrate compliance with all its obligations under the applicable Laws.

8. Transfer

In case of transfer of all or part of the Personal Data subject to Processing to a Third Country, i.e. located outside the European Union or not presenting a level of protection recognized as adequate within the meaning of the applicable Laws, or to an international organization, the Data Controller undertakes to provide the appropriate safeguards provided for within the applicable Laws and to ensure that they are respected by its Data Processors.

Under no circumstances shall the Data Processor sell, rent or use the Personal Data it receives for any purpose other than the aforementioned purposes. The disclosure of Personal Data to third parties is carried out by the Data Controller only for the purposes of carrying out the purposes and to third parties with the status of Data Processors under the conditions referred to herein.

9. Privacy Policy Update

The Data Controller regularly updates this Privacy Policy, which remains available on the Site at all times.

10. Social networks

The Site may contain social network icons allowing you to express opinions or share content on these social networks.

The Data Controller shall not be held responsible for the content shared on these social networks.

11. Cookies

Browsing the Site may cause cookies to be installed on the User's terminal (by the Company and/or its subcontractors). When you connect to the Site, you are asked to configure your choices regarding cookies.

a. Definition

A cookie is a small text file, deposited on your terminal, via the Internet browser, for example when visiting a site, reading an email, installing software, etc.

A cookie does not allow the identification of the User but records information relating to his navigation.

b. Types of cookies on the Site

The different types of cookies and their purposes:

- When you visit the Site, the Data Controller deposits cookies on your terminal in order to simplify and improve your browsing on the Site and to personalize the services offered to you under the conditions defined below.
- **Necessary cookies:** these are those that are strictly necessary for the proper functioning of the Site (e.g. measuring the performance of the Site, detecting navigation problems). These cookies contribute to the technical functioning of the Site and cannot be deactivated.
- **Functional cookies:** these cookies make it possible to improve browsing on the Site and in particular to make browsing more fluid and personalized without being essential to the proper functioning of the Site (for example: the possibility of sharing content on social networks, the display of personalized advertising, etc.).
- **Analytical cookies or audience measurement:** these cookies allow the Data Controller to know the use and performance of the Site and to improve its operation (for example, analysis of the content consulted, etc.)

The cookies and other trackers used on the Site are listed on the web page « [Cookie Policy](#) ».

The Google Analytics services used by the Data Processor allow to count the users and to identify the way they use the Website. This is a statistical tool that allows the Data Controller to improve its website by taking into account the needs of Users.

The data generated by these cookies concern the use of the Site, such as the pages visited by the Users.

Cookies and other Google Analytics trackers are controlled by Google, which may process personal data about the user if the user agrees. The issuance and use of these cookies and other trackers by Google is subject to its own privacy policy. For more information, the terms of use of Google Analytics are available [here](#).

c. Cookie retention time

The Data Controller stores the cookies listed above, subject to the consent and settings of the User, for a maximum period of 13 months.

d. Cookie settings and consent

When connecting to the Site, the User is invited to set his cookie preferences. They may modify their choices at any time. This cookie management can be carried out from the User's browser software.

To find out more about how to configure your browsers, we invite you to consult the website of the French National Commission for Information Technology and Civil Liberties: <https://www.cnil.fr/fr/cookies-les-outils-pour-les-maitriser>.

If the User does not wish for cookies to be installed or read on his/her terminal equipment, a refusal cookie will be placed on his/her equipment, so that the Data Controller can record the information that he/she is opposed to the use of cookies. If the User deletes this refusal cookie, it will no longer be possible to identify him as having refused the use of cookies.

Similarly, when the User accepts the deposit of cookies, a consent cookie is installed.

The refusal or consent cookies must remain on the User's terminal equipment.

12. Contact us

CYNBIOSE, avenue Bourgelat, Marcy l'Etoile (69280), France

[privacy\(at\)cynbiose.com](mailto:privacy(at)cynbiose.com)