

PERSONAL DATA PROTECTION POLICY

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Recipient: Any external stakeholder involved in Design Control Software's activities

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Version	APN	Date	Contributor	Changes

1 INTRODUCTION

1.1 Purpose and scope

This policy aims to inform all external stakeholders involved in Design Control Software's activities about the collection and processing of their personal data. These stakeholders include customers, suppliers of products or services, subcontractors, social organizations, job applicants, etc.

Personal data refer to any information or set of information that enables the identification of a person (such as first and last name, email address, social security number, etc.).

1.2 Company commitment to data protection

Just as with all confidential data handled in the course of its service and software publishing activities, Design Control Software places great importance on protecting the personal data entrusted to it and is committed to ensuring the highest level of confidentiality and security for such data.

2 DATA COLLECTION

2.1 Source of data

The personal data used by Design Control Software in the course of its service activities may originate from:

- Contact forms on the company's websites: designcontrol.fr and .com, designcontrolacademy.fr and .com,
- Incoming or outgoing contact by phone, email, or mail with a Design Control Software employee,
- Execution of a contract between Design Control Software and a client or supplier,
- Job applications submitted through job posting websites or by email.

2.2 Exclusion of specific categories of personal data

In accordance with applicable law, Design Control Software expressly excludes the collection or processing of special categories of personal data, commonly referred to as sensitive data. These categories include, but are not limited to, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data used for the purpose of uniquely identifying a natural person, data concerning health, data concerning a natural person's sex life or sexual orientation, and personal data related to criminal convictions or offenses.

Under no circumstances shall Design Control Software collect, process, or retain such special categories of personal data.

3 USE OF PERSONAL DATA

3.1 Recipient and use of personal data

Personal data is used solely and strictly for the proper functioning of Design Control Software's activities, and only by authorized personnel as applicable. All processed data, as well as the individuals responsible for processing, are recorded in a simplified processing register.

The personal data used in the context of commercial or institutional relationships includes the names, first names, telephone numbers, and email addresses of our contacts. This data is processed for the following purposes:

- The proper execution of a contract, including but not limited to the following main tasks: sending commercial proposals, project monitoring, invoicing and accounting, sending satisfaction surveys or complaints, sending commercial information or corporate event invitations, ordering equipment, monitoring supplier quality, etc.
- Compliance with legal obligations, including but not limited to the following main tasks: declaration and payment of contributions, taxes, and duties, activity reporting, etc.
- Compliance to internal procedures (including quality standards),
- The legitimate interest of Design Control Software's activities, particularly recruitment to fill available positions.

Regarding applicants for Design Control Software job openings, it should be noted that their resumes will be reviewed and may be archived by authorized personnel only. However, no personal data—other than names and first names—will be subject to further processing beyond the purpose for which it was collected (recruitment for the position applied for) or stored in a database.

No data is stored or transferred outside the European Union.

3.2 Transfer to third-parties

Personal data of our customers, suppliers, and other external stakeholders may be disclosed or made accessible to our subcontractors strictly within the scope of their missions, which are limited to ensuring the proper functioning of the company. This includes, for example, accounting firms for the company's financial management, law firms for legal assistance, and social organizations for compliance with legal obligations.

Additionally, the company Design Control Consulting, acting as a subcontracting partner of Design Control Software for its mechanical design and training services, may process the personal data of Design Control Software's customers as part of its subcontracting activities. Design Control Consulting is subject to the same personal data protection policy as Design Control Software.

3.3 Retention period

The retention period for personal data is a minimum of 10 years and at least equal to the duration of the contract between Design Control Software and its client, supplier, or any other organization.

Regarding application files and resumes, personal data shall not be retained for more than 2 years following the rejection of the application.

4 RIGHTS OF DATA SUBJECTS

4.1 Rights regarding personal data

Data subjects have the right to access, rectify, and erase their personal data, as well as the right to restrict processing and the right to data portability. They also have the right to object, on legitimate grounds, to the processing of their personal data, and the right to object to the processing of their data for direct marketing purposes.

4.2 How to exercise these rights

These rights may be exercised at any time by contacting:

- By mail : Design Control Software – 42 chemin du Moulin Carron – Allée A1 Le Norly – 69130 ECULLY
- By email : administratif@designcontrol.fr

A response will be sent to the applicant within one month of receiving the request.

If the applicant believes, after contacting Design Control Software, that their data protection rights are not being respected, they may file a complaint with the CNIL (French Data Protection Authority).

5 SECURITY AND CONFIDENTIALITY

Design Control Software implements technical and organizational measures to ensure the security and confidentiality of personal data processed in the course of its activities, including:

- Protection against unauthorized access (secure access, enhanced authentication).
- Encryption of sensitive data during transmission or storage.
- Awareness and training programs for staff on best practices for data protection.
- Strict access controls, limited to authorized personnel only.

Design Control Software's service providers and partners are also required to comply with strict confidentiality and security obligations.

6 REVISION OF THE POLICY

This policy may be updated to reflect future legal, technical or organisational developments.

7 CONTACT

For any questions or requests regarding the protection of your personal data, you may contact our Data Protection Officer (DPO) : Claire NALLET, contact@designcontrol.fr, 04 72 09 13 00.