



## **Privacy Policy**

Full Platform

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## 1. Introduction

- 1 *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, also known as the General Data Protection Regulation sets out the legal framework applicable to the processing of personal data.*
- 2 *The GDPR strengthens the rights and obligations of data controllers, data processors, data subjects and data recipients.*
- 3 *The main purpose of this document is to bring together, in a concise, transparent, comprehensible and easily accessible format, information concerning the data processing carried out by Fullll (hereinafter "Fullll" or "we") to enable you to understand the conditions under which your personal data is processed.*

## 2. Fair and transparent data collection

- 4 To ensure fairness and transparency, we take care to inform you of each processing operation we carry out, via this document.
- 5 Personal data is collected fairly. No data is collected without the knowledge or consent of the individual concerned.

## 3. Legitimate and proportionate use of your data

- 6 When we process personal data, we do so for specific purposes: each data processing operation has a legitimate, specific and explicit purpose.
- 7 For each processing operation, we undertake to collect and use only data that is adequate, relevant and limited to what is necessary for the purposes for which it is processed.
- 8 We ensure that data is kept up to date and that procedures are in place to enable inaccurate data to be deleted or rectified.

## 4. Purpose and nature of the processing

- 9 The sole purpose of the processing of personal data by Fullll is the management of accounting, fiscal and social matters on behalf of the beneficiary or a third party.
- 10 The data will be processed as follows:
  - Collecting, recording, storing, hosting, using, consulting, modifying, communicating, disseminating, limiting or destroying personal data.

## 5. Personal data we process

- 11 Fullll collects and processes the following categories of personal data for the purposes set out below:
  - Data identifying individuals, such as name, address, phone number, and email address;
  - Data on payment methods: Postal or bank information, cheque number, bank card number, bank card expiry date, and the visual cryptogram;

- Data relating to the order(s) for SaaS services and/or services from Fulll: transaction number, details of the SaaS service(s) and/or services ordered, etc.;
  - Data relating to the follow-up of the commercial relationship: requests for documentation, history of SaaS services and/or services ordered, correspondence between you and us;
  - Invoice payment data: payment terms, discounts granted, receipts, balances and outstanding amounts.
- 12 The mandatory nature of the personal data to be provided is indicated at the time of collection. If you refuse to provide the mandatory data, Fulll will not be able to provide you with the SaaS services and/or the services you request (such as creating your administrator or user account or processing your order).
- 13 In addition, you may provide us with the personal data of a third party, in particular if you are an Administrator. In this context, we remind you that you are required to inform this person of the communication and processing of their personal data by Fulll and to communicate this policy to them.

## 6. Legal basis and purposes of our data processing operations

14 The processing carried out by Fulll has the following purposes and legal bases:

	Purpose	Sub-purpose	Legal basis
1.	Customer relationship management	Managing the creation of an administrator or user space	Performance of the contract
		Contract management (provision of SaaS services)	Performance of the contract
		Management of orders and invoicing	Performance of the contract
		Customer Service management	Performance of the contract
		Management of pre-litigation or litigation relating to the contract	Performance of the contract
		Management of pre-litigation or litigation relating to the contract	Fulll's legitimate interest in providing evidence of a right or a contract
		Management of requests to exercise the rights of data subjects	Compliance with a legal obligation
		Management of accounting	Compliance with a legal obligation
2.	Improving the SaaS services of the Fulll offering	Depositing and analysing audience cookies	Consent collected via the cookies pop-up
		Anonymisation of data for the purposes of aggregating and compiling statistical information, including predictive and benchmark data, intended to improve the SaaS services offered by Fulll	Performance of the contract
3.	Management of requests from the competent authorities or courts	Communication of requested data	Compliance with a legal obligation

## 7. Data recipients

15 The recipients of your data are :

- Authorised Fulll employees;
- Fulll's service providers and subcontractors insofar as they are concerned;
- The competent authorities or courts.

16 We ensure that only authorised persons have access to this data. Fulll applies a strict authorisation policy to ensure that only authorised persons have access to data.

## 8. How long we keep your data

- 17 As a matter of principle, and unless otherwise instructed by the customer, the duration of the processing carried out by Full is limited to the duration of the contract, without prejudice to the stipulations set out in the "Termination" and "Reversibility" articles of this policy.
- 18 The retention periods we apply to your personal data are proportionate to the purposes for which they were collected.
- 19 We ensure that data is only kept in a form that allows identification of the data subjects for as long as is necessary for the purposes for which it is processed.
- 20 More specifically, we organise our data retention policy as follows:

	Purpose	Sub-purpose	Retention period
1.	Customer relationship management	Managing the creation of an administrator or user space	Your data will be retained until your account is deleted. Once your account has been terminated or the specified period of inactivity has expired, only the data necessary for pre-litigation or litigation purposes will be retained until the statutory limitation period has expired - it being understood that the common law limitation period in civil and commercial matters is five (5) years.
		Contract management (provision of SaaS services)	Your data is kept for three (3) months after the contract ends. Thereafter, only the data necessary for pre-litigation or litigation purposes will be retained until the expiry of the statutory limitation period - it should be noted that the common law limitation period in civil and commercial matters is five (5) years.
		Management of orders and invoicing	Your data is kept until your order has been processed in full. Thereafter, only the data required for pre-litigation or litigation purposes will be archived until the legal statute of limitations has expired - it being specified that the common law statute of limitations in civil and commercial matters is five (5) years.
		Customer Service management	Your data is kept until your request/complaint has been fully processed. Thereafter, only the data required for pre-litigation or litigation purposes is archived until the legal statute of limitations has expired - it being specified that the common law statute of limitations in civil and commercial matters is five (5) years.

	Purpose	Sub-purpose	Retention period
		Management of pre-litigation or litigation relating to the contract	Where appropriate, your data will be kept for the duration of the pre-litigation or litigation phase. In the case of pre-litigation, the data is then archived until the dispute has been settled out of court or, failing that, until the corresponding legal action has become prescribed. In the case of litigation, the data is archived until the ordinary and extraordinary remedies are no longer available.
		Management of pre-litigation or litigation relating to the contract	Your data will be kept until your request has been fully processed. Thereafter, only the data necessary to demonstrate that Fulll has fulfilled its legal and regulatory obligations will be archived for a period of five (5) years.
		Management of requests to exercise the rights of data subjects	Accounting data and commercial documents (invoices, order forms, delivery notes, commercial correspondence, etc.) may be archived for up to ten (10) years from the end of the financial year.
2.	Improving the SaaS services of the Fulll offering	Management of accounting	Your data is kept until the end of the analysis carried out by Fulll with a view to improving the Fulll platform and/or offer. Thereafter, only data required for pre-litigation or litigation purposes will be archived until the legal statute of limitations has expired - it being specified that the common law statute of limitations in civil and commercial matters is five (5) years.
3.	Management of requests from the competent authorities or courts	Depositing and analysing audience cookies	Your data will only be kept for as long as is necessary to process the request from the competent authority or court.

## 9. Personal data security

- 21 We pay particular attention to the security of personal data.
- 22 Technical and organisational measures appropriate to the sensitivity of the personal data have been put in place to ensure the integrity and confidentiality of the data and to protect it against any malicious intrusion, loss, alteration or disclosure to unauthorised third parties.
- 23 For example, Fulll makes access to your administrator or user space on the platform conditional on entering a user name and password that are subject to a complexity rule. Please note that each account holder is responsible for the confidentiality, quality and strength of this password (see CNIL recommendations). It is recommended not to share it with a third party. Fulll will never ask you, by sending an email, for your login, your password or your bank details.
- 24 Fulll also guarantees that its staff members and any other person who processes your personal data will comply with the internal rules and procedures relating to the processing of personal data and in particular the technical and organisational security measures put in place to protect your personal data.

## 10. Processing by third parties

- 25 When we use a service provider, we only disclose personal data to them once we have ensured that they are able to meet our security and confidentiality requirements.
- 26 In compliance with our legal and regulatory obligations, we enter into contracts with our subcontractors that precisely define the terms and conditions under which they process personal data, in accordance with the regulations on the protection of personal data.
- 27 The subcontractors authorised to process all or part of the personal data are defined on the following pages:



Name	Activities	Type of data	Location of data
<b>Amazon EU (AWS)</b> 31-, 33 Rives de Clausen, 2165 Luxembourg <a href="https://aws.amazon.com">aws.amazon.com</a>	Data hosting and managed cloud services	Documents, emails, address, user identity	European Union
<b>Freshworks Inc.</b> (Freshdesk) 1250 Bayhill Drive, Suite 315 San Bruno California 94066, United States <a href="https://www.freshworks.com">www.freshworks.com</a>	Support / ticketing service tool	Emails, user identity for debugging sessions and possibly access to other user data depending on customer support requests	European Union
<b>GitHub, Inc.</b> (Github) 88 Colin P Kelly Jr St San Francisco, CA 94107 United States <a href="https://github.com">https://github.com</a>	Management of source code, improvement actions and corrections associated with the source code	Emails, user identity for debugging sessions, depending on customer support requests	United States of America
<b>Google LLC</b> (Google Analytics) 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States <a href="https://www.google.com/intl/fr/analytics">www.google.com/intl/fr/analytics</a>	Website and web application audit analysis service	Metadata, IP address, web browser	United States of America
<b>Matomo Ltd. - Innocraft</b> 7 Waterloo Quay PO625, 6140 Wellington, New Zealand <a href="https://fr.matomo.org/">https://fr.matomo.org/</a>	Web application and site analysis service	Metadata, anonymised IP address, random unique identifier, number of visits, time of first and last visit, browser	European Union & France
<b>Google Inc</b> (Firebase) 1600 Amphitheatre Parkway Mountain View, CA 94043, United States <a href="https://firebase.google.com">https://firebase.google.com</a>	Error logging, application distribution and notification message service for mobile applications	Metadata, IP address, smartphone identifier (UUID)	United States of America

Name	Activities	Type of data	Location of data
<b>Functional Software, Inc.</b> (Sentry) 1 Baker Street Suite 5B San Francisco, CA 94117, United States <a href="https://sentry.io">https://sentry.io</a>	Web application error logging service	Metadata, IP address, web browser	United States of America & Worldwide
<b>Efficy</b> (Inès CRM) Rue Colonel Bourg 122, 1140 Evere, Belgique <a href="http://www.efficacy.com">www.efficacy.com</a>	CRM service (for internal use in managing commercial relationships)	Emails, address, telephone, user identity	Switzerland
<b>Quantos Evolution</b> (Dendreo) 19 rue Emile Duclaux 75015 Paris <a href="http://www.dendreo.com">www.dendreo.com</a>	SaaS Training Platform Service	Emails, address, telephone, user identity	France
<b>Learnworlds</b> LearnWorlds (CY) Ltd, Gladstonos 120, Foloune Building, 2nd Floor, B1, 3032, Limassol, Cyprus. <a href="https://www.learnworlds.com/">https://www.learnworlds.com/</a>	SaaS Training & e-learning Platform Service	Emails, address, telephone, user identity	European Union (Germany)
<b>WebMecanik SAS</b> 6 avenue de Thônes 74000 Annecy <a href="https://www.webmecanik.com">https://www.webmecanik.com</a>	SaaS Marketing Automation Service	Emails, user identity	France

## 11. Cookies

- 28 Cookies are covered by a cookie management policy.

## 12. Your rights

- 29 Fulll is particularly concerned about respecting your rights in relation to the data processing it carries out, to ensure that it is fair and transparent in relation to the specific circumstances and context in which your personal data is processed.

### 12.1 Your right of access

- 30 As such, you have confirmation as to whether or not your personal data is processed, and where it is, you have the right to request a copy of your data and information concerning :
- The purposes of the processing;
  - The categories of personal data concerned;
  - The recipients or categories of recipients as well as, where applicable if such communication were to be made, the international organisations to which the personal data have been or will be communicated, in particular recipients who are established in third countries;
  - Where possible, the planned retention period of personal data or, where this is not possible, the criteria used to determine this period;
  - The existence of the right to request from the data controller the rectification or erasure of your personal data, the right to request a limitation of the processing of your personal data, the right to object to this processing;
  - The right to lodge a complaint with a supervisory authority;
  - Information relating to the source of the data when it is not collected directly from the persons concerned;
  - The existence of automated decision-making, including profiling, and in the latter case, meaningful information regarding the logic underlying it, as well as the significance and intended consequences of such processing for data subjects.

### 12.2 Your right of rectification

- 31 You can ask us to have your personal data, depending on the case, rectified or supplemented if it is inaccurate, incomplete, ambiguous or out of date.

### **12.3 Your right to erasure ('right to be forgotten')**

- 32 You can ask us to erase your personal data in the cases provided for by legislation and regulations.
- 33 Your attention is drawn to the fact that the right to erasure of data is not a general right and that it can only be granted if one of the grounds provided for in the applicable regulations is present.

### **12.4 Your right to restriction of processing**

- 34 You can request the limitation of the processing of your personal data in the cases provided for by legislation and regulations.

### **12.5 Your right to object**

- 35 You have the right to object at any time, for reasons relating to your particular situation, to processing of your personal data whose legal basis is the legitimate interest pursued by the data controller (see article 6 on the legal basis of the processing).
- 36 If you exercise this right, we will ensure that you no longer process your personal data in the context of the processing concerned unless we have legitimate and compelling reasons to maintain this processing which we will make known to you. These reasons must be greater than your interests and your rights and freedoms, or in the event that the processing can be justified for the establishment, exercise or defense of legal rights.

### **12.6 Your right to data portability**

- 37 You have the right to portability of the personal data that you have provided to us, when your data is subject to automated processing based on your consent or on a contract.

### **12.7 Your right to withdraw your consent**

- 38 When the data processing that we implement is based on your consent, you can withdraw it at any time. We then stop processing your personal data without the previous operations for which you had consented being called into question.

### **12.8 Your right to lodge a complaint**

- 39 You have the right to lodge a complaint with the CNIL via its website or by mail (3 place de Fontenoy TSA 80715 - 75334 PARIS CEDEX 07) on French territory, without prejudice to any other administrative or legal recourse.

### **12.9 Your right to set post-mortem guidelines**

- 40 You have the possibility to define specific directives relating to the conservation, erasure and communication of your personal data which will be applicable after your death according to the terms defined below. These specific instructions only concern the treatments implemented by us and will be limited to this area only.
- 41 You also have, when this person has been designated by the authorities, the right to define general directives for the same purposes.

### **12.10 How to exercise your rights**

- 42 All the rights listed above can be exercised at the following email address: [dpo@full.fr](mailto:dpo@full.fr) or by post sent to the following address: 14 rue Rhin et Danube - 69009 LYON, providing a proof of your identity by any means.

### **13. Modification of this document**

- 43 We invite you to regularly consult this policy on our site. It may be subject to updates.