

# Data protection policy

Last updated on October 30, 2024

## Preamble

This privacy policy is addressed to Users and Visitors and is intended to inform them of the manner in which their personal information may be collected and processed.

Respect for privacy and personal data is a priority for Axonaut, which is why we are committed to processing them in strict compliance with the applicable regulations on the protection of personal data (hereinafter the "Applicable Regulations"), in particular the French Data Protection Act of January 6, 1978 (hereinafter the "LIL") as amended and the General Data Protection Regulation (EU) of April 27, 2016 (hereinafter the "GDPR").

As such, Axonaut ensures:

- To respect the protection of privacy by default and right from the design stage of its applications.
- To process data in a lawful, fair and transparent manner for legitimate and specific purposes.
- To allow Users to exercise their rights at any time.

In addition, Axonaut undertakes to:

- Not sell your personal data in any circumstance.
- Apply a rigorous process for selecting its subcontractors and ensure that they provide an adequate level of personal data protection through appropriate organizational and technical measures.
- Host data securely, in accordance with the recommendations of data protection authorities.

## Definitions

**Axonaut:** Site offered to Customer/Prospect with the possibility of purchasing Services, in particular customer relationship management Services for companies, as presented on the Platform. These Services are made available to the User in SaaS (Software as a Service) mode.

**Company:** refers to Digitica SAS, a simplified joint-stock company with capital of €62,897.00, headquartered at 12 rue Louis Renault - 31130 Balma, registered in the Toulouse Trade and Companies Register under number 809 022 643, represented by Nicolas RICARD.

**Customer:** refers to a legal entity represented by a natural person who benefits from Axonaut's services through a paid subscription. The Customer may also be a sole proprietorship or an "auto-entrepreneur".

**Login:** means the e-mail address and password chosen by the Customer/Trial when registering on the Platform, which must be entered in order to connect to the User account.

**Platform:** refers to the website accessible at [www.axonaut.com](http://www.axonaut.com) and the "Axonaut" mobile application, published by Axonaut, as well as all their graphic, sound, visual, software and textual components. The Platform is the exclusive property of Axonaut.

**Prospect:** means a legal entity represented by a natural person who subscribes to a trial period offered by Axonaut with a view to using the Services. The Prospect may also be a sole proprietorship or an auto-entrepreneur.

**Services:** refers to the services offered by Axonaut via the trial period and/or paid subscription, in particular via the Platform. The Services are detailed in the applicable conditions.

**Third-party service platforms:** refers to all intermediaries providing all types of Services and which the Customer/Visitor may use.

**User:** refers to all categories of users of the Platform. The following are thus considered Users:

- Customers
- Prospects

**Visitor:** refers to any natural person (whether or not representing a legal entity) accessing the [www.axonaut.com](http://www.axonaut.com) website to discover the Services, by any means and on various media (computer and cell phone).

## What personal data does Axonaut process?

The compulsory or optional nature of the personal data collected and the possible consequences of failure to reply are indicated at the time of collection on the associated forms.

You can consult the details of the personal data we may process below.

<b>Data types</b>	<b>Details of personal data processed</b>	<b>Persons concerned</b>	<b>Categories of processing concerned</b>
Identification data of Visitors	First and last names, e-mail addresses and/or phone number of Visitors. Data required for authentication of Visitor.	All Visitors on the Axonaut platform.	Marketing operations – providing personalized advertising; Customizing experience and response to individual needs; Platform improvement. Customer service improvement. Purpose of competitions, promotions or surveys.

User identification data	Civility, Last name, First name, Phone number, Email address (professional or personal depending on cases).	Any User of the Services offered by Axonaut	Management and use of the Platform. Accounting and customer relations. Marketing operations - Providing personalized advertising. Personalized experience and response to individual needs. Platform improvement. Customer service improvement. Purpose of competitions, promotions or surveys.
Data pertaining to professional life	Professional email address if any, Company in which the User works.	Any User of Services offered by Axonaut	Management and use of the Platform. Operation of Services. Marketing operations.
Technical data for the use of Platform	IP address, Mobile ID, Logs, Cookies, Connection data.	Any User of Services offered by Axonaut	Management and use of the Platform. Financial and transactional data.
Financial and transactional data	Bank account details ("RIB"), History of transactions, Terms of payment, Information related to a transaction.	Any Customer of services offered by Axonaut	Management and use of the Platform. Accounting and Customer-Relationship management.

# How is personal data collected?

In regard to the provision of Services, Axonaut directly or indirectly collects personal data concerning Users for the purposes mentioned below.

Data collected directly:

From the User: when the User fills in or completes their personal information in their account, when they navigate on the Platform, when a transaction carried out with a bank card or via bank details and/or when they transmit the data necessary for the execution of the contracts they conclude with Axonaut.

No data is collected indirectly by the Company.

# For what purposes are data collected?

Depending on the extent to which Axonaut determines the purposes and means of data processing, it will have the status of data controller.

## **Management and use of the Platform:**

- General administration of the Platform, including the implementation of security measures.
- Production of statistics on use of the Platform.
- Assistance and management of User requests.
- Placing cookies on the Platform, in accordance with the choices made by the User where applicable.

## **Banking transactions:**

- Execution of debit and/or credit transactions in connection with the use of Axonaut Services.
- Management of subscription requests for Axonaut services.
- Suspension or blocking of the use of Axonaut Services and related operations in the event of suspicious use.
- Compliance with legal and regulatory obligations.

## **Marketing operations:**

- B-to-B prospecting campaigns (email, telephone, mail).
- Sending promotional emails (on an ongoing basis or for one-off operations).
- Participation in game contests.
- Compiling statistics.
- Conducting satisfaction surveys.
- Conducting surveys on a theme related to Axonaut's offers.

## **+ Additional features depending on the package:**

### **1. Electronic signature :**

Management of signatures for dematerialized quotations.

### **2. Marketing campaign (sms/email) :**

Collection of personal and/or business details of User's contacts.

### 3. Postal mail :

Collection of personal and/or business details of User 's contacts.

### 4. Payment services (Stripe, Gocardless ..) :

- Accounting and commercial management with Users.
- Payment of Services and follow-up of invoices.
- Management of unpaid invoices and litigation.
- Keeping of accounting records and legal receipts.
- Sales follow-up management.

## What are the legal bases for processing?

In its capacity as data controller, Axonaut processes data for the aforementioned purposes on the following legal bases:

Execution of contractual and pre-contractual measures: operating in a B-to-B environment, Axonaut is contractually bound to the Users in order to provide, a service to the Users. Accordingly, the obligations arising from the provision of the various services are detailed in the contracts concluded between Axonaut and the Customer.

**Legal obligations:** Axonaut is subject to specific legal obligations because of its commercial activity.

SaaS billing and accounting tool service

- Accounting management
- Tracking invoices, expenses and cash flow
- Sales management, such as quotation and order management
- Customer contact management
- Task and project management
- Management of marketing tools to help companies manage their online presence and automate their marketing campaigns.

**Legitimate interest:** Users' personal data may be processed in order to improve the service provided, in particular by customer service. Users' personal data may be processed to offer complementary services and for commercial prospecting purposes.

**Consent:** in certain cases, Axonaut may process Users' personal data subject to their express prior consent, for the placement of certain cookies and/or the receipt of promotional offers.

## Who are the data recipients?

Axonaut may transmit your data to its subcontractors for the sole purpose of performing part of the Services. Axonaut audits and documents all the organizational and technical measures implemented by its subcontractors.

Axonaut systematically checks that sufficient security measures are in place to maintain an adequate level of security throughout the data lifecycle.

Consequently, Axonaut ensures that the personal data it processes cannot be read in clear text and is systematically encrypted during any transfers. In the absence of the encryption key, the data is inaccessible, even to a foreign judicial or administrative authority.

Axonaut also ensures robust contractual guarantees by imposing a **Data Processing Agreement (DPA)** tailored to its business sector.

You may request access to documents ensuring appropriate contractual guarantees by sending a request to our Data Protection Officer by e-mail to [ayesha@axonaut.com](mailto:ayesha@axonaut.com), or by post to Axonaut - 2460 l'Occitane, Regent Park 2, 31670 Labège.

Within the limits of their respective responsibilities and for the purposes specified, the following people may have access to your data:

Authorized personnel from our research and development, marketing, sales, administrative, logistics, legal and IT departments, responsible parties for improving our services, customer relations, prospecting and quality control; authorized personnel from our subcontractors.

It should be noted that all these people are subject to an obligation of competency and confidentiality, and that they may incur disciplinary, legal and/or administrative sanctions in the event of using said data for purposes contrary to those set out above.

In addition, we have strong contractual guarantees concerning the processing of personal data by our subcontractors and that access must be justified and authorized in advance by Axonaut.

## How does Axonaut secure data transfers to countries outside the European Union, in particular the United States?

Axonaut favors the selection of processors located within the European Union and automatically subject to the obligations of the GDPR. In some cases, subcontractors may be located and/or process certain data outside the European Union.

Axonaut ensures that it concludes all contracts with service providers processing personal data outside the European Union with adequate safeguards, in accordance with Article 46 of the GDPR, and attaches the European Commission's Standard Contractual Clauses in their most recent version.

The latter systematically undertake to inform Axonaut in the event of receipt of a judicial or administrative request for access to the data it holds. In such circumstances, Axonaut will take internal measures to protect Users' rights and freedoms.

For further information about our subcontractors, please send a request to our Data Protection Officer.

Your personal data are not communicated, exchanged, sold or rented without your express prior consent in accordance with the applicable legal and regulatory provisions.

## Main suppliers

In order to provide the Platform, Axonaut uses the services of subcontractors. As part of its compliance process, each subcontractor is audited beforehand to determine the quality of the technical and organizational measures implemented, as well as its level of security. Each relationship with a subcontractor is governed by a specific DPA and, if necessary, by Standard Contractual Clauses as specified above.

The main service providers are:

- Scaleway, Hetzner: for data hosting within the European Union (Datacenters are located in Paris and in Germany).
- Stripe: to provide a means of payment.
- Gocardless: to provide a means of payment.
- MySendingbox: to send postal mail.
- Brevo, Sendgrid: to send emails (transactional and commercial) to Users.
- Yousign: to provide electronic signatures.
- Mailchimp: for marketing campaigns.
- Customer.io: to send emails and newsletters.

## How does Axonaut keep your data safe?

Axonaut is committed to preserving security of its information systems and the personal data it processes. Axonaut implements all necessary technical and organizational measures to ensure the security of your personal data processing and the confidentiality of the data it collects. This mainly implies the implementation of the measures detailed below.

### Technical measures

- Systematic data encryption on hosting servers during data transit (between the application and the servers).
- Limiting the number of attempts to create a User account and implementing double authentication.
- Implementation of a technical team dedicated to incident management, monitoring of security controls and ongoing verification of the effectiveness of security measures.
- User access to the Platform is monitored and protected by a system that detects and prevents:
  - Brute force attacks ;

- Access from multiple IP addresses ;
- Multiple accesses from a single IP address.

## Organizational measures

- Physical protection of premises and entry control; Logging and traceability of connections.
- Authorization management policy for all personnel who may have access to data.
- Authentication procedures for people accessing data, with personal, secure access via confidential IDs and passwords.

## How long is the data stored?

Data life cycle at Axonaut for a User:

- 1) **Onboarding**: Account creation and administration - data processing and collection for the life of the account, until it is closed.
- 2) **Use of Services**: Data is collected and processed to ensure the performance of the Services and kept for at least the duration of use of the Services.
- 3) **Off-boarding**: Closure of the User account: storage in an intermediate database until the limitation period for data retention has expired (4 years from account closure).
- 4) **Final data purge**: Axonaut's internal purge mechanism for all databases.

## Details of retention periods by data category

Processing concerned	Data categories	Shelf life
Use of the Platform	Identification and contact details	For the duration of the contract plus the 4-year period
	Logs	12 months in the absence of detected fraud and up to 5 years in the case of investigative measures
Cookies and other trackers	Connection data	Up to 13 months depending on the tracker, in accordance with CNIL guidelines



Axonaut subscription payment	Financial transaction data related to the use of Axonaut Services	4 years following account closure
	Connection logs generated during payment transactions	5 years following account closure
	SEPA direct debit mandates	
Customer accounting and sales management	Identification, financial and contractual data	For the duration of the contract plus the 4-year period  Accounting data is kept for 10 years from issuing date.

## Who to contact for all GDPR-related queries?

Axonaut has appointed a Data Protection Officer (hereinafter "DPO"), who will be able to respond to all your requests, including to exercise your rights relating to your personal data.

She can be reached by:

Email via the following address: [ayesha@axonaut.com](mailto:ayesha@axonaut.com)

Post via : Axonaut - 2460 l'Occitane, Regent Park 2, 31670 Labège.

## What are your rights?

In accordance with Applicable Regulations, you have the following rights:

- **Right to access** (Article 15 GDPR), **rectify** (Article 16 GDPR), **update, complete your data**.
- **Right to erasure** (or "right to be forgotten") of your personal data (Article 17 GDPR), where it is inaccurate, incomplete, equivocal, out of date, or the collection, use, communication or storage of which is prohibited. The exercise of this right may be limited by a legal obligation to retain data for the purposes of combating fraud and/or money laundering.
- **Right to withdraw your consent at any time** (Article 7 GDPR).
- **Right to limit the processing of your data** (Article 18 GDPR) in case of dispute.
- **Right to object to the processing of your data** (Article 21 GDPR) systematically for cases of canvassing and conditional on the justification of compelling legitimate reasons in other cases.
- **Right to portability of the data** you have provided to us, where your data is subject to automated processing based on your consent or on a contractual commitment (Article 20 GDPR).

You may exercise your rights, provided you can prove your identity, by contacting our DPO. If you wish to close your Axonaut account, please contact our service department.

Finally, you may also lodge a complaint with the supervisory authorities, in particular the CNIL or any other competent authority.

## Login data and cookies

For the proper operation of the Platform and Services, we use connection data (date, time, Internet address, protocol of the Visitor's computer, consulted page) and cookies (small files saved on your computer) to identify you, to remember your consultations, and to benefit from audience measurements and statistics, in particular relating to the consulted pages.

Some so-called "unnecessary" cookies enable us to improve the quality of our Service and offer you solutions tailored to your needs and habits.

<b>Analytical cookies</b>	They anonymously remember your computer or mobile device when you visit axonaut.com. They track browsing habits and help us understand our Visitors' interests and how they use the website. Advertising and analytical cookies may be placed by independent advertisers who publish on our site within the advertisement and elsewhere on our site (video). They are anonymous - they cannot identify individuals. They are used for statistical analysis, enabling the advertiser to count the number of people who have seen their ad/video/etc.
<b>Service cookies</b>	They help us to provide you with the best possible service and user experience (storing your registration and connection data, your settings preferences).
<b>Third-party cookies</b>	The Company uses third-party cookies that can be read by third parties (for example, if you have logged in and have the ability to like or comment using your social network account). However, we do not have access to third-party cookies and third-party organizations do not have access to ours. Third-party organizations that set cookies have their own privacy policies.

## Consent

By using our Platform, you consent to our privacy policy.

## Changes to the data protection policy

This privacy policy is current as of 30/10/2024 and may be subject to change.