



Privacy Shield Policy

This Privacy Shield Policy (“**Policy**”) describes how Valiantys Group SAS and its subsidiaries and affiliates in the United States (“**US**”) (“**Valiantys**,” “**we**,” or “**us**”) collect, use, and disclose certain personally identifiable information that we receive in the US from the European Economic Area (“**EEA**”), the United Kingdom (“**UK**”), and Switzerland (“**Personal Data**”).

This Policy applies to the following US affiliated entity: Valiantys America Inc. This Policy supplements our Website Privacy Policy located at <https://valiantys.com/en/legal/privacy/>, and unless specifically defined in this Policy, the terms in this Policy have the same meaning as the Website Privacy Policy. Valiantys recognizes that the EEA, the UK, and Switzerland have established strict protections regarding the handling of Personal Data, including requirements to provide adequate protection for Personal Data transferred outside of the EEA, the UK, and Switzerland.

To provide adequate protection for certain Personal Data about consumers, corporate customers, clients, suppliers, business partners and employees received in the US from the EEA, the UK, and Switzerland, Valiantys has elected to self-certify to the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework administered by the US Department of Commerce (“**Privacy Shield**”). Valiantys adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement, and Liability.

For purposes of enforcing compliance with the Privacy Shield, Valiantys is subject to the investigatory and enforcement authority of the US Federal Trade Commission.

For more information about the Privacy Shield, see the US Department of Commerce’s Privacy Shield website located at: <https://www.privacyshield.gov>. To review Valiantys’ representation on the Privacy Shield list, see the US Department of Commerce’s Privacy Shield self-certification list located at: <https://www.privacyshield.gov/list>.

PERSONAL DATA COLLECTION AND USE

Our Website Privacy Policy located at <https://valiantys.com/en/legal/privacy/> describes the categories of Personal Data that we may receive in the US as well as the purposes for which we use that Personal Data. We may receive the following categories of Personal Data:

- Identifying Personal Data. Information that uniquely or semi-uniquely identifies a specific individual name, user-name, unique identifier, government issued identification, picture and biometric data.
- Authenticating Personal Data. Information used to authenticate an individual with something they know such as passwords, PIN, mother’s maiden name.

- **Behavioural Personal Data.** Information that describes an individual's behaviour or activity, on-line or off browsing behaviour, call logs, links clicked, demeanour or attitude.
- **Demographic Personal Data.** Information that describes an individual's characteristics shared with others age ranges, physical traits, income brackets or geographic.
- **Communication Personal Data.** Information communicated from or to an individual via telephone recording, voice mail, email or live chat.
- **Tracking Data.** Information on your browsing activities, location or IP addresses. Please note that this information will be non-personally identifying information.

Personal data will always be obtained with your knowledge and where required by applicable laws, your consent.

We process Personal Data for the following purposes:

Purpose/Activity	Type of Data	Lawful basis for processing including the basis of legitimate interest
To register you as a new Customer and verifying your identity when required.	a. Identity b. Contact	Performance of a contract with you.
Delivering any services, products or information requested by you and processing your orders and managing and administering your account.	a. Identity b. Contact c. Profile	a. Performance of a contract with you b. Necessary for our legitimate interests (to allow the service to operate in the manner described to you).
To manage our relationship with you which will include: a. responding to complaints, support tickets or account enquiries; administering debt recoveries b. Notifying you about changes to our terms or privacy policy c. Asking you to leave a review or take a survey	a. Identity b. Contact c. Profile d. Marketing and Communications	a. Performance of a contract with you b. Necessary to comply with a legal obligation c. Necessary for our legitimate interests (to keep our records updated and to study how customers use our Services).

To administer and protect our business and the Service (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	a. Identity b. Contact c. Technical	a. Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) b. Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	a. Technical b. Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	a. Identity b. Contact c. Technical d. Usage e. Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

If you choose to provide us with personal information it will be used in support of the intended purposes stated at the time at which it was collected, and subject to any preferences indicated by you.

Valiantys will only process Personal Data in ways that are compatible with the purpose that Valiantys collected it for, or for purposes the individual later authorizes. Before we use your Personal Data for a purpose that is materially different than the purpose we collected it for or that you later authorized, we will provide you with the opportunity to opt out. Valiantys maintains reasonable procedures to help ensure that Personal Data is reliable for its intended use, accurate, complete, and current.

We do not collect any sensitive personal data.

DATA TRANSFERS TO THIRD PARTIES

Third-Party Agents or Service Providers. We may transfer Personal Data to our third-party agents or service providers who perform functions on our behalf as described in our Privacy Policy. Where required by the Privacy Shield, we enter into written agreements with those third-party agents and service providers requiring them to provide the same level of protection the Privacy Shield requires and limiting their use of the data to the specified services provided on our behalf.

We take reasonable and appropriate steps to ensure that third-party agents and service providers process Personal Data in accordance with our Privacy Shield obligations and to stop and remediate any unauthorized processing. Under certain circumstances, we may remain liable for the acts of our third-party agents or service providers who perform services on our behalf for their handling of Personal Data that we transfer to them.

Disclosures for National Security or Law Enforcement. Under certain circumstances, we may be required to disclose your Personal Data in response to valid requests by public authorities, including to meet national security or law enforcement requirements.

SECURITY

Valiantys maintains reasonable and appropriate security measures to protect Personal Data from loss, misuse, unauthorized access, disclosure, alteration, or destruction in accordance with the Privacy Shield. Our Security and Backup policy is available at <https://valiantys.com/legal/trust>.

ACCESS RIGHTS

You may have the right to access the Personal Data that we hold about you and to request that we correct, amend, or delete it if it is inaccurate or processed in violation of the Privacy Shield. These access rights may not apply in some cases, including where providing access is unreasonably burdensome or expensive under the circumstances or where it would violate the rights of someone other than the individual requesting access. If you would like to request access to, correction, amendment, or deletion of your Personal Data, you can submit a written request to the contact information provided below. We may request specific information from you to confirm your identity. In some circumstances we may charge a reasonable fee for access to your information.

QUESTIONS OR COMPLAINTS

You can direct any questions or complaints about the use or disclosure of your Personal Data to us at dpo-gdpr@valiantys.com or Data Protection Officer, Valiantys Group SAS, 118 Route d'Espagne, 31100 Toulouse, France.

Please quote your name and address together with your account name (if relevant). We would be grateful if could also provide brief details of what information you want a copy of (this helps us to more readily locate your data).

We will investigate and attempt to resolve any complaints or disputes regarding the use or disclosure of your Personal Data within 45 days of receiving your complaint. For any unresolved complaints, we have agreed to cooperate with the EU data protection authorities or the UK Information Commissioner. If you are unsatisfied with the resolution of your complaint, you may contact the EU data protection authorities or the UK Information Commissioner at <https://ico.org.uk/make-a-complaint/> for further information and assistance.

Binding Arbitration

You may have the option to select binding arbitration for the resolution of your complaint under certain circumstances, provided you have taken the following steps: (1) raised your complaint directly with Valiantys and provided us the opportunity to resolve the issue; (2) made use of the independent dispute resolution mechanism identified above; and (3) raised the issue through the relevant data protection authority and allowed the US Department of Commerce an opportunity to resolve the complaint at no cost to you.

CONTACT US

If you have any questions about this Policy or would like to request access to your Personal Data, please contact us as follows: Data Protection Officer, Valiantys Group SAS, 118 Route d'Espagne, 31100 Toulouse, France or send an email to: dpo-gdpr@valiantys.com.

CHANGES TO THIS POLICY

We reserve the right to amend this Policy from time to time consistent with the Privacy Shield's requirements.

Effective Date: 22 August 2019

Last modified: 08 October 2019