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1. OCTOPIA'S COMMITMENTS RELATED TO PERSONAL DATA PROTECTION

1.1. OCTOPIA

MAAS (hereinafter « OCTOPIA »), registered in the Trade and Companies Register of Saint-Etienne under number 880 150 289, has developed an expertise in the creation, operation and implementation of digital, logistical and technical flows related to marketplace and has built a large data bases of marketplace's merchants.

The present OCTOPIA operator portal (hereinafter the "OCTOPIA Operator Portal") allows Octopia's clients (hereinafter the "Client") to manage their marketplace (products, orders, merchants, messages, etc.).

OCTOPIA'S data protection officer (hereinafter "DPO") ensures the compliance of personal data processing carried out by OCTOPIA.

You may contact OCTOPIA'S DPO:

- By email to dpo@octopia.com
- By postmail to OCTOPIA, Data Privacy Officer (Délégué à la protection des données personnelles), 120-126 quai de Bacalan, 33067 BORDEAUX Cedex.

1.2. OCTOPIA'S COMMITMENTS

This Privacy Policy applies if you are using and/or connecting to the OCTOPIA Operator Portal (hereinafter the "User").

It is essential to OCTOPIA to ensure the confidentiality and respect of your personal data (hereinafter "Personal Data"). OCTOPIA protects your privacy by ensuring protection, confidentiality, non-alteration, availability and security of your Personal Data.

OCTOPIA makes every effort to (i) provide a clear and transparent information on how Personal Data are processed, (ii) apply technical and organisational measures needed to protect Personal Data in accordance with applicable data protection laws and (iii) retain Personal Data only during the time necessary for the purposes of processing.

2. PROCESSING OF PERSONAL DATA BY OCTOPIA

OCTOPIA processes Personal Data of Users for the following purposes:

Purpose	Legal basis	Data subject	Personal Data
Management of Users accounts on OCTOPIA Operator Portal	Performance of contract	Users	Username, first and family name, email, password
Security of authentication on OCTOPIA Operator Portal	Legitimate interest	Users	IP address, connection logs

3. HOW LONG ARE YOUR DATA RETAIN?

OCTOPIA retains Personal Data to allow you to use OCTOPIA Operator Portal on a continuous basis, for as long as necessary to carry out the processing operations above mentioned and to comply with legal requirements.

The retention period of Personal Data varies depending on the purpose of processing. OCTOPIA retains and deletes Personal Data in accordance with applicable law.

Typology of Processing	Retention period
Processing relating to Users	5 years from the end of the commercial relationship with the Client
Processing relating to connection logs	12 months from collection

4. HOW TO EXERCISE YOUR RIGHTS?

4.1. YOUR RIGHTS

Regarding your Personal Data, you can exercise the following rights:

- Right of access;
- Right to rectification;
- Right to erasure (except if Personal Data are necessary to provide the services or for compliance with legal obligation or for establishment, exercise or defence of legal claims) ;
- Right to restriction of processing;
- Right to data portability;
- Right to object;
- Right to define guidelines relating to the fate of your Personal Data after your death, with a trusted third party, certified and responsible for ensuring that your wishes are respected in accordance with the requirement of the legal framework;

You have the right to object, on grounds relating to your particular situation, to processing of Personal Data which is based on OCTOPIA's legitimate interest. OCTOPIA shall no longer process Personal Data unless OCTOPIA demonstrates compelling legitimate grounds for the processing which override your interests, rights, and freedoms or for the establishment, exercise, or defence of legal claims.

You have the right to object to any processing related to commercial prospection without grounds relating to your particular situation.

4.2. EXERCISE OF YOUR RIGHTS

You can exercise your right:

- By email to dpo@octopia.com ;
- By postmail to OCTOPIA, Data Privacy Officer (Délégué à la protection des données personnelles), 120-126 quai de Bacalan, 33067 BORDEAUX Cedex.

For requests that reach the Data Protection Officer by email or postmail, please indicate the email address attached to your User account (or use it in the case of an email) as well as your full name. In the event that you are unable to find the email address attached to your User account or in the event of serious doubts about your identity, additional information relating to your identity may be requested in accordance with Article 12 of the GDPR.

OCTOPIA shall reply within a maximum of one (1) month following the date of receipt of your request. This period may be extended by two (2) additional months depending on the complexity and number of requests.

After contacting us, if you consider that your rights over your personal data have not been respected, you can submit a complaint to the Commission nationale de l’informatique et des libertés (3 place de Fontenoy - TSA 80715 – 75334 Paris cedex 07 ; phone number : +33 1 53 73 22 22).

5. TRANSFERS OUTSIDE THE EUROPEAN UNION

As a general rule, OCTOPIA stores your Personal Data within the European Union.

However, since some of our service providers are in countries outside the European Union ("Third Countries"), OCTOPIA might transfer some of your Data to Third Countries. In such a case, we ensure that this transfer is carried out in accordance with the applicable regulations and guarantees an adequate level of protection of your privacy and fundamental rights (in particular by using standard contractual clauses of the European Commission)

Upon simple request to our Data Protection Officer, we can provide you with more information about these transfers.

6. SECURITY MEASURES

OCTOPIA undertakes to implement appropriate technical and organisational measures to guarantee a level of security appropriate to the risk regarding the rights and freedoms of data subjects concerned by the processing operations referred to above.

These measures shall be defined taking into account the state of knowledge, the costs of implementation and the nature, scope, context and purposes of the processing operation as well as the risks identified.

7. COOKIES

This section is dedicated to the management of cookies on OCTOPIA Operator Portal.

This section informs about the use of navigation information processed during your use of the OCTOPIA Operator Portal and the rights you have regarding cookies management.

7.1 WHAT IS A COOKIE?

A cookie is a text file that is placed on your computer’s hard drive, subject to permission requested, by websites which are browsed. Cookies are used to make website work more efficiently. Some cookies are necessary for a better functioning of websites.

Cookies cannot give access to information about you that you do not want to share. Cookies have a limited lifetime and are deleted by browsers once the retention period has expired. Only the issuer of cookies is able to read or modify information contained in the cookies.

7.2 TYPE AND PURPOSES OF COOKIES

Different types of cookies are used regarding the purposes pursued. The main courant type of cookies are :

Cookies strictly necessary to the use and functioning of	These cookies are necessary to the functioning of the OCTOPIA Operator Portal and its features, exempt from obtaining consent.
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the OCTOPIA Operator Portal	
« Audience measurement » cookies	These cookies are used (i) to measure the audience of the OCTOPIA Operator Portal or (ii) to test different versions in order to optimize editorial choices according to their respective performances. Some of these cookies might be considered as « essential cookies » and thus exempted from the collection of consent.

7.3 LIABILITIES REGARDING COOKIES

- **Cookies issued by OCTOPIA and/or OCTOPIA’s subcontractors**

OCTOPIA is responsible for the issuance and use of cookies on OCTOPIA Operator Portal. Certain types of cookies (« essential » or « audience measurement » cookies) are exempt from consent.

- **Cookies issued by third-parties**

The issuance and use of cookies by third parties on the OCTOPIA Operator Portal are subject to the privacy policies of these parties. These cookies are not necessary for browsing the OCTOPIA Operator Portal.

You can manage the deposit of cookies on your navigation terminal in accordance with the procedure described below.

7.4 MANAGEMENT OF COOKIE’S DEPOSIT

In accordance with directive 2002/58/CE of July 12, 2002, OCTOPIA collects your prior consent to the deposit of cookies, except for “essential” and “audience measurement” cookies.

- **Browsing settings**

The settings of each browser software are different: please refer to the menu of your browser software for further explanation and appropriate settings.

Internet Explorer™	http://windows.microsoft.com/fr-FR/windows-vista/Block-or-allow-cookies
Safari™	https://support.apple.com/kb/PH19214?locale=fr_FR&viewlocale=fr_FR
Chrome™	http://support.google.com/chrome/bin/answer.py?hl=fr&hlrm=en&answer=95647
Firefox™	http://support.mozilla.org/fr/kb/Activer%20et%20d%C3%A9sactiver%20les%20cookies
Opera™	http://help.opera.com/Windows/10.20/fr/cookies.html

Warning: Any setting of your browser software regarding the acceptance or refusal of cookies may affect your Internet experience and access to certain services requiring the use of cookies. If you choose to refuse cookies in your terminal or if you delete cookies recorded in your terminal, OCTOPIA cannot undertake any liability regarding the consequences related to degraded functioning of the services.

- Smartphone settings

IOS	https://support.apple.com/fr-fr/HT201265
Android	https://support.google.com/chrome/topic/3434352

- Opposition list to cookies' deposit

In order to block the collect and use of information about you by advertising companies that display personalized advertising, you can access to the following sites :

- NAI : <http://www.networkadvertising.org/choices/>
- EDAA <http://www.youronlinechoices.com/>
- DAA : <http://optout.aboutads.info/?c=2&lang=EN>

8. REVIEW AND UPDATE OF THE PRIVACY POLICY

This privacy policy might be update as necessary to meet the requirements of applicable laws.

18th June, 2021

OCTOPIA's DPO