

NETIM - Personal data processing policy

Effective as of May 25, 2018

DEFINITIONS

Data Subject means an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name or an identification number.

Personal Data means any information relating to a Data Subject.

Personal Data Protection Legislation means the legislation that is part of the French law, including the relevant international treaties and legislation of the European Union, addressing the protection of Personal Data.

Data Protection Officer means the staff member designated by NETIM who is responsible for compliance with Personal Data Protection Legislation. In addition, he serves as the contact point for Authorities and Data Subject on privacy matters including access requests.

1. PURPOSE

NETIM offers a wide range of services within the scope of which Personal Data are processed. The range of these data and the method of processing vary from case to case.

This Personal Data Protection Policy explains:

- What information NETIM collects and for what reason.
- How NETIM uses this information.
- What options NETIM offers, including those related to gaining of access to and updating of information.

This policy applies to every **natural person** as customer, service holder and contact, as well as prospect. **Legal entities** such as companies, organisations or associations are recognized not having Personal Data and are not covered by this policy.

NETIM, as an European legal entity, is bound by European's General Data Protection Regulation ("GDPR") as part of Personal Data Protection Legislation. To the extend, by providing its service worldwide, this policy applies to every **natural person without distinction of nationality or place of residence**.

2. PERSONAL DATA ACQUISITION , TRANSMISSION AND PROCESSING

2.1 Subject to a contract

When processing Personal Data based on a contract, such processing is mandatory for the performance of the contract concluded between NETIM and the Data subject, with the purpose of performing such a contract at all time.

NETIM has right to process Personal Data for the duration of the contract validity and for a given period of retention after the contract has been terminated.

During all the duration of the contract, it is the responsibility of the Data Subject to ensure that all the Personal Data provided are correct and accurate in all time.

2.2 Subject to the consent of the Data Subject

When processing Personal Data based on a consent, such consent is provided to the extent and for the purposes as are indicated therein; refusal of a consent in no way affects provision of the service.

The Data Subject may at any time withdraw his/her consent to the processing of Personal Data, but this is without prejudice to the lawfulness of data processing based on the consent given prior to the withdrawal thereof.

2.3 Provided by a third party

If the Personal Data collected by NETIM has been provided by another entity or a third person, such entities or persons hereby acknowledge that they are authorized to provide NETIM with someone else's Personal Data.

Any entity or person who provide NETIM with Personal Data of third parties are required to notify NETIM of any changes in the provided Personal Data and confirm to have the authority of the Data Subject to provide such changes.

Moreover, it is the responsibility of the third party to ensure that all the Personal Data provided are correct and accurate in all time.

2.4 Data transmission abroad European Union

NETIM operates worldwide and processes personal data in full compliance with the GDPR and ensures that different countries always treat personal data from different countries of origin according to this regulation. NETIM does not transmit abroad Personal Data other than the herein mentioned with the exception of the Personal Data in connection with Domain Name services. See section 3.3

3. LISTING OF PERSONAL DATA

3.1 Website visitors and prospects

Concerning statistics

Type of data

Browsing data such as IP address, length of the visit, type of technical equipment used (operating system, device, browser....)

Basis and Purpose

NETIM collects and processes this data to improve its services and for statistical purposes.

Retention

If the data is collected in connection with a service, NETIM keeps the corresponding data for a period of five (5) years. Outside the scope of the provision of a service, NETIM keeps the data for a period of two (2) years or until a request for deletion is made.

Concerning cookies

Visitors to one of NETIM's website are advised that, for the purpose of browsing the site, NETIM may use the automatic collection of certain information about users by using cookies. If the user of the site does not wish the use of cookies by NETIM, it can refuse the activation of the cookies through the options offered by its Internet browser. For technical reasons, if the user disables cookies in his browser, certain services offered on the site may not be accessible to him.

Cookies are set with a validity period of 30 days .

3.2 Customer account

A customer may provide NETIM with Personal Data for several purposes.

Concerning account information

Type of data

First and last name, postal address, language and currency preference, phone number, email address

Basis and Purpose

NETIM collects and processes this data subject to a contract and for the provision of services.

Retention

NETIM keeps data for as long as the customer holds an account with the company. Should he / she want to close his/ her account, NETIM will anonymise all Personal Data attached to the account.

However, in certain cases, regulatory or legal obligations may prevent NETIM from completely deleting Personal data. For example, book keeping and accounting request to keep all invoices issued for a ten (10) years period.

Concerning payment information

NETIM collects certain payment and billing information when a customer orders paid services. He / She can also record means of payment in his / her customer account.

Type of data

Partial credit card information, Paypal and Skrill account identifier

Basis and Purpose

NETIM collects and processes this data subject to a contract and for the provision of services.

Retention

NETIM keeps data for as long as the customer holds an account with the company. Should he / she want to close his/ her account, NETIM will anonymise all Personal Data attached to the account.

However, in certain cases regulatory or legal obligations may prevent NETIM from completely deleting Personal data. For example, book keeping and accounting request to keep all transactions for a ten (10) years period.

Concerning customer reviews

After a new service has been created, certain Personal Data may be transferred to our partner, TrustPilot A/S, Pilestraede 58, DK-1112 Copenhagen, Denmark , who is operating the service NETIM uses to manage and collect customer reviews.

Type of data

First and last name, language preference, email address

Basis and Purpose

NETIM collects and processes this data for the purpose of collecting customer reviews. A customer can not receive more than one (1) request every six (6) months.

Retention

Once the review request is transferred to our partner, the customer can assert his / her rights with Trustpilot (<https://uk.legal.trustpilot.com/end-user-privacy-terms>). For European customers, NETIM has ensured that Trustpilot is compliant with the RGPD in force.

Should the customer don't want to receive any new review request, he / she has to contact our team or DPO.

3.3 Domain Name service

For the provision of this service, NETIM has to collect Personal Data by creating contact profiles which will be transferred to each registry with whom the customer want to register a domain name.

Additionally, in case the domain name is a generic extension, a copy of contact profiles will also be stored with Iron Mountain Intellectual Property Management, Inc. 9210 Sky Park Court, Suite 220 San Diego, CA 92123 USA, which is the ICANN-authorized escrow service provider that NETIM uses. Although established in the United States, this company adheres to the Privacy Shield Principles.

Type of data

First and last name, full postal address, phone number, email address

These data are collected for the Registrant and administrative, technical, billing contacts.

In addition, according to the registry the Domain name belongs to, additional Personal Data may be collected and processed in order to fulfill registration rules such as personal ID number, fiscal number, unique registry identifier, birth date and place, ... In such case and / or if a special policy applies to the registry, special provisions will be included in special terms and condition of the requested domain name extension.

Basis and Purpose

Collection and processing of this data is necessary to comply with our legal obligations as data processor for registries. Transfer of relevant data is a mandatory requirement by the registries who have a monopoly on the extensions they manage.

Retention

Each registry has its own retention period but in general this does not exceed two years after the deletion of the Domain Name. For further information, please refer to the applicable registry policy.

Transfer Abroad

Depending on the registry the domain name belongs to, Personal Data may be transferred outside the European Economic Area.

When a domain name is registered with a registry established outside the EEA, Data Subjects expressly understand and agree that this registry is not bound by the same privacy laws as NETIM and that, in some cases, no protection of Personal Data is offered.

To benefit from an adequate level of protection of Personal Data, the domain name should be registered under an European extension or an extension managed by a registry established within the EEA.

Alternatively, the whois privacy service offered by NETIM could be activated if it is available for the domain name extension. Further information in "General Sales conditions for Domain name Service"

3.4 SSL certificates

For the provision of this service, NETIM will share some of customer's Personal Data with the certification authority COMODO Group Inc, 1255 Broad Street, Clifton, NJ 07013 , United States.

Type of data

First and last name, postal address, phone number, email address

Basis and Purpose

NETIM collects and processes this data for the provision of the service.

Retention

NETIM keeps data for as long as the service is not terminated or expired.

3.5 Web hosting services

This service does not require the provision of additional personal data.

3.6 Email services

This service does not require the provision of additional personal data.

3.7 DNS services

This service does not require the provision of additional personal data.

4. RIGHTS IN RELATION TO PERSONAL DATA

Unless a request is deemed excessive or unfounded, a Data Subject may exercise the following rights in relation to his / her Personal Data:

4.1 Right to access

A Data Subject has the right to request a copy of the Personal Data that NETIM hold about him / her.

To do so, a request must be sent to NETIM support team or DPO point of contact.

4.2 Right to rectification

A Data Subject has the right to correct any inaccurate or incomplete Personal Data that NETIM hold about him / her.

To do so, customers can update their information into the online Interface. A request can also be sent to NETIM support team or DPO point of contact.

4.3 Right to be forgotten

In certain circumstances, a Data Subject can ask for the Personal Data that NETIM hold about him / her to be erased from records.

To do so, a request must be sent to NETIM support team or DPO point of contact.

NETIM will anonymise all Personal Data attached to the Data Subject. However, in certain cases regulatory or legal obligations may prevent NETIM from completely deleting Personal Data.

4.4 Right to portability

A Data Subject has the right to have the Personal Data that NETIM hold about him / her to be transferred to another organisation.

To do so, a request must be sent to NETIM support team or DPO point of contact.

NETIM will provide a copy to be data currently in records.

4.5 Right to object

A Data Subject has the right to object to certain types of processing of Personal Data that NETIM hold about him / her. However, in certain cases when the processing is mandatory for NETIM to provide a service, the latter may be cancelled.

To do so, a request must be sent to NETIM support team or DPO point of contact.

5. SECURITY MEASURES

NETIM implements technical and organisational measures to ensure an adequate level of data protection in particular from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

5.1 Technical measures

Personal Data is stored electronically in its information systems or backup media, **in the territory of the European Union**. NETIM's information systems are located or kept under the direct control of NETIM, or in the third-party's premises or facilities; they are however always under NETIM's direct control and unless otherwise provided in the Policy, personal data contained therein are not provided or made available to the third parties.

Information systems can be accessed from NETIM's offices via dedicated network connections or from anywhere through a secured VPN connection.

A combination of technical and physical controls to maintain the security of your data are in place such as firewalls, redundancies, data replications and external backups.

5.2 Organizational measures

NETIM has adopted and documented measures aimed at ensuring that the access to personal data and means of processing is restricted to authorized persons only and that such authorized persons process and access only such personal data and means for their processing that correspond to the level of their authorization.

6. DATA PROTECTION OFFICIER DETAILS

NETIM
Bruno Vincent

165 avenue de bretagne
59000 LILLE
France

dpo@netim.com

7. CHANGE TO THE POLICY

NETIM may change this privacy policy from time to time and, if modifications are significant, NETIM will provide a prominent notice on its Website and / or notified by email.

Data Subjects are encourage to review this privacy policy whenever they use NETIM services to stay informed about information practices and what they can do to help protect their security.

If a Data Subject disagrees with any changes to this privacy policy, he / she will need to stop using NETIM services and assert his / her rights as outlined above.