

## **DATA PRIVACY NOTICE**

### **Users / Website users**

### **Respect of personal data**

In accordance with existing regulations, Clariane is committed to protect the user's personal data collected and processed (1) and to inform website users of the use of cookies on its site (2).

"Personal data" refers to any information about you as a person that you will voluntarily provide us or that we will collect through your navigation to allow your identification, directly or indirectly.

This privacy notice is intended to provide information on personal data processed by Clariane, on how they are used and on individual rights of data subject.

Clariane is reachable to answer any question regarding the protection of personal data through regular mail or e-mail:

**Clariane DPO**  
**21-25 rue Balzac 75008 Paris**  
**dpo@clariane.com**

This privacy notice is regularly updated each time a new practice or a new policy on personal data protection is adopted. This information notice has been updated on June 15th, 2023.

## User personal data

### Which personal data is collected by Clariane?

When we are contacted on our website, by mail, e-mail, phone or via requests directly received in our facilities, we collect the following personal data about people interested in our services:

- Their identity and contact details,
- The type of service, department and the desired entry date,
- Information needed to propose the appropriate care

We also collect contact details from users' relatives, if applicable.

### For which reasons these personal data are processed?

We process users' personal data, for the following reasons:

- Make an individual follow-up of users' profile and needs,
- Direct users towards the appropriate solution,
- Analyze users' provenance,
- Follow commercial relationship.

### Which legal basis allow Clariane to process these personal data?

We process personal data on the following basis:

- Our legitimate interest to propose the most suitable offer to users,
- And, if applicable, on users' prior consent to receive offers and commercial messages by electronic means.

### On which supports and how long these personal data are conserved?

Personal data are stored on paper and computer supports, during legal retention periods or as long as necessary for the purposes for which they have been collected, which is two (2) years from last contact with the person.

### With whom these personal data are shared?

#### Internal use

We restrict the access to personal data to Clariane's employees.

We raise awareness and provide training to our employees on data protection issues, and we commit to undertake all appropriate disciplinary measures in case of non-respect of internal procedures in this area.

#### Data processors

We host personal data at data hosting providers who respect current legislations, and we share these data with data processors who act on our behalf.

However, if data processors have access to personal data, they will comply to the current legislation on personal data protection and to this privacy notice.

#### Legal obligations

These personal data are not disclosed with third parties without prior authorization from the data subject, except in exceptional cases when law or governmental authorities, such as the French data protection authority (CNIL – Commission Nationale Informatique et Libertés) or the authorities responsible for judicial matters, require it.

### What are the rights of data subject from whom Clariane collects data and how can they be exercised?

The General Data Protection Regulation (GDPR) and the Data Protection Act modified, confer certain rights to data subject on their personal data.

For any personal data processing concerning a data subject, the following rights can be exercised by this person:

- **Right of access:** everyone has the right to obtain a copy of his/her own personal data that Clariane holds and processes;
- **Right to request the rectification:** everyone has the right to rectify his/her personal data that Clariane holds, if they are incorrect ;
- **Right to make a complaint to the CNIL:** everyone has the right to make a complaint to the CNIL if they have concerns about the way Clariane processes their personal data.

Everyone can also exercise the following rights under certain conditions:

- **Right to request the erasure:** everyone can ask Clariane to erase his/her data;
- **Right to limitation:** everyone can ask Clariane to limit the process of his/her personal data;
- **Right to object:** everyone can ask Clariane to stop the processing of his/her personal data when it is based on Clariane's legitimate interest;
- **Right to withdraw consent:** everyone has the right to withdraw his/her consent if he has given his prior consent for receiving offers and marketing communications by electronic means.
- **Right to object data processing for marketing purposes:** everyone can ask Clariane to stop sending marketing communications at any time.

To exercise these rights, please address a written request with the required information (full contact details and an identity card copy) by mail or e-mail to the following address: Clariane, DPO - 21-25 Rue Balzac 75 008 Paris – [dpo@clariane.com](mailto:dpo@clariane.com).

We are committed to answer in a one-month delay. If for any reason, we are not able to respond to the request, we will explain to the person concerned why its request has been rejected.