NORDNET'S PERSONAL DATA PROCESSING POLICY
Version of August 11, 2020

Nordnet provides a wide range of Internet services intended for residential and professional use, such as Internet access through satellite, radio, optical fibre or xDSL, antivirus solutions, websites hosting, domain name reservation, SEO offers …
Convinced that Internet and its resources are a fundamental brick of tomorrow's world, Nordnet works around three strong values : enable everyone to access high-speed Internet, provide a more secure Internet experiment, without virus or spam, and allow every company, even the smallest, to create easily their own Website.

Facing these challenges, Nordnet commit, within the framework of its activities, to respect the applicable legislation in France, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter the "GDPR") and the French Data Protection Act relating to information technology, files and individual liberties of January 6, 1978, modified by the law 04-801 of August 6, 2004 and the law 18-493 of June 20, 2018, in particular to ensure the protection, the confidentiality and the security of service's end users or prospects' personal data, as well as to protect their privacy within the framework of the collection and processing of personal data.

For this purpose, Nordnet has designate a Data Privacy Officer, in charge of warranting that Nordnet's or potential subcontractors' processing are compliant to the applicable rules, and to ensure the exercise of your rights.

This Policy inform you of the way Nordnet - as a data processor - and its data processors, process your personal data.

This Policy applies in particular to clients and end users of Nordnet's offers and services, and to the visitors of Nordnet's websites (https://www.nordnet.net, https://www.nordnet.fr, https://www.nordnet.com, https://dotplace.com and https://www.blog.nordnet.com), as well as prospects and support users. It completes, where applicable, the contractual conditions of Nordnet's offers and services.

Specific or further information may also be brought to your attention through exchanges that you may have with Nordnet, or through the communication of documents and/or on the aforementioned websites (in example a particular offer or service, cookies …).

Nordnet may also provide you offers and/or tools developed in all or in part by third parties, who are therefore acting as joint controllers of your personal data's processing.

This Personal Data Processing Privacy may evolve. The version in force is the one published on the website.

WHICH TYPES OF PERSONAL DATA ARE PROCESSED BY NORDNET?

According to article 4, 11) of the GDPR and of the article 2 of the French Data Protection Act relating to information technology, files and individual liberties of January 6, 1978, modified by the law 04-801 of August 6, 2004 and the law 18-493 of June 20, 2018, constitute a personal data: any information relating to an identified or identifiable natural person, in a directly or indirectly way.

Nordnet process your personal data, which are directly collected from you or from the use of products or services. Nordnet may also be the recipient of data collected by a third party acting on your behalf or collected with your consent (by example when you are using, outside Nordnet's business hours, the conversational agent proposed on the website https://www.nordnet.com though Messenger).

Nordnet may process the following types of personal data:

- Identifying information: name, first name, email address, postal address, telephone number…
- Financial data: payment methods, invoices, payment history…
- Products and services detained or used
- Consumption records
- Information related to material, services, customer service and support
- Technical data: browsing data, connection logs, data about Nordnet's softwares installation…
- Potential claims and disputes.

When collecting personal data, you are informed of their mandatory or optional nature. Where applicable, if you fail to provide your personal data presented as mandatory, this could lead to the impossibility of treating your request.

HOW ARE USED YOUR PERSONAL DATA?

As a data controller, Nordnet collects and process your personal data for specific, explicit and legitimate purposes. Personal data are processed in accordance with Nordnet's previously defined purposes:

Nordnet process your personal data within the framework of your website's browsing, your information requests, or requests of eligibility, as well as your potential participations in contests.

- Nordnet process your personal data for clients or prospects' contractual or pre-contractual management purposes. For this end, several processings are made on the collected personal data, in particular in order to:
- Answer to the requests related to the exercise rights of the data subjects,
- Answer to information requests (including when you are using the conversational agent on the website www.nordnet.com or if you ask Nordnet to call you back),
- Realize or enable a request of Internet access's eligibility,
- Provide services (in particular deliver the products or services ordered),
- Identify and sign in the client and/or user, the contacts (…),
- Enter the order and your action requests,
- Invoice and collect the payments/if need the recovery,
- Ensure after-sales service and support, answer information requests,
- Process the offer's termination,
- Answer to potential claims and disputes.

- Nordnet realize the personal data's processings, based on lawful interest, in particular in order to:
- Manage requests of information or eligibility,
- Carry out clients' surveys,
- Realize processings for statistical purposes,
- Ensure the security of platforms and services,
- Stage and operate services,
- Fight fraud,
- Analyze uses of services in order to make some proposals to the client,
- Survey customers,
- Improve the offers, the customer relationship and support.

- Nordnet realize processings of your personal data based on your consent' collection, in particular:

- for prospection's purposes. This include, in particular, the processings in order to organize direct marketing operations, sales events, contests, etc ; take potentially a fully automated decision, based on profiling;
- for the management and the monitoring of the applications received in the context of the recruitment process in place on Nordnet's website (www.nordnet.com) or through its partners.

According to the applicable regulation, to your quality as customer or as professional, to the communication means used and the concerned operation, your prior consent may be collected by Nordnet if needed. For all intents and purposes, not expressly consent to the receipt of commercial prospecting on a new collection form would not be worth as an opposition to the receipt of offers and commercial information from Nordnet, without any other action from your behalf, in the event that you would have previously accepted their receipt.

- Nordnet process your personal data to comply with its legal or regulatory obligations, in particular in order to:
- Store the required data,
- Answer to the requests of data communication from the competent authorities,
- Answer to the court requisitions and interception requests.

HOW LONG ARE YOUR DATA STORAGED?

Your data are stored for the time:

- Needed to accomplish the aforesaid purposes,
- Defined in accordance with legal retention obligations,
- Of limitation periods.

Retention periods of personal data are applied by Nordnet on the basis of the following criteria:

Purpose of the processing	**Retention period**
Management of prospects files	3 years from the data collection or 3 years from the last contact from the prospect
Management of clients files	Duration of the commercial relationship + 3 years Necessary durations to the establishment of proof of a right or contract: prescription in civil and commercial matters 5 years Obligation to store books and documents created during commercial activities : 10 years from the year-end closing Storage of contracts concluded electronically : 10 years form the delivery or the service
Exercise of the right of access or rectification	1 year of storage of the identity document
Exercise of the opposition right	3 years of storage of the identity document

Contracts concluded between professionals and consumers	Prescription of the professionals' action for the goods and services that they furnish to consumers : 2 years
Management of orders, deliveries, invoicing Accounting documents and supporting documents	10 years
Statistics of audience measurements	13 months
Login data	13 months
Management of a newsletter	Until the concerned person unsubscribes
Banking data	5 years
Storage of credit card numbers	Data relating to credit cards must be deleted once the transaction has been realized (effective payment) increased of the withdrawal period if applicable. These data can be stored in intermediate storage for a purpose of proof in case of potential transaction dispute for a period of 13 months. This time limit can be extended to 15 months in order to take into consideration the possible use of credit cards with postponed payment. Longer storage period if consent in order to facilitate regular payments or subsequent purchases for example.
Visual credit card cryptogram	Necessary duration to the completion of each transaction
Management of an opposition list to receive prospection	At least 3 years from the subscription to the list Legal prescription 5 years
Management of recruitment files	Data storage for 24 months after the last contact with the applicant

WHO ARE THE RECIPIENTS OF YOUR PERSONAL DATA?

Your data are intended to Nordnet's services and its subcontractors operating for the provision of the services.

The processed data may finally be transmitted to competent authorities, administrations, at their request, within the framework of legal or regulatory process, judicial requisitions or decisions, and disclosure requests.

WHERE ARE PROCESSED YOUR PERSONAL DATA?

The personal data are processed by Nordnet and its potential partners mainly within the European Union. Certain data may nevertheless be processed outside the European Union mainly for reasons of storage or assistance. As the case may be, an appropriate level of data protection is required, in particular contractually,

through standard contractual clauses of the European Commission or any other approved mechanism, in compliance with the applicable regulation.

Concerning the domain names, some specificities defined by registries and supervisory authorities may exist according to the extensions concerned.

WHAT ARE YOUR RIGHTS REGARDING PERSONAL DATA?

In accordance with the applicable laws and regulations, you benefit in particular of a right of access, of rectification, of deletion, of opposition, for legitimate reasons, to the processing of your personal data, and a right to object to the transmission of your personal data to third parties or to the receipt of commercial information.

You also have a right to define general or specific guidelines regarding the storage, the deletion and the communication of your personal data after your death, in the conditions set by law.

In accordance with articles L.224-42-1 à L.224-42-4 of the Consumer French Code, you also benefit from a right to portability and to data recovery.

You have a right to file a complaint with the supervisory authority.

You are informed that you also have the right to object that a fully automated decision, based on profiling, may be made by Nordnet.

In order to exercise your rights, please send a complete request (with as an attachment a copy of an identity document if necessary) by mail to Nordnet - Département Clients - 20 rue Denis Papin – CS 20458 – 59664 VILLENEUVE D'ASCQ CEDEX – FRANCE or by email to coordonnees@nordnet.com (only the requests relating to personal data will be processed), specifying:

- Your surname, first name, address (mailing or emailing),
- Your telephone number if needed,
- Your client number or file number if needed.

Furthermore, any customer may register, for free, on an opposition list "Bloctel" in order to stop being approached by telephone by a professional with which he has no actual contractual relationship. The customer may register on the website www.bloctel.gouv.fr or send a letter to: Société Opposetel, Service Bloctel, 6 rue Nicolas Siret, 10 000 Troyes, France.

HOW ARE YOUR DATA SECURED?

Nordnet ensure that your personal data are processed in compliance with the applicable laws and regulations, including when some operations are made by data processors.

For this purpose, technical and organizational measures are taken by Nordnet and its potential data processors in order to mitigate any destruction, disclosure, copying, wrongful use, loss, alteration, unauthorized access of your personal data, including data encryption. These measures are adapted according to the level of sensitivity of the processed data and the risk level of the processing.

If you want to contact Nordnet's Data Privacy Officer, please send an email to: dpo@nordnet.com.