

e-Campsis Data Privacy Policy

Effective date: 28-May-2025

Calvagone SAS ("Calvagone", "we", "us") respects your privacy and is committed to protecting the personal data of users who access and use our simulation platform **e-Campsis**. This policy describes how we collect, use, and store your data in compliance with the **General Data Protection Regulation (GDPR)** and other applicable data protection laws.

1. Data Controller

Calvagone SAS

3 Allée Victor Pulliat
69380 Chazay d'Azergues
France
Email: contact@calvagone.com

2. What Personal Data We Collect

When you register to use **e-Campsis**, we may collect the following personal data:

- Name
- Email address
- Organization (optional)
- Account login information
- Billing information (for paid services only)

We also collect technical session data, such as IP address and browser type, to ensure secure and stable operation.

3. Use of Personal Data

We use your personal data for the following purposes:

- To create and manage your user account for e-Campsis.
- To provide access to and operate the simulation services.
- To inform you about new **e-Campsis** features, workshops, webinars, and other services offered by **Calvagone**.
- To send administrative and support-related communications.

You may unsubscribe from promotional communications at any time using an unsubscribe link in the email or by contacting us directly.

4. Upload and Handling of Simulation Data

As part of using e-Campsis, you may upload external data files (e.g., NONMEM models, datasets). Please note:

- **Uploaded data is stored temporarily:** Files uploaded to e-Campsis are only stored for the **duration of your active session** and some **time-out period**. After the time-out all session data will be deleted.
 - **No persistent storage** of uploaded files is performed.
 - **Patient-level data must be anonymized:** You are responsible for ensuring that any personal patient information is fully de-identified prior to upload.
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5. Billing Information (for Paid Services)

For paid subscriptions or services, we may collect and store billing-related information, such as:

- Company name and billing address
- VAT ID (if applicable)
- Payment method details (handled securely via third-party payment processors)

This information is used solely for **invoicing, tax, and contractual purposes**, and stored securely in compliance with accounting and tax regulations.

6. Legal Basis for Processing

We process your personal data on the following legal bases:

- **Performance of a contract:** To deliver the services and features you request.
 - **Legitimate interest:** To provide service notifications and improvements.
 - **Consent:** For newsletters and non-essential updates (you may withdraw consent at any time).
 - **Legal obligation:** For tax and accounting compliance in the case of billing data.
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7. Data Sharing and Disclosure

We **don't sell or rent** your personal data. We may share data only under the following conditions:

- With third-party service providers (e.g., shinyapps.io, payment processors) acting on our behalf under strict confidentiality.
 - When legally required (e.g., by court order or authority request).
 - In the event of a merger, acquisition, or business transfer, subject to appropriate safeguards.
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8. Hosting and International Transfers

e-Campsis is primarily hosted on shinyapps.io (provided by Posit Software, PBC). Some technical data may be processed in the United States under Standard Contractual Clauses (SCCs) or other legal safeguards as stipulated in [Posit's Terms of Use](#) and their Data Privacy Policy, which you agree to when using shinyapps.io-hosted versions of e-Campsis. For workshops and beta-testing we may use also e-Campsis hosted on servers in a secure and certified data center in Europe.

9. Data Retention

- **Account data** is retained for as long as your account is active and for a limited time afterward to fulfill legal or support obligations.
 - **Uploaded simulation data** is retained **only temporarily**, as explained in Section 4.
 - **Billing information** is retained as required by applicable tax and accounting laws (typically 5–10 years, depending on jurisdiction).
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10. Your Rights (under GDPR)

You have the right to:

- Access your personal data.
- Request correction or deletion.
- Object to or restrict processing.
- Withdraw consent (where applicable).
- Receive a copy of your data (data portability).
- File a complaint with a supervisory authority.

To exercise these rights, contact us at contact@calvagone.com.

11. Security Measures

We use appropriate technical and organizational measures to safeguard your data, including:

- Secure server hosting and firewalls
 - TLS (HTTPS) encryption for data in transit
 - Session-based authentication and automatic session expiry
 - Access controls and monitoring
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12. Changes to this Policy

We may update this Privacy Policy from time to time. Changes will be posted on this page with an updated effective date.

Contact Us

Calvagone SAS

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69380 Chazay d'Azergues

France

Email: campsis@calvagone.com

Website: www.e-campsis.com