

PERSONAL DATA POLICY

The personal data controller is:

- [Geode-solutions](#), a French Company, located at Technopole Hélioparc, 2 avenue du Président Pierre Angot, 64000 Pau, and duly registered before the Commercial register under the number 852 994 789 00018

Geode-solutions undertakes to implement appropriate measures to ensure compliance and to process such data in accordance with the law and regulations in force.

The purpose of this personal data policy (hereinafter the "**Personal Data Policy**") is to inform you of the conditions under which Geode-solutions collects, processes and ensures the protection of the users personal data of the website <https://share-twin.com> (hereinafter the "**Website**") and of the free online multi-user platform that the Website provides (hereinafter the "**Software**").

You must familiarize yourself with the Personal Data Policy and agree to its content before using the Website and/or the Software offered on it.

1. Personal data collected and processed by Geode-solutions

1.1. Personal data

Any information relating to an identified or identifiable natural person constitutes personal data.

Geode-solutions ensures that it only collects and processes data that is strictly necessary for the purposes as defined in article 2 of the Personal Data Policy.

In this context, Geode-solutions collects the following personal data directly from you: name, surname, email address, phone number, and more generally any personal data that could be imported by you into the Software through the document charged and processed.

The data mentioned above are hereinafter referred to as "**Personal Data**".

1.2. Necessary collection to process your requests

Your Personal Data is required by Geode-solutions to contact Geode-solutions through the contact form, or to use the Software accessible via the Website or to use the SHARETWIN's services.

You undertake to provide Geode-solutions with accurate and up-to-date Personal Data. SHARETWIN may not be held liable in the event of failure to do so. Geode-solutions also reserves the right to hold you liable for any prejudice that may result.

1.3. Cookies

Cookies are text files with small pieces of data. They are used to identify your computer as you use a network. Specific cookies can be also used to identify specific users and improve their web browsing experience. Data stored in a cookie is created by the server upon your connection.

There are two main kinds of cookies:

- **Session cookies** - used only while navigating a website. They are stored in random access memory and are never written on to the hard drive. When the session ends, session cookies are automatically deleted. They also help the "back" button work on your browser.

- **Persistent cookies** - remain on your computer according to dedicated expiration date. They are automatically removed when that date is reached. Persistent cookies are used for two primary purposes: authentication or tracking.

Cookies can notably be used for technical purposes (i.e. to enable or facilitate electronic communication - implemented without the user's prior consent) or for commercial purposes (the other cookies – only implemented with the user's prior consent).

Even if no prior consent is required from you, Geode-solutions wants to inform you that it only uses technical cookies, allowing you to navigate through the Website and the Solution, and use all the related features.

2. Legal basis and purposes of Personal Data processing

The processing of Personal Data by Geode-solutions is based on the applicable laws and regulations.

Geode-solutions processes your Personal Data solely for the following specified, explicit and legitimate purposes, to the exclusion of any other:

- On the basis of your free, specific, informed and unambiguous consent, your Personal Data is processed for the following purposes:
 - o Verify your identity,
 - o Operate the Website
 - o Operate the Software accessible via the Website,
 - o Process your information requests
 - o Process your requests to exercise your rights, in accordance with article 4 of the Personal Data Policy.
- Meet any legal or regulatory obligations, such as the fight against tax fraud and money laundering.

3. Personal data retention period

Geode-solutions retains your Personal Data for the period strictly necessary to achieve the purposes for which it was collected, subject to legal and regulatory retention obligations.

Thus:

- The Personal Data required to operate the Software accessible via the Website are kept for a period of a maximum of 5 (five) years from the date of receipt of your request.
- The Personal Data required to process your requests to exercise your rights is kept in an "active database" for a period of 5 (five) years from receipt of your request.

Geode-solutions does not keep any record of the document you process through the Website nor the processing results.

4. Your rights and ways of exercising them

4.1. Right of access, modification, suppression, objection and portability

You have a right to access, modify and suppress your Personal Data. In this respect, you may:

- o Access all the Personal Data collected about you by Geode-solutions
- o Access the Personal Data on which Geode-solutions has based a decision concerning you,

- o Obtain a copy of your Personal Data (Geode-solutions may request that the expenses incurred be covered, as long as they do not exceed the cost of reproduction),
- o Demand that your Personal Data be, depending on the case, rectified, completed, updated, or deleted, subject to the exceptions provided for by the applicable laws and regulations,
- o Define the treatment of your Personal Data after your death (conservation, deletion or transmission to a third party that you have previously designated),

You also have the right to object:

- o the re-use of your Personal Data for solicitation purposes, in particular commercial solicitation, when subscribing to services offered or to be offered on the Website;
- o the processing of your Personal Data for legitimate reasons, unless this is required by law or regulation.

Finally, the right to portability offers you the possibility of recovering your Personal Data in a structured, open and machine-readable format. This means that you can store it or transfer it easily from one information system to another, with a view to re-using it.

4.2. Exercising your rights

To exercise your rights or to request information about your Personal Data, you can send a written request to Geode-solutions, together with a copy of both sides of your identity card, to the following addresses:

- o by postal mail : GEODE SOLUTIONS - 2 avenue du président Pierre Angot, 64053 Pau, France
- o by email : contact@share-twin.com

Geode-solutions undertakes to provide you with the information requested under the conditions set out above, within a maximum of 1 (one) month from receipt of your request. This period may be extended if the request is complex or requires further study.

If the time limit for processing your request is extended, you may ask Geode-solutions to limit your Personal Data. This right to limitation makes it possible to obtain a "freeze" on the use of your Personal Data by Geode-solutions while your request is being processed.

5. Recipients and transfer of personal data

Geode-solutions does not communicate your Personal Data to third parties, other than its service providers or subcontractors (IT services provider, partners), whose access to your Personal Data is necessary for the purposes set out in Article 2 of the Personal Data Policy.

Geode-solutions has ensured that all its service providers and subcontractors offer the appropriate warranties in terms of data protection.

Geode-solutions does not transfer your Personal Data in any way, whether for commercial purposes or for any other use.

Finally, Geode-solutions does not transfer any Personal Data outside the European Union.

6. Confidentiality and security of Personal Data

The security and confidentiality of Personal Data are essential to Geode-solutions.

For this reason, Geode-solutions ensures that the members of its teams, its partners and its subcontractors which, because of their function/role, may have access to your Personal Data, are subject to a strict confidentiality obligation.

Geode-solutions implements appropriate technical and organizational measures to protect Personal Data against damage, loss, misappropriation, intrusion, disclosure, alteration or destruction.

Geode-solutions has also ensured that all its subcontractors/partners/suppliers present the appropriate guarantees in terms of the protection of Personal Data.

7. Information requests or complaints

If you have any complaints or questions about exercising your rights or about all or part of the Personal Data Policy, you can contact Geode-solutions:

- o by postal mail : GEODE SOLUTIONS - 2 avenue du président Pierre Angot, 64053 Pau, France
- o by email : contact@share-twin.com

You can also contact the French Protection Data Authority (Commission Nationale de l'Informatique et des Libertés or "CNIL") as follows to request information or lodge a complaint:

- o by postal mail: 3 Place de Fontenoy – TSA 80715 – 75334 Paris Cedex 07, France
- o via the contact form available on the CNIL website: <https://www.cnil.fr/fr/vous-souhaitez-contacter-la-cnil>
- o via the complaints procedure available at <https://www.cnil.fr/fr/plaintes>

8. Modifications to the Personal Data Policy

Geode-solutions reserves the right to modify the Personal Data Policy, in particular to reflect any changes in the law and regulations in force.

Geode-solutions will notify you of any changes to the Personal Data Policy by means of an information banner posted on the homepage of the Website, which must be read and accepted in order to continue using the Website and the Software.

Last update: 30th of May 2024