



PRIVACY POLICY

Respecting your personal data and your privacy is our priority.

This Privacy Policy informs you about the way in which WIFIRST processes the Personal Data that you may be asked to provide or that may be collected by WIFIRST when using its services or on its website www.wifirst.com

Special provisions may apply to certain services or to certain users, which will be made known to the user prior to accessing or using the services concerned.

1. General

The company WIFIRST, a simplified joint stock company registered in the Paris Trade and Companies Register under number 441 757 614 and whose registered office is located at 26, rue de Berri 75008 Paris, is responsible for the processing of personal data collected and processed within the framework of the use of its services and/or its Internet site www.wifirst.com.

In its capacity, WIFIRST undertakes to comply with the regulations applicable to the protection of personal data, and in particular the amended Act No. 78-17 of 6 January 1978 relating to information technology, files and freedoms, and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data ("GDPR").

"Personal Data" means data relating to an identified or identifiable living natural person, i.e. one who can be identified, directly or indirectly, by means of such data.

2. Nature of the Personal Data processed by WIFIRST

Within the framework of its activities, Wifirst collects and processes the following Personal Data:

- Identification data that its customers or users of its services or website provide to it by filling in forms and/or contacting its services: subscriptions, contact form, recruitment form, technical support, etc. ;
- The identification data that users of its services are asked to provide in order to access them (surname, first name, email address);
- The identification data of the connection tools (MAC address, operating system), IP addresses and logs;
- Bank details and billing details, in the context of the provision of paid services;
- Data shared by users and at their initiative on the community portal made available to them by WIFIRST and likely to constitute Personal Data;
- The connection and navigation data of users and visitors to the pages of its website and for certain emails, data relating to its reception and clicks on the links contained within the email. WIFIRST does not collect the history of Internet pages and third-party websites.

3. Purposes of the processing of Personal Data by WIFIRST

Wifirst undertakes to ensure that your Personal Data collected will only be processed for the purposes described below and limited to those strictly necessary and relevant to those purposes.

Each processing of Personal Data is based on one of the legal bases provided by the GDPR.

Furthermore, Personal Data is kept only for the period necessary to achieve the purposes for which it is collected; a longer retention period is possible when it results from a legal or regulatory obligation to which Wifirst is subject.

In order to ensure full transparency regarding the purposes of the processing and retention periods applied within Wifirst, you will find below an explanatory table:

Goals	Legal basis	Retention period
Managing the contractual relationship with the client	Performance of a contract (art. 6.1(b) GDPR) Compliance with legal or regulatory obligations (article 6.1.c) of the GDPR)	Duration of the contractual relationship and an additional 10 years from the end of the contractual relationship
Ensure the implementation of the electronic communications services provided by Wifirst (service provision, maintenance, support, after-sales service)	Legitimate interest of Wifirst to ensure the efficient implementation of the services (article 6.1.f) of the GDPR	As long as the user account is active and for an additional 6 months after the user account is deleted
Recruiting	Consent of the person sending the application (article 6.1.a) of the RGPD) Wifirst's legitimate interest in contacting candidates (article 6.1.f) of the GDPR Execution of pre-contractual measures (article 6.1.b) of the GDPR	For successful candidates: duration of the recruitment procedure and may be used for personnel management purposes For unsuccessful candidates: for the duration of the recruitment process. With the consent of the applicant, Personal Data may be retained for a further 24 months.
Process and respond to your requests for information about Wifirst or its services	Consent (article 6.1.a) of the GDPR Legitimate interest of Wifirst (article 6.1.f) of the GDPR)	36 months from their collection or from the last contact from the data subject
To conduct data analysis in order to better understand the needs of Wifirst users (statistical studies, satisfaction surveys, analysis and audience measurement, to improve and adapt offers and services, ...)	Consent (article 6.1.a) of the GDPR	As long as the user account is active and for an additional 6 months after the user account is deleted

Promoting Wifirst's services	<p>Legitimate interest of Wifirst to offer its customers new services related, complementary or similar to those already provided (Article 6.1.f) of the GDPR)</p> <p>Consent of the data subject (Article 6.1.a) of the GDPR)</p>	<p>Personal Data relating to a non-customer prospect, including the user: 36 months from its collection by Wifirst or from the last contact from the prospect</p> <p>Personal Data relating to a customer: for the duration of the contract(s) and an additional 10 years from the end of the contractual relationship.</p>
Ensure delivery and/or opening of some emails and/or consultation of the links contained within some emails relating to the provision of the services (e.g. creation of an account, sending of codes or passwords, invoicing, new T&Cs)	<p>Legitimate interest of Wifirst to ensure delivery and/or opening of emails and access to information and documents transmitted in connection with the provision of the services (article 6.1.f) of the GDPR and exemption from consent under CNIL deliberation n°2020-091)</p>	<p>Opening and click statistics are kept for a limited period of 30 days</p>

4. Recipients of your Personal Data processed by Wifirst

WIFIRST limits access to your Personal Data to those persons who need to use it, namely:

- WIFIRST's employees and collaborators who need to know this information in order to provide the services subscribed to and the commercial and technical assistance service;
- WIFIRST's technical service providers or other technical operators involved in the routing of electronic communications, for the strict needs of the execution of WIFIRST's services;
- The commercial partners where WIFIRST infrastructures are installed;
- WIFIRST's subcontractors.

WIFIRST never discloses Personal Data to other third parties unless: (1) disclosure is necessary for the performance of your contract(s) with WIFIRST; (2) an administrative or judicial authority makes a request for disclosure to WIFIRST, in particular upon request; (3) disclosure is necessary to comply with contractual, legal and/or regulatory obligations; (4) you request or authorise disclosure.

In the event of transfer of your Personal Data to a country outside the EEA, WIFIRST undertakes to take all the necessary guarantees to protect your Personal Data and to ensure that it is processed in accordance with the GDPR.

5. Protection of your Personal Data processed by Wifirst

WIFIRST takes all appropriate technical and organisational measures to ensure the security of Personal Data and, in particular, to prevent unauthorised access and/or disclosure of Personal Data. The user's Personal Information is stored in France on secure servers hosted by Equinix and Jaguar.

WIFIRST requires its employees, partners, service providers and subcontractors to comply fully with the GDPR. This implies, in particular, written contractual guarantees concerning the security and

confidentiality of the processing carried out, including in order to prevent Personal Data from being destroyed, distorted, damaged or communicated to third parties without authorization.

WIFIRST undertakes to respect and to ensure that the recipients mentioned in Article 4 respect the following obligations:

- Not to use the Personal Data processed for purposes other than those provided for or agreed with you in this Policy;
- To transmit Personal Data only to persons contractually bound by an obligation of confidentiality;
- To implement the necessary measures to ensure the secure storage of the Personal Data processed throughout the duration of the contractual relationship;
- To pass on to its subcontractors, if any, all the obligations incumbent upon it under the RGPD.

6. Rights available to you

You may exercise the following rights at any time:

- Right of access and information regarding your Personal Data;
- Right of rectification of your Personal Data; Right of deletion
- Right of deletion;
- Right to object to the processing of your Personal Data and right to request a limitation of such processing in certain cases;
- Right to request the portability of your Personal Data used by WIFIRST for the sole purpose of performing your contract;
- The right to determine the fate of your Personal Data after your death.

You may exercise your rights by contacting WIFIRST:

- By email: donnees-personnelles@Wifirst.fr
- By post: Wifirst - Customer service - personal data - 26 rue de Berri - 75008 Paris

Your request will be processed within a maximum of 1 month, renewable if necessary for the same period. WIFIRST reserves the right to ask you for a copy of a proof of identity in order to verify your personal interest in exercising your rights, unless your identity is sufficiently established; this copy will be kept only for this purpose and for the duration of the processing of your request.

7. Questions and complaints

If you have any questions or complaints about WIFIRST's processing of your Personal Data or about this Policy, please contact the Data Protection Officer (DPO):

By phone: 01 70 70 46 26

By email: personal-data@wifirst.com

By post: Wifirst - Customer service - personal data - 26 rue de Berri - 75008 Paris

WIFIRST makes every effort to provide a prompt and satisfactory solution to questions and complaints relating to the protection of your Personal Data.

However, if you are not satisfied with the response received from the Data Protection Officer, you may refer the matter to the competent supervisory authority in your country. The main competent

authority in France is the Commission Nationale de l'Informatique et des Libertés (CNIL) located at 3 place de Fontenoy - 75007 Paris (www.cnil.fr).

8. Modification of the Privacy Policy

This Policy may be modified by WIFIRST at any time.

In case of modification of the Policy, the new version in force will be applicable as of its posting on the WIFIRST website.

PROOFREADING		
Name	Function	Date

VALIDATION		
Name	Function	Date
FX BOULIN	DPO	30/09/2022

Document Classification					
C1 : Public	X	C2 : restricted		C3 : Confidentiel	
C1-C2 : no specific mention of dissemination required ; C3 : specific mention required					
DISSEMINATION					
Name, First name	Group of people			Date	

DOCUMENT MANAGER		
Name	Function	Date (from...)
Laura NAJBERG	Juriste	

HISTORIQUE DES VERSIONS			
Version	Author	Comments	Date
V0.1	Laura NAJBERG	Creation of the document	
...
V2	François-Xavier BOULIN	Update of the privacy policy	04/02/2020
V3	Emily SAUVALLÉ	Update of the privacy policy	12/08/2022
V3.1	Laura NAJBERG	update of the privacy policy by integrating trackers	30/09/2022