



## Privacy and Personal Data Protection Policy (September 23, 2020)

This Privacy and Personal Data Protection Policy is issued by the company RINGO (trading under the name "MODJO"), a French simplified joint stock company with a capital of 30,000 euros registered with the trade and commercial register of Nanterre under n° 879 606 283 and having its head office at 59, avenue Sainte Foy - 92200 Neuilly-sur-Seine (France).

It applies to all the processing of personal data carried out by RINGO SAS in its capacity as data controller via its website [www.modjo.ai](http://www.modjo.ai) and the app [modjo.ai](#).

RINGO SAS is a company specializing in the provision of advice, studies, projects, products, services and computer software and their operation.

We have placed at the center of our commitments, that of respecting and protecting the privacy and personal data of our customers and users, and consequently to comply with the regulations in force, and in particular the French Law n°78-17 of 6 January 1978 "*Informatique et Libertés*" in its amended version and the European Data Protection Regulation No. 2016/679 (known as "GDPR") entered into force on May 25, 2018, but also to ensure better data protection for the purpose of improving our goods and services.

This Privacy and Personal Data Protection Policy will allow you to understand how and why your personal data is collected and processed by RINGO SAS and how to exercise your rights.

This Privacy and Personal Data Protection Policy may be updated, in particular to take into account changes in our services, technologies or applicable regulations. These updates will be effective immediately when they are made available and searchable on our website or through the Modjo application.

For any questions regarding this document and, in general, about the collection and processing of your personal data by RINGO SAS, do not hesitate to contact us by e-mail: [celeste@modjo.ai](mailto:celeste@modjo.ai)

### Who is this Policy for?

This Privacy and Personal Data Protection Policy is intended for any person who transmits or entrusts us with personal data via our products and services.

### What is "personal data"?

Within the meaning of the GDPR and of the French law "*Informatique et Libertés*", "personal data" consists of any information relating to a natural person who can be identified directly or who is indirectly identifiable, such as names, first names, email addresses and postal service of a natural person, his/her image, an IP address, a location data, a license plate ...

### What personal data do we collect?

The personal data that we collect when you contact us or use our services may be, without this list being exhaustive, data relating to:

- your identification (name, first names, email address, username / password, etc.);
- your professional life (function, company, etc.);
- information sent via the "Contact us" functionality or the support and customer services;
- personal data relating to the users of our services and their prospects / customers (and in particular their voice and telephone number (s)).

When you browse our websites and our services, we may also collect:

- information about your use of our sites and services, including data traffic and records of the choices you make online;
- log and statistical files relating to actions taken on our sites and services;
- technical information about any device and operating system that you use when you visit our sites, including your device identifier, your Internet Protocol (IP) address, the browser version of your device, the pages of our service that you visit, the time and date of your visit, the time spent on these pages and other statistics. For the collection and processing of tracking data on our sites, we use cookies; to better understand their operation and usefulness, please see "Information on cookies" below.

### Why do we need to collect personal data?

RINGO SAS collects personal data to provide and improve its services, and in particular for the following purposes:

- Provide and manage our services;
- Understand your uses and thus adapt our products and services accordingly;
- Provide you, through our products and services, a personalized and secure space;
- Communicate with our customers and prospects and improve the quality of our services, namely answering your questions and keeping you informed of our news;
- Resolve any possible dispute or resolve any problem in connection with the use of our services.

### Can I object to the processing of my personal data?

Information that you communicate, through the use of our products and services, remains your personal data.

You therefore have the right to oppose or limit certain processing of your personal data, as well as to access, rectify or even request the erasure of your personal data or request their portability, by writing to us at: celeste@modjo.ai

Your requests will be processed within 1 month as from its receipt, this period being possibly renewable. We reserve the right to ask you for a copy of an identity document, in order to check your identity; this will be kept by us only for the duration of processing of your request.

You can also, if you are a customer and have a user account, go to the "My Account" section to access and modify your data.

To find out more about your rights, you can visit the CNIL website: [www.cnil.fr](http://www.cnil.fr)

For the processing of personal data relating to your customers or prospects, and which you communicate or provide us as part of the use of our services, you act as data controller and we act as a data processor within the meaning of the GDPR. It is therefore your responsibility to ensure that the rights of the data subjects and, more generally, the applicable regulations are respected. On these questions, you can consult our Annex relating to the subcontracting of personal data, available on request.

### How RINGO SAS ensures the protection of personal data?

RINGO SAS has implemented a number of actions and technical and organizational measures to meet the requirements of the GDPR in terms of protection and security of personal data.

RINGO SAS has also appointed a Data Protection Officer (DPO), Mr. Jérémy Fornanino, in charge of ensuring the compliance of our practices with regard to the GDPR. For each new processing operation implemented by RINGO SAS, our DPO, as part of an internal prior validation procedure, checks its purpose and legitimacy with regard to the needs of the company, but also and above all with regard to the risk of breach of data protection and/or privacy of data subjects.

You can contact our DPO by writing to: RINGO SAS, DPO, 59 avenue Sainte Foy 92200 Neuilly-sur-Seine (France).

Regarding the security measures implemented to protect personal data from any risk of violation, unauthorized disclosure or attack on their integrity, RINGO SAS has deployed all the necessary means with its teams and service providers to minimize the risk of security breaches.

We strive in particular to maintain 24/7 systems monitoring in order to ensure the security of the personal data we process.

Our sites are regularly scanned for security breaches and vulnerabilities and we take the necessary precautions to avoid the loss, abuse or alteration of personal data.

When certain services require the use of a third party (subcontractor), RINGO SAS selects its service providers on the basis of strict security and confidentiality criteria previously defined with regard to the issues, and systematically requires from its subcontractors a level security that guarantees a sufficient level of protection of the personal data that they process on our behalf.

### What are the retention periods for the personal data collected?

RINGO SAS undertakes to keep the personal data entrusted to it for periods limited to the provision of services or necessary with regard to its contractual or legal obligations. In particular:

Call recordings / voice / phone numbers	Duration of the services agreement
Data relating to the customers (company's contact)	Duration of the contractual relationship = 2 years as from its end
Prospects	3 years as from the last contact
CV and resume (recruitment)	2 years as from the last contact and subject to the candidate's prior consent.
ID	Destruction once the checking are made

## Are your personal data subject to transfers to countries outside the European Union?

Your personal data may be transmitted service providers we use for IT services in particular.

The performance of these services is contractually regulated and we make every effort to select our service providers on the basis of very demanding criteria in terms of safety.

Regarding the hosting and storage of data, RINGO SAS requires its hosting service providers that the data be hosted in France or in a country of the European Union. The RINGO SAS sites and databases are hosted by AWS on servers located in the European Union.

If, for technical reasons or for specific needs related to the maintenance of certain applications, personal data is transmitted or made accessible to third parties located outside the European Union, RINGO SAS ensures in advance that the latter guarantee a sufficient level of protection of this data and comply with the GDPR.

## Information about cookies:

We inform you that when you consult our website, "cookies" or "Trackers" are deposited and stored on demand from our Internet server to or on your computer or smartphone using your browser (eg Chrome, Explorer, Firefox, etc.). The browser returns cookies to our server which allows us to remember your previous visits.

This section allows you to better understand how cookies work and how to use certain tools to configure them.

### *What is a "cookie"?*

A cookie is a small, non-executable file consisting simply of text that is sent by our website or third-party websites to your computer or smartphone, and stored through your browser.

Cookies cannot erase or read information from your computer or smartphone. However, the deposit and recording of cookies can indirectly identify the user since it can detect the pages visited by a user on a site and remember your user profile. However, cookies are neither spyware nor viruses.

### *Why do we use cookies?*

We use several kinds of cookies:

#### 1. Functional and technical cookies

We use functional and technical cookies, which are essential for the use of the website.

Disabling these cookies may have the effect of preventing the use of certain features of the site, navigation on the site or the display of certain pages.

Other cookies allow us to improve your user experience when viewing the pages of our website, as these cookies allow certain content to be personalized. They allow you to recognize and remember your browsing preferences and settings as you defined them during a previous visit to our site, in order to facilitate your browsing and make it more pleasant.

They allow you to access reserved and personal areas of the site or our services, such as your personal account, for example by memorizing your identifiers and current editions.

Name of the cookie	Provider	Duration	Purpose
accessToken	-	7 days	Users' session management

## 2. Analytical cookies

Analytical cookies are used to measure and analyze traffic to our website to improve its ergonomics.

They allow us to compile statistics on the average time spent on a page, the number of page views, the number of times the user has already seen this page, the most viewed services.

Name of the cookie	Provider	Duration	Purpose
_ga	Google	2 years	Analysis of audience measurements
_gat	Google	Session	Analysis of audience measurements
_gid	Google	1 day	Analysis of audience measurements

## 3. Advertising cookies

These are advertising cookies that allow us and our partners to analyze your behavior and browsing to better understand your preferences, your taste and purchasing trends and to offer you targeted commercial prospecting offers according to your needs.

Name	Provider/partner	Duration	Purpose
No advertising cookie			

Your browser's internet options menus should also allow you to disable cookies.

Through the configuration of your browser, you can carry out a number of actions allowing you to administer cookies in order to accept or refuse their use either globally or more precisely and at all moment. The configuration elements being specific to each browser, we suggest that you follow the link corresponding to your browser to find out more:

- To manage cookies on Google Chrome: <http://urlz.fr/75Kb>
- To manage cookies on Internet Explorer: <http://urlz.fr/75Kd>
- To manage cookies on Mozilla Firefox: <http://urlz.fr/75Ke>
- To manage cookies on Safari: <http://urlz.fr/75Kf>

For other terminals (smartphones, tablets, connected objects), we invite you to consult the help menu of your browser.

To choose the type of cookies you accept and the consequences for your browsing, access your browsing settings at the bottom of the site or in your personal settings.