

Download our Privacy Policy

Sidetrade SA, French company registered in the corporate trade registry, located 114, rue Gallieni, 92200 Boulogne-Billancourt, France and/or any of its affiliated companies (“Sidetrade”, “we”, “us”) are committed to protecting and respecting your privacy. This Privacy Policy (together with any other documents referred to in this document) sets out the basis on which:

- the Personal Data (as defined below) of people browsing the www.sidetrade.com website of Sidetrade (the “Site”) are processed by us.
- The Personal Data collected indirectly by us are processed by Sidetrade.

This Privacy Policy lets you know how Sidetrade collects and uses your Personal Data and how you can control their use.

With respect to recruitment this Privacy Policy is supplemented by the “**Sidetrade Privacy Notice for Recruitment**”.

With respect to cookies this Privacy Policy is supplemented by the “**Sidetrade Cookie Policy**”.

1. SCOPE OF THIS PRIVACY POLICY

This Privacy Policy sets forth the principles and guidelines governing the protection of the Personal Data (as defined below) collected on or through the Site and concerning the Site’s visitors and users (“You” or “Your”) and/or the Personal Data collected indirectly by Sidetrade.

“**Personal Data**” means any information relating to an identified or identifiable person. An identifiable person is a person who can be identified, directly or indirectly, in particular, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“**Non-Personal Data**” means any information which is not a Personal Data.

Any Personal Data You provide on the Site or collected indirectly by Sidetrade are subject to the terms of this Privacy Policy.

Sidetrade will comply with all local applicable provisions of data protection laws (in particular the General Data Protection Regulation -GDPR).

2. PERSONAL DATA COLLECTED ON OR THROUGH THE SITE

In order to use certain functions and features of the Site, Sidetrade requires that You provide certain Personal Data when visiting or using the Site. Personal Data likely includes basic contact data such as:

- title,
- first and last name,
- postal address,
- email address,
- telephone number(s),
- company, company size, department and job title,
- industry and industry sub-industry sectors,
- IP address, and any other Personal Data as may be relevant for the purposes listed below.

In all cases, however, the Personal Data gathered is limited to data necessary to the purposes described under Article 3 hereafter.

You are free to decide whether or not to provide all or part of Your Personal Data. However, if You choose not to provide all or part of this Personal Data, the purposes as described in Article 3 hereafter might not be achieved or not properly achieved, some areas and functions of the Site may not function properly and/or You may be refused access to certain pages on the Site.

With regard to clients, the provision of Personal Data is a contractual requirement. Processing is necessary for the performance of the contractual relationships with Sidetrade.

With regard to prospects, processing is based on the legitimate interests pursued by Sidetrade in order to develop the knowledge of the Sidetrade services on the market.

3.METHODS AND PURPOSES OF COLLECTION OF PERSONAL DATA COLLECTED ON OR THROUGH THE SITE

We collect Personal Data in a variety of ways: Personal Data is collected directly from You, either by You providing the information directly to us or You acting in a manner that provides us with the information, for example: either offline and online; through cookies, through Your use of a mobile application; through Your device; if You browse our Sites, we may also collect information about Your use of our services through Your browser to trace activity on our Sites.

Personal Data is generally collected to carry out the business of Sidetrade, such as improving Sidetrade's marketing and advertising efforts, better tailoring Sidetrade products and services to customers' needs or complying with reporting obligations required by applicable law, and similar activities.

Your Personal Data collected by Sidetrade on or through the Site is used by Sidetrade for the following purposes:

- To enable You to request information;
- To provide You with a personalised interactive use of the Site;
- To ascertain Your requirements and interests and provide You with the most suitable products and/or services;
- To allow You to open and maintain an account in order to obtain specialised documentation and technical assistance;
- To enable You to subscribe to a commercial or support-type service;
- To access all the features and options offered by the Site;
- to provide You with information about new products and services;
- to respond to comments and questions and provide customer service;
- to operate, maintain and improve our Sites, products and services;
- for marketing purposes and market research;
- to internally administer this Site and to help us improve our services; or
- to comply with applicable laws or regulations and to protect, investigate and deter against fraudulent, unauthorized, or illegal activity,
- and any other purposes associated with the above purposes.

By providing Your e-mail address, You hereby expressly authorize, Sidetrade, its business partners to use it together with other relevant Personal Data to send You commercial or marketing messages.

The Personal Data may also be processed by subprocessors involved in the provisions of the Sidetrade services. Sidetrade takes great care in who is using to process Your Personal Data have subprocessors agreements in place that regulates how they handle our data.

4. INDIRECT COLLECTION OF PERSONAL DATA

Without prejudice to the application of articles 14-5-a and 14-5-b of the GDPR, article 95 of the GDPR and the doctrine of the CNIL in terms of electronic prospecting, it is specified that Sidetrade may obtain, from public databases; social media platforms or from well-known third-party partners in the market and recognized for their expertise in the management of Personal Data. Personal Data likely includes basic contact data such as:

- title,
- first and last name,
- postal address,
- email address,
- telephone number(s),
- company, company size, department and job title,
- industry and industry sub-industry sectors,
- IP address, and any other Data as may be relevant for the purposes listed below.

In accordance with Recital 47 of the GDPR, Sidetrade may, in response to its legitimate interest of promoting awareness of its services, process such Personal Data for purposes of commercial prospecting and /or for the purposes of providing its customers with information to target the right prospect with the right message. In such a case of indirect collection, it is specified that any person concerned has the rights governed by Article 14 of the GDPR and, more broadly, the rights summarized in Section 9 below.

The Personal Data may also be processed by subprocessors involved in the provisions of the Sidetrade services. Sidetrade takes great care in who is using to process Personal Data have subprocessors agreements in place that regulates how they handle these data.

5. COOKIES

Sidetrade may use cookies or other technologies which may collect or store Personal Data under the conditions defined in the [Sidetrade Cookies Policy](#).

6. PERSONAL DATA PROCESSING AND STORAGE TERM

Processing of Personal Data includes using, storing, recording, transferring, adapting, summarizing, amending, reporting, sharing and destroying Personal Data as necessary under the circumstances or as otherwise required by applicable law.

All Personal Data that will have been collected will be stored for a limited duration that is relevant to the purpose of such collection and for so long as required by applicable law, and as necessary to pursue our legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes, and enforce our agreements.

7. LINKS TO WEBSITES NOT CONTROLLED BY SIDETRADE OR ITS SUBSIDIARIES

This Site might offer links to third party Websites which may be of interest to You.

Unless Sidetrade receives Your express authorization, Sidetrade does not share any Personal Data with these third parties. However, Sidetrade may provide them with Non-Personal Data.

These third parties use technological processes to send advertisements and links appearing on the Site to Your browser software, via Your IP address. They may also use other technologies (such as cookies, JavaScript or web beacons) to assess the effectiveness of their advertisements and to personalize their content.

Sidetrade does not exercise any control over the content of third-party Websites or the practices of these third parties in connection with the protection of Personal Data that they might collect and are thus not in the control of Sidetrade. Consequently, Sidetrade declines all liability for the content of third-party websites or the practices of these third parties concerning the protection of Personal Data.

It is therefore Your responsibility to inform Yourself as to these third parties' privacy policies.

8. TRANSFER OF PERSONAL DATA

If You are accessing the Site from a location outside of the European Union, with laws or regulations governing data collection, use, and disclosure that differ from European Union, please note that through Your continued use of the Site, which are governed by French law, the corresponding terms of use and this Privacy Policy, You are transferring Your Personal Data to the European Union and You consent to that transfer.

Sidetrade is able to use available technology to efficiently manage Personal Data and obtain such Personal Data online or otherwise throughout its international operations. Personal Data may be collected through the Site and/or indirectly and subsequently disclosed to and used by an affiliate or subsidiary of Sidetrade ("Sidetrade Group Companies") and /or to business partners and/or suppliers and/or to customers for the purposes stated in Articles 3 and 4 of this Privacy Policy.

We have put appropriate safeguards in place for transfers of Your Personal Data outside the EEA, including the standard data protection clauses adopted by the European Commission, available at <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32004D0915> and <http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32010D0087>.

Where Sidetrade has knowledge that a third party to which Sidetrade has provided Personal Data for the purposes listed in Articles 3 or 4 above, is using or disclosing Personal Data contrary to this Privacy Policy or to applicable laws, Sidetrade will take reasonable steps to prevent or stop such use or disclosure.

Sidetrade will also disclose Personal Data to third parties if Sidetrade determines that such disclosure is necessary for technical reasons (such as hosting services by a third party) or to protect Sidetrade's legal interests (such as in the event of acquisition or merger by a third company or total or partial liquidation of Sidetrade). These transfers may be transmitted by any method which Sidetrade determines is appropriate and in accordance with applicable law.

9. YOUR RIGHTS

Sidetrade will take reasonable steps to ensure that the Personal Data collected is used for the purposes stated in this Privacy Policy and that such Personal Data is correct and up to date.

You have a number of important rights. In summary, those include rights to:

- access to your Personal Data;
- correct any mistakes in your Personal Data which we hold;

- request the erasure of Personal Data concerning you unless we have a legitimate ground to not delete the Personal Data.
- object, at any time, to our processing of your Personal Data;
- to receive the Personal Data you have given us in a structured, commonly used format. Please note that this only applies to Personal Data that was given to us directly from you.
- otherwise restrict our processing of your Personal Data in certain circumstances

Otherwise, you may exercise your rights by sending a request to one of the following addresses, with a proof of your identity and address:

- E-mail address: privacy@sidetrade.com.
- Postal address : Sidetrade SA, Legal Department 114, avenue de Gallieni 92100 Boulogne, France.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority in the EU member state where you live, work or where an alleged infringement of applicable data protection law occurred.

10. DATA SECURITY AND RECIPIENTS

Sidetrade undertakes to ensure the protection and security of Personal Data, in order to ensure the confidentiality of your Personal Data and prevent your Personal Data from being distorted, damaged, destroyed or disclosed to unauthorized parties.

Sidetrade complies with relevant industry standards to protect Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction. As part of those safeguards, Sidetrade employs sophisticated technology designed to protect Personal Data during its transmission and prevent transmission errors or unauthorized acts of third parties.

11. CONTACT

For any additional question concerning this Privacy Policy, you may send an email to the following address: privacy@sidetrade.com.

12. DATE OF ENTRY INTO FORCE OF THE PRIVACY POLICY AND CHANGES TO IT

This Privacy Policy may be updated according to Sidetrade's requirements and circumstances, or where required by applicable laws and regulations.

Last modification: The Privacy Policy has been modified on **18/11/2019**