



Doc. name : **Oxygis - Privacy policy**

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I. How we protect your privacy

- on [Oxygis.eu/.com/.be/.fr](https://oxygis.eu/.com/.be/.fr) and when you use our services -

Oxygis Partners SRL and its affiliates offer a number of services to help you manage your business, including a platform to host your own Oxygis database. As part of these services, we collect data about you and your business. This data is not only essential for the operation of our services, but also for the security of our services and all of our users. This policy explains what information we collect, why we collect it and how we use it.

II. Information we collect

Most of the personal data we collect is provided directly by our users when they register and use our services. Other data is collected by recording interactions with our services.

- **Account and contact details**

When you register on our website to use or download one of our products, or to subscribe to one of our services (Oxygis applications, free trial, etc.), or when you fill out one of our contact forms, you voluntarily provide us with certain information. This generally consists of *your name, company name, e-mail address*, and sometimes *your telephone number, your postal address* (when an invoice or delivery is required), *your sector of activity* and *your interest in Oxygis*, as well as a *personal password*.

We never record or store our Customers' credit card information, and we always rely on trusted third-party **PCI-DSS compliant payment processors** for credit card processing, including the processing of recurring payments.

- **Data on job applications**

When you apply for a job on our website or through an employment agency, we will usually collect your contact details (*name, email address, telephone number*) and any information you choose to share with us in your *cover letter* and *curriculum vitae*. If we decide to send you a job offer, we will

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also ask you to provide additional personal information in order to fulfil our legal obligations and personnel management requirements.

We will **not** ask you to provide information that is not necessary for the recruitment process. In particular, we will **never** collect information about your racial or ethnic origin, political opinions, religious beliefs, trade union membership or sex life.

- **Navigation data**

When you visit our website and access our online services, we detect and store the *language and geolocation* of your *browser* in order to personalise your experience according to your country and preferred language. Our servers also passively record a summary of the information sent by your browser for statistical, security and legal purposes: your *IP address*, the *time and date of your visit*, your *browser version and platform*, and the *web page that referred you* to our website.

Your browser may also be used to store and retrieve data from your current session, using a session cookie (see also the **Cookies** section for more details).

Form protection: some forms on our website may be protected by Google reCAPTCHA. This technology relies on heuristics based on the technical characteristics of your browser and device, and may also use specific Google cookies. See also Google's privacy policy and terms of use in the **Third Party Service Providers** section below.

- **Customer databases**

When you subscribe to an Oxygis Cloud service and create your own Oxygis database (for example, by starting a free trial), any information or content you submit or upload to your database belongs to you, and you have full control over it.

Similarly, when you ask us to upload an on-premise database to the Oxygis Cloud version, you own the data it contains. This data will often include personal information, for example: *your employee list, your contacts and Clients, your messages, photos, videos, etc.* We only collect this information on your behalf, and **you always retain full ownership and control of this data**.

III. How we use this information

- **Account and contact details**

We use your details to provide our services, to respond to your requests and for billing and account management purposes. We may also use this information for marketing and communication purposes (our marketing messages are always accompanied by an option to opt-out at any time). We also use this data in aggregate/anonymised form to analyse trends in the service.

If you have registered to take part in an event published on our website, we may transfer your *name, e-mail address, telephone number* and the *name of your company* to our local organiser and we may use this information to contact you. to our local organiser and event sponsors for direct marketing purposes and to facilitate event

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preparation and booking.
If you have expressed an interest in using Oxygis or if you have requested to be contacted by an Oxygis service provider, we may also transfer your *name, email address, telephone number* and *company name* to one of our official **partners** in your country or region, so that they may contact you to offer local support and services.

- **Data on job applications**

We will only process this information as part of our recruitment process, in order to assess and monitor your application, and as part of the preparation of your contract, should we decide to send you a job offer. You may contact us at any time to request the deletion of your information.

- **Browser data**

This automatically recorded data is analysed anonymously in order to maintain and improve our services. Google reCAPTCHA may also be used for security purposes to prevent misuse of our services. In this case, we only process the anonymous score that reCAPTCHA determines based on your browser and device. We will only correlate this data with your personal data where required by law or for security purposes if you have breached our Acceptable Use Policy.

- **Customer database**

We collect and process this data only on your behalf, in order to perform the services to which you have subscribed, and on the basis of the instructions you explicitly gave when registering or configuring your Oxygis service and database. Our support staff and engineers may have limited and reasonable access to this information in order to resolve any problems with our services, or at your explicit request for support purposes, or as required by law, or to ensure the security of our services in the event of a breach of our Acceptable Use Policy in order to maintain the security of our services.

Our treatments are based, depending on the case, on :

- a. the need to perform a contract (e.g. customer account management),
- b. compliance with legal obligations (e.g. retention of invoices),
- c. our legitimate interests (e.g. improving the service),
- d. or your explicit consent (e.g. sending newsletters).

IV. Accessing, updating or deleting your personal information

- **Your rights with regard to personal data**



In accordance with Regulation (EU) 2016/679 (RGPD), you have the following rights:

- Right of access: find out what data we hold about you.
- Right of rectification: to request the correction of inaccurate or incomplete data.
- Right of deletion: request the deletion of your data, under certain conditions.
- Right to restrict processing: in certain cases, temporarily suspend the use of your data.
- Right to object: oppose the use of your data in certain cases (e.g. direct marketing).
- Right to portability: receive your data in a structured and commonly used format.

To exercise these rights, you may contact us via the means mentioned in the "Contact Us" section or use the functionalities related to these rights in the Oxygis web and mobile applications.

- **Account and contact details**

You have the right to access and update the personal information you have previously provided to us. You may do so at any time by logging into your personal account on Oxygis. If you wish to permanently delete your account or personal data for a legitimate purpose, please contact our **helpdesk** to request this. We will take all reasonable steps to permanently delete your personal information unless we are required to retain it for legal reasons (typically, for administrative, billing and tax reporting purposes).

- **Data on job applications**

You may contact us at any time to request access to, update or delete information relating to your application. The easiest way to do this is to reply to the last message you exchanged with our human resources staff.

- **Customer database**

You can manage all the data collected in your databases hosted on Oxygis at any time, using your administration credentials, including modifying or deleting any personal data stored therein. At any time, you may export a complete backup of your database by simple request to our Helpdesk, in order to transfer it, or to manage your own backups/archives. You are responsible for processing this data in compliance with all confidentiality rules. You can also request the deletion of all your data via our helpdesk at any time.

- **Security retention period**

we keep a copy of your data in our back-ups for security reasons, even after it has been deleted from our active systems. See **Data retention** for more details.

V.Security



We are aware of the importance and sensitivity of your personal data, and we take a large number of measures to ensure that this information is processed, stored and preserved securely against data loss and unauthorised access.

For more details on our security measures (authentication, backups, logging, data isolation, etc.), [security policy](#), please consult our security policy available on request or via our customer portal -

VI. Third-party service providers / Sub-contractors

To support our operations, we rely on a number of service providers. They help us to provide various services such as payment processing, web audience analysis, cloud hosting, marketing and communication, etc.

Whenever we share data with these service providers, we ensure that they use it in accordance with data protection legislation and that the processing they carry out for us is limited to our specific purpose and covered by a specific data processing contract.

Below is a list of the service providers we currently use, why we use them and the type of data we share with them.

A. Sub-processors

These third party service providers process data for which Oxygis is the controller or processor, on behalf of Oxygis.

Important: Due to the great variability of the resources and services provided by these sub-processors, Oxygis Clients cannot choose which sub-processor will be used to process their data. They may, however, choose their primary *hosting region* (see the **Data Location** section).

Subprocessors	Objective	Shared data
Microsoft Azure Confidentiality and security	Infrastructure and hosting of Oxygis. eu (production + backups), Oxygis SaaS (production + backups), DDOS protection.	Currently hosted on Microsoft Azure: Production data for Oxygis and its affiliated services, including shared or individual Oxygis Online (SaaS) client databases; Backup data for all Oxygis cloud services. Data centre certifications: ISO 27001, SOC 1 TYPE II, SOC 2 TYPE II, PCI-DSS, CISPE, SecNumCloud, CSA STAR.
Amazon Web Services, Inc. Confidentiality and security	Infrastructure and hosting of Oxygis Infocenter (cadastral database and shape files)	Currently hosted by AWS: Production data from Oxygis.eu and its affiliated services, including Oxygis Infocenter, Backup data for all Oxygis cloud services. Data centre certifications: ISO 27001, ISO 27017,

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Subprocessors	Objective	Shared data
		ISO 27018, SOC 1, SOC 2, SOC3, PCI-DSS, HIPAA, CISPE, CSA STAR .
Kinsta.com Privacy and security	Infrastructure and hosting of the Oxygis website	Currently hosted by Kinsta : Oxygis WordPress website and database. Kinsta is hosted on Google Cloud Platform.

B. Sub-contractors and third-party auditors

These third party service providers process the data for which Oxygis is a controller, as processors, on behalf of Oxygis, or they receive such data as controllers, for the specific purpose of performing the services for which they have been engaged.

Service provider	Objective	Shared data
reCAPTCHA by Google Confidentiality and security	Shape protection.	Used by Google reCAPTCHA: browser and device characteristics, Google cookies.
Calendly Confidentiality and security	Schedule the demo/meeting on Oxygis.eu.	Shared with Calendly : All the personal information entered by the user in the planning form: name and contact details, reason for the request, etc.
CloudFlare Security and confidentiality Cookie policy	Distributed caching of Oxygis.eu static resources and images	Used by CloudFlare: Browser and device characteristics, CloudFlare cookies.
MailChimp / Intuit Confidentiality and security	Mail campaigns	Used by MailChimp: Email campaigns to inform our Customers of new features, updates, security issues or for marketing purposes. It is always possible to unsubscribe from these campaigns.

VII.Data retention

- **Account and contact details**

We will only retain such data for as long as is necessary to fulfil the purpose for which it was collected, as set out in this policy, including any statutory retention period, or for as long as is necessary for the legitimate and reasonable promotion of our products and services.

- **Data on job applications**



If we do not employ you, we may keep the information you have provided for up to 3 years in order to contact you again about any new employment opportunities that may arise, unless you ask us not to do so. If we employ you, your personal information will be retained for the duration of your contract of employment with us, and thereafter for the statutory retention period applicable in the country where we have employed you.

- **Browser data**

We may retain this data for a maximum of 12 months, unless we need to retain it in connection with a legitimate concern relating to the security or performance of our services, or as required by law. Any server-side session information is only retained for 3 months where it is actively used, otherwise it is deleted after 7 days.

- **Customer database**

We only retain this data for as long as is necessary to provide the services to which you have subscribed. For databases hosted on the Oxygis Cloud, if you cancel the service, your database is kept deactivated for 3 weeks (the grace period during which you can change your mind), and then destroyed.

Security retention period :

As part of our **security policy**, we always try to protect your data from accidental or malicious deletion. Consequently, after we have deleted any of your personal information (account and contact data) from our database at your request, or after you have deleted any personal information from your database (Customer database), or if you delete your entire database, it is not immediately deleted from our back-up systems, which are secure and unalterable. Personal data may remain stored for up to 12 months in these backups, until they are automatically destroyed.

We undertake not to use these backup copies of your deleted data for any purpose other than maintaining the integrity of our backups, unless you or the law require us to do so.

VIII. Physical location of data / Data transfers

Hosting services

- **Accommodation**

Clients' databases are hosted in the Oxygis Cloud region closest to their place of residence. They may request a change of region (subject to availability):

- Europe (Netherlands, France, Belgium, Germany, Ireland)



- **Backup locations**

Backups are replicated in several data centres within an availability zone in order to meet our disaster recovery objectives. Customers may request replication to other availability zones in the following countries, **irrespective of the original hosting region**:

- Netherlands, France, Belgium, Germany, Ireland

- **International staff**

In some cases, the personal data referred to in this privacy policy may be accessed by staff of Oxygis Partners SRL subsidiaries in other countries. Such access will always be carried out for the same purposes and with the same confidentiality and security precautions as if it were carried out by our own local staff, so that all the guarantees we provide remain applicable.

We use the **EU standard contractual clauses** to bind our subsidiaries in a way that provides sufficient data protection safeguards for the limited and temporary data transfers that take place for this access.

No transfer of personal data to third countries not covered by a protection framework (e.g. adequacy decision or standard contractual clauses) is made without prior information to the customer.

IX. Disclosure to third parties

Except as explicitly stated above, we do not sell, trade or otherwise transfer your personal data to third parties. We may share or disclose aggregated or de-identified information for research purposes, or to discuss trends or statistics with third parties.

X. Cookies

Cookies are small pieces of text sent by our servers to your computer or device when you access our services. They are stored in your browser and subsequently sent back to our servers so that we can provide contextual content. Without cookies, using the web would be a much more frustrating experience. We use them to support your activities on our website, for example your session (so you don't have to log in again) or your shopping basket.

Cookies are also used to help us understand your preferences based on your previous or current activity on our website (the pages you have visited), your language and your country, enabling us to provide you with improved services. We also use cookies to help us compile aggregate data



about site traffic and interaction, so that we can provide better site experiences and tools in the future.

We also use third-party services such as Google Analytics, which set and use their own cookies to identify visitors and provide their own contextual services. For more information about these third party providers and their cookie policy, please see the relevant references in the **Third Party Service Providers** section.

To date, Oxygis has recorded a very limited number of cookie categories when visitors visit our website or use our applications. Our website will function correctly even if the visitor rejects or discards cookies.

When you first visit our site, we ask for your consent via a cookie management banner.

You can change your preferences or withdraw your consent at any time by accessing our preferences centre.

Only essential cookies are activated by default. Analytical or tracking cookies are only activated with your explicit consent.

This may change in future versions of our website as follows:

Cookie category	Objective
Session and safety	<p>To authenticate users, protect user data and enable the website to provide the services that users expect, such as maintaining the contents of their shopping basket or enabling files to be downloaded.</p> <p>The website will not function properly if you reject or delete these cookies.</p>
Preferences	<p>Memorise information about the preferred appearance or behaviour of the website, such as your preferred language, region and time zone.</p> <p>Your experience may be degraded if you delete these cookies, but the website will continue to function.</p>
History of interaction	<p>Used to collect information about your interactions with the website, the pages you have visited and any specific marketing campaigns that brought you to the website.</p> <p>We may not be able to provide you with the best service if you refuse these cookies, but the website will function.</p>
Advertising and marketing	<p>Used to make advertising more attractive to users and more valuable to publishers and advertisers, for example by providing more relevant ads when you visit other websites displaying ads or to improve reporting on the performance of advertising campaigns.</p>



Cookie category	Objective
	<p>Please note that certain third-party services may install additional cookies on your browser in order to identify you. You can refuse the use of cookies by a third party by consulting the Network Advertising Initiative refusal page.</p> <p>The website will continue to function if you reject or delete these cookies.</p>
Analytical	<p>To understand how visitors use our website, via Google Analytics. Find out more about Analytics cookies and privacy information.</p> <p>The website will continue to function if you refuse or delete these cookies.</p>

You can ask your computer to notify you each time a cookie is sent, or you can choose to disable all cookies. Each browser is a little different, so consult your browser's help menu to learn the correct way to modify your cookies, or consult the links below:

- Chromium: <https://support.google.com/chrome/answer/95647?hl=en>
- Advantage : <https://support.microsoft.com/en-us/help/4468242/microsoft-edge-browsing-data-and-privacy>
- Firefox : <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

We do not currently support Do Not Track signals, as there is no industry standard for compliance.

XI. Policy updates

We may update this privacy policy from time to time to clarify it, to reflect any changes to our website or to comply with legal requirements. The words "Last updated" at the top of the policy indicate the last revision, which is also the date on which these changes came into effect.

XII. Contact us

If you have any questions about this privacy policy, or if you wish to obtain information about your personal data, please contact the **Oxygis help** desk or contact us by telephone at +32 (0)2 736 10 17 or by e-mail at info@oxygis.eu or by post :

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