

# Privacy Policy

INNOVHEM attaches the greatest importance and care to the **protection of Privacy and Personal Data**, whether for its customers, partners, or employees, and to compliance with the relevant legal provisions.

The **European Union General Data Protection Regulation**<sup>1</sup> (GDPR) states that Personal Data must be processed **lawfully, fairly, and transparently**. Thus, this **Privacy Policy** aims to provide you with simple, clear information on the processing of your Personal Data, in the context of your browsing and the operations carried out **on our website**.

This Privacy Policy may be updated from time to time to take account of changes in the regulations relating to Personal Data (last updated: 24/11/2023).

## Definitions

All terms relating to the protection of Personal Data used in this document and identified by capital letters, used in the singular or plural, must be interpreted in accordance with the GDPR of 27 April 2016<sup>1</sup>.

The term "**Data**", used in the singular or plural, refers to Personal Data whose processing is carried out by INNOVHEM in its capacity as Data Controller and Subcontractor.

The **user** who is the **Data Subject** within the meaning of the GDPR is the natural person who consults the site and who uses the contact form where applicable.

## Data controller

The website <https://www.innovhem.fr/> is provided by INNOVHEM (see our [Legal terms](#)).

### 01 Subcontractor

INNOVHEM sometimes acts as a subcontractor in investigative and clinical research for its clients.

### 02 What Data do we collect and how?

When you use our website, you provide us with information about yourself, some of which may identify you ("Personal Information" or "Personal Data"). This is the case when you browse our website.

The nature and quality of the Data collected about you varies. It is mainly:

- **Identification Data:** name, first names, email address
- **User Data:** refers to your Data and, where applicable, of the Company for which you works, you share by with INNOVHEM on any medium whatsoever, processed by INNOVHEM, with the aim of providing the Services and/or any document of any nature whatsoever, uploaded, distributed, collected or put online by you on the INNOVHEM Platform.

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<sup>1</sup> Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC

### 03 Why Data do we collect and how?

We collect your Data for specific purposes and on different legal grounds.

Purposes	Personal data collected	Legal basis	Duration Saved
Website navigation	Management of traffic statistics on the website and the Service (IP anonymised)	Legitimate interest	13 months
Processing of your request	Identification Data, Data, content of your request	Consent	Duration necessary to process your request and 3 years from the last contact
Maintenance of our Service and follow-up of user requests	Pseudonymised traces of connection identifiers, navigation Data, connection history	Legitimate interest	13 months

### 04 Management of cookies

A **cookie** is a small file stored on your computer that allows you to move from one Internet page to another while keeping your browsing parameters.

The INNOVHEM website only uses functional cookies that are strictly necessary for its operation. This information is provided to you when you enter the website via an information banner. It is however possible to configure and block these cookies directly via your Internet browser.

To find out more about the configuration to be followed, consult the dedicated page on the CNIL website (<https://www.cnil.fr/fr/cookies-les-outils-pour-les-maitriser>). However, blocking these functional cookies could considerably limit or even prevent your navigation on the website and access to the Service.

Cookie Name	Category	Functionality	Storage time
_GRECAPTCHA	Necessary	Google Recaptcha service sets this cookie to identify bots to protect the website against malicious spam attacks.	6 months
_ga_*	Analytic	Google Analytics sets this cookie to store and count page views	1 year 1 month 4 days
_ga		Google Analytics sets this cookie to calculate visitor, session and campaign data and track site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors.	1 year 1 month 4 days
axeptio_cookies	Functional	xeptio sets this cookie to remember cookie consent choices.	1 year
axeptio_authorized_vendors		Axeptio sets this cookie to remember which providers you have given your consent to.	1 year
axeptio_all_vendors		Axeptio sets this cookie to the list of providers.	1 year

### 05 Do we share your Personal Data?

For certain processing purposes, we may share your Data with the service providers we use to carry out a range of operations and tasks:

- **Service hosting provider:** AWS (AMAZON WEB SERVICES EMEA SARL)

Only the information they need to carry out the Service is communicated to these service providers. They shall refrain from using the Data for purposes other than those initially intended.

Finally, your Data may also be transmitted to legal or regulatory authorities in order to comply with our legal obligations. In this case, only the necessary Data is provided.

We make every effort to ensure that these third parties preserve the confidentiality and security of your Data. **We do not sell your Data.**

## 06 Is your Data transferred to other countries?

The INNOVHEM website that processes Data is hosted on servers in Europe.

In case of transfer of your Data outside the European Union, we guarantee that the transfer is carried out:

- either to a country providing an adequate level of protection, i.e. a level of protection equivalent to that required by European regulations;
- or, it is governed by standard contractual clauses.

## 07 How long do we keep your Data?

We keep your Data only for as long as is necessary to fulfil the purpose for which we hold it, to meet your needs or to comply with our legal obligations.

Retention periods vary depending on several factors, such as:

- The needs of INNOVHEM's business
- Contractual requirements
- Legal obligations
- Recommendations from supervisory authorities

Please refer to the table in articles 3 and 4 for more details on the retention periods by type of Data.

## 08 How we ensure the security of your Data?

INNOVHEM is committed to **protecting the Data that we collect**, or that we process, against any loss, destruction, alteration, disclosure or unauthorised access.

Thus, we implement all appropriate technical and organisational measures, according to the nature of the Data and the risks that their processing entails. These measures must preserve the security and confidentiality of your Data. These measures may include practices such as limiting access to Data to authorised persons by virtue of their position.

In addition, our practices and policies and/or physical and/or logical security measures (e.g. secure access, authentication procedures, back-up, software, etc.) are regularly **reviewed and updated** as necessary.

## 09 What are your rights?

On the Data we collect/process, you can exercise the following rights:

**A right of access:** you have the right to request access to the Data we hold about you, and you may request a copy;

**A right of rectification:** you may request rectification of any inaccurate Data held about you;

**A right to deletion:** you may request the deletion of your Data in certain circumstances;

**A right to portability:** under certain conditions you can receive any Data you have provided to us in a structured format. You also have the right to request that we transfer it, where possible, to another controller;

**A right to object** to processing in certain circumstances;

**A right to withdraw** consent at any time;

**A right to restrict** processing: you have the right to restrict the processing of your Data if:

- you dispute the accuracy of your Data, until we verify its accuracy;
- the processing is unlawful but you do not want us to delete your Data;
- we no longer need your Data for the purposes of the processing but you need your Data in order to bring, assert or defend against legal claims;
- you object to the processing on related grounds pending verification of whether our compelling legitimate grounds for further processing override those interests.

If such Data is subject to such limitations, we will only process your Data with your consent, or for the purpose of bringing, enforcing or defending against legal claims.

**A right to determine what happens to your personal Data after your death.**

To exercise your rights, you can contact the Data Protection Officer (DPO) of INNOVHEM: [dpo@innovhem.life](mailto:dpo@innovhem.life).

When you send us a request to exercise a right, you are asked to specify as far as possible the scope of the request, the type of right exercised, the Data processing concerned, and any other useful element, in order to facilitate the examination of your request. In addition, you may be asked to prove your identity.

In any case, you have the right to make a complaint to the CNIL via the following link: <https://www.cnil.fr/fr/plaintes>.