



PERSONAL DATA PROTECTION POLICY

2025

TELELOGOS is a publisher of digital signage software as well as device and data administration and synchronization software designed to manage and administer fleets of mobile, fixed and/or automatic devices. TELELOGOS software solutions are available, via an international network of certified partners, in both license mode (On Premise) and cloud mode (SaaS).

TELELOGOS publishes a website www.telelogos.com that has the following key functions: (i) to present the TELELOGOS software solutions, (ii) so that people can contact TELELOGOS, and (iii) for users of any of the TELELOGOS software solutions to connect, in order to have access to certain information about the TELELOGOS software and/or to a TELELOGOS advisor (the “Website”).

TELELOGOS will, in the course of its business, process the Personal Data of its Website users, of its customers and/or TELELOGOS Software users. TELELOGOS is concerned with protecting Personal Data, and makes the utmost effort to guarantee the highest level of protection in compliance with the applicable regulations.

1. Purpose

The purpose of this policy is to:

- present the technical and organizational measures that TELELOGOS has put in place to guarantee a high-level of protection for the processed Personal Data, which also complies with the applicable regulations;
- document such compliance with the applicable regulations; and
- inform the users concerned who are natural persons of the means they have at their disposal to remain informed and to monitor the Processing of their Personal Data.

2. Definitions

For the purposes of this policy, in accordance with (EU) regulation 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“**GDPR**”) and in accordance with French law no. 2018-493 of June 20, 2018 for the protection of personal data:

- the term “**Personal Data**” means any information relating to an identified or identifiable natural person (“**Data Subject**”); an identifiable natural person is one 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;
- the term “**Processing**” is understood as any operation or set of operations carried out, with or without using automated processes and applied to Personal Data or sets of data, such as collecting, recording, organising, structuring, preserving or storing, adapting or modifying, retrieving, consulting, using, communicating by transmission, disseminating or any other form of making available, matching or interconnecting, limiting, erasing or destruction;
- the term “**Data Controller**” means a natural or legal person, public authority, agency or other body who alone or jointly with others determines the purposes and means of the Processing; and
- the term “**Processor**” means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Data Controller.

3. Principles of personal data protection

Before any processing takes place, TELELOGOS ensures that said Processing of the Personal Data is:

- based on a specific, express and legitimate purpose;
- strictly limited to the pursued purpose;
- lawful to justify (i) the necessary execution of a contract/license binding TELELOGOS and the user concerned or pre-contractual measures; (ii) a legal obligation; (iii) the prior consent of the Data Subject, or (iv) TELELOGOS’s pursuit of a legitimate interest, provided this does not contravene the fundamental rights of the Persons Concerned.

TELELOGOS ensures that the processed Personal Data is accurate and up-to-date.

TELELOGOS regularly analyzes its Processing operations and Personal Data protection procedures in order to adjust them and refine them, in order to guarantee to its customers, the customers of its certified partners, its service providers, users and prospective customers, the highest possible level of protection with regard to the applicable regulations.

4. Processed personal data category

An asterisk (*) will indicate that the requested Personal Data is mandatory; where there is no asterisk, this indicates that its entry is optional. Personal Data are usually collected while (i) browsing on the website, (ii) placing an order (directly or indirectly via a certified partner) for one or several TELELOGOS Software solutions or service provisions related to the TELELOGOS Software, and (iii) creating a TELELOGOS Software customer/user account on the Website.

Personal Data that may be collected by TELELOGOS includes, where appropriate:

- title, last name, first name, position and contact address of the customer, prospective customer or Website visitor; and
- email address and other personal contact details of the aforementioned persons.

The use of the Website by any user gives rise to the collection of browsing data by means of cookies and IP addresses. TELELOGOS also collects statistical data on the users of the search engine or contact form. The statistics also cover sales data.

No Sensitive Data, as defined by the applicable regulations, is processed by TELELOGOS.

5. Purposes of the personal data processing

The purposes of the Personal Data Processing implemented by TELELOGOS are:

5.1 the execution of a pre-contractual or contractual relationship between TELELOGOS and the Data Subject or between a certified partner and a user of a TELELOGOS Software Solution:

- the production/communication of any documentation containing sales and/or technical information relating to the TELELOGOS Software and/or service provisions relating to the Software supplied by TELELOGOS, and the production/communication of any quote prepared as part of TELELOGOS's business;
- the production, execution, management and monitoring of Software support tickets, orders, licenses and the rights of use of TELELOGOS Software, and of the service provisions relating to TELELOGOS Software for each customer or for prospective customers of TELELOGOS or of a certified partner; and
- invoicing and its follow-up;

5.2 the legitimate interest pursued by TELELOGOS when it pursues the following purposes:

- sales prospecting and management as part of TELELOGOS's business;
- the management of relations with customers or prospective customers of TELELOGOS or its certified partners;
- organization of, registration and invitation to TELELOGOS events, where applicable, as well as subscription to the TELELOGOS newsletter;
- users' awareness of the Website;
- Website performance; and
- making the Website secure;

5.3 compliance with legal and regulatory obligations when Processing is performed for one of the following purposes:

- prevention of money-laundering and terrorist financing and the fight against corruption, and compliance with any other applicable French and European regulations;
- invoicing; and
- accounting;

5.4 the Data Subject's consent:

- direct solicitation.

6. Personal data storage period

TELELOGOS only stores Personal Data for as long as necessary in order to perform the operations for which it was collected, as well as to comply with the applicable regulations.

The Personal Data of TELELOGOS customers or of a TELELOGOS Software user are stored throughout the entire contractual period or for the duration of the rights of use of the TELELOGOS Software Solution used by the Data Subject, and for a duration of five (5) years following the expiry of the contractual relationship or the period of the rights of use.

For accounting purposes, they are stored for ten (10) years from the end of the fiscal year during which the last invoice was sent to the Data Subject.

The Personal Data of prospective customers are stored for a duration of three (3) months if no contractual relationship is established between the Data Subject and TELELOGOS or between the Data Subject and one of TELELOGOS's certified partners.

7. Personal data security measures

In order to guarantee the security, confidentiality, integrity, availability and protection of the Personal Data processed by TELELOGOS against any destruction, loss, unauthorized alteration or disclosure thereof, TELELOGOS implements the following protection measures:

- training of TELELOGOS personnel on the applicable regulations concerning the Processing and protection of Personal Data;
- restricted access of TELELOGOS personnel to the Personal Data;
- verification of the compliance of every Data Processor with the applicable regulations;
- securing of TELELOGOS's premises, computer hardware and software;
- update of personalized and secure profiles, using passwords that satisfy high security assurance standards and are changed regularly;
- use of regularly updated anti-virus and IT security systems;
- use of different internal and external backup modes; and
- implementation of an internal procedure to manage any Personal Data incident or breach.

8. Personal data breach

In the event of a Personal Data breach, TELELOGOS will notify the competent supervisory authority of said breach as soon as possible and no later than seventy-two (72) hours after becoming aware of it. Furthermore, in the event that the breach could entail a high risk for the rights and liberties of a natural person, TELELOGOS will report the Personal Data breach to the Data Subject as soon as possible, unless:

- TELELOGOS has implemented the appropriate technical and organizational protection measures and these measures have been applied to the Personal Data affected by said breach, in particular any measures, such as encryption, that render the Personal Data incomprehensible to any person who is not authorized to access them;

- TELELOGOS has taken the subsequent measures to ensure that no high risk to the rights and liberties of the Data Subjects is likely to materialize;
- and if the communication to the Data Subject requires disproportionate efforts.

9. Processing by third parties and transfer of personal data

The processed Personal Data are intended solely for TELELOGOS, and where necessary, its service providers and certified partners. These data may also be shared with third parties in order to meet any legal or regulatory obligation.

TELELOGOS will not transfer any Personal Data to countries outside the European Union. Furthermore, TELELOGOS will not resell processed Personal Data to third parties.

10. Rights of data subjects

Under the conditions set forth in the applicable regulations, the Data Subjects have the following rights, under certain conditions:

- access to the Data that concerns them; whereby TELELOGOS must, on request, supply them with a copy of the Personal Data that concerns them;
- to obtain from TELELOGOS, as soon as possible, the rectification of all inaccurate or incomplete Personal Data that concerns them;
- to obtain from TELELOGOS, as soon as possible, the erasure of the Personal Data concerning them;
- to obtain from TELELOGOS the restriction of the Processing; and
- to receive the Personal Data concerning them that they have supplied, in a structured, commonly used and machine-readable format, and to transmit those Data to another Data Controller (right to Data portability).

When the Processing is founded upon the consent of the Data Subject, the latter may withdraw their consent at any moment. Every Data Subject may also object to any Processing that is based on the legitimate interest of TELELOGOS by indicating this to the latter.

For any further information or to exercise the aforementioned rights concerning the Processing of Personal Data, you may contact us by email at the following address: rgpd@telelogos.com, or by letter sent by recorded delivery, accompanied by the copy of an ID card, to the address below: TELELOGOS, for the attention of the GDPR Manager, 3 avenue du Bois l'Abbé, 49070 Beaucouzé France.

TELELOGOS will process all requests for information and requests to exercise rights relating to the Personal Data as soon as possible following the date of receipt of the request, and within one (1) month at the latest.

Any Data Subject may, at any moment, submit a claim to the French data protection authority (the "CNIL") (Supervisory Authority in France).

11. TELELOGOS SaaS - Processing of personal data by Telelogos in its capacity as data processor on behalf of the users of Telelogos software in cloud mode

As part of its business and especially as part of the distribution of TELELOGOS Software in Cloud mode (SaaS), TELELOGOS can provide, on behalf of the user of TELELOGOS Software in Cloud mode, the hosting and storage of the Personal Data collected and processed by the user (data subject).

The specific purpose of the Processing of these Personal Data is the supply of TELELOGOS Software in Cloud Mode (SaaS) to the users (data subjects).

The user of TELELOGOS Software in Cloud Mode must provide TELELOGOS with precise and detailed instructions regarding the Processing of Personal Data. The latter is responsible for assuring the lawfulness of its Personal Data Processing.

AS PART OF THIS ACTIVITY, TELELOGOS MAY NOT USE THE PERSONAL DATA PROCESSED ON BEHALF OF A USER OF TELELOGOS SOFTWARE IN CLOUD MODE FOR ANY PURPOSE OTHER THAN THE SUPPLY OF SAID SOFTWARE AND/OR RELATED SERVICES IN CLOUD MODE, AND ESPECIALLY MAY NOT, IN ANY WAY WHATSOEVER, USE THESE DATA FOR PURPOSES OTHER THAN THOSE MENTIONED ABOVE.

For this purpose, in its capacity as Data Processor, TELELOGOS must specifically:

- process the Personal Data of the User of the TELELOGOS Software in Cloud Mode only for the purposes for which the TELELOGOS Software in Cloud Mode is intended to be used; and, consequently, not to reuse, transfer, allow or facilitate the use of the Personal Data by third parties, except in those circumstances agreed with said user or those provided for in the applicable regulations, and unless previously authorized by the user concerned;
- process the Personal Data in accordance with the written instructions of the TELELOGOS Software user (data subject), in its capacity as Data Controller, as transmitted in writing by the latter;
- guarantee the confidentiality of the Personal Data processed on behalf of the user (data subject) of the TELELOGOS Software, pursuant to this policy;
- take all the necessary technical, logistical and/or organizational measures and adopt any necessary procedure to ensure the protection of the Personal Data against alteration, destruction, dissemination and/or unauthorized access, as well as against any unlawful or unauthorized processing, pursuant hereto;
- inform the user of the TELELOGOS Software solution in writing, as soon as possible, of any binding request to disclose Personal Data, emanating from an authority;
- ensure compliance with the applicable regulations concerning Personal Data by any data processor to which a service has been subcontracted on behalf of the user (data subject) of the TELELOGOS Software;
- assist the user (data subject) of the TELELOGOS Software, as far as possible, to fulfill their obligation to respond to requests from data subjects to exercise their rights; it being specified that, in the event that the data subjects contact TELELOGOS directly, TELELOGOS will forward such requests to said TELELOGOS Software user as soon as possible; and
- delete all Personal Data from its servers when the supply of the TELELOGOS Software and/or its related services in Cloud Mode ends, in accordance with this policy.

TELELOGOS will notify the TELELOGOS Software user (data subject) of any suspected or proven breach of Personal Data no later than forty-eight (48) hours from the moment it becomes aware of it.

The hosting of TELELOGOS SaaS is currently outsourced to MICROSOFT AZURE. In the event of a change in the hosting subcontractor, TELELOGOS will inform its customers and partners concerned at least thirty (30) days before the change takes effect.

12. Website

12.1 Use of cookies

Like most online services, the Website uses first-party and third-party cookies. First-party cookies are necessary for the proper functioning of the website and do not collect any data that could personally identify the user.

Third-party cookies help to understand and optimise the performance of the website, track how users interact with it, maintain the security of the services, deliver relevant advertising and improve the overall user experience.

Users of the Website may object to the use of these cookies at any time by configuring their browser software accordingly.

The maximum retention period for cookies implemented by TELELOGOS varies according to their purpose and is a maximum of thirteen (13) months and four (4) days [NB: cookies and their duration are detailed in the TELELOGOS Cookie Policy document, which can be consulted online on the Website].

12.2 Google Analytics

The Website uses [Google Analytics](#), a website analysis service provided by Google Inc. ('Google'). Google Analytics uses cookies, which are text files placed on your computer, to help the website analyse how users use the site. GA4 uses data collection technologies (such as cookies, user IDs or device IDs) to record information about your use of the Website (such as page views, clicks, purchases, etc.).

Although Google has a more privacy-focused approach and **does not store the IP addresses** of European users on its servers, the aggregated data and identifiers generated are nevertheless likely to be transmitted and stored by Google on servers located in the **United States** or other countries. Google uses this information for the purpose of evaluating your use of the Site, compiling reports on Site activity for its publisher, and providing other services relating to Site activity and Internet usage.

Google may disclose this data to third parties where required to do so by law, or where such third parties process the data on Google's behalf, including, in particular, the publisher of this site.

There are several ways you can object to this collection:

- **Browser settings:** You can disable the use of cookies by selecting the appropriate settings in your browser. However, such deactivation may prevent the use of certain features of this Site.
- **Deactivation module:** Google offers a browser add-on for deactivating Google Analytics, available [here](#).

By using this website and accepting the trackers subject to your consent, you expressly consent to the processing of your data (non-nominative and aggregated) by Google under the conditions and for the purposes described above.

13. TELELOGOS Software

Furthermore, in parallel to the protection of the Personal Data that TELELOGOS will process as part of its business, the company is committed to a Privacy by Design and Privacy by Default policy that aims, starting at the design phase of the Software, to: (i) minimize the use and

storage of Personal Data in its solutions, (ii) encourage compliance with good IT security practices to guarantee the maximum level of confidentiality, (iii) allow the users of its Software solutions to fulfill their obligations with regards to Personal Data Protection.

14. Record of the processing of personal data

TELELOGOS undertakes to keep a record of the Processing activities under its responsibility, citing all of the information set forth in the provisions of article 30 of the GDPR.

15. Cooperation with the supervisory authority

TELELOGOS undertakes to cooperate with the CNIL in the execution of its tasks, at the latter's request.

16. Personal data controller within the company

The Personal Data controller within TELELOGOS is M. **Eric Blin**, in his capacity as **data protection officer (DPO)** of the TELELOGOS company.

TELELOGOS MAY MODIFY THIS PERSONAL PROTECTION DATA POLICY AT ANY MOMENT, WITHOUT HAVING TO PREVIOUSLY INFORM USERS, CUSTOMERS OR ANY OTHER DATA SUBJECT. IT IS RECOMMENDED THAT YOU REGULARLY CONSULT THIS POLICY ON THE TELELOGOS WEBSITE.

FOR ANY OTHER INFORMATION ABOUT PERSONAL DATA PROTECTION, ANY PERSON MAY CONSULT THE CNIL WEBSITE: <https://www.cnil.fr/>.