Why Is My Data Processed?

The company Spineway has developed MySpineway, an application which lets its users access the latest versions of documents regarding the products it sells.

In order to offer a personalised experience, Spineway collects the following personal information:

Identity data is used to identify the user in order to ensure that this person is interested in accessing the application.

Contact data allows authorised people to easily contact the user. The email address is used to send emails to the application users to inform them of news. It is also used in the login credentials.

Safety data makes it possible to automatically verify that the user has right of access to the application and its contents. It also protects the information stored on the application.

Finally, personalisation data lets us offer the user an experience closely tailored to their needs by providing adapted content.

As we always hope to improve our services, we calculate statistics to identify the most sought after content and adapt our offer.

Spineway is able to find out the path of its users on the application MySpineway as well as see which documents they consult.

The legal basis for processing the data is legitimate interest (see article 6.1.f of the European data protection regulations).

What Data Does Spineway Record About the Users of the MySpineway Application?

- *Identity: first name, surname, company.*
- Contact: Phone number, email address.
- Safety: password*.
- Personalisation: language, country, profile, activity, products.

Who Has Access to My Data?

- Authorised people from the sales team (only the Spineway sales reps in charge of the country in question).
- Authorised people from the communication team (application administrators).

How Long Is My Data Stored For?

Until you delete your account.

^{*} The password that you choose is encrypted in the database. If you forget your password, you can tap "Forgotten your password?" on the application login page and create a new one.

What Are My Rights?

You can access the data stored about you and modify it directly from the application menu. Go to "Settings" and then "Account Information", or send an email to communication@spineway.com asking for your data to be deleted.

You also have the right to rectify the data collected about you or oppose or limit its processing (go to https://www.cnil.fr/en/home for more information about your rights).

Contact our communication team if you wish to exercise these rights or have any questions about the processing of your data.

- Our communication team is available via email at <u>communication@spineway.com</u>
- They may also be contacted via post at Service Communication
 Spineway
 7 allée Moulin Berger
 69130 ECULLY
 FRANCE

After contacting us, if you believe that your digital freedom rights have not been respected or the access control system does not comply with data protection regulations, you can submit a complaint to the National Commission for Data Protection and Liberties (CNIL) online or via post.