



PRIVACY POLICY – VADE FOR GOOGLE WORKSPACE

LAST UPDATED ON March 28th, 2024.

This privacy policy applies to the collection and processing of personal data for Vade Google Workspace (hereinafter referred to as "Data") in the context of the use of the Solution and Services, in accordance with Regulation (EU) 2016/679 of April 27, 2016, known as the European Data Protection Regulation (hereinafter referred to under the initials "**GDPR**"), and the French Data Protection Act n°78/17 of January 6, 1978 as amended.

1. Data controller

The data controller is **VADE France**, a French simplified joint stock company (Société par Actions Simplifiée) with a single shareholder, RCS Lille n°509 568 416, located at 2 bis Avenue Antoine Pinay, 59 510 Hem, France (hereinafter "**Vade**").

2. Data collection conditions

Vade collects and processes data relating to the management of license and the improvement of Solution and/or service during the performance of the agreement. This information is transmitted by the Customer, who has the right to do so, directly or indirectly via the Solution.

3. Personal data collected, purpose and duration of processing

Vade may process Data under the following conditions:

Purpose(s)	Category Data Processed	Duration
Contractual management	Customer name - identity and contact details for the Customer,	Contract duration + 10 years after contract end
Improvement of solution and services of Vade and its subsidiaries	E-mails identified as "false positive" or "false negative" by the user, the content of quarantined e-mails, the IP addresses of servers sending e-mails to users of the software, the subjects, links (or URLs), telephone numbers, components and image links contained in all e-mails processed by the Solution	1 year
End Customer account	Operationnal management of license: Workspace ID, login for Vade administrator account, list of domains to be protected	Contract duration + 6 months after contract end

4. Categories of Data Recipients

Data will be processed, depending on the situation, by authorized persons belonging to the following categories of recipients:



- Internally: the CTPO and CRO departments, the support services of Vade or its affiliates
- Subcontractor: partner in relation to the management of the license

5. Security

As data controller, Vade defines and implements the technical and/or organizational physical or logical security measures appropriate to each processing operation in order to prevent the accidental or unlawful destruction, loss, alteration or unauthorized disclosure of data.

6. Sub-processor

The processing of Data may, upon Vade's decision, be subcontracted, partially or totally, in compliance with the obligations provided for by the GDPR. In this context, the selected subprocessor(s) will be required to provide sufficient warranties regarding the implementation of appropriate technical and organizational measures, and to sign a written data processing agreement which sets forth the appropriate measures and obligations for the relevant subcontracted processing operation(s).

7. Transfer outside the European Union

In order to process data, Vade may use service providers located outside the European Union and may communicate Customer's data to certain Vade subsidiaries located outside the European Union.

In this case, Vade ensures, prior to any access, the implementation by its affiliates and subprocessor(s) of adequate warranties and ensure its affiliates & subprocessor(s)' compliance with confidentiality and data protection obligations.

8. Data breach

In the event of a personal data breach, Vade undertakes to notify the CNIL under the conditions prescribed by the GDPR. If the violation poses a high risk to data subjects' rights and freedom, the Customer will be informed as soon as possible.

9. Personal rights

Data subject has a number of rights relating to its personal data.

- A right of access to her/his data and information on the characteristics and methods of processing, as well as the right to request a copy of such data;
- The right of rectification, within the limits of applicable law, of your erroneous data, including when it is inaccurate or incomplete;
- A right to erase her/his data within the limits of applicable law (in certain cases, this right may only apply when the data is no longer necessary to achieve the purposes for which it was collected or processed);
- The right to limit the processing of her/his data within the limits of applicable law;
- The right to the portability of her/his data in a structured, commonly used, machine-readable format to a third party (or to the data subject);



- A right to object to the processing of her/his data, in accordance with Article 21.1 of the GDPR, justified by a legitimate interest, unless Vade can demonstrate that there are compelling reasons for processing her/his data that would override the data subject's interests, rights and freedom, or because Vade needs to process her/his data as part of legal proceedings.
- A right to give general or specific instructions on how her/his data will be processed and used after her/his death.

To exercise these rights, please contact Vade's Data Protection Officer at the following address: VADE - Legal Department – 2 bis avenue Antoine Pinay – 59510 HEM, FRANCE, or by email to dpo@vadesecure.com. A copy of the data subject's ID showing her/his date and place of birth may be required to prove her/his identity. Vade will do its best to respond to her/his request within the applicable timeframe.

Data subject also have the right to lodge a complaint with her/his local data protection authority. For France, the supervisory authority is the CNIL, 3 Place de Fontenoy, 75007 Paris, France.

10. Evolution

The present Privacy Policy may be modified or amended at any time, in the event of changes in legislation, case law, CNIL decisions and recommendations, or usage, particularly with regard to limitation periods.