

Privacy Policy and protection of personal data

Introduction

KEPLER, a simplified joint-stock company with a capital of €37,000, whose offices are located at 8 Rue Volney 75002 Paris and registered in the Paris Trade and Companies Register under the number 500 533 682, offers consultancy services directed at optimising operating margins (the “**Services**”)

KEPLER publishes a website at the following address www.kepler-consulting.com (the “**Website**”).

The Services are presented and provided to the clients and prospects of KEPLER while specifying that KEPLER’s clients and prospects are professionals.

KEPLER attaches paramount importance to the protection of the personal data of its clients, prospects and suppliers (“**Persons Concerned**”). Personal data consists of any information relating to an identified or identifiable natural person (“**Personal Data**”).

The purpose of this policy is to detail the commitments made by KEPLER to ensure that the personal Data of the Persons Concerned are fully protected. In particular, KEPLER complies with the applicable legal provisions laid down by Law no.78–17 of 6 January 1978, and with the General Personal Data Protection Regulation no.2016/679 of the European Parliament and of the Council of 27 April 2016 (“**Applicable Law**”).

By entrusting the provision of Services to KEPLER or by providing products and services to KEPLER, the Persons Concerned agree to the processing of their Personal Data within the conditions described in this data privacy policy.

1. The person responsible for the processing of personal data

KEPLER is responsible for the handling of all the Personal Data collected in respect of the Persons Concerned for the purposes of presenting and providing the Services.

KEPLER, the person responsible for the processing of personal data, is the person who determines the means and purpose of processing personal Data.

The subcontractor is the person who processes the Personal Data on behalf of the person responsible (KEPLER) and acts under the authority and on the instructions of this person who is responsible for this processing.

2. The Personal Data collected

KEPLER may collect personal Data from a Person Concerned in the following ways:

- directly, when the Person Concerned freely discloses their personal Data
- indirectly from professional social media networks such as LinkedIn.

2.1 Direct collection from the Persons Concerned

KEPLER collects personal Data from the Persons Concerned. The Personal Data collected are the following: family names, first names, professions, companies, email addresses, postal addresses, and telephone numbers.

This data is collected:

- during discussions between KEPLER and the Persons Concerned for the purpose of providing Services, particularly when exchanging emails or visiting cards.
- via the website, when the Person Concerned completes the contact form provided. The data fields marked with an asterisk on the form must be filled in. This is mandatory, and necessary in order for the message of the Person Concerned to be received and processed. Other unmarked data fields are optional.

Once the Persons Concerned have provided KEPLER with their personal Data, they undertake to give accurate and complete information without prejudice to the interests or rights of third parties.

2.2 Indirect Data collection from third parties

KEPLER may collect Data indirectly; notably from third-party solutions or from professional social networks such as LinkedIn. The following data is collected: family names, first names, professions, companies, email addresses, postal addresses, and telephone numbers.

The Data is then collected in accordance with the data protection policies of the third-party solutions or the social networks and the settings of the Persons Concerned on these networks. LinkedIn's Data protection policy may be consulted [here].

3. The purpose of Data processing

The legal basis for the processing of personal Data by KEPLER is as follows: KEPLER justifies the processing in its legitimate interest in the search for professional opportunities, in the provision of services by KEPLER to its clients and prospects, and in the monitoring of the provision of products and services between KEPLER and its suppliers.

KEPLER processes personal Data with the agreement of the Persons Concerned or in accordance with the contracts made between KEPLER and its suppliers.

KEPLER uses the collected personal Data to present and provide specific Services requested by clients and prospects, and with the view to offering complementary services that are likely to interest them.

Personal Data is used particularly for the following purposes:

- For the purpose of providing Services, which comprise:
 - o giving advice
 - o the offer of complementary or new Services
 - o a sustained business relationship

- the invoicing and follow-up of invoicing relating to the use of the Services.
- For the purpose of a business relationship with suppliers, which comprises:
 - a sustained business relationship with suppliers
 - monitoring the quality of the Services or of the products provided by the suppliers
 - follow-up of invoicing relating to the purchase of products and services from suppliers.
- For the purpose of a sustained relationship with the Persons Concerned, which comprises:
 - the sending of newsletters and communications
 - invitations to meetings, conferences, fairs or other professional events
 - conducting opinion polls and surveys to collect ideas, opinions and advice from the Persons Concerned in order to improve the website's usability and the services offered.
- For the purpose of business prospection, which is comprised of sending newsletters to clients and prospects with information about the Services, or changes to the Services provided by KEPLER and all other information concerning KEPLER's activity.
- Analysing and improving the Services particularly in the fight against internet fraud.

4. Data recipients

KEPLER highly values the personal Data of the Persons Concerned and does not share them except with third parties that guarantee appropriate protection in compliance with the Applicable Law.

The personal Data of the Persons Concerned are transmitted to members of the KEPLER staff for the purpose of providing Services and sustaining business relations.

KEPLER only shares personal Data with third parties when:

- the Person Concerned has given prior and express permission to share these data.
- KEPLER has to share Personal Data with its partners for the purpose of providing Services, after the Person Concerned has given prior and express permission.
- KEPLER has to share these Personal Data with its providers, notably technical, for the purpose of the provision of Services.
- requested by judicial authority or any administrative authority empowered by law requesting this information in accordance with the applicable laws in force.
- KEPLER never transmits or sells any Personal Data to third parties for direct commercial prospection by these partners.

Personal Data is given to third parties acting as subcontractors for the following operations:

- sending newsletters
- sending business prospecting emails
- accounting management.

KEPLER pays particular attention to the commitments undertaken by its subcontractors concerning the protection of personal Data and in particular, to the security and

confidentiality of the data that has been entrusted to them. KEPLER ensures that every subcontractor can provide the necessary guarantees for Personal Data protection that comply with the Applicable Law, and most particularly for those subcontractors outside the European Union, by implementing data-transfer contracts that comply with the Applicable Law, or by selecting subcontractors who are members of the Privacy Shield.

KEPLER may also hand over the personal Data of the Persons Concerned in the event of a merger, an acquisition, reorganisation, a total or partial sale of KEPLER's assets, or in the case of receivership or liquidation.

5. Protection and confidentiality of the Data

KEPLER has implemented appropriate technical and organisational measures to ensure the protection, integrity, confidentiality and authenticity of Personal Data. It consists of technical security measures that are put in place to protect Personal Data against destruction, loss, alterations, leaks, or unauthorised access, whether accidental or illicit.

In the case of a security breach that KEPLER is aware of and that affects the personal Data of the Persons Concerned, KEPLER will make every effort to inform the Persons Concerned and to act as rapidly as possible according to the circumstances and the Applicable Law.

6. The retention period for personal Data

Personal Data are only retained for a reasonable length of time and then only for as long as is strictly necessary for carrying out the processing for which they were collected, or which were subsequently authorised by the Persons Concerned.

The personal Data of prospects are kept for a period of three (3) years from the time they were collected or from the time of the last contact made by the prospect.

The personal Data of clients and suppliers are kept for the entire duration of the business relationship, and an additional period of five (5) years as from the end of the business relationship.

7. The rights of the Persons Concerned

All Persons Concerned regarding personal Data processing have the right of access, rectification, objection and deletion, objection to profiling, and to restrict processing and the portability of their personal Data.

Every Person Concerned regarding the processing should contact KEPLER acting as the person responsible for the processing.

The Person Concerned should contact KEPLER and email their request to:
privacypolicy@kepler-consulting.com.

The Person Concerned must include the following details:

- the necessary identification particulars (at a minimum, email and telephone number) by attaching an identifying document (identity card or passport)

- the personal data that they want corrected, updated or deleted.

Requests for deletion of Personal Data, are treated by KEPLER on a case by case basis according to the legal obligations that bind KEPLER, particularly with regard to retaining or archiving documents.

The Persons Concerned may also file a claim with an administrative authority such as the CNIL (<https://www.cnil.fr/fr/plaintes>) [Commission nationale informatique & liberté/The French data protection authority].