

## **Personal Data, Privacy and cookies Policy**

When using the website <https://smart-city.two-i.com>, (hereinafter the "Service"), the company Two-i SAS (hereinafter Two-i) may be required to collect and process personal data. (hereinafter the "Personal Data") relating to the people using the Service (hereinafter the "Users").

The purpose of this Personal Data, Privacy and cookies Policy (hereinafter the "Policy") is to inform Users of the use Two-i makes of their Personal Data, in compliance with French law and applicable European law, in particular Loi n° 78-17 du 6 janvier 1978 relative à l'informatique, aux fichiers et aux libertés (hereinafter la "loi Informatique et Libertés") and Regulation (EU) 2016/679 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 (General Data Protection Regulation) here- after the "GDPR" (hereinafter together the "Applicable Regulations").

By accessing and / or using the Service, the Users accepts that their Personal Data will be collected and processed under the terms and conditions set out below.

The Policy is an integral part of the General Conditions of Use of the Service (hereinafter the "T & Cs") and must be read in conjunction with these T & Cs.

The Policy may be modified at any time by Two-i, in particular in order to comply with all legislative, regulatory, jurisprudential, editorial or technical developments.

The User must therefore refer before any use of the Service to the latest version of the Policy.

### **I. Identity of the Data Controller**

The data controller is Two-i Company registered in the Metz Trade Register, whose registered office is 11 Rempart Saint-Thiebault 57000 Metz and whose telephone number is 06 80 60 25 29 ( hereinafter "Two-i", "We", "Our", "Our").

However, when visiting <https://smart-city.two-i.com>, other companies may collect personal data concerning the User. Some companies may, for example, edit cookies, or other tags.

### **II. Collection of Personal Data**

In order to provide the Service , Two-i may need to collect Personal Data concerning the Users.

In particular, Two-i may need to collect the following Personal Data:

#### **1. Data transmitted directly by the User**

- Data related to newsletter subscription;
- Data transmitted during a demonstration request for solutions developed by Two-i;
- Data transmitted during a contact request.

#### **2. Data collected during the use of the Services**

When using the Services, Two-i collects Data relating to connection, navigation, interactions with the advertisements offered, or use of the Services.

### **III. Purposes of processing**

Personal Data is collected and / or processed when the user access to the Service, in particular to:

- Provide the Service, ensure its proper functioning;
- Facilitate the navigation of the User;
- Inform Users of Two-i offers and news
- Adapt and optimize the display of content of the Service, in particular advertising, and promotional offers, to the parameters or preferences, appetites and centers of interest, proven, assumed or inferred, of the User, which may result from his use of the Service, the information it has entered or its navigation and interactions with the Service;
- Measure the audience of the Service;
- Manage free contact requests;
- Manage demonstration requests for solutions developed by Two-i
- Secure the Site.

### **IV. Lawfulness of processing**

Under Data Protection Regulations, in order to use the User's personal data, Two-i must ensure the lawfulness of processing.

Two-i processing's relies on the user's consent and on the legitimate interest of Two-i, without overridden the interests or fundamental rights and freedoms of the User which require protection of its personal data.

### **V. Data recipients**

The Data collected or processed during the use of the Service by the User is intended for Two-i, and Two-i employees who, by virtue of their functions, need to be aware of it for the purposes of the treatment as well as:

- Processors chosen by Two-i may, on behalf and on the instructions of Two-i intervene in particular to host and store User Data on their servers, ensure the security of the technical infrastructure of Two- i, such as Online, 8 rue de la Ville l'Evêque, 75008 Paris.
- Administrative or judicial authorities.

### **VI. Data Transfer of personal data**

Two-i does not transfer the User's personal data outside the European Union.

## VII. Data retention period

Two-i undertakes not to keep the User's Personal Data beyond the period strictly necessary for the purposes of their processing, and in accordance with the Applicable Regulations.

Two-i undertakes to archive or delete the User's Personal Data as soon as the purpose and / or the defined retention period expires.

Thus, data relating to the following purposes are kept for the periods indicated above:

- Newsletter subscription: 3 years after the last contact
- Contact request: 3 years after the last contact
- Demo request: 3 years after the last contact
- Google analytics :

_ga	90 days
_gat_gtag_UA_157415999_1	1 minute
_gid	24 H

## VIII. Security of personal data

In accordance with the Applicable Regulations, Two-i processes Personal Data in complete security and confidentiality.

In particular, Two-i implements all the technical and organizational measures necessary to guarantee the security and confidentiality of the Personal Data collected and processed, and in particular to prevent them from being distorted, damaged or communicated to unauthorized third parties, by ensuring a level of security adapted to the risks associated with the processing and the nature of the Personal Data to be protected, having regard to the technological level and the cost of implementation.

Two-i cannot, however, guarantee the confidentiality or deletion of Personal Data made public by the User in the public parts of the Service.

The Service may include links to websites or external sources. The User acknowledges that the Policy applies only to the use of the Service, and in no way covers information collected and / or processed on external websites or sources. Consequently, two-i cannot be held responsible for the practices of these websites or external sources with regard to the collection and processing of personal data. The user should refer to the privacy policy of these websites.

## IX. User rights

- The User of the Service has the following rights:
  - A right of access,

- A right to rectification,
- A right to object to the collection and processing of Data,
- In the event of exercise of the right to object, Two-i will cease processing Personal Data, except in the event of legitimate for the processing, or to ensure the recognition, exercise or defense of their rights in court, in accordance with the Applicable Regulations.
- A right to erasure,
- A right to limitation in the collection and processing,
- A right to portability.

These rights can be exercised as follows:

By mail, by writing at the following address: Two-i 11 Rempart Saint-Thiebault 57000 Metz, indicating name, first name, address, email address and if possible customer reference in order to speed up the consideration of your request.

By e-mail : [dpo@two-i.com](mailto:dpo@two-i.com)

Two-i will send a response within 1 month of exercising the right. In certain cases, linked to the complexity of the request or the number of requests, this period may be extended by 2 months.

- Data after the user's death:

The User can formulate directives relating to the storage, erasure and communication of his personal data after his death in accordance with article 40-1 of law 78-17 of January 6, 1978. These directives can be general or specific.

The User can formulate his advance directives to the following address: [contact@two-i.fr](mailto:contact@two-i.fr)

## **X. Cookies policy**

When using the <https://smart-city.two-i.com> website, information relating to the navigation of the User's terminal may be recorded or accessed in Cookies files installed on his terminal, subject to the choices made by the User. Choices regarding Cookies can be modify at any time: <https://smart-city.two-i.com#cookies>

- What is a cookie ?

A "Cookie" is a small text, image or software file which is deposited and stored in the User's terminal via his Internet browser when the User visits the smart-city.two-i.com site, subject to his agreement and except opposition on his part.

Very useful, Cookies make it possible to recognize the User, to indicate his passage on such or such page and thus to bring him an additional service: the improvement of his browsing comfort, the security of his connection or the adaptation of the content.

The information stored by Cookies, for a limited period of validity may for example relate to the pages visited, the advertisements on which the User has clicked, the type of browser he uses, his IP address, the information he a entries on a site in order to avoid entering them again.

- What are the purposes of the Cookies used on the site?

Only the issuer of a Cookie is likely to read or modify the information contained therein. The information concerning the User contained in the Cookies used on the Two-i site may be deposited by third parties for content sharing purposes.

Several types of cookies are likely to be used on the Two-i site.

Navigation cookies on the Service allow in particular:

- adapt the presentation of the Service to the display preferences of the User's terminal (language used, display resolution, operating system used, etc.) during Users' visits, depending on the display hardware and software or reading that the terminal includes;
- memorize the user preferences, display settings and readers that Users use in order to facilitate their navigation during their next visit to the Service;

Statistical Cookies relating to the Service allow in particular:

- to establish statistics and measures of attendance and use of the various elements making up the two-I site (sections and content visited, routes, etc.), making it possible to improve the interest and ergonomics of the Service;
- measure the number of visits, the number of pages viewed as well as the activity

To maintain control over Cookies, it is up to the User to express his choices regarding cookies in the following module which lists the cookies: <https://smart-city.two-i.com#cookies>

- User choice regarding cookies

Some cookies are necessary for the proper functioning of the smart-city.two-i.com website and as such do not require the consent of the User. These are in particular those which allow the preservation of the choice expressed by users on the deposit of tracers, authentication with the Service, load balancing of equipment contributing to a communication service, audience measurement of the Service

Several possibilities are offered to you to manage Cookies. The User understands that Cookies improve the comfort of browsing the Service.

Any configuration that the User can undertake will be likely to modify his navigation on the smart-city.two-i.com website requiring the use of Cookies. Two-i cannot be held responsible for the consequences of a less efficient operation of the site due to the impossibility of installing or reading the Cookies necessary for its proper functioning, once the User has rejected or deleted them. .

Users can also configure their browser software so that Cookies are saved in their terminal or, on the contrary, rejected, depending on their issuer.

In addition to setting cookies via the browser software, setting is possible directly on the Service via a dedicated module, accessible at the following address: <https://smart-city.two-i.com#cookies>

## **XI. Contact**

For any request concerning the processing of his Data, the User can send a request to the Two-i Data Protection Officer by email at the address [dpo@two-i.com](mailto:dpo@two-i.com) or by post at the following address : Two-i 11 Rempart Saint-Thiebault 57000 Metz.

## **XII. Complaints**

In the absence of a response or if the User is not satisfied with the response provided, he has the possibility to lodge a complaint with the CNIL: <https://www.cnil.fr/fr/plaintes> or by postal address: National Commission for Computing and Liberties - 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07.

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