

# Privacy Policy – XSole PTI / XSmanager products

## Preamble

The solutions and services developed by TRAXxs are part of a strategy to improve people's safety. In case of an unconventional situation or an emergency, they allow the rapid transmission of a geolocated alarm to a group of supervisors so that they can provide assistance as quickly as possible.

Customers subscribe to the Services either for themselves or for third parties. For the proper functioning of the services, they are invited to fill in the "XS Manager" application with data on users or on the people who will manage the alerts. Some of this data may be "personal" within the meaning of European Directive EU 2016/679, also called General Data Protection Regulation, and its transposition into French law.

## Purposes and Data Controller

The client is the Legal Responsible for Processing with users. He defines the plans and procedures for the protection of the people in the context of which he subscribes to the services of TRAXxs. He takes the initiative for the processing and transmits the personal data to TRAXxs. It subcontracts the performance of the processing to TRAXxs, which in turn sends it the personal data enriched for the purposes of the contract.

The data processing carried out by TRAXxs responds to a need to improve the safety of people. It is based on the management of information relating to the events of use of connected insoles, having as objects:

- The detection of falls or loss of verticality, the issuance of alerts in the event of danger or the reception of alerts, for example in the event of the need for evacuation.
- The orientation of assistance operations towards the person in distress, such as information allowing the location of this person for the duration of the alert
- Keeping an event log for the customer: person who triggered the alarm, date and time of the triggering, person who took care of it, duration of care, number of steps, etc.
- Statistical management of information relating to events of use of connected insoles (for example for the identification of accident-prone areas)
- The improvement of the solution

## Legal basis and regulatory nature of the processing

The customer must ensure that he bases the Processing ordered on one of the six legal bases in accordance with the regulations and that the data is processed by the recipients in a lawful, fair and transparent manner with regard to the persons for whom he transmits the data. given to TRAXxs. In particular, it is his responsibility to inform these persons, to obtain their explicit consent if the legal basis requires it, and to allow them to exercise their rights with TRAXxs.

## Data recipient

The customer is the main recipient of the data. The people he has entered in the "responsible" field of XSmanager also receive the data according to the level of permission granted to them. TRAXxs sales and technical staff may need to access the data to enable the proper performance of the contract and the maintenance of the XSole PTI and XS Manager solution.

## Category of data processed

The personal data processed are as follows:

"Insole wearer" profile:

- The identifier entered in the "last name" and "first name" fields of the application
- Telephone numbers
- Information concerning the position in the hierarchy in the company via the notion of belonging to a group to a team
- Timed geolocation information with the type of associated event (periodic feedback / alert)
- Statistical information on the number of steps to indicate a notion of wearer mobility over a given time interval and during alerts.

"Manager" profile (person who can connect to "XSmanager")

- The identifier entered in the "last name" and "first name" fields of the application
- Email address
- Phone number
- Information concerning the position in the hierarchy of the company via the notion of belonging to a group or a team
- Date and time of the last connection event to the application

## Hosting of data and localization of processing

The data entrusted to TRAXxs is hosted in Europe and processed in Europe in countries subject to European data protection regulations.

## Storage periods

The data of the persons concerned are kept in the production base as long as the customer subscribes to the service or deletes the data. The processing carried out by TRAXxs on this data is accessible by the customer for a period of two months.

Beyond that, the data is transferred from the production base to a temporary archive base where it is stored for twelve months. The data is then processed by obfuscation and secured to make it impossible for them to be identified or decoded by a third party. Only duly authorized TRAXxs personnel can access it. This temporary archiving is carried out for the sole purpose of resolving disputes or judicial investigations.

## Rights of data subjects to their data

In accordance with the regulations, the persons concerned have a right of access, rectification, erasure, limitation and opposition. They can obtain information on the processing carried out by TRAXxs on their data and know the people to contact at the customer's in order to exercise their rights by contacting TRAXxs

by email to:

rgpd@traxxs.net

or by post to:

TRAXxs – Referent in data protection,

WTC

1300 ridge road

06560 Sophia Antipolis

FRANCE.

If they believe that the processing does not comply with the data protection rules, the persons concerned may file a complaint with the CNIL by following the procedure indicated on the website <http://www.cnil.fr>.