

# Policy Privacy

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### 1. Purpose and Scope of the Policy

Phone Recycle Solution attaches the greatest importance and the greatest care to the protection of privacy and personal data, as well as to compliance with the provisions of the applicable legislation.

Regulation (EU) 2016/679 of April 27, 2016 on the protection of natural persons with regard to the Processing of Personal Data and on the free movement of such Data (hereinafter "GDPR") states that Personal Data personnel must be treated lawfully, fairly and transparently. Thus, this privacy policy (hereinafter the "Policy") aims to provide you with simple, clear information on the Processing of Personal Data concerning you, in the context of your browsing and the operations carried out on our site. Internet.

### 2. Data Controller

As part of your activity on the site and the subscription to our services, we collect and use personal data in connection with you, natural persons (hereinafter "Data subject").

For all Processing, Phone Recycle Solution, a simplified joint-stock company residing at 189 rue d'Aubervilliers, 75018 PARIS with a capital of 1,000,000 euros and registered in the Trade and Companies Register under number Paris B 831 008 842, determines the means and purposes of the Processing. Thus, we act as Data Controller, within the meaning of the Regulations relating to Personal Data, and in particular Regulation (EU) 2016/679 on the protection of natural persons with regard to the Processing of Personal Data. personnel and the free movement of such Data.

### 3. What Personal Data do we collect and how?

By using our website or by subscribing to our services, you send us a certain amount of information about you, some of which is likely to identify you ("Personal data"). This is the case when you browse our site, when you fill out online forms or any other document necessary for our commercial relationship.

The nature and quality of the Personal Data collected about you vary depending on the relationship you enter into with Phone Recycle Solution, the main ones being:

- **Identification data:** this includes all information that we would identify you, such as your surname, first name, telephone number. We are also required to collect your email address, as well as your postal address (in the event of payment, the postal address will be necessary to generate an invoice). In case of subscription, proof of identity may also be requested.
- **Login data:** this is all the information we need to access your personal account, such as password, and other information necessary for authentication and access to an account. We also collect your IP address for maintenance and statistical purposes.

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- **Financial datas:** this corresponds to banking data such as a bank details.
- **Documents of different kinds**(PDF, Office format, Image) with titles, contents, folder names, or document-related information, such as comments written in documents, alert and reminder dates.
- **Information about your browsing:** by browsing our website, you interact with him. Therefore, certain information relating to your browsing is collected.
- **Data Collected from Third Parties:** personal data that could be communicated to us by our reseller partners for the processing of requests made to our after-sales service.

## 4. Why do we collect your Personal Data and how?

We collect your Personal Data for specific purposes and on different legal bases.

As part of the execution of the contract or pre-contractual measures, your Data is processed for the following purposes:

- Management of orders, purchases;
- Billing management;
- Contract management ;
- Managing the shipping and delivery of repaired/ordered products;
- Management of your after-sales service account;
- Management of complaints and after-sales service;
- Management of outstanding payments;
- Recruitment management (pre-contractual measures);

Based on your consent, your Data is processed for the following purposes:

- Carrying out commercial prospecting and marketing operations;
- Transmission of your Data to our business partners;
- Newsletter management;
- Management of cookies requiring your consent;

As part of the legitimate interest of Phone Recycle Solution, your Data is processed for the following purposes:

- Establishment of statistics for improving products and services;
- Conducting satisfaction surveys and polls;
- Management of pre-litigation and litigation.

Within the framework of the legal and regulatory obligations to which Phone Recycle Solution is subject, your Data is processed for the following purposes:

- Fight against fraud ;
- Maintenance of general and auxiliary accounts.

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### 5. Do we share your Personal Data?

Your Data is intended for Phone Recycle Solution employees authorized in charge of the management and execution of contracts and legal obligations, depending on the purposes of the collection and within the limits of their respective attributions.

They are possibly transmitted for certain tasks related to the purposes, and within the limits of their respective missions and authorizations, to the following recipients:

- Reseller partners for the processing of requests made to our after sales service ;
- Service providers and subcontractors (delivery, shipping, hosting, etc.) to which we appeal to carry out a set of operations and tasks;
- Duly authorized public authorities (judicial, control, etc.), within the framework of our legal and regulatory obligations;
- Regulated professions (lawyers, bailiffs, etc.) who may intervene in the framework of the implementation of guarantees, recovery or litigation;

When your Data is communicated to our service providers and subcontractors, they are also asked not to use the Data for purposes other than those initially intended. We make every effort to ensure that these Third Parties maintain the confidentiality and security of your Data.

In any case, only the necessary Data is provided. We make every effort to guarantee secure communication or transmission of your Data.

We do not sell your Data.

### 6. Are your Personal Data transferred to Third countries?

Phone Recycle Solution strives to store Personal Data in France, or at least within the European Economic Area (EEA).

However, the Data we collect when you use our platform or as part of our services may be transferred to other countries. This is the case, for example, if some of our service providers are located outside the European Economic Area.

In the event of a Transfer of this type, we guarantee that it is carried out:

- Towards a country providing an adequate level of protection, i.e. a level of protection equivalent to what European Regulations require;
- Within the framework of standard contractual clauses;
- Within the framework of internal company rules.

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### 7. How long do we keep your Personal Data?

We keep your Personal Data only for the time necessary to achieve the purpose for which we hold this Data, in order to meet your needs or to fulfill our legal obligations.

Storage times vary depending on several factors, such as:

- The needs of Phone Recycle Solution's activities;
- contractual requirements;
- Legal obligations;
- The recommendations of the supervisory authorities.

The retention periods for your Data are as follows:

| Purposes   | Storage periods                                      |
|--|--|
| Order management, purchasing                                   | 5 years from order                                   |
| Contract management  | 5 years from the end of the contractual relationship |
| Managing your after-sales service account                      | 5 years from last account login                      |
| Management of complaints and after-sales service               | 5 years from expiry of the warranty period           |
| Recording of service calls                                     | 6 months   |
| Realization of commercial prospecting and marketing operations | 3 years from last contact                            |
| General and auxiliary accounting                               | 10 years   |

### 8. How do we ensure the security of your Personal Data?

Phone Recycle Solutions is committed to protecting the Personal Data we collect, or what we process, from loss, destruction, alteration, unauthorized access or disclosure.

Thus, we implement all appropriate technical and organizational measures, depending on the nature of the Data and the risks that their Processing entails. These measures must make it possible to preserve the security and confidentiality of your Personal Data. They may include practices such as limited access to Personal Data by authorized persons, due to their functions, pseudonymization or encryption.

In addition, our practices and policies and/or physical and/or logical security measures (secure access, authentication process, backup copy, software, etc.) are regularly checked and updated if necessary.

### 9. What are your rights?

The GDPR provides Data Subjects with rights that they can exercise. Thus are provided:

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1. **Right to information:**the right to have clear, precise and complete information on the use of Personal Data by Phone Recycle Solution.
2. **Permission to access:**the right to obtain a copy of the Personal Data that the Controller holds about the applicant.
3. **Right of rectification:**the right to have the Personal Data rectified if they are inaccurate or obsolete and/or to complete them if they are incomplete.
4. **Right to erasure / right to be forgotten:**the right, under certain conditions, to have the Data erased or deleted, unless Phone Recycle Solution has a legitimate interest in keeping it.
5. **Right of objection:**the right to object to the Processing of Personal Data by Phone Recycle Solution for reasons relating to the particular situation of the applicant (under conditions).
6. **Right to withdraw Consent:** the right at any time to withdraw Consent when the Processing is based on Consent.
7. **Right to restriction of Processing:**the right, under certain conditions, to request that the Processing of Personal Data be temporarily suspended.
8. **Right to Data Portability:**the right to request that the Personal Data be transmitted in a reusable format allowing it to be used in another Database.
9. **Right not to be subject to an automated decision:**the right for the applicant to refuse the fully authorized decision-making and/or to exercise the additional guarantees offered in this regard.
10. **Right to set post-mortem guidelines:**the right for the applicant to define directives relating to the fate of the Personal Data after his death.

Additional rights may be granted by local law to Data Subjects.

To this end, Phone Recycle Solution has implemented a **rights management procedure** Persons who comply with the requirements of the Applicable Legislation. This procedure establishes:

- The standards to be respected to ensure the transparent information of the Persons concerned;
- Legal requirements that must be met;
- The means authorized to submit a request for each right, according to the category of Persons concerned ;
- The business processes for processing such requests in accordance with the above requirements;
- The parties involved in these processes, their roles and responsibilities.

To exercise your rights, you can contact the Data Protection Officer (DPO): [dpo@phonerecyclesolution.com](mailto:dpo@phonerecyclesolution.com) .

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When you send us a request to exercise a Right, you are asked to specify as much as possible the scope of the request, the type of right exercised, the Processing of Personal Data concerned, and any other useful element, in order to facilitate the examination of your request. In addition, in the event of reasonable doubt, you may be asked to provide proof of your identity.

You also have the right to refer any complaint relating to the way in which [Phone Recycle Solution] collects and processes your data.

## **10. Update of this Policy**

This Policy may be regularly updated to take into account changes in the Regulations relating to Personal Data.

Date of last update 04/24/2023.