

## PRIVACY POLICY

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### 1. Introduction

Our website's Privacy Policy contains useful information related to the personal data we collect and process, how we value your privacy, the purposes and legal bases of processing your personal data, how we use and retain your information, your legal rights, and our Cookie Policy.

Any personal data processing is in compliance with the obligations and guarantees established in applicable laws, and in particular, Regulation (EU) 2016/679 (GDPR), French Act No. 2018-493 of 20 June 2018, and any other applicable legislation, as well as Guidelines of the CNIL.

### 2. Data controller

The Data Controller is the company Infinite Orbits SAS, with its registered office at 3, Rue Alaric II, 31000, Toulouse, Occitanie, France.

Tel.: +33 6 13 29 45 06, E-mail: [info@infiniteorbits.io](mailto:info@infiniteorbits.io)

### 3. How we protect your Personal data

We are committed to safeguarding your privacy. We use a variety of technical and organizational measures to help protect your personal information from unauthorized access, use, disclosure, alteration or loss, consistent with applicable data protection laws. All our employees and third parties we engage to process your personal information are obliged to respect the confidentiality of your information.

#### 4. The personal data that we collect

Navigation on our website and its contents is accessible to all users without requiring prior declaration of their personal data.

The registration of personal information indicated in this Privacy Policy is only necessary if the user utilizes the "Contact us" form in our website, subscribes to our monthly newsletter, applies for a career opportunity through our website, or voluntarily shares any personal information via e-mail or other forms of communication (eg. When the user shares their social media profile with us).

The personal data that we process may include:

- Personal information, [e.g., name, company, title/position];
- Contact information [e.g., postal address, email address, telephone number, social media account];
- Communication content files;
- Your CVs;
- Any other information you may voluntarily provide us.

#### 5. Purposes of the processing

The information you provide through our website as set out above, will be used for the purposes specified in this Privacy Policy or any relevant pages of the website.

We may use your personal information for the following purposes:

- Provision of information or services that you have requested (in particular via the various forms of our website);
- Improvement of our website and services;
- Contact you through our monthly newsletter (if you choose to subscribe);
- Sharing information on social networks;
- Fulfillment of legal obligations, including establishment, exercise or defense of legal claims;
- Recruitment and the performance of employment contracts.
- Legal bases of processing

- Legitimate business purposes [e.g., the proper administration or protection of our website, services, business, legal rights, etc.];
- Performance of a contract with you, or in order to take steps at your request prior to entering into a contract;
- Compliance with legal and/or regulatory obligations;
- Your consent.

## 6. Recipients and Personal Data sharing

- a. Recipients:** Infinite Orbits is the sole recipient of your Personal Data. We do not disclose any of your personal data collected under our Privacy Policy to any third parties without your consent, with the sole exception of where we are required to do so by law, or where it is necessary for the purpose of legal proceedings, or in order to exercise or defend legal rights.
- b. Data processors:** to carry out certain necessary functions for the provision of our services (such as our monthly newsletter, or manage job applications), your data may be processed by third parties who act as data processors on our behalf, and are contractually required to comply with their legal obligations to keep information confidential.

We will not, without your expressed consent, supply your personal information to any third party for their or any other third party's direct marketing or other purposes.

## 7. International data transfers

In order to provide our services, we may need to transfer your personal information to locations outside of France. We will only transfer your data within the European Economic Area (EEA). Should we transfer your data to a location outside the EEA, we will implement appropriate measures to ensure that your personal information remains protected and secure in accordance with applicable data protection legislation.

We also inform you that we may use authorized service providers to facilitate the collection and processing of the data that you have communicated to us. In some cases, these providers may be located outside the European Union. We have received advance assurance of the implementation by all our service providers of adequate guarantees and compliance with strict conditions regarding data protection.

## 8. Retention of personal data

We ensure that we comply with our legal and regulatory obligations in relation to the erasure of personal data and retention for a minimum period.

Personal data that we collect and process for any purpose shall not be retained for longer than necessary for that specific purpose. We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject.

#### 9. Security of your personal data

We will take reasonable technical and organizational precautions to prevent the loss, misuse, or alteration of your personal information. You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

Our website may include hyperlinks to third party websites, such as various social media platforms. We have no control over, nor we are responsible for, the privacy policies and practices of such third parties. Connection and sharing of personal data with third party websites shall be made at your own risk.

#### 10. Your rights

Our Privacy Policy in accordance with the relevant legislation grants you a series of rights in relation to the processing of your data when using our services. These can be summarized as follows:

- a.** Right request access to the personal data we hold about you;
- b.** Right to rectification of inaccurate personal data and to completion of incomplete personal data provided to us;
- c.** Right to erasure of your personal data when processing is no longer necessary;
- d.** Right to restrict future processing of your personal data;
- e.** Right to object to the processing of your personal data;
- f.** Right to request transfer of your personal data to another organization or to you (portability)
- g.** Right to withdraw your consent for the processing of your personal data, to the extent that the legal basis of our processing is consent. Withdrawal of previously given consent will only have effect for the future and will not affect the lawfulness of processing based on consent until the time of its withdrawal. It is noted that even after you withdraw your consent, we may continue to process your personal information to the extent required or otherwise permitted by law, in particular in connection with exercising and defending our legal rights or meeting our legal and regulatory obligations.

- h.** Right not to be subjected to a decision based solely on automated processing of data, that could significantly affect you, without human intervention.
- i.** Right to lodge a complaint with the CNIL online, if needed, by clicking on the following link: <https://www.cnil.fr/fr/plaintes/internet>.

You may exercise any of your rights in relation to your personal data by contacting us at [info@infiniteorbits.io](mailto:info@infiniteorbits.io). You may also contact us here, in case you have any questions, complaints or concerns regarding our Privacy Policy.

## 11. Job Applications

By applying for a career opportunity through our website's forms, you are required to provide your personal details, including your CV. We ensure that we will only use your data for the purposes of the recruitment process, under the provisions of this Privacy Policy and we will only retain your personal information for a period of twelve (12) months, unless you provide us your consent to process for a longer period. You can request the deletion of your data or the withdrawal of your application at any time. In case your application is successful, we shall retain your information within the subsequent employment, in compliance with applicable laws.

## 12. Monthly Newsletter

While entering our website, or at any other time, you will have the opportunity to subscribe to our monthly newsletter, in order to stay updated on our news. Please note that our mailing list is managed via our service provider, Mailchimp. For more information on Mailchimp's services and Privacy Policy, please visit <https://mailchimp.com>.

If you do not wish to receive our monthly newsletter anymore, you can unsubscribe at any time easily, simply by clicking the unsubscribe link in the footer of each email, or by contacting us, as per clause 11 above.

## 13. Amendments

We may update this policy from time to time by publishing a new version on our website. You are encouraged to check this page occasionally in order to ensure you are happy with any changes to this policy. By continuing using our services after these changes are in effect, you agree to our revised Privacy Policy.

## 14. Cookie Policy

When you use our services, we may send one or more cookies (small text files containing a string of alphanumeric characters) to your computer that distinguish you from other users of our website and collect information and details of our visitors' behavior patterns in order to obtain statistics on the number of visits and the popular pages of our website. Cookies are used to improve your user experience of our website by remembering your preferences and allowing you to move from page to page within the site more easily, track errors within the site and generally to improve our website. Cookies may also be provided by trusted third parties.

Consenting to our use of cookies in accordance with the terms of this policy when you first visit our website permits us to use cookies every time you visit our website.

Most web browsers are initially set up to accept cookies. You can customize your cookie preferences through your web browser to refuse all cookies or to indicate when a cookie is being sent. Please note, however, that certain features of the site might not function properly if you delete or disable cookies. Our website's cookies do not and cannot infiltrate a user's hard drive to collect any information stored on the hard drive.

Insofar as those cookies are not strictly necessary for the operation of the website and the optimization of the user experience, we will ask you to consent to the use of such cookies when you first visit our website.

We also use Google Analytics. Google Analytics gathers information about the use of our website by means of cookies. The information gathered is used to create reports about the use of our website. You can find out more about Google's use of information by visiting <https://www.google.com/policies/privacy/partners/> and you can review Google's privacy policy at <https://policies.google.com/privacy>. We inform you that in compliance with the GDPR, we use Google Analytics with the option of anonymizing your IP address enabled.