



## PAIR WORK SAS PRIVACY POLICY FOR IRMA WEBSITE

This document lays down the privacy policy (the "Privacy Policy") under which Pair Work SAS, a company having its registered office at Toulon, France, registered in the Registre du Commerce et des sociétés de Toulon with number 823037346, ("Pair Work SAS" or "we", "our", "us"), collects, uses and processes personal data ("Personal Data Handling"). This Privacy Policy also provides you with all of the necessary information according to the General Data Protection Regulation (EU) 2016/679 ("GDPR").

The Privacy Policy can be found on the Website at <https://www.irma-tactical.com> (the "Website", "IRMA web app", "IRMA"), where you can also find the last version of the Terms of Services you must agree upon to access the Services.

IRMA web app is a software designed and developed by Pair Work SAS.

### 1. Philosophy

Pair Work SAS is the controller of the Personal Data you provide. Pair Work SAS only handles Personal Data for the purpose of contract performance and legitimate interest, namely to ensure the proper functionality, a better user experience of our Services and compliance with laws and regulations.

Pair Work SAS will never give, loan, rent or sell your Personal Data to third parties, except if we are legally obliged to disclose it to public authorities.

Pair Work SAS acts in compliance with applicable laws and regulations, in particular those in force in France.

### 2. Scope of Personal Data

#### 2.1 What we don't collect:

We don't use tracking cookies, we don't collect records of usage, we don't collect analytical data. We don't collect your locations. We are not aware of the locations and information you display when navigating on IRMA website.

In particular, we don't collect:

- Information about your device and device capabilities;
- Information about your device's operating system;
- Information about how you use the Services;
- Your activities on the Services;
- Mobile or internet carrier/provider;
- Browser type;
- Browser identifier;
- Operating systems;
- Referring URL;



- Visited URLs or browsing parameters;
- IP addresses;
- Geolocation;
- The time and time zone of the browser are read only locally (in the browser) to display the correct map, but they are never sent to or stored on the server.

Third party technologies that we use can produce technical logs with your IP address; we do not collect neither perform any analysis or data mining with this data and delete it regularly, usually after one month.

**2.2. What we collect:**

We only collect data needed to grant you access to the Website and display synchronized data:

- Entity precise description (when registering);
- Personal Data of people in charge, including contact information (when registering);
- Information about the provided service (e.g., information about the service ordered, its price, date of the order, its cancellation);
- Payment details (e.g., credit or debit card number, bank account number);
- Content of your communication with us (e.g., when you write to us with a query);
- A session cookie to block simultaneous logins on the same account. This cookie contains a session ID and the login timestamp (we do not collect the browser time here, but the time on our server at the time of login).

Whenever the Service webpage crashes, a crash message is sent to our server for investigation (and deleted after one month).

### **3. Handling of Personal Data**

We limit access to personal information to employees who reasonably need to have access to that information to provide access to Services. These employees may access your personal data only to the extent necessary to carry out the obligations arising from their work.

Emails used for exchanges are hosted by a renowned provider in France and on Pair Work SAS's computers, also in France. Pair Work SAS's data benefits from a backup in Luxembourg that meets the highest standards of privacy. Your personal data is secured in compliance with the GDPR.

We only store your personal data for as long a time as is necessary for legitimate and essential business purposes.

We may periodically ask for your further consent to use your personal data for certain specific reasons.

We may also use your email address for direct marketing. You may, at any time, declare your objection. Any electronic marketing messages you receive from us will include an opt-out mechanism within the message itself, e.g. an 'unsubscribe' link in the email you receive from us.

Some of your personal data may be disclosed to tax authorities, criminal law authorities and, to a certain extent, also to other public authorities. We will share your personal data when we, in good faith, believe it is necessary for us to do so in order to comply with legal obligations under applicable law, or respond to valid legal processes.



#### 4. Your rights

We hereby inform you that you have, as available and except as limited under applicable law, the following rights under the GDPR in relation to your personal data:

**Right to access your personal data.** You have the right to access personal data about you that we have collected. You can do so by contacting us.

**Right to rectification of personal data.** You have the right to request that we rectify or amend incorrect or incomplete personal data about you that we have collected. You can do so by contacting us.

**Right to erasure of personal data.** You have the right to request that we erase all of your personal data that we have collected during your use of our Services. You can do so by contacting us.

**Right to restriction of processing of personal data.** You have the right to request that we restrict the processing of your personal data in certain cases until your request that we erase or change your personal data or other objection is processed. You can do so by contacting us.

**Right to portability of your personal data.** You have the right to request that we give you the personal data that you have provided to us if such data has been processed based on your consent or based on a contract concluded with us and such personal data has been processed by automated means. If you make such request, we will provide you with all of your personal data that we collected in a structured machine-readable form. You are also entitled to request that we transfer such personal data to a new controller if it is technically possible. You can do so by contacting us.

**Right to object to the processing of your personal data.** If you feel that the processing of your personal data based on our legitimate interest is not proportional to your rights, you can object to such processing and request that we provide you with compelling legitimate grounds for such processing. You can do so by contacting us.

**Right to object to your personal data** being processed for direct marketing purposes. If we send you electronic marketing messages based on your consent or as otherwise permitted by applicable law, you may, at any time, withdraw such consent or declare your objection. Any electronic marketing messages you receive from us will include an opt-out mechanism within the message itself, e.g. an 'unsubscribe' link in the email you receive from us.

**Right to withdraw your consent to process your personal data.** Should we have processed your personal data based on your consent, you can withdraw such consent at any time by emailing us with such a request to do so. Please note that such withdrawal will not affect the legality of the processing of your personal data made prior to such withdrawal.

#### 5. Contacting us

If you want to exercise your rights or have any questions about this Privacy Policy, please contact us at [contact@pair-work.com](mailto:contact@pair-work.com). We will give you an answer within one month.