



Personal data protection policy

Version effective on 30/04/2026

Positive Group Sales Solutions SAS, located at 3 Avenue Antoine Pinay, Parc d'activité des 4 vents in Hem (59510) - RCS Lille Métropole 504 497 215, acting as a data controller as defined by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 applicable since 25 May 2018 and by the amended Law No. 78-17 of 6 January 1978, relating to data processing, files and freedoms (hereinafter, together, the "Regulation"), attaches great importance to the protection of personal data.

This policy (hereinafter the "Policy") applies to all websites and services (hereinafter the "Services") offered by Positive Group Sales Solutions (hereinafter "We"). Any product or service offered by Positive Group Sales Solutions may be supplemented by specific mentions.

Through this Policy, We wish to inform the users of our Services (hereinafter "You") of the means used and the purposes pursued for the collection of any information that directly or indirectly identifies a natural person (hereinafter "Personal Data"), in accordance with the Regulation, when We act as data controller, i.e. when We determine the purposes and means of the processing.

It is understood that processing means any operation (or series of operations) relating to Personal Data, by any process and in particular the collection, recording, organization, storage, adaptation or modification, extraction, consultation, use, communication by transmission, diffusion or any other form of distribution, merging or interconnection, as well as restriction, erasure or destruction (hereinafter referred to as "Processing").

I. What kind of personal data do we collect ?

When using our Services, You may provide Personal Data, directly or indirectly. The compulsory or optional nature of the Personal Data requested and the possible consequences of a lack of response are specified to you during the collection.

Thus, We collect Personal Data that You provide to Us, Personal Data that We obtain from third party sources, and Personal Data that We obtain through Your use of the Services.

Thus, the following Personal Data and other data may be collected and processed:

- Your contact information (name, first name, job title, address, telephone number, e-mail address);
- Transaction history, orders, payment IP address;
- Bank details (within the scope defined by the law);
- The identifiers of the machines when using our software, IP address of connection, activity log;
- Information collected through the use of cookies;
- Data related to the performance of our products and information on how You use them;
- Your interactions with Us;
- Data collected as part of our affiliate program.

Regarding data collected from other sources, We may also obtain your contact details and other personal information from companies which are part of the Group to which We belong and from other third parties, including companies with which We offer shared services and which warrant to Us that they have obtained

your data lawfully; and/or from publicly available sources and/or from the data providers from whom We obtain data.

II. What is the legal basis to collect your Personal Information?

We collect and process Your Personal Data under the following legal bases:

- The execution of our contractual relations. The failure to provide such Personal Data would result in the impossibility or difficulty of performing the services related to our products;
- The necessity to respect a legal obligation;
- Our legitimate interest to ensure you the best possible quality of service;
- Your express consent to the Processing of your Personal Data. This consent can be easily withdrawn at any time;

III. Why are your Personal Data collected?

We may process your Personal Data for the following purposes:

- Management of our commercial relationship (creation of customer accounts, orders, payments, etc.);
- Monitoring of customer relations such as satisfaction surveys, management of complaints and support services;
- Evaluation and improvement of the quality of our products, services and websites, including the preparation of commercial statistics; Management of technical prospecting operations (including technical operations such as normalization, enrichment and deduplication);
- Conducting prospecting operations;
- Sending of newsletters, information and promotional offers by e-mail or sms, to keep You informed of the latest news;
- Management of applications for recruitment purposes;
- Organization of contests;
- Management of your rights regarding the rules on the protection of Personal Data;
- Management of potential litigations;
- Execution and respect of all our contractual elements;
- Respect of legal obligations which we are subject to.

IV. Who are the recipients of your Personal Data?

Your Personal Data are processed by Us, but We may also share your Personal Data (i) with different appropriate departments of the companies within the Group to which We belong (ii) and/or with external service providers, duly authorized. The departments of our Group and our external subcontractors operate on our instructions and within the strict limits of their tasks (e.g.: to process your payment or to create your invoice). In this context, your Personal Data are neither sold nor rented to third parties.

When these service providers use servers outside the EU, We have entered into contracts with them on the protection of personal data, and in particular the European Commission's Standard Contractual Clauses (SCCs) to regulate the transfer of personal data.

In any case, We ensure that the persons authorized to process your Personal Data (staff, partners, subcontractors, etc.) are committed to respect the confidentiality of Personal Data or are subject to an appropriate legal obligation to confidentiality. Thus, We ensure in particular that our employees who may have access to your Personal Data as part of their tasks are made aware of the protection of Personal Data.

V. How are your Personal Data secured?

We inform you that, taking into account the state of the art, appropriate organizational and technical measures are taken to preserve the security, the integrity and the confidentiality of your Personal Data and in particular, to prevent that they are distorted, damaged or accessible to unauthorized third parties.

Furthermore, We are committed to keep the Personal Data confidential, not to disclose it, in any form whatsoever, except (i) for the purposes of the execution of the Services and the purposes of the Processing; (ii) in application of a legal or regulatory provision; (iii) to fulfill communication requests from judicial and/or administrative authorities; (iv) to exercise our rights or those of our partners and third parties (v) with your prior consent or upon your request.

VI. How long will your Personal Data be kept?

We keep your Personal Data for the time necessary to fulfill the purposes for which it was collected. We also keep your Personal Data for the period of time defined by the law, especially in civil and commercial matters.

For example, the Personal Data required for commercial prospecting, in particular name, first name, postal address, e-mail address and telephone number are kept for a period of three years after the end of the commercial relationship. If you are a prospect, your Personal Data is kept for a maximum of three years from the date of collection or the last active contact with You.

Likewise, as an example, if You are a candidate for a recruitment, if your application is rejected and if You do not request the destruction of your application, your Personal Data are kept for a maximum of two years after the last contact. Only your express consent allows a longer retention.

VII. What are your rights regarding your Personal Data?

In accordance with Regulations, You have the following rights:

- Right of access to your Personal Data;
- Right to rectify your Personal Data if they are inaccurate ;
- Right to erasure of your Personal Data in certain cases;
- Right to restriction of the Processing of Your Personal Data and the right to the portability of your Personal Data, within the limits established by the applicable regulations;
- Right to withdraw Your consent at any time when the Processing is based on it
- Right to object to the processing of your Personal Data;
- Right to determine directives (post-mortem instructions) regarding your Personal Data after your death. Without such instructions, your heirs may exercise their right to your Personal Data.

You also have the right to exercise a complaint to the [supervisory authority](#) under the conditions of Article 77 of the GDPR.

VIII. Cookies

A "cookie" or "tracker" (hereinafter the "Cookie(s)") is a file with a limited size, generally composed of letters and numbers, created and stored in the memory of your browser, on the hard disk of your device (tablet, computer, mobile, etc.), when you visit a website or a mobile application. Cookies have an essential role and allow us to improve and personalize your navigation on our website and our application (hereinafter our "Services").

Cookies have multiple uses: they can be used to memorize your customer ID within a merchant website, the current content of your shopping cart, an ID that allows Us to track your navigation for statistical or advertising purposes or to allow authentication on your account, etc

For more details, please consult our [cookies policy](#) available on our website.

IX. How to contact us ?

To exercise your rights, or contact us, You can contact Us at the following e-mail address : dpo@nocrm.io, or at the following address :

Positive Group Sales Solutions SAS
Legal department
3 Avenue Antoine Pinay,
Parc d'activité des 4 vents
59510 Hem

X. How can this Policy be amended?

We may change this Policy from time to time, in order to comply with legal, regulatory, case law, or technical developments.

We recommend that you check this policy regularly for any changes or updates made to it.