

PERSONAL DATA PROTECTION POLICY

Solem, a simplified joint-stock company registered under number 329 605 760, with its registered office located at ZAE La Plaine, 5 rue Georges Besse, 34830 CLAPIERS, undertakes, within the framework of its activities and in accordance with the legislation in force in France and Europe, to ensure the protection, confidentiality, and security of the personal data of its clients and users of its services, as well as to respect their privacy.

This privacy policy is intended to present how we collect, use, store, and share your personal data, in accordance with applicable laws and regulations, and to inform you of the rights you can exercise regarding your data.

You are currently viewing the most recent version of our privacy policy. This may evolve over time.

Why does Solem process your data?

Under regulations on the protection of personal data, we act as a data controller when we collect and process your personal data for purposes that we determine, using means that we define.

We therefore undertake to comply with the obligations imposed by these regulations as a data controller, and among these rules, to respect the obligation to inform the natural persons concerned by the processing we carry out.

In accordance with regulations, Solem processes personal data only for specified, explicit, and legitimate purposes. Solem does not process such data in a manner incompatible with these purposes.

Depending on the case, Solem processes your personal data, either directly collected from you or resulting from the use of its products or services.

We process your personal data to allow you to use our services, but not only that. Indeed, we may also be required to process your personal data to send you communications about our product and service offers, to comply with our legal obligations, or to respond to legitimate interests that we pursue, without this list being exhaustive.

What personal data processing do we carry out?

To clearly present our processing activities, we have listed below the personal data we process, the purposes for which we do so, the legal bases that allow us to do so, and the data retention periods we apply.

Our legal basis for processing and our processing purposes	Categories of personal data processed	Retention period of your data
In the context of the execution of our contract for the sale of products or services and the use of the latter: • Management, processing, and tracking of orders; • Account creation; • Installation, monitoring of connected equipment, and data exploitation; • Performance or proposal of services by professionals, with your consent; • Notifications necessary for the functioning of the proposed services (e.g., receipt of alerts, supervision of equipment); • Geolocation necessary for the functioning of the proposed services (e.g., use of WIFI functions); • Online payment; • Use of our technical support.	• Identification data: surname, first name, role... • Contact data: postal address, email, phone number... • Economic and financial data: payment methods, payment history... • Connection, service usage, and interaction data; • Information on products and services held or used and associated content; • Location data of installed products.	Your data is retained for the entire duration of the use of our products and services. Data logs are archived for 52 weeks after data deletion.
With your consent, we may be required to share data and alerts with one or more professional(s) so that they can monitor installations, perform or propose their services to you (e.g., garden maintenance contract).	• Identification data: surname, first name, role... • Contact data: postal address, email, phone number...	Your data is retained for the entire duration of the use of our products and services. Data logs are archived for 52

Our legal basis for processing and our processing purposes	Categories of personal data processed	Retention period of your data
Professionals with full access can make modifications to your account (e.g., adding a module, modifying alert-related parameters...), whereas professionals with restricted access only have the right to consult your data and cannot modify anything.	• Economic and financial data: payment methods, payment history... • Connection, service usage, and interaction data; • Information on products and services held or used and associated content; • Location data of installed products.	weeks after data deletion.
To respond to our legitimate interests if we already have a customer relationship, for the purpose of commercial prospecting operations.	• Identification data: surname, first name, role... • Contact data: postal address, email, phone number... • Economic and financial data: payment methods, payment history...	We retain your personal data for up to three years after your last interaction with us.

Our legal basis for processing and our processing purposes	Categories of personal data processed	Retention period of your data
Thanks to your consent or to respond to our legitimate interests if we already have a customer relationship with you, we may send you our newsletters.	• Identification data: surname, first name; • Contact data: email address.	For our clients: We retain your personal data for the entire duration of the use of our services, and up to three years after your last interaction with us, or until you unsubscribe from our services. For individuals who voluntarily subscribe to our newsletter: We retain this data until you unsubscribe from our newsletter, or up to three years after your last interaction with us.

To respond to our legitimate interests, we may install and use cookies or trackers, or audience measurement and tracking tools, notably if they are necessary for the provision of our services. For example, on our platform https://www.mysolem.com/, the cookies used serve solely to maintain the user session after authentication. These are exclusively functional cookies, which can however be refused by configuring your browser settings.	• IP Address; • Type of device used by the user; • Interaction data (clicks, page views); • Connection data.	We retain your personal data between 6 to 13 months following the collection of information.
Our legal basis for processing and our processing purposes	Categories of personal data processed	Retention period of your data
We may also justify this processing purpose based on your consent, depending on the nature of the cookies and tools used, notably if they are not necessary for the provision of our services. For example, on our website https://solem-irrigation.com/, we request your permission before placing the different types of cookies.		
To comply with our legal obligations and protect our legitimate interests, so that we can ensure our defense in the event of a dispute, we may store and use our exchanges and retain traces of the use of our products and services.	• Identification data; • Data on the use of our products and services;	We retain your personal data by applying the legal statute of limitations for legal actions, which is five years in principle.

	• Content of exchanges and complaints; • Content of concluded contracts.	For the retention of our accounting documents, we may be required to apply a retention period of 10 years.
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Who are the recipients of your data?

The personal data we collect is intended for the following categories of recipients:

- Solem's online services, to ensure the functioning of connected platforms and applications;
- Solem's internal services, notably technical teams and customer support, within the limit of their respective missions;
- Third-party professionals who, at your request, have access to your MySolem account data via the Platform, in order to monitor your installations, perform or propose services to you (e.g., monitoring and maintenance of your green space).

Is your data transferred abroad?

The location of the hosting of your personal data depends on the location of use of the products you declare in the MySolem application or platform.

Use in Europe

If you declare using the products in the "Europe" geographical zone, your personal data is hosted in France, by a host certified ISO 27001 (international information security standard) in accordance with European Union regulations on personal data processing, including Regulation EU No. 2016/679 (GDPR). In this context, we do not carry out transfers of personal data outside the European Union.

Use outside Europe

If you declare a location of use other than the "Europe" geographical zone, your personal data may be subject to transfer to third countries. These transfers are framed by appropriate guarantees to ensure the security and confidentiality of your data, in accordance with applicable regulations.

What are your rights?

Users of our services have rights regarding their personal data. You can indeed contact us to exercise the following rights on your personal data:

- The right to request access to your personal data (right of access);
- The right to modify your personal data at any time (right to rectification);
- The right to obtain the erasure of your personal data without undue delay (unless regulations oblige us to retain certain information despite a deletion request) (right to erasure);
- The right to withdraw your consent if it was given to us, and to no longer provide us with certain information (revocation of consent);
- The right to object to the processing of your personal data (right to restriction of processing);
- The right to receive your personal data in a structured, commonly used, and machine-readable format, if this is possible and reasonable (right to data portability);
- The right to lodge a complaint with a supervisory authority.

We inform you that these various actions could have consequences on the proper functioning of our services.

How to exercise your rights?

You can exercise your rights at any time by contacting the Data Protection Officer: dpo@solem.fr

We will respond to you as soon as possible and no later than within one month. This period may nevertheless be extended by two additional months if necessary, depending on the complexity and number of requests we receive.

If you have a complaint regarding the way we process your personal data, you can also contact the National Commission on Informatics and Liberty (CNIL), 3, place de Fontenoy - UNESCO, 75007 PARIS (FRANCE), +33 1 53 73 22 22, whose website is www.cnil.fr.

How is your data secured?

Solem ensures that your data is processed securely and confidentially, including when certain operations are carried out by partners.

To this end, Solem has implemented appropriate organizational measures to preserve the confidentiality and privacy of the persons concerned.

These measures are adapted according to the sensitivity level of the processed data and the risk level presented by the processing or its implementation. These measures help prevent the loss, misuse, modification, and deletion of the concerned personal data.

Solem guarantees the security of data and servers, accessibility, as well as evolutionary and corrective maintenance for associated services. Solem ensures the integrity of partitioned backups.

Client requests or inquiries are made directly to the address dpo@solem.fr.