

# PRIVACY POLICY

## CYGOGN

The CYGOGN company (hereinafter referred to as "CYGOGN") offers a solution (the "Solution") enabling:

- The creation of a self-supporting universal email address, capable of pre-qualifying incoming emails and automatically routing them to the competent recipients.
- The analysis and forwarding of emails received in generic mailboxes to the competent recipients.

In the context of using the Solution, users (hereinafter referred to as "Users") are required to communicate emails, pieces, confidential documents, and personal data concerning them.

CYGOGN places the utmost importance on the confidentiality and security of these personal data. This privacy policy (hereinafter the "Privacy Policy") was established in compliance with current laws, regulations, and standards and explains which personal data are concerned, how they are collected, processed, disseminated, and stored, and for what purposes.

Furthermore, these provisions aim to inform Users about the processing of their personal data and to remind them of CYGOGN's commitments to confidentiality and security.

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## 1 – DEFINITIONS

<b>CYGOGN</b>	Refers to CYGOGN company, as a French SAS ("société par actions simplifiée"), with a capital of 298,840 €, registered in the Lyon-France Trade and Companies Register under number 902237494, represented by Olivier Berger hello@cygogn.com – +33 4 65 84 69 02. CYGOGN is the publisher of the Solution and provides the Service.
<b>Recipient</b>	Refers to any legal entity that has subscribed to CYGOGN's offer and benefits from a self-supporting universal email address, the configuration of their incoming email flow, and access to the Service according to the subscribed rights.
<b>Solution</b>	Refers to the artificial intelligence software solution that allows for the automation of the email routing system via a universal email address through artificial intelligence.
<b>Service</b>	Refers to the entirety of services and performances provided by CYGOGN. The Service allows a User, depending on their role as: <ul style="list-style-type: none"><li>- A recipient, to subscribe to an offer to obtain a self-supporting universal email address and benefit from an automated email reception flow.</li><li>- A sender, to send emails without needing to identify a specific contact to target the designated recipient.</li></ul>
<b>E-mail</b>	Refers to an electronic mail, that is, a written message sent electronically through a computer network. An email is sent from one electronic mailbox to another. It may include an attachment, that is, Content.
<b>Content</b>	Refers to any document, file, image, in any format that can be transmitted as an attachment or within the body of an email.
<b>Sender</b>	Refers to the person who sends an email to a recipient via a CYGOGN address.
<b>Generic mailbox</b>	Refers to any generic email mailbox (e.g., contact@mycompany.com) that the company subscribing to the Cygogn offer wishes to have sorted by the Solution.
<b>User</b>	Refers to any person who uses the CYGOGN Service. <ul style="list-style-type: none"><li>- They can be an Administrator User when subscribing to the Service on behalf of a recipient or sender organization.</li><li>- They can be a Sender User when they send an email to a CYGOGN email address.</li><li>- They can be a Recipient User when they receive an email via the CYGOGN routing Solution.</li></ul>
<b>Site</b>	Refers to the website published by CYGOGN, available at <a href="http://www.cygogn.com">www.cygogn.com</a>

## 2 – COLLECTED DATA AND PURPOSES OF PROCESSING

CYGOGN ensures the collection and processing of data are strictly necessary for the purpose of providing the Service, in accordance with the rules and instructions given by the Users.

## 2.1. Personal data processed when CYGOGN acts as a data controller or data processor

The processing carried out by CYGOGN, whether as a data controller or a processor, serves a clear, legitimate, and defined purpose. Data is primarily processed for the following purposes:

Category of Information Collected	Collected Information	Purposes	Legal Basis	Retention Period
Data related to emails exchanged through or filtered by CYGOGN.	Emails (subject, message, attachments, sender, recipients, and email metadata)	<ul style="list-style-type: none"> <li>- Resolving CYGOGN accounts for recipient organizations</li> <li>- Inviting non-registered recipient organizations to subscribe</li> <li>- Anonymizing personal data contained in emails</li> <li>- Language detection</li> <li>- Detecting email types through artificial intelligence or human intervention (based on anonymized emails)</li> <li>- Selecting final recipients according to distribution rules of recipient organizations subscribed to CYGOGN</li> <li>- Distributing to final recipients</li> <li>- Returning to senders in case of incorrect CYGOGN address, or refusal to subscribe to the solution</li> <li>- Improving artificial intelligence</li> </ul>	Contract	For traceability reasons, emails are retained for a maximum duration of 12 months from their date of handling. Moreover, emails are kept for no longer than 12 months following the end of the commercial relationship.
Data related to the deliverability of emails.	<i>Email opening detection data, user feedback on email deliverability (receipt acknowledgment, correct final recipient email address in case of distribution error)</i>	<ul style="list-style-type: none"> <li>- <i>Monitoring the email's deliverability by the Sender</i></li> <li>- <i>Redistribution of the email in case of negative feedback indicating that the user who received the email is not the correct recipient or the detected type of email is incorrect</i></li> </ul>	Contract	12 months from the end of the commercial relationship
Data related to recipient organizations.	Distribution rules of organizations (distribution conditions and email addresses of final recipients)	- <i>Email distribution to final recipients</i>	Contract	6 months from the end of the commercial relationship

Data related to user accounts.	Name, first name, email address, and telephone number of the preferred contact at CYGOGN	- Subscription to the Service - Administrative management of the subscription contract - Management of the recipient's distribution rules	Contract	6 months from the end of the commercial relationship
Web browsing data such as cookies.	<i>Please refer to section 2.3 below</i>	<i>Please refer to section 2.3 below</i>	Consent	No more than 13 months from the initial placement of the cookies.

The personal data collected in this context are in no case transferred to a third party for commercial purposes.

In the event of an impact analysis conducted by the data controller, CYGOGN commits, in its capacity as a processor, to provide all necessary information. Furthermore, CYGOGN commits to informing the recipient within a maximum period of 72 hours from the observation of a security breach that caused a violation of personal data subject to notification to the competent authorities.

## 2.2. Website Navigation Cookies

The website uses several types of cookies for different purposes:

- **Functionality cookies:** Essential for using the site, they enable main site functionalities like maintaining identification throughout navigation, adapting the site's presentation to the user's display preferences, securely managing and accessing the user's personal space, etc. These cookies are necessary for providing services during site navigation and cannot be disabled without impairing the site's functionality.
- **Analytical and audience measurement cookies:** These non-individualized cookies help understand site usage (e.g., most visited pages) and performance to improve site operation. They can be installed by the data controller or their audience measurement partners and are not essential for navigation but help measure the site's performance, identify navigation issues, facilitate searches, analyze viewed content, or optimize site operation.

Category	Cookie Publisher	Purpose
Functional	Cygogn	Management of user sessions, authentication, and personalization of the service
Analytics	Google	Tracking the user's interaction with the site, distinguishing between them, and remembering them over time and during repeated visits.

It is considered that the User of the Site has given their consent to the placement of cookies if the User has continued their navigation by clicking on the "Ok, accept all" button on the banner informing them of the use of Cookies, or on an element of the Site such as an image, a title, a button, etc., or by going to any other page than the one through which they accessed one of the Sites during their first connection. This consent is only valid for a period of thirteen (13) months from the first placement of a cookie. Once this period has passed, consent will be requested again for the use of these cookies.

You can at any time choose to oppose or limit the recording of Cookies by configuring your browser software (Internet Explorer, Google Chrome, Safari, Firefox, etc.) and to the extent that your device is capable of displaying content developed with Flash language, you can access your Flash Cookie management tools.

Your browser can be set to notify you of the Cookies that are placed on your computer and ask you whether to accept them or not. You can accept or refuse Cookies on a case-by-case basis or refuse them systematically.

Be aware, it is possible that this configuration of your browser deprives you of access to certain content or significantly disrupts your browsing and the services you expect from our Site. In such cases, we decline any responsibility for the consequences linked to the degraded behavior of our Site resulting from the impossibility of using the Cookies necessary for its functioning. If your browser is configured to refuse all Cookies, you will not be able to make purchases or enjoy essential functions of our Site, such as storing items in your cart or receiving personalized recommendations.

To manage Cookies as closely as possible to your expectations, we invite you to configure your browser taking into account the purpose of Cookies as mentioned above.

The configuration of each browser is different. It is described in the help menu of your browser, which will allow you to know how to change your Cookie preferences. It tells you how to refuse new Cookies or receive a message that notifies you of their reception, or how to disable Cookies, either systematically or according to their issuer. You can also manually delete Cookies.

For more information on the use, management, and deletion of "cookies" for any type of browser, you should consult the following link: <https://www.cnil.fr/fr/cookies-les-outils-pour-les-maitriser>

### 3 - RECIPIENTS

Data may be collected or transmitted and processed by a third party on behalf of and for CYGOGN within the strict limit of the aforementioned reasons. In this case, CYGOGN ensures that all service providers with whom it works maintain the confidentiality and security of the data. For example, CYGOGN may request services requiring the processing of personal data of its Users from:

Subcontractors: partner structures that carry out part of the service, IT services such as maintenance and technical support for databases as well as for software and applications that may contain data concerning

CYGOGN's Users or prospects, Marketing and/or web agencies that create the website, advertising, marketing, and commercial campaigns for CYGOGN.

Recipients or joint controllers: lawyer, auditor, accountant, etc., competent public authorities upon their request.

## 4 – RETENTION PERIOD

Personal data is retained only for the duration necessary to achieve the purposes mentioned above or to enable CYGOGN to meet its legal obligations. Once data is no longer useful, it is deleted or anonymized.

## 5 – TRANSFER OF PERSONAL DATA ABROAD

The processed data is hosted by Amazon Web Services and Microsoft Azure on the territory of the European Union. CYGOGN does not transfer data outside of the European Union.

## 6 – USER'S RIGHTS

Under the regulation applicable to personal data, Users have the following rights:

- The right of access and rectification of their personal data. In this case, before implementing this right, CYGOGN may request proof of the User's identity to verify its accuracy.
- The right for the User to withdraw their consent at any time to the processing of their personal data, for processes carried out on this basis.
- The right to request the deletion of personal data. However, data necessary for compliance with a legal obligation imposed on the Data Controller cannot be deleted. Moreover, data necessary for the execution of the contract will be deleted after a notice period of thirty (30) days, and the request for data deletion will lead to CYGOGN's inability to fulfill the execution of the Contract.
- The right to object to the processing of their personal data, for a legitimate reason. The User is aware that exercising this right of objection may lead to CYGOGN's inability to perform all or part of the Service when this right is exercised on data necessary for its execution.
- The right to restrict processing, allowing the User to temporarily freeze the use of some of their personal data by CYGOGN.
- The right to data portability. In accordance with Article 20 of the European Regulation No. 2016/679, known as "GDPR," the data subject has the right to receive the personal data concerning them, which they have provided to CYGOGN, in a structured, commonly used, and machine-readable format, and has the right to transmit those data to another data controller without hindrance from CYGOGN to which the personal data have been provided.
- Finally, the User can define the fate of their data after their death and choose whether (or not) CYGOGN communicates these data to a third party they have previously designated. In case of death and in the absence of instructions from them, CYGOGN commits to destroying these data, unless their retention is necessary for evidential purposes or to meet a legal obligation.

GDPR-related rights can be exercised by mail or email with the Data Protection Officer or their representative:

CYGOGN

20, boulevard Eugène Deruelle, 69003, France.

Email: fr.90223749400015@cygogn.com

If you believe, after contacting CYGOGN, that your "Computing and Liberties" rights are not respected, you can file a complaint with the CNIL services.

## 7 – SECURITY AND PRIVACY

CYGOGN implements organizational, technical, and software measures regarding physical and computer security to protect personal data against alteration, destruction, and unauthorized access.

CYGOGN uses the collected data with the goal of offering an efficient Service and Solution. In particular, the data is used to:

- Provide the Service, which includes updating, securing, troubleshooting, as well as offering support; this also includes sharing data, when it is necessary for the provision of the Service or to carry out desired email exchanges;
- Improve and develop the Solution and Service;
- Analyze the performance of the Solution, comply with legal obligations, and develop and improve artificial intelligence.

The processing of personal data for these purposes includes both automated and manual (human) processing methods.

In the event of a manual review required for emails (support, analysis, improvement of processes), it is entrusted to authorized and trained CYGOGN personnel, who are bound by confidentiality. In all cases, respect for confidentiality and data protection is required of all collaborators, providers, and subcontractors of CYGOGN. The entire system and data are hosted on Amazon Web Services and Microsoft Azure clouds. The data is fully encrypted. Only authorized CYGOGN teams bound by confidentiality can have access to the encryption keys.

## 8 –CYGOGN ACCOUNT

When a User wishes to take advantage of the Service and organize the routing of their Emails or sort their generic mailboxes, they subscribe to the CYGOGN offer and provide their instructions for routing and the list of email addresses of the concerned individuals.

In doing so, they act as the Recipient.

The User is responsible for the processing of data transmitted in this context and ensures to inform the concerned individuals and to keep the routing instructions up to date, so that CYGOGN's Service remains effective and functional.

## 9 – CHANGES TO THE PRIVACY POLICY

CYGOGN reserves the right to make any modifications or updates to this Policy at any time and without notice.