

# **APHESA DATA POLICY**

APHESA takes your privacy seriously and will only use your personal information to administer your account and to provide the products and services you have requested from us.

However, from time to time, we may send you targeted commercial information.

This document describes our data use and data protection policy in details.

## **1. Data acquired from the website**

### **1.1. Aphesa website**

The Aphesa website uses Google Analytics to collect anonymous user information like for example your location, time spent on site, visited pages, browser used, screen resolution and operating system used. Google acts as a data processor and we rely on Google's GDPR policies. This information is mostly used to build statistics and all tracking is made based on your IP address. Aphesa does not retain any of this information.

Aphesa's servers use logs for monitoring and debug purposes. These logs records the actions of the web server and may store your IP address. The logs are rotated every 7 days and old logs are deleted. Logs are not backed up.

### **1.2. Contact form on the website**

The website provides a contact form where you need to provide some information like your e-mail address. The form will send us an e-mail that will include all the data and the message that you have provided and also your IP address. A copy of the e-mail can also be sent to your e-mail address. The data is not stored on the web servers and only serves the purpose of sending the contact e-mail. See below for our data protection policy regarding e-mails.

The form has an optional opt-in check box for our newsletter. If ticked, your e-mail address will be added to the distribution list of our newsletter. See below the data protection policy regarding the newsletter.

### **1.3. Newsletter**

The Aphesa newsletter is sent from the website and the database only contains the e-mail addresses. The newsletter is sent several times per year on an irregular basis.

If you chose to unsubscribe either by using the link provided on the website or the link provided in the newsletter, then your e-mail address is immediately removed from the list and there will be no trace left behind, except in temporary backups of the database. See below for the policy regarding backups. If you chose to unsubscribe by sending us an e-mail, then it is a manual process that will be made at the latest before the next newsletter, the result of the deletion is the same as if you had used one of the links provided.

In May 2018, Aphesa has sent an automated e-mail to request all subscribers of the newsletter to resubscribe in order to confirm again their choice to opt-in. On May 25<sup>th</sup>, all e-mail addresses that

have not confirmed their participation again will be deleted and there will be no trace left except for backup purposes. See below for the policy regarding backups.

#### **1.4. Online payments**

Online payments use the Paypal system and therefore Paypal is a data processor and we rely on Paypal's GDPR compliance. The whole process is on Paypal's side and Aphesa does not collect any information besides the production of the shopping cart. No information remains on Aphesa's servers after the transaction is completed.

#### **1.5. Software licenses**

Aphesa's licensing mechanism is based on an e-mail address. The e-mail addresses are kept in a database to allow for the proper operation of the licensed software. This database is backed up, see below for the policy about backups of the web servers.

Any licensee can request for its e-mail address to be removed from our licensing database. However, this will also terminate the license agreement and the user won't be allowed to receive any refund or compensation for the loss of the license privileges.

The licensing mechanism may send e-mails to validate licenses at the first use and during the purchasing process.

#### **1.6. Backups of the web servers**

The web servers are automatically backed up for the sole purpose of data recovery in case of system failures. The newsletter database is backed up. The data is conserved on the web servers and support servers as several copies for the time required to serve its purpose. The backup data is also replicated on servers located within the company for a longer period of time also for the time required to serve its purpose. Ultimately, all data disappears when the backup files are rotated to their last iteration.

#### **1.7. Web sessions**

The website uses sessions to store data and maximize your experience. The session data is dynamic and is not stored, it disappears shortly after you have left the website.

#### **1.8. Cookies**

Aphesa does not make use of cookies, except for the cookies generated by google analytics. GA features such as remarketing, user-ID and advertising reporting are disabled. The IP adress that is used to get a rough idea of the location is anonymized. The user and data event retention is set to 50 months and therefore all collected data is automatically deleted. The cookie itself has a lifetime of two years. Therefore it is not required to request user consent for the use of the cookie.

## **2. E-mails**

All e-mail received or sent by Aphesa are kept forever on computer (mailboxes) and in backup files. E-mails can be deleted on simple request and subsequently the backup data will be deleted after all the rotation of the backup files.

The e-mails are temporarily stored on servers until they have been retrieved by the users in their mailboxes.

See below for the special policy regarding resumes.

## **3. Resumes**

Resumes (CVs) are only kept in the original e-mail received and therefore follow the general policy regarding e-mails. However, resumes and applications received before May 21<sup>st</sup> 2018 have been deleted. No data has been shared with the external employee management company for individuals who have not been hired.

## **4. Data protection**

Aphesa uses standard protection measures against data breaches and limits the data remaining on external servers to the minimum required for their purpose. Backup servers and commercial data servers are located behind a second layer or protection mechanisms and are not exposed to the outside web.

## **5. Use of data**

Your data is exclusively used for the purpose of conducting Aphesa's business and will never be sold or given to third parties.

## **6. Data Protection Officer**

The data protection officer is the managing director.

## **7. Personal data of employees**

Personal data of employees is collected for the sole purpose of the management of their employment. Such data includes personal address, phone number, birth date, bank account, passport or ID number and other similar information. This data is shared with the external company for employee management and Aphesa relies on their GDPR policy. Details are provided in the employment contracts.

As the use of computers and Aphesa e-mails for personal data is not allowed, Aphesa assumes that the computers and their backups do not contain any personal information. Any personal information located on the computers is under the responsibility of the employee.

## **8. Children**

Our services and products are not intended to be used by children, therefore we do not knowingly collect any information from children under the age of 18. As we do not request the birth date or age of a user, we do not have any means to know if the data belongs to a child. If you think that children data has been acquired, please contact us so that the data can be deleted.

**DOCUMENT REVISION**  
Version 1.0 – May 10<sup>th</sup> 2018