

## Lucca Privacy Policy

This privacy policy provides you with information on how Lucca, as data controller, processes your personal data (hereinafter referred to as “Personal Data”) for purposes of commercial prospecting or communication (which data, for how long, etc.) and the rights that you have over this data.

This privacy policy applies to any person who submits their data via the contact forms on Lucca’s website.

This privacy policy does not apply to the following:

- Processing of cookies. You can find our cookie policy by clicking [here](#)
- Processing relating to people who have filed a report on our internal whistleblowing channel. The privacy policy for this case can be found [here](#)
- Applicants for a job offer or internship with Lucca, for whom the specific privacy policy can be found [here](#)
- Data of employees who use our solutions through their employer:
  - If you are an employee, your request must be submitted directly to your employer
  - If you are a client, you can submit your request to our client help desk (unless you have signed a contract with a Lucca distributor, in which case you should contact the distributor directly).

We process your Personal Data in compliance with the applicable regulations and particularly in line with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

### 1. Personal data processed

Lucca is required to collect and process the following categories of Personal Data:

- Identification data: identity, email address (particularly professional email address), telephone number;
- Data relating to the person’s professional life: job title, employer’s name.
- Any other data that you may be required to send us.



This data is either collected directly from you or sent to us by third parties, and the latter guarantee for us that they have obtained it and sent it to us legally for processing.

## **2. Purposes of the processing**

This data is processed by Lucca for the following purposes, as applicable:

- For purposes of developing our client and partner portfolio;
- For the review and implementation of your suggestions;
- For providing or sharing information on our solutions and services, namely through demonstrations, news updates, etc.;
- In any case, for purposes of commercial prospecting or communicating in relation to our solutions and services.

## **3. Legal basis**

Your Personal Data is processed on the basis of our legitimate interests, which primarily include promoting our solutions and services to our clients, prospects, and partners, or responding to your requests.

## **4. Recipients of the data and transfers**

Only people duly authorized by Lucca may access your data, without prejudice to the possibility of it being sent to regulatory or supervisory organizations in compliance with the applicable regulations.

Any person with access to your Personal Data will be subject to a strict duty of confidentiality. These people include our employees and data processors. Our service providers may also be required to process the Personal Data strictly necessary for the performance of the services that we entrust to them (IT maintenance and hosting, communications, electronic and postal distribution, logistics, etc.).

In certain cases and for certain processing operations, we may use processors based outside of the European Union. In such cases, Lucca is committed to making sure that appropriate measures have been put in place in order to ensure that your Personal Data is covered by an appropriate level of protection (namely through the signature of the European Commission's standard contractual clauses).

## 5. Data retention

Personal Data is retained for a period of up to three (3) years from your last contact with Lucca.

Beyond this period, the data will be permanently deleted or will be subject to anonymization operations ensuring that the data subject is no longer identifiable.

If you are a client or partner of Lucca or should you become one, your Personal Data will be retained for the term set in our contractual agreements.

## 6. Your rights

You have the following rights over your data:

- **Right to be informed:** the right to obtain clear and precise information on the processing of your personal data
- **Right to object:** the right to object, for legitimate reasons, to the processing of your data, unless this processing is legally required
- **Right of access:** the right to request access to your data
- **Right to rectification:** the right to request that your data be rectified, supplemented, or updated
- **Right to data portability:** the right to request that your data be sent to you in a structured and machine-readable (computer) format and to send it to a third party
- **Right to restriction of processing:** the right to request a temporary pause on the use of some of your data
- **Right to erasure:** the right to request the deletion of your personal data
- **Right not to be subject to a decision based solely on automated processing,** including profiling
- **Right to decide on what happens to your data after your death:** the right to set directives for your data after your death
- **Right to file a complaint with a supervisory authority:** should you believe that your rights are not being respected, you can file a complaint with a supervisory authority. A list of supervisory authorities is available on the European Commission's website. For France, the CNIL (French Data Protection Authority) is the competent supervisory authority (<https://www.cnil.fr/fr>)



## **7. Contact the Data Protection Officer (DPO)**

If you have any questions or complaints, please contact our Data Protection Officer (DPO):

- By emailing [dpo@lucasoftware.com](mailto:dpo@lucasoftware.com)
- By writing to: Lucca, FAO DPO, 151-157 avenue de France, 75013 Paris - France

If there are any doubts, Lucca may request that you provide evidence of your identity by any reasonable means.

For purposes of traceability and proof of erasure of your data, we will retain your erasure request, the effective date of erasure, and the date on which Lucca's response was sent for five (5) years from the effective erasure of the data.

## **8. Amendments to the Privacy Policy**

On occasion, we may be required to amend this policy, namely in order to make sure that we comply with any regulatory, legislative, censorship, or technical developments. If applicable, we will change the date of the "last update" and will indicate the date on which the amendments were made. Whenever necessary, we will inform you of such changes and/or seek your agreement. We recommend regularly referring to this policy in order to learn about any amendments or updates.

**Last updated: 19/08/2024**