

PRIVACY POLICY
VERSION 1.1 – 07/18/2021

TRANSFERNOW

TransferNow (hereinafter the "**Platform**") is an online platform, operated by an online platform, accessible at the address www.transfernow.net (the "**Website**") operated by Highsense, a simplified joint stock company with capital of 2,500 euros, whose registered office is located at 9, rue des Victoires in Boulogne-Billancourt (92100), registered at the Nanterre Trade and Companies Register under the number 833 205 669 and with the intra-community VAT number FR60833205669 (the "**Company**").

Users of the Platform (the "**User(s)**") have the ability to access various file transfer services (the "**Service(s)**").

Becoming a User of the Platform involves information collection. In this context, the protection of your data is an absolute priority for the Company. Thus, in order to preserve your trust, the Company has adopted this Privacy Policy.

All of this information is processed in accordance with the present Privacy Policy and is subject to our General Conditions of Use.

1. The collected information

In order to allow Users to fully benefit from the Services and features of the Platform, the Company collects various information.

It is recalled that by using the Website, you expressly agree that this information will be collected, regardless of the country from which you are connecting. In addition, the fact that you communicate data to the Company is an entirely voluntary process on your part. You have the possibility to object to it at any time, in accordance with the General Conditions of Use of the Platform and this Privacy Policy, by modifying your settings, knowing that the withdrawal of your consent does not operate retroactively.

This information is collected at different times and by various methods:

Use of the Platform

When you use the Platform, the Company's servers automatically record the information created and exchanged using our Services. For example, the Company is aware of all of your session information (which page you visited on the Platform, what data was entered, etc.).

In addition, in the context of your use of the Services, the Company acts as a processor of the personal data that may be contained in the files processed in accordance with the provisions of the General Conditions of Use.

Creation of a member account - File Transfer

When creating a member account: first name, last name, email address, password, company (optional), VAT number (optional), postal address, zip code, city, country;

When transferring Files: email address, sender name (optional), possible email address of recipients, subject (optional), message (optional);

When adding or removing a collaborator: first name, last name, email address, password;

Log files

The Company receives, when you connect to the Platform, the link of the website from which you arrived and the one to which you go when leaving the Platform.

Cookies

The Company, like the vast majority of websites, uses cookies. Cookies are small data files stored on your computer's hard drive which identify you as a User when you log into the Platform. They allow, amongst other things, to track the connection and use statistics of the Platform (*Google Analytics*). However, you can deactivate the use of cookies by changing your preferences in your internet browser. In this case, certain features of the Platform may no longer function.

2. Retention of the collected information

Once collected, this information is stored on the servers of the Company or of any subcontractor of the Company for processing in connection with the use of the Services. They are retained, unless otherwise provided in the General Conditions of Use, for a period of 36 months.

In order to ensure the best functioning of the services and features of the Platform, it is recommended that Users regularly update the information appearing in their Profile and, accordingly, correct or delete any inaccurate information.

You always remain the owner of the information that you transmit on the Platform concerning you. In this sense, you have, in accordance with Law No. 78-17 of January 6th, 1978 and EU Regulation 2016/679 of April 27th, 2016, a right of access, rectification, limitation of processing and/or erasure of personal data concerning you, as well as the right to object to such processing and the right to portability of personal data. To exercise your rights, please write to the following email address: "privacy(at)transfernow(dot)net" or to the following postal address: Highsense - 9, rue des Victoires - Boulogne-Billancourt (92100).

A response to your request will be sent to you within 30 days.

You retain the right to file a complaint for breach of the protection of your data with the CNIL (French National Commission for Data Protection and Liberties).

3. Use of the collected information

The information collected is used to enable you to use the various Services offered on the Platform. By accessing the Services, you voluntarily and expressly accept the General Conditions of Use of the Platform and this Privacy Policy, which authorise the Company to process your data.

Because the protection of your personal data is essential, the Company undertakes not to sell, rent nor provide in any way whatsoever your personal information as well as the files processed on the Platform, except under the conditions described in this Privacy Policy and in the General Conditions of Use of the Platform. However, in various cases the Company will be likely to disclose or share your personal information to third parties, including:

- with your express or implied consent;
- in order to comply with the law, the regulations in force, any legal proceedings, court decisions or any other case of mandatory disclosure;
- to protect the rights, property or safety of the Platform, its members or the public; or
- as part of the provision of the various Services and features offered by the Platform, but only when this is necessary for the execution of its operations and the provision of these services and features.

4. Your obligations

As a User of the Platform, you are required to comply with, in addition to legal and regulatory obligations, the obligations arising from this Privacy Policy and the General Conditions of Use of the Platform.

The Company also calls for your responsibility, it being understood that Users are solely responsible for information and content, including information concerning race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, union membership or any health-related information they share.

5. Protection of minors

In order to protect minors, the User must have reached the age of 18 and have full legal capacity.

6. Modification of the Privacy Policy

The Company reserves the right to modify, supplement or replace the provisions of this Privacy Policy. In the event of a significant change, the Company undertakes to post, on the Platform, a notification relating to the modification of the Privacy Policy.

7. Contact

For any questions, observations, suggestions or complaints, please contact Highsense by email – [contact\(at\)transfernow\(dot\)net](mailto:contact(at)transfernow(dot)net) - or by post at the following postal address: Highsense, 9 rue des Victoires - Boulogne-Billancourt (92100).

This document is translated from French for informative purposes. In case of a divergence between the information provided on this document and the one provided in the English version, the French version prevails.