



PRIVACY POLICY

As an online trading platform, we consider protection of our users' personal data is crucial.

You will find hereunder THE DEEPCORE's Privacy Policy, i.e. the explanation of our practices and commitments in terms of protection of personal data, in compliance with the [General Data Protection Regulation](#).

As we think clear and transparent information is key, we have included several tables to help you better understand and exercise your rights.

This Privacy Policy was last updated on November 18th 2020.

1. WHO IS THE DATA CONTROLLER OF YOUR DATA?

The trading platform at thedeepcore.com is managed by THE DEEPCORE, a French simplified joint-stock company with VAT number FR29 877900381 and its registered office at 6, rue des Bateliers – 92110 CLICHY (FRANCE) (hereinafter “THE DEEPCORE” or “we”).

THE DEEPCORE collects and processes a various range of personal data for its own purposes, as described below – for instance to allow you to connect to thedeepcore.com and to create your account on the trading platform.

In those cases, THE DEEPCORE is the data controller; this means that we are your contact for any question or concern relating to those various uses of your data. You may contact us in this respect by email at gdpr@thedeepcore.com.

2. WHICH DATA DO WE COLLECT, AND WHY?

a. [Connecting to thedeepcore.com](#)

When you connect to thedeepcore.com, a certain number of data is automatically collected by the hosting service provider of that website/service. This data relates to your device (computer, smartphone, etc) and your web browser. This includes your IP address.

This data is collected to allow your device to connect to the respective web servers, and afterwards to detect bugs and cyberattacks. They are retained for 12 months after the date of the respective http query.

Collection and processing of this data is justified by THE DEEPCORE's legitimate interest in providing functioning, secure and accurate website and services that may work on the various types of existing devices and web browsers, in accordance with Article 6.1.f) GDPR.

b. Session cookie

We use a session cookie to maintain your connection to your account each time you log in to the platform. As per the competent supervisory authorities' doctrine, this purely technical cookie does not require your consent.

The cookie collects a connection identifier which is only retained for the duration of your session. Processing of this data is justified by the execution of the platform's terms and conditions, in accordance with Article 6.1.b) GDPR.

c. Web audience measuring

The website uses web audience measuring cookies. These cookies collect data relating to your browsing, such as visited web pages, consulted contents and duration of your session.

This data is used to generate web audience statistics for the website and to understand the preferences of our audience in order to improve the content and style of our website.

Processing of this data is justified by THE DEEPCORE's legitimate interest in improving its website and its content, in accordance with Article 6.1.f) GDPR.

d. Bug reporting

We use a bug reporting solution that allows use to detect, reproduce and fix bugs you may encounter on the platform. This solution collects bug reports composed of technical information relating to the bug and your account ID (email address associated with the account).

We retain these bug reports for 30 days.

This processing of data is justified by THE DEEPCORE's legitimate interest in providing a well-functioning service, in accordance with Article 6.1.f) GDPR.

e. Creation and management of your account (including support)

To have your account created on thedeepcore.com you must provide us with your name, surname, email address, a valid password and the details of the company you work for.

This information will be used to create and maintain your account on the platform and to process your various bids/offers and requests.

We also collect information linked to your use of the platform such as details of your bids/offers, your role (Super Admin, Manager, Trader, Analyst) and permissions (None, Read, Read/Write), the date and time of your last connection to your account, your current status (online/offline, locked, blocked), your timezone, your preferred settings for email notifications. You may also provide us with your landline and/or mobile phone numbers.

We retain all these data for the duration of your account, as necessary to provide you our services and the related customer support, in accordance with Article 6.1.b) GDPR. We may also retain some of these data afterwards in accordance with section h. below (proof retention).

f. Recruitment

As explained on the “Careers” section of the website, you may contact us to apply to a position at THE DEEPCORE.

Data included in your job application shall be collected and processed by THE DEEPCORE to review your application and answer it as applicable. It will be retained for the duration of the whole recruitment process; we may also retain and process rejected applications afterwards to offer you other positions within THE DEEPCORE, for a maximum duration of 2 years.

Processing of the data during the recruitment process is justified by precontractual measures at your demand as per Article 6.1.b) GDPR; its further 2-year retention and processing is justified by THE DEEPCORE’s legitimate interest in managing its own recruitment needs, in accordance with Article 6.1.f) GDPR.

g. Newsletter and business reports

We may send newsletters and business reports to our clients and leads using their professional email address. You may also subscribe to receive these newsletters and reports directly on our website.

Such B2B emailing is justified by THE DEEPCORE’s legitimate interest in promoting its services, in accordance with Article 6.1.f) GDPR.

We will stop sending you these newsletters and reports as soon as you object to it or if we do not receive any contact from you for 3 consecutive years.

h. Proof retention

We may retain all or part of the data mentioned above as a matter of proof. We will use it, as applicable, to prevent, initiate or reply to any dispute in the context of which it may seem relevant, whether you are a party to this dispute or not.

This retention is justified by THE DEEPCORE’s legitimate interest in protecting and defending its own rights and interests (before a court as applicable), in accordance with Article 6.1.f) GDPR.

We will retain all those data that seem relevant as a proof for the applicable statute of limitations, which in principle is 5 years (French statute of limitations for typical civil claims).

► Summary

Categories of collected data	Purpose (actual or intended use of the data)	Justification for the purpose	Maximum retention period of the data in a form that allows to identify you
Information relating to your device and your web browser (http query)	Allow you to connect to thedeepcore.com and our SaaS	THE DEEPCORE’s legitimate interest (Article 6.1.f) GDPR)	12 months

Categories of collected data	Purpose (actual or intended use of the data)	Justification for the purpose	Maximum retention period of the data in a form that allows to identify you
	services; detect bugs and cyberattacks		
Session cookie identifier	Maintain connection to your account during your session	Execution of our service terms and conditions (Article 6.1.b) GDPR)	Duration of your session
Information relating to your browsing on thedeepcore.com (collected through web audience measuring cookies)	Obtain web audience statistics for the website and better understand your preferences to improve the website and its content	THE DEEPCORE's legitimate interest (Article 6.1.f) GDPR)	Data is anonymized briefly after its collection through the cookies
Bug reports	Detect, reproduce and fix bugs encountered by our users	THE DEEPCORE's legitimate interest (Article 6.1.f) GDPR)	30 days following creation of the bug report
Information provided for creation of your account and information related to your use of the platform	Provide you our services	Execution of our service terms and conditions (Article 6.1.b) GDPR)	Duration of your account
Job applications	Review and answer to your application	Precontractual measures at your demand (Article 6.1.b) GDPR)	Duration of the recruitment process
	Offer you another position within THE DEEPCORE	THE DEEPCORE's legitimate interest (Article 6.1.f) GDPR)	2 years following rejection of your initial application
Your professional email address	Send our newsletters and business reports (B2B emailing)	THE DEEPCORE's legitimate interest (Article 6.1.f) GDPR)	Until you object to receiving our newsletters and business reports / 3 years after last contact received from you
Data that seems relevant as a proof in anticipation of a dispute	Defend THE DEEPCORE's rights and interests (before a court as applicable)	THE DEEPCORE's legitimate interest (Article 6.1.f) GDPR)	Applicable statute of limitations (5 years in principle)

3. WHO CAN ACCESS YOUR DATA? WHOM IS IT SHARED WITH?

a. THE DEEPCORE's teams and employees

THE DEEPCORE's teams and employees may access and use your data within the limits of their missions, for the purposes described above. Those teams and employees are all located in the EU.

b. Hosting service provider for thedeepcore.com and @thedeepcore.com inboxes

Data linked to the thedeepcore.com website and data linked to emails we exchange with you are hosted by professional secured hosting service providers in the EU.

c. Other technical and legal service providers

Certain data may also be accessed or stored by the following persons and organizations, for the purposes of the services they provide to THE DEEPCORE:

- Technical service providers who assist THE DEEPCORE in developing, maintaining and modifying the thedeepcore.com website and its technical infrastructure;
- Technical service providers who provide our emailing solution and the bug reporting solution;
- Our legal counsels.

Some of our technical service providers may be located in non-EU countries. In such cases, we will make sure they do not receive or access personal data relating to our users; should they need to receive or access such data, we will make sure appropriate guarantees in line with GDPR are set up.

d. Authorities, jurisdictions and parties to a dispute

Occasionally, we may be required to share all or part of the data above with authorities and jurisdictions which are competent to require communication of this data, and with the authorities, jurisdictions and parties (and their counsels) to the disputes and proceedings we may intervene in for the defence of our rights and interests.

e. Mergers and acquisitions

In case of a merger or acquisition of our company or any equivalent operation, we may need to transfer your data to the respective buyer or seller. In such a case we will inform you of the identity thereof and the reasons for the transfer.

4. WHAT RIGHTS DO YOU HAVE TO CONTROL THE PROCESSING OF YOUR DATA?

As any person whose data we process as a data controller, you have a certain number of rights determined by applicable laws and regulations.

You will find details for each of those rights below. A summary table is provided at the end of this section.

You may exercise those rights by writing an email to THE DEEPCORE at gdpr@thedeepcore.com. Please make sure you mention clearly the nature of the right you wish to exercise and the reasons which justify your request, as applicable.

a. Right of access

You have the right to request a copy of all personal data we have that relates to you, in a legible, understandable format, and a copy of this Privacy Policy.

b. Right to rectification

You have the right to ask us to rectify, complete or update personal data we have that relates to you, in case it appears inaccurate, incomplete or obsolete.

In such case, please make sure you provide us spontaneously, as possible, with all information necessary to proceed with the requested rectification, completion or update.

c. Right to object

You have a right to object to those processing activities above that are based on THE DEEPCORE's legitimate interests (such as proof retention) on grounds relating to your particular situation.

In other words, you may ask THE DEEPCORE to stop processing your personal for a given purpose that is based on a THE DEEPCORE's legitimate interest, by explaining the particular reasons that justify this objection.

It is possible however that we refuse to comply with your request if the processing of your data is still necessary, according to us, for compelling reasons that override the grounds relating to your particular situation (e.g. use of said data as proof in an actual dispute).

If it is grounded and no compelling reason goes against it, your objection will result in us ceasing the respective processing activities, but not necessarily deleting the data; to obtain deletion of your data, you must exercise your right to erasure (see below), which also comes with a series of conditions and limitations.

d. Right to erasure

You may ask us to delete all or part of the data we have that relates to you, where one at least of the conditions below is met:

- You objected to the processing of your data as explained above, and you wish that THE DEEPCORE delete the respective data.

- It is not necessary anymore for THE DEEPCORE to retain the respective data for the purposes described in this Privacy Policy.
- You consider that THE DEEPCORE collected and/or processed the data in an unlawful manner.
- Deletion of the data is imposed as a legal obligation.
- The respective data was collected when you were less than 15 years old.

Please be aware that THE DEEPCORE may refuse to delete certain data where it is required to retain it for important reasons such as defending THE DEEPCORE's interests before a court.

Also, please note that we may choose to anonymize the data instead of deleting it. In this case, we will be able to retain the data in a format that does not allow to identify you anymore (for instance for statistical purposes).

e. Right to limitation of processing

You may ask us to limit the processing of your data, i.e. to retain it without using it (except for legal obligations). You may especially ask this instead of asking for deletion of the same data.

You may exercise this right where one at least of the following conditions is met:

- The respective data appears inaccurate and you prefer that we stop using it for the time necessary to verify and rectify it as applicable.
- You objected to the processing of your data as explained above, and you wish that we stop using it for the time necessary to verify the grounds for that objection.
- You consider that THE DEEPCORE collected and/or processed your data in an unlawful manner, but still you prefer that we retain that data instead of deleting it.
- It is not necessary anymore for THE DEEPCORE to retain the respective data for the purposes described in this Privacy Policy, but still you wish that we retain that data for you to be able to use it before a court.

In such a case, we will stop using the respective data and will retain it for the appropriate duration.

f. Right to data portability

You may ask us to give you a machine-readable copy of personal data linked to your account and your use of the platform on thedeepcore.com, so that you may reuse that data yourself or with another service provider.

This right to data portability is not the same as the right of access above, as it is about obtaining not a legible copy of the data, but a machine-readable copy that may be reused by you or another service provider.

g. Right to provide directives regarding your personal data after your death

You may provide us with directives as to how you want THE DEEPCORE to proceed with your data after your death.

For instance, you may ask that we delete all of your personal data (except as needed for THE DEEPCORE to defend its rights before a court) or to transfer it to a recipient of your choice.

You may also designate any person of your choice to control our respect of those “last wishes”. That person does not need to be your heir or your testamentary executor.

► **Summary**

Your rights	What they allow you to obtain	Which data/ processing they are applicable to	Conditions, exceptions or limitations
Right of access	A legible and understandable copy of all personal data we have that relates to you, and a copy of this Privacy Policy	All personal data	None
Right to rectification	Rectification, update or completion of the personal data we have that relates to you	All personal data	Clearly identify data which needs rectification, update or completion and provide the appropriate additional/new data
Right to object	To stop the processing of your personal data	Processing based on THE DEEPCORE's legitimate interests (see above)	Clearly state the grounds relating to your particular situation which justify the objection
Right to erasure	Erasure or complete anonymization of your personal data	All personal data	See conditions above (d)
Right to limitation of processing	Retention of your personal data by THE DEEPCORE without using it	All personal data	See conditions above (e)
Right to data portability	A reusable, machine-readable copy of your personal data	Data linked to your account and your use of the platform	As applicable, clearly state the identity and contact details of the person or organization to which you wish your data be transferred
Right to provide directives regarding your personal data after your death	Respect of your “last wishes” regarding the retention, use, transfer or deletion of your personal data	All personal data	Clearly state the identity and contact details of the persons who will control the respect of your directives after your death

You consider that we did not provide a satisfactory answer to your request or that we process your personal data in an unlawful manner?

We invite you to first contact us so that we discuss the issue together and try to find a way to solve it efficiently.

If you wish, you have the right to lodge a complaint with the competent data protection supervisory authority, such as the French *Commission Nationale de l'Informatique et des Libertés* (CNIL), through its website cnil.fr or by postal mail at CNIL – 3, place de Fontenoy – TSA 80715 – 75334 PARIS CEDEX 07 (FRANCE).

This right to lodge a complaint may be exercised at any time and free of charge, except for (as applicable) postal fees and legal counsel fees (if you choose to get assistance from a legal counsel).