



Last updated: March 2025

Definitions

"Personal Data" : Any information relating to an identified or identifiable natural person as defined by Regulation (EU) 2016/679 of April 27, 2016, and any subsequent equivalent regulation.

"Purposes of Processing": The objective pursued through the use of Personal Data.

"Applicable Data Protection Laws" or "Applicable Laws": Refers to Law No. 78-17 of January 6, 1978, on information technology, files, and freedoms as amended by Law No. 2004-801 of August 6, 2004, the Digital Republic Law No. 2016-1321 of October 8, 2016, as well as the General Data Protection Regulation (EU) 2016/679 and Law No. 2018-493 of June 20, 2018, on the protection of personal data, along with any subsequent equivalent regulation.

"Third Countries": Any country outside the European Union that does not have an adequate level of personal data protection as determined by the European Commission.

"Data Controller" or "SWIKLY": SWIKLY – a company registered with the Lyon Trade and Companies Register under number 819 514 076, with offices located at 92 cours Lafayette, 69003 Lyon, France.

"Processing": Any operation or set of operations performed on Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, transmission, dissemination, extraction, consultation, as defined by Regulation (EU) 2016/679 of April 27, 2016, and any subsequent equivalent regulation.

"Website": Refers to SWIKLY's website available at: <https://www.swikly.com>.

"Data Processor": Any third party processing Personal Data on behalf of the Data Controller.

"User" or "You": Refers to the natural person whose Personal Data is collected and processed under this Policy.

The purpose of this Privacy Policy (hereinafter the "Policy") is to inform You about SWIKLY's practices regarding the collection, use, and storage of Your Personal Data when You browse the Website.

Personal Data is processed lawfully, fairly, and transparently. The collected Personal Data is adequate, relevant, and limited to what is strictly necessary for the Purposes of Processing.

1. Purposes of Processing Personal Data

SWIKLY collects Users' Personal Data to:



La solution pour vos cautions

- Process appointment requests made via the form available on the Website;
- Process free trial requests submitted through the Website;
- Respond to chatbot inquiries;
- Respond to requests made via phone or email;
- Send You newsletters;
- Send documentation;
- Publish User reviews on the Website;
- Respond to Users' rights exercise requests.

2. Collected Personal Data

Users are informed that SWIKLY collects and processes the following Personal Data:

- For processing appointment requests: Name, surname, email address, phone number.
- For processing free trial requests: Name, surname, business name, industry sector, postal address, email address, phone number, password.
- For responding to chatbot inquiries, phone, or email requests: Any Personal Data provided in this context.
- For newsletter subscriptions: Email address.
- For sending documentation: Name, surname, email address, phone number.
- For publishing User reviews: Name, surname, position, affiliated company, content of the review.
- For rights exercise requests: Identification data, request subject, email address.

3. Retention Period for Personal Data

Personal Data is retained for as long as necessary for the purposes for which it was collected:

- For appointment requests, chatbot inquiries, phone, or email requests and documentation requests: 3 years from the last User contact.
- For the free trial : until the end of it ;
- For publishing User reviews: A maximum of 3 years or until the User exercises their right to object.
- For newsletter subscriptions: Until the User unsubscribes.
- For rights exercise requests: The calendar year of the request plus 5 years.

4. Legal Basis for Processing Personal Data

SWIKLY processes Personal Data based on an explicitly identified legal basis:

- SWIKLY's legitimate interest in processing Personal Data, particularly for responding to inquiries, and handling appointment requests.
- Pre-contractual measures when the User requests a free trial.
- User consent for newsletter subscriptions, receipt of documentation, and submission of reviews.
- Legal obligations for managing rights exercise requests.

5. Commitments of the Data Controller



SWIKLY commits to:

- Process Personal Data only for the defined Purposes;
- Process Personal Data in compliance with Applicable Laws;
- Inform Users before transferring Personal Data to a Third Country;
- Ensure the confidentiality of Personal Data by implementing appropriate technical and organizational security measures to (i) prevent unauthorized access to Personal Data, (ii) conduct identity and access controls through an authentication system and a password policy, (iii) implement an access rights management system, (iv) store your Data on secure servers protected by various systems and protocols, such as firewalls, antivirus software and restricted access mechanisms;
- Ensure that authorized personnel handling Personal Data respect confidentiality obligations and receive adequate data protection training;
- Implement data protection by design in its tools, applications, and services;
- Delete, anonymize, or archive Personal Data after the retention period.

SWIKLY shall in no event be liable for security incidents related to the User's use of the Internet, including but not limited to the loss, alteration, destruction, disclosure, or unauthorized access to the User's data or information.

The User is reminded that it is its responsibility to keep the password used to access its User account confidential and to ensure that sessions are logged out when not in use.

6. Recipients, Data Processors and Personal Data Transfers

The User agrees that its Personal Data may be transferred to Data Processors and recipients solely for the execution of the aforementioned Purposes, provided they are subject to regulations ensuring an appropriate and adequate level of protection as defined by the GDPR.

The Personal Data may be transferred to SWIKLY's internal recipients like business department, legal department and IT department.

SWIKLY may transfer your Personal Data to the authorities (i) To comply with legal processes like a court decision, search warrant, government investigation, law enforcement request or other legal requirements, (ii) assist in the prevention or detection of criminal offenses, (iii) protect individual safety, or (iv) establish, exercise, or defend legal claims.

In case of transfer to a Third Country or international organization that does not provide an adequate level of protection, appropriate safeguards under Applicable Laws will be implemented.

The list of SWIKLY's Data Processors is available here: <https://support.swikly.com/fr/support/solutions/articles/101000452068-rgpd-liste-des-sous-traitants-de-swikly>.

Under no circumstances does SWIKLY sell, rent, or use the Personal Data it receives for any purpose other than the specified Purposes. The disclosure of Personal Data to third parties is carried out solely for the fulfillment of these Purposes.



7. Your Rights

Users have the following rights: access, rectification, erasure, objection, restriction of processing, data portability, and the right not to be subject to automated decision-making (including profiling).

You may obtain a copy of your Personal Data upon written request addressed to the Data Controller.

By submitting a written request, the User may, at any time, request the correction or deletion of their Personal Data, subject to the rights of the Data Controller.

You can exercise these rights by emailing: contact@swikly.com. SWIKLY will respond within one month, extendable by two months for complex or numerous requests.

You may also file a complaint with the CNIL (www.cnil.fr).

8. Policy Updates

SWIKLY regularly updates this Policy, which remains accessible on the Website at all times.