

www.atlantechpartners.com

Privacy Policy

Welcome to the privacy policy of Atlantech Partners

Atlantech Partners ("We") values the privacy of its clients and Web/blog site viewers and is committed to protecting it through our compliance with this policy. This policy describes the types of information we may collect from you or that you may provide to us when you visit the website www.atlantechpartners.com and use its features (our "Website"), and our practices for collecting, using, maintaining, protecting and disclosing your personal data.

1. IMPORTANT INFORMATION AND WHO WE ARE

Controller

ATLANTECH PARTNERS is an alliance of independent law firms located in France, the United States, and Canada. Each of these law firms shall be deemed a co-controller with respect to the processing of any personal data through the Website for such purposes as described in the table below.

The contact information for each co-controller is as follows:

If you are based in Europe:

Maître Caroline Sandler-Rosental, a lawyer at the Paris Bar

26 avenue Kléber, 75116 Paris

Tel : (00 33) 6 81 23 02 97

Email : caroline@atlantechpartners.com

Siret Number : 420 096 224 00043

If you are based in the United States:

Law Office of S. Grynwajc

c/o Stephan Grynwajc, Esq.

P.O. Box 341

New York, NY 10159

Tel : 347-543-3035

Email : stephan@atlantechpartners.com

If you are based in Canada :

Kimmit Wrzesniewski Lawyers

c/o Joanna Wrzesniewski

202-1433 St. Paul Street

Kelowna BC

Canada V1Y 2E4

Tel : 250-763-6441

Email : joanna@atlantechpartners.com

Should you wish to obtain more information regarding our processing activities, please contact us using the above information or by sending an email to info@atlantechpartners.com

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on February 18, 2021.

We reserve the right to change the terms of this privacy policy at any time. When we do, we will post the revised privacy policy to our Website and the last revision date of revision will be updated so that you will always be able to understand what information about you we collect, how we use your information, and under what circumstances we may share your information with others. We will notify you of any material changes by email announcing that the privacy policy has changed, and pointing the changes to your attention.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Social Media Features

Our Website includes Social Media Features, such as links to our company pages on Facebook, LinkedIn, Twitter and Instagram. As a result of you liking us on Facebook or following our company on LinkedIn, Twitter or Instagram these features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social Media Features are either hosted by a third party or hosted directly on our Website. Your interactions with these Features are governed by the privacy policies of the companies providing them.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you grouped together as follows:

- **Identity Data includes your first and last name;**
- **Contact Data includes your email address and telephone numbers;**
- **Communication Data includes messages and content included in e-mails you send to us;**
- **Technical Data includes data such as browser type, mobile device, internet protocol (IP) address, domain name, date and time stamp for your visit, your login data, time zone setting and location, operating system and version, product registration number, logs files.**

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal information but is not considered personal information in law as this information will not directly or indirectly reveal your identity. For example, we may aggregate Usage Data to calculate the percentage of users accessing a Website feature. However, if we combine or connect Aggregated Data with your personal information so that it directly or indirectly identifies you, we treat the combined data as personal information in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data) or data related to Criminal Convictions and Offenses through your use of our Website. Nevertheless, when at your initiative, you provide us such data through messages or emails you send to us, we will process these types of data with the greatest care and adopt all appropriate measures in order to ensure the highest level of security is applied to the data.

3. HOW IS YOUR PERSONAL DATA COLLECTED

We use different methods to collect data from and about you including through:

Direct interactions

You may give us your Identity, Contact and Communication Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you:

- **subscribe to our newsletter;**

- contact us info@atlantechpartners.com.

Automated technologies or interactions

As you interact with our Website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal information by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

Third parties sources

We will receive Technical Data from analytics providers such as Google based outside the EU.

4. HOW WE USE YOUR PERSONAL INFORMATION

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

Your consent. When the collect and use of your personal data is based on your consent, you can withdraw your consent at any time contacting us info@atlantechpartners.com.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Please read our Glossary below to find out more about the types of lawful basis that we will rely on to process your personal information.

Purposes for which we will use your personal information

We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate and the recipients of these data for each purpose.

Purpose / Activity	Type(s) of data	Legal basis for processing
Manage your subscription to our newsletter and send it to you	(a) Contact Data	Article 6(1)a: Consent to the processing
Manage and answer your requests through our "Contact Us" form	(a) Communication Data (b) Contact Data (c) Identity Data	Article 6(1)f: Our legitimate interests, which include contact us and to grow our business

If you fail to provide personal information

The provision of your personal data to subscribe to our newsletter and contact us info@atlantechpartners.com is mandatory in order to consider your request. Without them, we would not be able to answer to your request and/or send to you our newsletter.

Automated decision-making

Processing operations in our Website don't involve automated decision-making.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing. You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us info@atlantechpartners.com.

Third-party marketing

We will get your express opt-in consent before we share your personal information with any third party for marketing purposes, including service providers who perform marketing services on our behalf, such as sending communications to you on our behalf, or serving advertisements to you.

California Residents: Your Privacy Rights

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal

information to third parties for their direct marketing purposes. To make such a request, please send us a message info@atlantechpartners.com.

Do Not Track "DNT" Signals

While we take all reasonable steps to protect the privacy of our Website visitors, we cannot promise that the current limitations of our online applications programming will address every browser setting or honor every personal browser preference. In particular, we have not implemented the necessary program changes to honor "Do Not Track" or "DNT" browser signals.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Website may become inaccessible or not function properly.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. info@atlantechpartners.com

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. In particular, following your visit to our Website or your contacting us info@atlantechpartners.com, we may process your personal data, upon your request, to offer you an estimate of our legal services or an engagement letter and/or to perform our legal services. Information about how we collect and process your data in this respect will be contained in our estimate, engagement letter or any contract we would conclude with you.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL INFORMATION

We may share your personal information for the purposes set out in the table above.

Third Parties as set out in the table above. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We share your personal information among the members of Atlantech Partners. If you are based in the European Union, this will involve transferring your information outside the European Economic Area (EEA).

Our external third parties are based outside the EEA so their processing of your personal information will also involve a transfer of information outside the EEA.

As data controller, we transfer your personal data outside the European Union with two services providers:

- **Hosting service provider: Wix, based in the US**
- **Service provider: [RENSEIGNER] to send you our newsletter, based in the US**

When we transfer your personal data to members of our alliance or to service providers based in the U.S. we do it on the basis of the EU Commission's standard contractual clauses whereby the data importer commits to protect the information in accordance with EU laws.

Please contact us info@atlantechpartners.com if you want further information on the specific mechanism used by us when transferring your personal information out of the EEA.

If you are based in Canada, please note that we may process, store, and transfer your personal information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your personal information through the laws of the foreign country. Whenever we engage a service provider, we require that its privacy and security standards adhere to this policy and applicable Canadian privacy legislation.

7. INFORMATION SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

In the event of a data breach, we will notify you and any applicable regulator where we are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

Should you wish to receive any additional information about our information security please contact us info@atlantechpartners.com .

8. YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

Under certain circumstances, you have rights under data protection laws in relation to your personal information:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent
- Right to lodge a complaint with a supervisory authority

To exercise any of the above rights or if you have questions or concerns about our Privacy Policy, please contact us info@atlantechpartners.com.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Consent of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION

Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. In particular, in compliance with applicable professional standards, we retain records relating to professional services that we provide so that we are better able to attend to your professional needs.

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information in the following scenarios:

- **If you want us to establish the information's accuracy.**
- **Where our use of the information is unlawful but you do not want us to erase it.**
- **Where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims.**
- **You have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.**

Request the transfer of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

