

# R3MSCORE — PRIVACY POLICY

# **November 2025 Edition**

This Privacy Policy explains how **R3MSCORE** ("the Company", "we", "us") collects, uses, stores and protects Personal Data when providing its services, operating its website, and managing customer accounts.

#### It applies to:

- visitors of our website;
- prospective clients;
- clients and Authorized Users of the R3MSCORE platform;
- all individuals whose Personal Data may be processed through our Services.

#### 1. IDENTITY OF THE DATA CONTROLLER

For data processed for our own business purposes, the Data Controller is: **R3MSCORE** 242 boulevard Voltaire, 75011 Paris, France Email: privacy@r3mscore.com

For data processed on behalf of clients within the platform (surveys, datasets, analysis outputs), the **Client is the Data Controller**, and R3MSCORE acts as **Data Processor**, as defined in the Data Processing Agreement (DPA — Annex A of the T&C).

#### 2. PERSONAL DATA WE COLLECT

We collect the following categories of Personal Data:

#### 2.1. Account and Identification Data

- first name, last name;
- professional email address;
- company name and role;
- account credentials (hashed password).

# 2.2. Billing and Financial Information

- billing address;
- VAT number;
- invoice history;
- payment method information (stored exclusively by the payment provider).



# 2.3. Technical and Usage Data

- IP address;
- browser, device and operating system information;
- log events, session timestamps;
- API usage metrics;
- error logs and performance metrics.

# 2.4. Marketing and Communication Data

- newsletter opt-in status;
- contact form information;
- event registration details.

# 2.5. Data Processed on Behalf of Clients (Platform Content)

When clients upload or collect Personal Data using our Services (e.g., survey responses, datasets for emotional analysis), we process this data **solely on their instructions**. This data is governed by the **DPA** and **not used for any other purpose**.

#### 3. PURPOSES OF PROCESSING AND LEGAL BASES

We process Personal Data for the following purposes:

Purpose Legal Basis

Creating and managing accounts Contract performance

Providing and improving the platform Contract performance + Legitimate interest

Billing and payment processing Legal obligation + Contract

Responding to support requests Contract performance

Ensuring security and fraud prevention Legitimate interest

Website analytics Legitimate interest (or consent when required)

Marketing communications Consent

#### 4. COOKIES AND TRACKING TECHNOLOGIES

We use cookies to:

- ensure the platform functions correctly;
- analyse website traffic;
- improve user experience.

Non-essential cookies (e.g., marketing or advanced analytics) are used only with consent.



# 5. SHARING OF PERSONAL DATA

We may share Personal Data with the following categories of recipients:

- hosting providers;
- payment service providers;
- email delivery platforms;
- CRM or analytics tools;
- subcontractors listed in Annex A (DPA) of our TERMS & CONDITIONS (T&C).

We never sell Personal Data.

# 6. INTERNATIONAL DATA TRANSFERS

Some service providers may be located outside the European Economic Area (EEA). In such cases, transfers are governed by:

- adequacy decisions;
- Standard Contractual Clauses (SCC);
- supplementary technical and organisational measures.

# 7. DATA RETENTION

We retain Personal Data only for the time necessary for the purposes described:

- account data: as long as the account is active;
- billing data: 10 years (legal requirement);
- technical logs: 12 months;
- marketing data: 3 years after last interaction;
- survey data or uploaded datasets: duration defined by the Client.

After these periods, data is deleted or anonymised.

#### **8. SECURITY MEASURES**

We implement strong technical and organisational measures, including:

- encryption in transit and at rest;
- access control and authentication;
- monitoring and intrusion detection;
- regular backups;
- principle of least privilege for staff access;
- periodic security reviews.



# 9. RIGHTS OF INDIVIDUALS

Under GDPR, individuals may exercise:

- right of access;
- right to rectification;
- right to erasure;
- right to restriction;
- right to data portability;
- right to object;
- right to withdraw consent.

Requests may be sent to: privacy@r3mscore.com

For data collected via the platform (surveys, datasets), requests must be addressed to the **Client**, who acts as Data Controller.

#### 10. DATA BREACH NOTIFICATION

If a personal data breach occurs, we will:

- notify the affected Client (Data Controller) without undue delay;
- provide all information necessary for regulatory reporting.

#### 11. CHANGES TO THIS POLICY

We may update this Privacy Policy to reflect operational or regulatory changes. The revised version will be published online with updated effective dates.

### 12. CONTACT

For any privacy-related inquiries: Email: privacy@r3mscore.com

Address: 242 boulevard Voltaire, 75011 Paris, France