

PRIVACY POLICY RELATING ON THE PROCESSING OF PERSONAL DATA OF BPIFRANCE PROSPECTS OR LEADS

1. WHO IS THIS POLICY FOR?

This policy (the "**Policy**") is intended for all persons whose data is processed by Bpifrance and its entities, in the context of its activities using **commercial prospecting**, i.e. the sending of any message intended to promote, directly or indirectly, the activities of one of the entities of the Bpifrance group, which are not of an informational nature.

You are covered by this Policy if you are ("You"):

- **Prospect (Leads):** a company that is not yet a customer of Bpifrance or one of its entities (i) that has entered into a relationship with Bpifrance in order to obtain information concerning its offers and services or (ii) with which Bpifrance has entered into a relationship in order to offer it its offers and services. With regard to the processing of personal data implemented by Bpifrance in the context of its relationship with Prospects outside of its prospecting activities, please consult the privacy policy of the website or mobile application if existing from which you entered into a relationship with Bpifrance.
- **Individual:** a natural person acting in a private capacity.
- **Professional:** a person acting for purposes within the scope of his or her professional activity (commercial, industrial, artisanal, liberal or agricultural), including acting in the name and on behalf of another professional. In this case, when you provide personal data relating to other persons, it is your responsibility to duly inform these persons of the transmission of their data to Bpifrance and to make available to them the information contained in this Policy.

2. WHO IS RESPONSIBLE FOR THE PROCESSING CARRIED OUT?

The entity of the Bpifrance group carrying out commercial prospecting operations is deemed to act as a data controller (the "**Company**") when it processes your Personal Data.

At the end of this Policy, you will find a list of all the entities of the Bpifrance group, as well as their contact details, and will thus be able to determine, according to your personal situation, which one acts as the data controller with regard to you. Bpifrance, 27-31 avenue du Général Leclerc 94 710 Maisons Alfort, is deemed to act as a data controller (the "**Company**") when it processes your personal data for the purposes detailed below.

List of Bpifrance entities likely to act as data controllers ("the Company")

Entity of the Bpifrance group	Coordinates
Bpifrance	27-31 avenue du Général Leclerc 94 710 Maisons Alfort
Bpifrance Investissement	27-31 avenue du Général Leclerc 94 710 Maisons Alfort
Bpifrance Assurance Export	27-31 avenue du Général Leclerc 94 710 Maisons Alfort
Bpifrance Courtage	27-31 avenue du Général Leclerc 94 710 Maisons Alfort

3. WHAT DATA DOES BPIFRANCE PROCESS, FOR WHAT PURPOSES AND FOR HOW LONG IS THIS DATA KEPT?

In accordance with the applicable regulations, in particular European Regulation 2016/679, known as the General Data Protection Regulation (GDPR) and the national provisions relating to information technology, files and freedoms, Bpifrance, as data controller, collects and processes your personal data for the purposes listed below.

Bpifrance retains your personal data for the time necessary to implement the purposes set out and applies the retention periods below.

We invite you to refer to the information adapted to your particular situation.

CASE N°1: YOU ARE A PROFESSIONAL (BTOB)

Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention period
On the basis of the Company's legitimate interest in developing and managing its relationships with the Companies	1- Prospect Identification	Identification data : title, surname, first name Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	3 years from the last contact from the Prospect
	2- Sending commercial communications to Professional Prospects	Identification data : title, surname, first name Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company. Connection data related to the use of our websites and applications : identification and authentication data for your connected spaces, including IP address, logs, browsing data.	3 years from the last contact with the Prospect
	3- Management of the commercial relationship between Bpifrance and its Prospects	Identification data : title, surname, first name. Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company. Data from correspondence and communications between you and us : interviews, phone calls, e-mails, instant messaging, social media communications or any other type of communication.	3 years from the last contact with the Prospect

Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention period
	4- Organization and management of a Prospect's participation in an event that can be done via a form on a Bpifrance website or a social network	Identification data : title, surname, first name. Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	3 years from the last contact from the Prospect
	5- Carrying out studies, satisfaction surveys and statistics	Identification data : title, surname, first name. Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company. Connection data related to the use of our websites and applications : identification and authentication data for your connected spaces, including IP address, logs, browsing data.	3 years from the last contact from the Prospect
On the basis of Bpifrance's legitimate interest in ensuring the defence of its rights, in particular in court	6- Management of possible disputes and complaints	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company. Data from correspondence and communications between you and us : interviews, phone calls, e-mails, instant messaging, social media communications or any other type of communication) Connection data related to the use of our websites and applications : identification and	French and European legal and regulatory limitation periods

Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention period
		authentication data for your connected spaces, including IP address, logs, browsing data.	

CASE N°2: YOU ARE AN INDIVIDUAL (BTOC)

Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention period
Based on your consent	1- Commercial prospecting between Bpifrance and its Prospects	Identification data : title, surname, first name. Contact data : postal address, telephone number, email address. Data from correspondence and communications between you and us: interviews, phone calls, e-mails, instant	3 years from the collection of your consent

Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention period
		messaging, social media communications or any other type of communication.	
	2- Organization and management of a Prospect's participation in an event that can be done via a form on a Bpifrance website or a social network	Identification data : title, surname, first name. Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	3 years from the last contact from the Prospect
	3- Carrying out studies, satisfaction surveys and statistics	Identification data : title, surname, first name. Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company. Connection data related to the use of our websites and applications : identification and authentication data for your connected spaces, including IP address, logs, browsing data.	3 years from the collection of your consent
On the basis of Bpifrance's legitimate interest in ensuring the defence of its rights, in particular in court	4- Management of possible disputes and complaints	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	French and European legal and regulatory limitation periods

Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention period
		Data from correspondence and communications between you and us : interviews, phone calls, e-mails, instant messaging, social media communications or any other type of communication) Connection data related to the use of our websites and applications : identification and authentication data for your connected spaces, including IP address, logs, browsing data.	

Please note that, in accordance with the principle of minimisation, Bpifrance only collects the personal data it needs for the above-mentioned purposes.

When you do not provide the personal data identified as mandatory, Bpifrance will not be able to carry out its activities and carry out the financing.

Finally, please note that information allowing you to understand how Bpifrance's websites use cookies and other trackers during your browsing is detailed in our Cookie Policy [accessible here](#).

4. HOW IS YOUR PERSONAL DATA COLLECTED?

Your personal data is collected by Bpifrance directly from you or from a third party who has duly informed you of the transmission of your information to Bpifrance.

In some cases, Bpifrance also collects personal data about you indirectly from:

- Other entities of the Bpifrance group in compliance with the legal, regulatory or contractual confidentiality obligations that apply to third parties;
- Freely accessible sources on the internet, professional social networks, professional directories,
- Company websites and other official databases;
- Data brokers, a list of which can be found here <https://urlr.me/j2c3vs> ;
- IT service providers whose solution integrates a database containing information about you.

5. TO WHOM IS YOUR PERSONAL DATA DISCLOSED?

Your data is intended for Bpifrance and will also be communicated:

- To the other entities of the Bpifrance group, when this transmission is necessary to enable these entities to meet their legal, regulatory or contractual obligations, or to ensure the deployment of the system. This transmission of intra-group information does not in any way exempt the entities of the Bpifrance group from the legal, regulatory or contractual confidentiality obligations that apply to them with regard to third parties;
- IT service providers, or any other service provider or subcontractor providing services in connection with all or part of the processing identified above on behalf of Bpifrance;
- To any French or European administrative, judicial, or supervisory authority that needs to be aware of it in the context of an administrative or judicial procedure that benefits from a right of communication based on a legislative provision, at their request.

Bpifrance is committed to limiting the transfer of personal data outside the European Union. When such transfers are to be implemented, Bpifrance relies on the following to carry out these transfers:

- A decision issued by the European Commission, attesting to the level of adequacy of the regulations of the country to which your data is transferred;
- One of the derogations provided for by the GDPR (in particular when the transfers are implemented because they are necessary for the conclusion or performance of a contract concluded in your interest between Bpifrance and the legal person to which you are linked);

In other cases, Bpifrance ensures that the transfer is supervised in accordance with the GDPR and implements appropriate guarantees with regard to the protection of personal data, by means of legal, technical and organisational measures.

6. WHAT ARE YOUR RIGHTS?

In accordance with the Applicable Regulations, and subject to the conditions set out therein for the exercise of these rights, you benefit from:

- The right to access, rectify, delete, and portability of your personal data.
- The right to withdraw your consent to processing.

- The right to request the limitation of the processing concerning you and to object to receiving commercial prospecting.
- The ability to provide Bpifrance with instructions relating to the fate of his or her personal data after your death.

To exercise your rights, you can contact the data protection officer of the Bpifrance group, using the contact details provided in Section 7 ("*How to contact Bpifrance?*") below.

You also have the right to lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL).

7. HOW TO CONTACT BPIFRANCE?

Please send all correspondence to the Data Protection Officer (DPO) of the Bpifrance group using the contact details below:

- Via our online form accessible here: <https://bpifrance.app.witik.io/fr/form/bpi/formulaire-rgpd-bpifrance>
- By mail by writing to Bpifrance - DCCP - Data Protection Officer 27-31 avenue du Général Leclerc 94 710 Maisons Alfort

After receiving your request, it will be answered within a maximum period of one month, except for derogations provided for by the GDPR.

If there is reasonable doubt as to the identity of the person concerned by the request to exercise the right, you may be asked to provide additional information necessary to confirm your identity.

8. UPDATING THE POLICY

This Policy may be amended and updated periodically to reflect legislative or regulatory developments or to meet our information obligations under applicable regulations on the protection of personal data.

We invite you to refer to it regularly on the Bpifrance website. The Policy is available at: <https://www.bpifrance.fr/protection-des-donnees>

In addition, in the event of substantial changes, Bpifrance will make available on its website (add the website) an update to this Policy and specify the changes relating to the processing of your personal data.