

Privacy Policy

Last update: February 2026

INTRODUCTION

As part of the exploitation of its website <https://www.viaccess-orca.com/> (hereinafter referred to as the “**Website**”) and more generally in the course of its business, VIACCESS protects and processes personal data (the “**(Personal) Data**”) relating to customers, partners, prospects, users and visitors of the Website, candidates and to any other interested parties (the “**Data Subject(s)**”).

VIACCESS undertakes to process Data Subjects’ Personal Data in compliance especially with Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“GDPR”) and with Act No. 78-17 of 6 January 1978 (French “Loi Informatique & Libertés”) (the “**Regulations**”).

The aim of this Privacy Policy (the “**Policy**”) is to inform Data Subjects about the conditions under which their Personal Data is processed, what are their rights regarding such processing operations, and how to exercise them.

The processing operations implemented through the use of cookies on the Website are specifically described in the dedicated [Cookie Policy](#).

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1. DATA CONTROLLER AND DATA PROTECTION OFFICER

The Data controller responsible of the processing of the Personal Data is **VIACCESS S.A.**, a French *société anonyme*, duly organized and existing under the laws of France, with its head office located at Tour Egée, 9 Allée de l'Arche, 924000 Courbevoie, France, acting on its own behalf as well as on behalf of its affiliates (hereinafter "**VIACCESS**").

VIACCESS' Data Protection Officer (DPO) can be contacted by email at dpo@viaccess.fr or by writing to VIACCESS, attention of the DPO, Tour Egée, 17 avenue de l'Arche, 92671 Courbevoie, France.

2. SOURCES OF THE PERSONAL DATA

VIACCESS collects Personal Data about the Data Subjects by the following means:

- **Directly through the Data collection forms** available on the Website (e.g., when the Data Subject downloads an eBook, request a demo, etc.);
- **Directly through the cookies placed on the Website:** this involves information placed on the device of the Data Subject and technical Data. To learn more about cookies, please see our [Cookie Policy](#);
- **Indirectly through VIACCESS' commercial partners:** Data is communicated by our partners when the Data Subject has given prior consent for instance in the frame of webinars organisation.

3. DESCRIPTION OF THE PROCESSING OPERATIONS

PROCESSED PERSONAL DATA

Depending on the context and the interaction with the Data Subject, VIACCESS collects the following Personal Data:

- **Identity Data:** first name, last name
- **Contact details:** professional email address, professional phone number, country of location, event attended, product of interest
- **General source of the Data collected by VIACCESS** (e.g., form on the Website, direct traffic, email campaign, social media)
- **Data linked to professional activity:** organisation name, job title
- **Other Data linked to professional activities:** this Data is collected especially when the Data Subject applies for a position/work within VIACCESS: CV, professional experience, diploma, any other information provided as part of the job application
- **Any other Data voluntarily shared by the Data Subject**, especially through the free-text fields on the Website. Data not necessary to respond to the Data Subject's request is deleted by VIACCESS.

The mandatory or optional nature of the requested Personal Data and the possible consequences of failure to provide such Data are specified at the time of collection.

PURPOSES OF THE PROCESSING OPERATIONS

Depending on the context and the interaction with the Data Subject, VIACCESS processes the Personal Data for the following reasons:

- Allow VIACCESS' customers to connect to their online account through the login portal;
- Manage and answer requests made by Data Subjects, especially through the Website (requests for information, for demo, for product information, requests to register for events and webinars, etc.);
- Send newsletters, marketing emails (latest blog posts and other news) and other information emails (invites to events, invites to schedule appointment, new products, important company news etc.);
- Manage job applications by analysing their content and conducting job interviews;
- Manage Data Subjects' requests to exercise their GDPR rights as detailed in Article 6 of this Policy.

RELATED LEGAL BASIS

VIACCESS processes the Personal Data under the following legal basis:

- **VIACCESS' legitimate interest** in: **(i)** allowing its customers to connect to their online account, **(ii)** managing and answering requests made by Data Subjects especially through the Website, **(iii)** sending newsletter, marketing emails and information emails to professional prospects;
- **Data Subject's prior consent** to: **(i)** send newsletters, marketing emails and information emails to non-professional prospects, and **(ii)** share Data to VIACCESS' partners for marketing purposes;
- **The execution of pre-contractual measures** taken at the request of the Data Subject to manage job applications;
- **Compliance with a legal obligation to which VIACCESS is subject** regarding the management of Data Subjects' requests to exercise their GDPR rights.

4. DATA FLOWS

RECIPIENTS OF THE PERSONAL DATA

Depending on the purpose of the processing operations, VIACCESS communicates all or part of the Personal Data to different recipients.

VIACCESS internal recipients include internal teams dedicated to Communication, Sales, Customer Support, HR and IT, which might be located in different regions, especially in France, Spain, Israel, Dubai (United Arab Emirates), USA, Singapore, Mexico and Hong-Kong.

VIACCESS may also share Data to the following third parties' categories:

- **IT service providers** used for database management, CRM, consent management, maintenance, development support;
- **Lead Scanners and Retrievals** providers used during organized events;
- **VIACCESS partners and third-party media websites**, especially for hosting data collection forms on their own website and in case of webinar.

TRANSFERS OUTSIDE THE EEA

Where Personal Data are transferred outside the European Economic Area (the "EEA"), VIACCESS ensures that the recipient country is subject to an **adequacy decision** of the European Commission. This is the case when Data are shared with **IT service providers located in the USA** (through Data Privacy Framework) and with **VIACCESS Israel**.

Where no such adequacy decision exists, VIACCESS undertakes to ensure that the transfer is governed by the appropriate legal instruments, in particular the European Commission's **Standard Contractual Clauses** ("SCC"), provided that the conditions for using these clauses are met. Intra-group SCCs are used when Data are shared with **VIACCESS' teams in different regions of the world**.

If the Data Subject wishes to obtain more information on how VIACCESS protects Personal Data or wishes to obtain a copy of the legal instruments implemented, he may request it at dpo@viaccess.fr.

5. DATA RETENTION PERIODS

VIACCESS will retain Personal Data for no longer than necessary to achieve the identified purposes:

- **Enable VO customers to connect to their account:** duration of the contract with customer or duration of the account;
- **Manage and answer the various requests by Data Subjects especially through the Website:** time necessary to process the request;
- **Send newsletters, marketing emails and information emails:** 3 years from the last contact with the Data Subject or until they become non-engaged contacts (i.e., the last 11 emails sent to them have not been opened);
- **Receive and manage job applications:** 2 years from the last contact with the candidate if the candidate has not been recruited;
- **Manage Data Subjects' request to exercise their GDPR rights:** 3 months from the closure of the request.

Data may then be archived to enable VIACCESS to defend itself in potential legal actions, for the prevention and detection of criminal offences, to be able to make Data available to the judicial authority, or to meet legal obligations.

6. RIGHTS OF DATA SUBJECTS

Data Subjects can contact VIACCESS at any time to exercise their rights as follows:

By email: dpo@viaccess.fr

By mail: VIACCESS, attention of the DPO, Tour Egée, 17 avenue de l'Arche, 92671 Courbevoie, France

The rights available to Data Subjects, subject to the limitations provided by the Regulations, are as follows:

- **Right of access:** right to request a copy of the Data processed by VIACCESS and to obtain information related to the processing operations;
- **Right to rectification:** right to ask VIACCESS to rectify Data if it is inaccurate or incomplete.;
- **Right to erasure:** right to ask VIACCESS to erase the Data when it is no longer necessary, when the Data Subject has withdrawn his/her consent, exercised his/her right to object, or when the processing was unlawful.
- **Right to withdraw consent:** right for the Data Subject, at any time, to withdraw its consent when such consent has been priorly given and has been used as the legal basis of the processing;
- **Right to object to the processing of the Data for direct marketing purposes;** Data Subjects can also exercise this right by clicking on the “unsubscribe” or “opt-out” link in the emails sent to them;
- **Right to object on ground relating to Data Subject’s particular situation:** right to oppose processing operations based on VIACCESS’ legitimate interests;
- **Right to restriction of processing:** right to ask VIACCESS to temporarily freeze the use of certain Data;
- **Right to Data portability:** in certain cases and under certain conditions, right to obtain from VIACCESS all or part of the Data in an open and machine-readable format to store or reuse it, or right to request VIACCESS to transfer such Data to another Data controller;
- **Right to formulate specific instructions** for post-mortem Data storage, erasure or communication.

If there is a reasonable doubt as to the identity of the person exercising his or her rights, VIACCESS may request this person to attach any document that proves his or her identity.

Data Subjects’ requests relating to their rights will be processed within four weeks of receipt. The Personal Data will be processed for the sole purpose of managing the request.

7. RIGHT TO LODGE A COMPLAINT WITH THE CNIL

Data Subjects may lodge a complaint with the relevant supervisory authority (the CNIL in France) if they consider, after contacting VIACCESS or its DPO, that the processing of their Data does not comply with the Regulations, at the following address: CNIL, 3, place de Fontenoy – TSA 80715 – 75334 PARIS CEDEX 07.

For more general information on the protection of personal data, please consult the [CNIL Website](#).

8. POLICY UPDATES

This Privacy Policy may be amended at any time, in particular to comply with any regulatory, case law, editorial or technical changes. Before browsing the Website, Data Subjects are encouraged to read the latest version of the Policy.