



Privacy Policy

Definition

Any capitalized terms not defined herein will have the meaning ascribed to them in the GSUTC.

"Privacy Policy" means these terms, including the terms of the Cookies Policy, which govern UPPLY's use of personal data provided by Users and UPPLY's use of Cookies on the Website.

"Personal Data" refers to personal data collected as part of the registration process on the Website and/or use of the Website and Services which may include the following elements: Your first name, last name, IP address, country of residence, telephone number and company name, address, identity card, passport.

I. Personal Data

UPPLY is committed to maintaining high standards of personal data protection.

As part of its activities, UPPLY is required to collect and process Personal Data relating to its Users and its partners such as suppliers and service providers.

a. User Information

The User is informed that the Personal Data processed as part of the process of registering on the Website and/or using the Website and Services are subject to computerised processing under the responsibility of UPPLY, acting as data controller.

The User is informed that the provision of the first name, surname and business e-mail address is a condition for registration on the Website. Furthermore, the provision of the telephone number, the name of Your company and the country of residence is optional, a lack of response will not prevent the User from accessing the Services requested.

b. Fair and transparent collection

UPPLY shall inform its Users of the processing that concerns them.

c. Lawful and proportionate data processing

When UPPLY processes Personal Data, it does so for specific purposes as listed below. These purposes each relate to a legal basis for processing, as required by applicable law.

	Purposes	Legal bases
1	Allow You to access some of Our services proposed on the Website	This processing is necessary for the purpose of the legitimate interests pursued by UPPLY to provide the services You request.
2	Manage, protect, enhance and optimize the Website experience	This processing is necessary for the purpose of the legitimate interests pursued by UPPLY. UPPLY considers that it has a legitimate interest in improving the Services in order to preserve the business operations and grow the business.
3	Protect the Website and Your account from security incidents	This processing is necessary for the purpose of the legitimate interests pursued by UPPLY. UPPLY considers that it has a legitimate interest in protecting the Services in order to ensure the continuity of the business operations and maintain a good relationship with the Users.
4	Send You Services-related messages, updates (including our Conditions of Use and Sales, security alerts and account notifications	This processing is necessary for the purpose of the legitimate interests pursued by UPPLY. UPPLY considers that it has a legitimate interest in updating its Users on any incidents that may affect them, in order to maintain a good relationship with Our Users. UPPLY may also in certain situations have a legal obligation to provide You with such information.
5	Send You promotional notifications about our Products and Services, marketing communications and Our newsletter via the e-mail address communicated on the Website	This processing is necessary for the purpose of the legitimate interests pursued by UPPLY. UPPLY considers that it has a legitimate interest in ensuring that the Users are kept up to date with information about Our products and services, as this helps Us to Our business operations and grow Our business. However, where We are required by law to obtain Your consent before sending you such information, We will rely upon such consent as our basis to proceed with processing.
6	Contact you through our Customer Service in response to a request from you, possibly recording calls, subject to your prior acceptance	This processing is necessary for the realisation of Uppl's legitimate interests. Uppl considers that it has a legitimate interest in responding to Users' requests, particularly those related to problems related to the Services.

7	Allow you to access a messaging service between Buyers and Sellers when you are using the Buy and Sell Service	This processing is necessary for the fulfilment of Upplly's legitimate interests. Upplly considers that it has a legitimate interest in ensuring that Buyers and Sellers can discuss the Transport Services in real time, and in particular reduce the risk of problems in the performance of the Transport Services
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d. Security, confidentiality and retention period of Personal Data

In accordance with the Personal Data Protection Regulation 2016/679, UPPLY takes all necessary technical and organisational security measures to respect the User's privacy and protect the Personal Data it communicates in order to keep them confidential.

Among these measures and as an example, Personal Data is stored behind secure networks and is encrypted by UPPLY. In addition, UPPLY uses industry-recognized intrusion test service providers to identify and resolve predictable attack vectors and potential intrusion scenarios.

The User is informed that the Personal Data will be communicated to Our providers, acting as data processors, who contribute to the achievement of the purposes listed above (hosting, CRM provider, direct messaging service provider, customer service provider, real-time notification provider...) The transfer and the storage of Your Personal Data shall occur in compliance with this Privacy Policy that is framed by contractual clauses that ensure sufficient level of protection of privacy and fundamental rights.

The data processed by UPPLY are located within the European Union on servers of third party hosting service providers of the Site, duly appointed as subcontractors.

If the processing of Your Personal Data by Our providers involve transfers to non-EEA countries that are not recognized by the European Commission as providing an adequate level of data protection according to EEA standards, We will put in place adequate measures, such as by ensuring that the recipient is bound by European Commission standard contractual clauses. You will have the possibility to obtain a copy of these measures by contacting UPPLY.

Please note that the Personal Data that You may be led to communicate to UPPLY online are destined solely for use by persons authorized by UPPLY and in no event shall the data collected on the Website be sold to third parties.

UPPLY may disclose Your information, including Your Personal Data, to courts, governmental or law enforcement authorities or authorized third parties, if required or permitted by law.

This Personal Data will be kept for as long as necessary for the purposes for which it was obtained as indicated above. In particular, We will retain Personal Data for the duration of the relationship maintained with the User, and in particular as long as the User has an active account on the Website. In any case, We will keep this Personal Data for 3 years from the end of the relationship with the User or from the last contact with the User in accordance with the regulations in force concerning prospecting activities. We may also retain Personal Data for longer periods if required by law or if it is desirable in view of our legal situation (for example with regard to the application of the Terms of Use, applicable limitation periods, disputes or administrative investigations).

The User undertakes to communicate accurate information. Each User is fully responsible for his login data concerning him. Unless proved otherwise, any connection to the Website or transmission of Personal Data made from the login information of the User, will be deemed to have been made by the latter.

e. Rights of the data subjects

In accordance with applicable data protection laws, Users are entitled to request access, rectification and/or erasure of Personal Data concerning them, as well as the right to request that We restrict the processing of their Personal Data. Each User is entitled to request the provision of their Personal Data to them or to a third party in machine readable format. Please note that, where We rely on consent for the use of your Personal Data, You can withdraw at any time Your consent by manage your preference in Your account or by sending Your request to UPPLY. You have the right to give Us directives relating to the use of your Personal Data after your death.

The User has the right to object at any time to the processing of his/her Personal Data where We process his/her Personal Data on the basis of Our legitimate interests or for direct marketing purposes.

f. Contacting UPPLY

Upplly is able to respond to requests for the exercise of the rights of data subjects throughout the processing, in compliance with the conditions and time limits set by the applicable regulations.

Requests for exercise of rights by the data subject are made electronically at the following address: dpo@upply.com or by post at the following address:

UPPLY

26 Charles Pasqua Pier

Espace Seine

92300 Levallois-Perret

UPPLY reserves the right to request verification of the User's identity before taking any action regarding the request. UPPLY also reserves the right to charge a fee where permitted by law, for example if the request is manifestly unfounded or excessive.

Finally, Users shall have the right to lodge a complaint with the competent supervisory authority, such as the CNIL for France.

II) Cookies of Upplly.com

When you browse on UPPLY.com, cookies are deposited on your computer, mobile phone or tablet in order to improve your use and increase performance.

a. What are cookies?

Cookies are text files deposited on the users' computer or mobile device whenever they visit the website. They are stored by their browser. Cookies contain information about the users' use (including IP address) of the website but do not identify them personally. The browser returns these cookies to the website when the User revisits the Website, in order to identify it, better understand its needs and improve its user experience on UPPLY.com.

b. What is their usefulness?

Cookies are deposited on the terminals for several purposes such as :

- Navigation needs
- Optimization and personalization of the services offered to the User
- Website Security
- Improvement of Website Services
- Measuring the Audience on the Website
- The display of personalized advertising content

c. What types of cookies does UPPLY.com use?

When the User connects to UPPLY.com, cookies may, subject to the User's choice via the "personalize my cookies" tab, be installed on your device, such as :

- Cookies that are strictly necessary

Necessary for your browsing and the proper functioning of UPPLY.com, these cookies activated by default allow you to browse the site freely and smoothly. Otherwise, the functioning of the Site would be impaired.

- Statistical cookies

These are cookies that specialise in collecting information. They are used to better understand the behaviour of Users for the purposes of analysis, improvement and optimisation of the performance of the UPPLY.com website. The information collected by these cookies is not of a personal nature.

- Preference cookies

They allow the User's choices and preferences to be remembered in order to offer personalized navigation, provide relevant content and improve ease of use.

- Third party cookies

These are cookies deposited by third party companies. They are used for marketing purposes, presentation, targeted and personalized advertising. Upply.com has no control over the information collected by third parties.

- Marketing cookies

These are cookies used to track visitors through websites. The purpose is to display advertisements that are relevant and interesting to the user.

d. What cookies are deposited on Upply.com?

Cookies necessary for the site to function (12)

Name of the cookie	Provider	Finality	Duration of conservation
_cfuid	hsadspixel.net	Used to identify trusted web traffic where the cookie does not store any personally identifiable information.	1 year
cfuid	hs-analytics.net	Used to identify trusted web	1 year

		traffic where the cookie does not store any personally identifiable information.	
_cfuid	hscollctedforms.net	Used to identify trusted web traffic where the cookie does not store any personally identifiable information.	1 year
_cfuid	hsforms.com	Used to identify trusted web traffic where the cookie does not store any personally identifiable information.	1 year
_cfuid	hsleadflows.net	Used to identify trusted web traffic where the cookie does not store any personally identifiable information.	1 year
_cfuid	hs-scripts.com	Used to identify trusted web traffic where the cookie does not store any personally identifiable information.	1 year
_cfuid	hubspot.com	Used to identify trusted web traffic where the cookie does not store any personally identifiable information.	1 year
_cfuid	usemessages.com	Used to identify trusted web traffic where the cookie does not store any personally identifiable information.	1 year
rc ::a	google.com	Used to distinguish between humans and robots. It allows to make valid reports on the use of the website.	Persistent
rc ::b	google.com	Used to distinguish humans from robots	Expiration of the session
rc ::c	google.com	Used to distinguish humans from robots	Expiration of the session
Next-i18next	google.com		1 year
rc ::b	google.com	Used to distinguish humans from robots	Expiration of the session
rc ::c	google.com	Used to distinguish humans from robots	Expiration of the session
Next-i18next	google.com		1 year

Preference Cookies (2)

Name of the cookie	Provider	Finality	Duration of conservation
lang	ads.linkedin.com	Stores the language selected by the user	Expiration of the session
lang	linkedin.com	Stores the language selected by the user	Expiration of the session

Statistical cookies (6)

Name of the cookie	Provider	Finality	Duration of conservation
_dg_gtm_UA-#	upply.com	Used by Google Tag Manager to control the loading of a Google Analytics script tag	1 day
ga	upply.com	Used to generate statistical	2 years

		data on how the visitor uses the website.	
_gid	upply.com	Used to generate statistical data on how the visitor uses the website.	1 day
_hjid	upply.com	Used to generate statistical data on how the visitor uses the website.	1 year
_hjid	upply.com	Used to generate statistical data on how the visitor uses the website.	Persistent
collect	google-analytics.com	Used to track visitor behaviour and provide targeted advertising to visitors	Expiration of the session

Cookies marketing (20)

Name of the cookie	Provider	Finality	Duration of conservation
_ab12#	upply.com	Used to present relevant advertising	1 year
_hssrc	upply.com	Used to enable personalized online advertising	Expiration of the session
_ptq.gif	hubspot.com	Sending data to the Hubspot platform on the terminal and user behavior. It is used to track the visitor's navigation on the site	3 months
_fbp	upply.com	Used by Facebook to broadcast a series of advertising products	3 months
_gcl_au	upply.com	Used by Google AdSense to experiment with advertising effectiveness	3 months
_hjIncludedInSample	upply.com	Determines whether the user's navigation should be stored in a certain statistical location.	Expiration of the session
ads/ga-audiences	google.com	Used by Google AdWords to target visitors who are likely to convert to customers based on their online behavior.	Expiration of the session
bscookie	linkedin.com	Used by LinkedIn to monitor the use of integrated services	2 years
fr	facebook.com	Used by Facebook to broadcast a series of advertising products	3 months
hubspotutk	upply.com	Keeps track of a visitor's identity	1 year
IDE	doubleclick.net	Used to record and report user actions on the site, measure the effectiveness of an advertisement and present targeted	1 year

		advertisements to the user.	
lidc	linkedin.com	Used by LinkedIn to monitor the use of integrated services	1 day
MUID	bing.com	Used for user tracking by synchronizing the identifier in Microsoft domains	1 year
MUIDB	bing.com	Used to measure the effectiveness of advertising on the site	1 year
NID	google.com	Used to identify a user's device for sending targeted advertisements	6 months
Pagead/1p-user-list/#	google.com	Used to send targeted advertisements	Expiration of the session
Test_cookie	doubleclick.net	Used to check whether the user's browser supports cookies.	1 day
tr	facebook.com	Used to broadcast a series of advertising products	Expiration of the session
UserMatchHistory	linkedin.com	Used to present relevant advertising	29 days
apc_local_id	upply.com		Persistent
apc_my_id	upply.com		Expiration of the session
apc_my_id_ts	upply.com		Expiration of the session
apc_user	upply.com		Expiration of the session
Embed/v3/counters.gif	Forms.hsforms.com		Expiration of the session

For more information

The cookies used by Upply to measure are in particular :

Google, Hubspot and Hotjar also use cookies for their own purposes. For more information about how Google, Hubspot and Hotjar use cookies and how to decline them, please visit their privacy policies through the links below:

Google : <https://policies.google.com/privacy>

Huspot : <https://legal.hubspot.com/privacy-policy>

Hotjar : <https://www.hotjar.com/legal/policies/privacy>

e) Configuration of cookies stored on a terminal

Any configuration that the User may undertake is likely to modify User's Internet browsing and conditions of access to certain services requiring the use of cookies. The User, at any time, may choose to express and modify its wishes with regard to cookies, by the means described below.

For http cookies, it is possible to configure the browser in such a way that the Cookies are systematically saved on the terminal or, on the contrary, rejected either systematically or according to their issuer. The User may also configure the browser in such a way that the acceptance or refusal of Cookies is proposed from time to time, before a cookie is likely to be saved on the terminal.

If the User refuses to save a Cookie, or deletes those that are saved there, the User may not benefit from a certain number of functionalities that are nevertheless necessary to browse in certain areas of

the Website. In order to manage Cookies as close as possible to Your expectations, please configure Your browser taking into account the purpose of Cookies.

The configuration of cookies is different depending on the internet browser. In order to know how to configure the Cookies in their browser, Users must go to the "help" menu of their browser to find out how to modify their wishes with regard to Cookies. If the Users have accepted to save cookies on their terminal, the Cookies will be stored temporarily in a dedicated space on their terminal, for a maximum of 13 months.

For internet Explorer™:

<http://windows.microsoft.com/fr-FR/windows-vista/Block-or-allow-cookies>

For Safari™:

https://support.apple.com/kb/PH21411?viewlocale=en_US&locale=en_US

For Chrome™:

<http://support.google.com/chrome/bin/answer.py?hl=fr&hlrm=en&answer=95647>

For Firefox™:

<http://support.mozilla.org/fr/kb/Activer%20et%20d%C3%A9sactiver%20les%20cookies>

For Opera™:

<https://www.opera.com/help/tutorials/security/privacy/>

For Google Analytics, in order to disable cookies related to the use of this tool, You can follow the following link provided by Google:

<http://tools.google.com/dlpage/gaoptout?hl=fr>.

III) Applicable law

The Privacy Policy is subject to French law. This Privacy Policy constitutes the entire agreement between UPPLY and the User concerning the use of Users Personal Data by UPPLY and the use of Cookies by UPPLY on the Website. It supersedes and replaces all prior or contemporaneous understandings or agreements, written or oral, regarding such subject matter, and prevails over any conflicting terms.

The Privacy Policy is established in English and in French. In any case, the French language version of Privacy Policy shall prevail over any other version.

In the event of any dispute arising out of the validity, interpretation and/or performance of the Privacy Policy, UPPLY and the User agree to meet to try and find an amicable solution to their dispute.

In the event UPPLY and the User fail to reach an amicable solution, any dispute concerning the interpretation, validity, and/or performance of the Privacy Policy shall be submitted to the competent courts of Paris, including in the case of multiple defendants or introduction of a third party, for proceedings aiming to obtain urgency or protective measures, in summary proceedings or on application.