



Privacy Policy

Version: 5.1

Last updated: 12/11/2025

1. Introduction

AprovaLL, a French simplified joint-stock company (SAS) entered in the Evry Trade and Companies Register under number 503 829 368, having its registered office at 27 avenue Carnot, 91300 MASSY, is committed to ensuring the protection of your personal data.

This policy describes how we collect, use, and protect your data in connection with:

- Our SaaS third-party assessment and management services ("**Services**")
- Our platform for assessed companies
- Our commercial relationship management (customers, prospects, partners)
- Our management of suppliers and service providers
- Our website and marketing communications
- Our recruitment process

Data Protection Officer: privacy@aprovall.com

2. Our role depending on the processing

When we are the data controller

We decide on the purposes and means of processing for:

- Managing our customers, prospects, and business partners
- The management of our suppliers and service providers
- Managing user accounts (customers and assessed companies)
- The technical operation of our platforms
- Standard third-party evaluations in our shared database
- Our communication and marketing
- Our recruitment

You exercise your rights directly with AprovaLL

When we are a Subcontractor

We process personal data solely on behalf of and under the documented instructions of our clients:

- Specific assessments requested by a client
- Documents submitted to the platform for assessed companies at a client's request



- Managing user accounts and activity logs for audit purposes on behalf of our clients

You can exercise your rights with the client or via AprovaLL, which will forward them

3. Data collected

For users of our Services (customers)

- Identity and contact details: surname, first name, position, email address
- Connection: identifiers, IP address, logs, technical data
- Professional information: job title, company name
- Documents and related metadata (e.g., forms)
- Contract and billing: contractual information, payments

For the platform for assessed companies users

- Identity and contact details: last name, first name, email address, telephone number
- Connection: login details, IP address, logs, technical data
- Professional information: job title, company name, career history
- Documents and related metadata (e.g., forms, attestations, certificates, supporting materials)

For our business partners

- Identity and contact details: surname, first name, email address, telephone number
- Professional information: job title, company name, contractual information, interaction history

For our suppliers and service providers

- Identity and contact details: last name, first name, email address, telephone number
- Professional information: job title, company name
- Financial: invoices, payments, interaction history

For website visitors and prospects

- Identity and contact details: last name, first name, email address, telephone number
- Professional information: job title, company name
- Browsing: IP address, cookies, pages visited

For candidates

- Identity and contact details: surname, first name, email address, telephone number
- Professional information: job title, company name, resume, letters, interviews, references
- Browsing: IP address, cookies, pages visited



4. Purposes and retention periods

When we are the data controller

Services (customers)

Purpose	Legal basis	Duration
360 user profile management	Contract	Profile duration
Contractual and commercial management	Contract	Contract duration + 10 years
Claims management	Contract	3 years after closure
Technical logs	Contract	12 months
Standard assessments (shared basis)	Contract	Default, 6 years
Platform improvements	Legitimate interest*	12 months (pseudonymized)
Marketing	Legitimate interest*	Objection or 3 years
360 support	Contract	3 years

Platform for assessed companies

Purpose	Legal basis	Duration
Platform user profile management	Contract	Profile duration
Platform operation	Contract	Profile duration
Technical logs	Contract	12 months
Platform improvement	Legitimate interest*	12 months (pseudonymized)
Platform communication	Contract	Profile duration
Marketing	Consent	Objection or 3 years
Support Platform	Contract	3 years

Business partners

Purpose	Legal basis	Duration
Monitoring of partner relations	Contract	Duration of the partnership + 3 years
Prospecting activities	Legitimate interest*	3 years after last contact

Suppliers and service providers

Purpose	Legal basis	Duration
Supplier management	Contract	Contract duration + 10 years
Accounting	Legal obligation	10 years

Prospects and visitors

Purpose	Legal basis	Duration
Prospect and lead management	Legitimate interest*	3 years
Marketing	Legitimate interest*	Objection or 3 years
Analytical cookies	Consent	13 months

Candidates

Purpose	Legal basis	Duration
Recruitment	Legitimate interest*	6 months
Contact for future positions	Consent	Until withdrawal



Interview recordings	Consent	6 months
----------------------	---------	----------

Cross-functional processing

Purpose	Legal basis	Duration
Exercise or defense of legal rights	Legitimate interest*	Duration of proceedings + limitation periods

*Legitimate interests:

- Improvement: optimizing our services
- Marketing/prospecting: developing our B2B business
- Partners: developing and maintaining our commercial partnerships
- Recruitment: attracting talent
- Defense of rights: protecting our interests and those of others

When we are a Subcontractor

Purpose	Duration
Specific customer evaluations	6 years max
Customer user management	Account duration
Business audit logs	36 months
Invitation history	3 years
Assessed companies platform documents (customer request)	According to customer instructions

***36 months: time required for customers to conduct their internal audits and checks

5. Recipients of your data

Within AprovaLL: Authorized personnel within AprovaLL (support, development, security, sales, HR, compliance teams)

AprovaLL customers: Customer companies access the contact details of the companies they evaluate

Assessed companies: Receive the contact details of the user who invites them to the platform for assessed companies

Business partners: Technical integrations with other software

Subcontractors:

- Hosting (France/EU)
- Communication and CRM
- Monitoring and analysis
- Electronic signature (eIDAS certified)
- Artificial intelligence (document analysis)
- Recruitment (career site, ATS)

A detailed list of our subprocessors is available in our Terms and Conditions or upon request at privacy@aprovall.com



6. Transfers outside the EU

General principle: Data is hosted and processed within the European Union

Exceptions: Certain service providers (e.g., AI, messaging, recruitment) may process data in the United States under Standard Contractual Clauses and/or the EU-US Data Privacy Framework

Enhanced security measures: encryption, limited access

More info: privacy@aprovall.com

7. Your rights

In accordance with Articles 15 to 22 of the EU General Data Protection Regulation (GDPR), you have the following rights:

- **Access:** obtain a copy of your data
- **Rectification:** correct inaccurate data
- **Erasure:** request deletion (except in cases of legal obligations or shared data*)
- **Restriction:** restrict processing
- **Object to the processing of your personal data:** refuse processing (legitimate interest) or prospecting (without justification)
- **Data portability:** receive your data in a structured, commonly used and machine-readable format
- **Withdrawal of consent:** at any time

*Shared data: you can request the deletion of your user data, but not of reviews shared between customers

8. Exercising your rights

If AprovaLL is the data controller

- **Email:** privacy@aprovall.com
- **Candidates:** privacy@aprovall.com
- **Mail:** AprovaLL SAS, DPO, 27 avenue Carnot, 91300 MASSY

We will respond within one month of receipt of your request, which may be extended by two additional months where necessary, depending on the complexity and number of requests.

If AprovaLL is the data processor

You can contact the client directly or go through us (privacy@aprovall.com) and we will forward your request.

If in doubt: Contact us and we will guide you

Requests are free of charge unless they are manifestly unfounded or excessive.



9. Complaints

You can file a complaint with:

France: Commission Nationale de l'Informatique et des Libertés (CNIL) - 3 Place de Fontenoy, 75334 Paris Cedex 07 - www.cnil.fr - +33 (0)1 53 73 22 22 **Other EU countries:** https://edpb.europa.eu/about-edpb/board/members_fr

10. Security

Certifications:

- **ISO 27001** (information security) since 2018
- **ISO 27701** (privacy protection) since 2021 **Main measures:**
- Encryption (in transit and at rest)
- Strong authentication, limited access, semi-annual reviews
- Monitoring, logs, incident detection
- Backups, business continuity
- Security testing, regular audits
- Staff training
- Data Processing Agreements (DPAs) compliant with the GDPR

In the event of a data breach, we notify the CNIL within 72 hours and, where required, affected individuals if there is a high risk to their privacy.

11. Automated decisions

AI-based document analysis (Services)

Used solely to verify the compliance, ownership, and validity of documents (e.g., attestations, certificates). No profiling, scoring, or automated decisions producing legal effects.

Transparency: Reasons for rejection communicated, new submission required

Supervision: Product Director, bias detection

Reporting: ai@aprovall.com

Recruitment

No automated decisions in the recruitment process—all decisions are made by humans

12. Data source

- **Directly from you:** Registration, use, application, documents



- **Your company:** Account creation/management by administrator
- **Our clients:** Invitations to the platform for assessed companies
- **Public sources:** Websites, public administration, LinkedIn (evaluated companies and candidates)
- **Third parties:** Referrals, references, recruitment agencies (candidates)
- **Generated by AprovaLL:** Interview notes, evaluations (candidates)

13. Special cases

Invitation on the platform for assessed companies

When you are invited via the platform by a client, you will receive the sender's contact details for transparency purposes. The client remains responsible for providing you with prior information in accordance with the GDPR.

Company reviewed

When a client follows your company, they have access to your contact details.

Sourced/referred candidates

We may identify you on public sources (LinkedIn, etc.) or receive your recommendation from an employee

We will contact you for information and consent before further processing

References

If a candidate mentions you, we will contact you to obtain information.

Retention: for as long as the candidate's data is retained

14. Cookies

We use cookies on our public websites.

Details are provided in our Cookie Policy available on:

- <https://www.aprovall.com>
- <https://www.e-attestations.com>
- <https://careers.aprovall.com>

15. Changes

We may update this Privacy Policy from time to time for legal, regulatory, or operational reasons. You will be notified at least 30 days in advance (except in urgent cases) via email or the platform. If you do not agree with the changes, you may stop using our Services before they take effect. Check this page regularly for updates.