

PRIVACY POLICY

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PREAMBULE

This Privacy Policy is intended for Users of the Portal published by IRCAM AMPLIFY. The purpose of this document is to inform you about how we collect and process your personal data.

Respect for privacy and personal data is a priority for IRCAM AMPLIFY, which is why we undertake to process such data in strict compliance with the French Data Protection Act of 6 January 1978, also known as the "Loi Informatique et Libertés" in French, (hereinafter "**IEL law**"), as amended, and the General Data Protection Regulation (EU) of 27 April 2016 (hereinafter "**GDPR**").

In any event, we undertake to respect the following two (2) essential principles:

- Each User remains in control of his or her personal data;
- We process your data in a transparent, confidential, and secure manner.

Article 1. Definitions

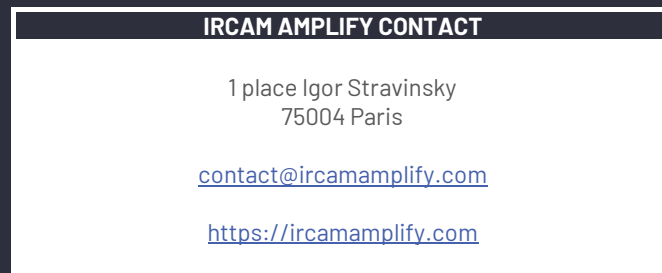
For the purposes of this Policy, terms shall have the following meanings:

- **« Beneficiaries »**: means any person who uses the Solution(s) selected and authorised by the Client to benefit from the Services. The Client is entirely responsible for the use of the Solution(s) by the Beneficiaries.
- **« Client »**: means any person who guarantees to be a professional, as defined by French law and jurisprudence, accessing the Portal via their Account, and subscribing to one of the paid subscriptions offered by IRCAM AMPLIFY as part of the Service, to benefit from one or more Solution(s).
- **« Account »**: means the interface hosted on the Portal where all the data provided by the User is gathered and which allows the User to access the Services. The access to the Account is done through the Identifiers. There are two types of Accounts on the Portal:
 - **« Main account »**: this account is individual and may only be linked to a single natural person representing the Client, who is deemed to hold all the authorisations required for this purpose. Each Client may only create one main Account: and
 - **« Associated account »**: This account is individual and can only be linked to one physical person authorised by the Client. Each User may only create one and only one Associated Account. The number of "Associated Accounts" that can benefit from the Services may be limited, where applicable, in accordance with the indications on the Solution Sheet.
- **« Contract »**: means all the contractual conditions governing relations between the User and IRCAM AMPLIFY, particularly the Portal & Solution General Terms and Conditions of Service and the associated Solution Sheet.
- **« Identifiers »**: means the identifiers that allow Users to access their Account: password and work email address. Each Client is responsible for his/her Login Information.
- **« Solutions »** or **« the Solution »**: the software solutions published and operated by IRCAM AMPLIFY and all their graphic, sound, visual, software, database, and text components. The Solutions are software applications provided as a SaaS service (meaning "Software as a Service", a kind of software that can be accessed through a suitable web browser) offering various features for the Client.

- «**Portal**»: refers to the online Portal accessible at the following address: www.ircamamplify.io. The Portal comprises all the web pages, Services and functionalities offered to Users.
- «**Services**»: means any service offered by IRCAM AMPLIFY as part of the provision of the Portal and the supply of Solution(s), as well as any other associated ancillary service.
- «**User**»: means any person accessing and browsing the Portal, whether a Client or an ordinary Internet user.

Article 2. Identity of the data controller

In providing the various Services, IRCAM AMPLIFY will be your "Data Controller" as defined by the GDPR.



Legal Notice:

For the purposes of the IEL Law and the GDPR, the data controller is the person who determines the means and purposes of the processing. When two or more data controllers jointly determine the purposes and means of processing, they are referred to as joint controllers.

The data processor is a person who processes personal data on behalf of the data controller, acting under the authority of and on the instructions of the data controller.

Article 3. Contact of our Data Protection Officer

Our Data Protection Officer (hereinafter "DPO") is available to respond to all requests, including requests to exercise your rights, relating to your personal data.

He can be contacted at:

- **By e-mail** to the following address : donneespersonnelles@ircamamplify.com
- **By post**: Ircam Amplify - Data Protection Officer, 1 place Igor Stravinsky, 75004 Paris

More information

The Data Protection Officer's role is to inform, advise and monitor IRCAM AMPLIFY's compliance with data processing operations.

In accordance with data protection regulations, the DPO acts as a point of contact:

- In relation to the data subjects, for any matters relating to the data processing carried out by IRCAM AMPLIFY or the exercise of their rights;
- In relation to the CNIL as part of its cooperation mission. The DPO may also contact this authority to request an opinion or prior consultation on all subjects concerning the protection of personal data;
- In relation to other DPOs appointed by participating subcontractors or data controllers.

Article 4. How do we collect your data?

As a rule, we obtain all your personal data directly from you.

For example, when registering on the Portal or when dealing with IRCAM AMPLIFY (contact requests, letters, etc.).

As an exception, we may obtain your personal data from your employer to set up an account for you (under our "Enterprise" service).

Article 5 - What are the purposes and legal bases of the processing operations we carry out?

We collect only the personal data necessary for the explicit purposes set out below:

PURPOSE	DETAILS OF THE PURPOSE PURSUED	LEGAL BASIS
Portal and Solutions Administration	<ul style="list-style-type: none"> - General administration of the Portal and Solutions; - Carrying out maintenance operations; - General management of the security of the Portal and Solutions; - Deposit of cookies and other tracers necessary for the proper functioning of the Portal and the Solutions; - Control and monitoring of API operation; - Monitoring Beta Testing programs, and carrying out analysis on your use as part of our research and development actions and; - Production of statistics on the use of the Portal and Solutions. 	Our legitimate interest in ensuring Internet users have the best experience on the Portal, and the best quality of the Services offered.
Provision of Services	<ul style="list-style-type: none"> - Management of Account creation, modification and deletion requests; - Provision and delivery of Services to Users; - Monitoring and controlling the proper use of the Services; - Sending non-commercial information relating to the provision of the Services and; - Production of statistics on the use of the Services. 	Contractual , the Processing is necessary for the execution of a contract or pre-contractual measures.
Monitoring of partnerships	<ul style="list-style-type: none"> - Monitoring and animation of partnerships 	Our legitimate interest in activating our network of partners
Management of contact and information requests and complaints	<ul style="list-style-type: none"> - Processing requests for information; - Carrying out a B2B prospecting campaign (email, telephone, mail); - Animation of the Portal and social networks (community management); - Event planning; - Development of statistics on marketing operations. 	Our legitimate interest in responding to your requests and defending the interests of IRCAM AMPLIFY
B2B Prospecting	<ul style="list-style-type: none"> - Carrying out a B2B prospecting campaign (email, telephone, mail); 	Our legitimate interest in proposing offers to you as part of our commercial development. These solicitations are sent to you

	<ul style="list-style-type: none"> - Animation of the Portal and social networks (community management); - Event planning; - Development of statistics on marketing operations. 	if they are related to your professional activity. You can opt out of these mailings at any time via the dedicated unsubscribe links.
Management of billing for Services	<ul style="list-style-type: none"> - Monitoring payment for Services and invoicing; - Management of unpaid debts; - Maintaining accounting records and legal supporting documents. 	<p>Contractual, the processing is necessary for the execution of a contract.</p> <p>Our legitimate interest in monitoring invoicing and managing unpaid debts.</p> <p>In accordance with our legal obligations, which primarily stem from articles L102 B and the subsequent provisions of the French Code of Tax Procedures.</p>
Sending the Newsletter	<ul style="list-style-type: none"> - Management of newsletter subscriptions; - Production of statistics on the use of the Services. 	Your consent
Management of requests for the exercise of legal rights	<ul style="list-style-type: none"> - Monitoring the processing of requests; - Carrying out operations on your data in the context of requests sent. 	Our legal obligations arising from articles 15 and the subsequent provisions of the GDPR and the French Data Protection Act.

When the legal basis used is the exercise of a legitimate interest, you may, on request, obtain further information on the balancing of interests.

Article 6 - What types of data are collected?

The compulsory or optional nature of the Personal Data collected and the possible consequences of failing to reply are indicated during the various contacts with Users.

You can consult the details of the Data that we may hold on you below:

TREATMENTS	TYPES OF PERSONAL DATA COLLECTED
Portal and Solutions Administration	<ul style="list-style-type: none"> - Information associated with the User Account (surname, first name, title, business details, etc.). - Connection logs, hardware identification data, usage data for Services and APIs and history of actions on the Portal and Solutions. - Data collected via cookies and other "technical" tracers. - Statistics.
Provision of Services	<ul style="list-style-type: none"> - Information associated with the User Account (surname, first name, title, business details, etc.). - Contractual information relating to the subscription to Services. - Connection logs. - Data relating to the use of services. - Statistics.
Monitoring of partnerships	<ul style="list-style-type: none"> - Data relating to the identity of our partners: title, surname, first name, address, telephone number, e-mail addresses, date of birth, etc. - Contractual data from agreements signed with our partners. - Statistics.

Management of contact and information requests and complaints	<ul style="list-style-type: none"> - Information about the applicant (title, surname, first name, contact details). - Information relating to the request. - Statistics.
B2B Prospecting	<ul style="list-style-type: none"> - Client/prospect civil status data (surname, first name, title). - Professional details (position, e-mail, contact information, etc.). - Interests expressed in Services / Use of Services. - Information relating to the organisation of events. - Data relating to interactions with our services on blogs, forums, and social networks. - Statistics.
Management of billing for Services	<ul style="list-style-type: none"> - Financial information relating to the consumption of Services. - Payment data, for example: data relating to the means of payment used when subscribing to a Service (RIP or RIB, information on transfers, information on payments by bank card, etc.). - Data relating to the preparation and payment of invoices: payment methods, discounts granted, receipts, balances, and unpaid invoices, etc. - Statistics.
Sending the Newsletter	<ul style="list-style-type: none"> - Civil status data and professional e-mail address - Statistics
Management of requests for the exercise of legal rights	<ul style="list-style-type: none"> - Data relating to your identity: title, surname, first names, address, telephone number, email addresses, membership number, date of birth. Proof of identity may be kept for the purposes of proving the exercise of a right of access, rectification, or opposition or to meet a legal obligation. - Data relating to your request to exercise your rights. - Statistics.

The information provided below is not intended to be exhaustive and aims above all to inform you of the categories of Data that IRCAM AMPLIFY is likely to process.

In any event, IRCAM AMPLIFY undertakes to Process all Data collected in accordance with the GDPR and the French Data Protection Act.

When the collection of this information is of a regulatory or contractual nature, or if it is a condition for the conclusion of a contract, or if there is an obligation to provide the information, we will indicate this by means of an asterisk (*) at the time of collection.

Failure to provide this information could result in IRCAM AMPLIFY terminating or not offering you its Services, and, where applicable, incur your liability.

Article 7 - Who can access your personal data?

Within the limits of their respective responsibilities and for the purposes set out above, the main persons likely to have access to your Data are as follows:

- Authorised personnel of IRCAM AMPLIFY;
- Where applicable, authorised personnel of IRCAM AMPLIFY subcontractors: Portal hosting service provider, etc;
- Where applicable, third parties involved in invoicing operations: banks, payment service providers, etc.
- Where applicable, the courts concerned, mediators, chartered accountants, statutory auditors, lawyers, bailiffs, debt collection companies, police or gendarmerie authorities in the event of theft or judicial requisition;
- Where applicable, third parties likely to place "commercial" cookies on your terminals (computers, tablets, smartphones, etc.) when you give your consent.

Your data will not be communicated, exchanged, sold, or rented to anyone other than those mentioned above without your express prior consent and in accordance with the applicable legal and regulatory provisions.

Article 8 - How long do we keep your personal data?

We retain your Personal Data only for as long as is necessary for the purposes for which it was collected, as summarised in the table below:

TREATMENTS	CONSEVATION PERIOD
Portal and Solutions Administration	For the entire duration of the contractual relationship, followed by intermediate archiving for the duration of the applicable statute of limitations, for example, five (5) years, for purposes of proof. Storage of connection logs and history of actions for a period not exceeding twelve (12) months.
Provision of Services	For the entire duration of the contractual relationship, followed by intermediate archiving for the duration of the applicable statute of limitations (five (5) years for evidential purposes). Retention of connection logs and history of actions for a period not exceeding twelve (12) months.
Monitoring of partnerships	For the duration of the established partnership, then for the duration of the applicable statute of limitations, for example, five (5) years, for evidential purposes.
Management of contact and information requests and complaints	For the time required to process your request in full, and thereafter for a period not exceeding three (3) years. Where your request relates to the performance of your contract, the maximum retention period will be extended to five (5) years after the end of our contractual relationship (for evidential purposes). Where your request relates to a complaint, for the duration of the processing of your complaint, and where applicable until all ordinary and extraordinary remedies have been exhausted.
B2B Prospecting	For a period not exceeding three (3) years from the last positive contact from you, and/or from the end of our commercial relationship.
Management of billing for Services	We shall retain records of our invoicing for the duration required for accounting purposes and thereafter for a maximum period of ten (10) years to fulfil our statutory obligations in relation to bookkeeping.
Sending the Newsletter	The Data is kept until the withdrawal of consent (cancelling subscription via the link provided for this purpose) or, where applicable, for the entire duration of the contractual relationship, then stored in an intermediate archive for three (3) years at the end of the contractual relationship, or for three (3) years after the last contact with IRCAM AMPLIFY.
Management of requests for the exercise of legal rights	Personal Data relating to the management of requests for rights are kept for the entire period required to process the request, then stored in intermediate archives for the duration of the applicable criminal statute of limitations, for example, six years, in intermediate archives (Art. 8 of the French Code of Criminal Procedure).

Article 9 - What are your rights?

In accordance with the IEL law and the GDPR, you have a several rights in relation to your Personal Data:

- **Right of access:** you have the right to access all your Personal Data at any time, pursuant to [Article 15 GDPR](#);
- **Right of rectification:** you have the right to rectify inaccurate, incomplete or obsolete Personal Data at any time in accordance with [Article 16 GDPR](#);
- **Right to erasure:** you have the right to demand that your Personal Data be erased and to prohibit any future collection on the grounds set out in [Article 17 of the GDPR](#), for example, where it is inaccurate, incomplete, equivocal, out of date, or the collection, use, communication or storage of which is prohibited (find out more);
- **Right to restrict processing:** you have the right to ask us to temporarily freeze the use of some of your data, subject to the conditions laid down ([Article 23 of the GDPR](#));
- **Right to object:** under [Article 21 of the GDPR](#), you have the right to object to the Processing of your personal data. Please note, however, that we may continue to Process them despite this objection, for legitimate reasons or to defend legal rights;

- **Right to portability:** under certain conditions specified in [Article 20 of the GDPR](#), you have the right to receive the Personal Data you have provided to us in a standard machine-readable format and to request that it be transferred to the recipient of your choice.

You will also have the:

- **Right to withdraw your consent at any time:** for purposes based on consent, Article 7 of the RGD states that you may withdraw your consent at any time. This withdrawal will not call into question the legality of the Processing carried out prior to the withdrawal ([article 13-2c GDPR](#));
- **The right to define the fate of your Personal Data after your death** and to choose whether we communicate your Personal Data to a third party that you have previously designated ([article 85 the French Data Protection Act](#) – French version).

You may enforce these rights by communicating with our DPO:

- By e-mail to the following address: donneespersonnelles@ircamamplify.com
- By post to the following address: IRCAM AMPLIFY - 1, Place Igor Stravinsky 75004 Paris

You may also file a grievance with an appropriate regulatory body.

So far, IRCAM AMPLIFY has not made any automated determinations that could entail legal ramifications for you or materially impact you.

Article 10 - What about cookies and other tracking devices?

IRCAM AMPLIFY uses connection data (date, time, Internet address, protocol of the visitor's computer, page consulted) and cookies (small files saved on Your computer) on its Portal to identify You, to remember Your visits and to measure and analyse the audience of the Portal, particularly in relation to the pages consulted.

Depending on their purposes, Users may consent, reject, or select the deposit of specific types of cookies on their devices. This information is retained for a maximum period of thirteen (13) months. Beyond this timeframe, raw traffic data associated with an identifier is either deleted or anonymized. Information collected through trackers is retained for twenty-five (25) months. Beyond this period, this data is deleted or anonymized.

During your browsing, you have the option to click on dedicated social network icons X (e.g., Twitter), Facebook, Instagram, TikTok, LinkedIn...

Social networks enhance the user-friendliness of our Services and assist in their promotion through sharing.

When users use share buttons for social network posts, IRCAM AMPLIFY may access personal information that users have marked as public and accessible from their profiles. However, IRCAM AMPLIFY does not process any data related to your privacy in this manner.

Article 11 - Are your personal data transferred outside the European Union?

In principle, we process your data within the European Union.

Given the evolution of our activities, we may be required to transfer your Data outside the European Economic Area. In such a scenario, we will keep you informed of this development.

Article 12 - What security measures are in place?

We implement all necessary technical and organizational measures to ensure the security of our processing of personal data and the confidentiality of the data we collect.

In this regard, we take all necessary precautions, considering the nature of the data and the risks posed by the processing, to preserve its security and, notably, prevent data from being distorted, damaged, or accessed by

unauthorized third parties (physical protection of premises, authentication processes for individuals accessing data with personal and secure credentials, logging and traceability of connections...)."