

## **Privacy Notice**

### **TOTEM contact form**

This Privacy Notice explains how TOTEM Group - acting as data controller - processes your personal data.

#### **Why does TOTEM Group process your personal data, and on under what legal basis?**

TOTEM Group processes your personal data with your consent in order to respond to the contact request you sent via the TOTEM Group website available at the URL: <https://www.totemtowers.com>

In addition, TOTEM Group processes your personal data, with your consent, collected on the contact form page in order to carry out marketing operations (loyalty, prospecting).

#### **What personal data is collected?**

The personal data collected by TOTEM Group in this regard is:

- Your identification data (first name and last name)
- Your phone number
- Your email address

#### **Who has access to your personal data?**

Collected data is shared solely with authorized services within the TOTEM Group, as part of their duties and within their respective remits:

- o Services in charge of IT and Communication
- o Services in charge of billing at TOTEM France and Spain
- o Services in charge of landlord relations at TOTEM France and Spain
- o Services in charge of business relations at TOTEM France and Spain

You are informed that pursuant to prevailing laws and regulations, data may be sent to the competent authorities, at their request, in their capacity as Authorized Third Parties.

#### **How long do we retain your personal data?**

TOTEM Group keeps your personal data for no longer than is necessary for the purposes for which it was collected, in accordance with prevailing regulations.

If you have given your consent to the collection of your data for loyalty and canvassing purposes, your data will be kept for a period of three (3) years from the date of their communication to TOTEM Group.

TOTEM Group might require keeping, in archive file, some of your personal data in order to be able to fulfil its legal obligations and/or to respond to any lawsuit, and for the duration of prescription provided by the applicable legislation.

#### **What are your rights and how can you exercise them?**

You can exercise the right of access and of correction of your personal data at any time. You can also exercise the right to request the deletion, oppose the processing and the right to obtain the limitation of the processing. You might be able to exercise the right to data portability in some cases.

TOTEM Group informs you that you are free to withdraw your consent for personal data processing at any time.

You can also give instructions on the retention, erasure or disclosure of your personal data after your death.

To exercise your rights, you can email TOTEM Group by justifying your identity at the following address: [group.dpo@totemtowers.com](mailto:group.dpo@totemtowers.com)

TOTEM Group also informs you that you have the right to submit a request to the “Commission Nationale de l’Informatique et des Libertés” (CNIL), the supervisory authority in charge of compliance with the obligations regarding personal data in France. However, TOTEM Group encourages you to contact it before filing any request so that they try to solve it.

#### **Data Protection Officer’s contact details:**

You may also contact the Data Protection Officer at TOTEM Group with any questions concerning personal data protection:

- By e-mail: [group.dpo@totemtowers.com](mailto:group.dpo@totemtowers.com)
- By post:
  - TOTEM Group
  - For the attention of the Data Protection Officer
  - La Défense-Espace Village Immeuble 6 31 Place Ronde
  - 92800 NANTERRE

#### **Is your personal data transferred outside the European Union?**

Personal data collected and processed by TOTEM Group is not transferred outside the European Union.

In case of transfer of personal data outside the European Union, TOTEM Group will ensure that the appropriate guarantees are put in place, notably contractual guarantees, to ensure the protection of your data and compliance with the applicable personal data protection regulations.

#### **How is your personal data kept secure?**

TOTEM Group undertake to protect your data in a secure and confidential way, including when certain operations are carried out by suppliers. In this respect, appropriate technical and organizational measures to prevent loss, misuse, alteration, and deletion of your personal data are implemented. These measures are tailored in line with the level of sensitivity of the data.

#### **Amendment of this Personal Data Notice**

This Personal Data Notice might be amended in the future.

Last updated: 09/03/2023