

# PRIVACY POLICY

Datum Cloud Platform — datumcloud.net

Effective Date: April 10, 2026

**ASS GROUP SARL** (the “**Company**”, “**we**”, “**our**”, or “**us**”), a société à responsabilité limitée organized under the laws of France, respects your privacy and is committed to protecting your Personal Data. This Privacy Policy explains how we collect, use, disclose, and safeguard information in connection with the Datum Cloud platform and the website available at datumcloud.net (together, the “**Service**”).

This Policy applies to Personal Data we process as a **data controller** — primarily information about website visitors, prospects, and individuals who correspond with us. When we process Personal Data on behalf of our enterprise customers as a **data processor** (for example, data stored in vaults by our customers), our processing is governed by our Data Processing Addendum and the applicable customer agreement, not this Policy.

## 1. Data Controller

The data controller responsible for Personal Data processed under this Policy is:

**ASS GROUP SARL**

Registered in France

Contact: [privacy@datumcloud.net](mailto:privacy@datumcloud.net)

Data Protection Officer: [dpo@datumcloud.net](mailto:dpo@datumcloud.net)

## 2. Categories of Personal Data We Collect

Depending on your interaction with us, we may collect the following categories of Personal Data:

### 2.1 Information You Provide Directly

- **Contact information:** name, business email address, telephone number, job title, company name, postal address.
- **Account information:** username, password (stored in hashed form), account preferences, and role assignments when you register for the Service.
- **Commercial information:** billing address, VAT number, purchase history, and payment method details (payment card data is processed by our PCI-compliant payment processors and not stored on our systems).
- **Communications:** content of emails, support tickets, demonstrations, and any other correspondence you send to us.

### 2.2 Information Collected Automatically

- **Usage data:** IP address, browser type, device identifiers, operating system, pages viewed, features used, referral URLs, timestamps of access.
- **Cookies and similar technologies:** strictly necessary cookies for session management, and (with your consent) analytics and preference cookies. See Section 7 for details.
- **Log data:** records of API calls, administrative actions, and security events, retained for auditing and incident response purposes.

## 2.3 Information From Third Parties

- We may receive information from business partners, referral sources, event organizers, and publicly available sources (such as professional networking platforms) for the purposes of business development and due diligence.

## 3. Personal Data We Do Not Collect Through the Service

The core functionality of the Service is designed to minimize our exposure to our customers' Personal Data. Personal Data stored by customers in their vaults is encrypted, and in configurations supporting customer-managed keys, we have no ability to decrypt such data. We do not access, mine, analyze, or monetize customer vault contents, and we do not use customer vault contents to train artificial intelligence or machine learning models.

ZK Proofs generated by the Service and recorded on blockchain networks contain only cryptographic commitments and non-identifying metadata. They do not contain Personal Data, and we cannot extract Personal Data from them.

## 4. Purposes and Legal Bases of Processing

We process Personal Data for the following purposes, based on the following legal bases under Article 6 of the GDPR:

| Purpose   | Legal Basis (GDPR Art. 6)                    |
|---|--|
| Providing and maintaining the Service                             | Contract performance (6(1)(b))               |
| Processing payments and invoicing                                 | Contract performance (6(1)(b))               |
| Communicating with you about the Service                          | Contract / Legitimate interest (6(1)(b)/(f)) |
| Marketing our Service to existing and prospective customers (B2B) | Legitimate interest (6(1)(f))                |
| Direct marketing to individuals (where required)                  | Consent (6(1)(a))                            |
| Security, fraud prevention, and incident response                 | Legitimate interest (6(1)(f))                |
| Complying with legal and regulatory obligations                   | Legal obligation (6(1)(c))                   |
| Establishing, exercising, or defending legal claims               | Legitimate interest (6(1)(f))                |
| Analytics and improvement of the Service                          | Legitimate interest / Consent                |

## 5. How We Share Personal Data

We do not sell Personal Data. We may share Personal Data with the following categories of recipients, under appropriate contractual and technical safeguards:

- **Sub-processors and service providers:** cloud hosting providers (located within the European Economic Area), email service providers, analytics tools, customer relationship management systems, payment processors, and professional advisors. A current list of sub-processors is available upon request.
- **Affiliates:** companies under common ownership or control with Company, for internal administrative and business development purposes.

- **Legal and regulatory recipients:** courts, law enforcement, tax authorities, and regulators where disclosure is required by law or necessary to protect our rights or the safety of others.
- **Successors in interest:** in the event of a merger, acquisition, reorganization, or sale of assets, Personal Data may be transferred as part of the transaction, subject to notice and safeguards required by law.

## 6. International Data Transfers

Personal Data is primarily processed within the European Economic Area. Where we transfer Personal Data outside the EEA, we rely on appropriate safeguards under Chapter V of the GDPR, including European Commission adequacy decisions, Standard Contractual Clauses, or other legally recognized mechanisms. You may request a copy of the safeguards applicable to a specific transfer by contacting us at the address in Section 1.

## 7. Cookies and Similar Technologies

Our website uses cookies and similar technologies to operate properly and to understand how visitors interact with our content. We distinguish between:

- **Strictly necessary cookies:** required for session management, security, and load balancing. These cannot be disabled and do not require consent.
- **Analytics cookies:** help us understand aggregate usage patterns. Deployed only with your consent via our cookie banner.
- **Preference cookies:** remember your choices (such as language). Deployed only with your consent.

You may withdraw your consent at any time through the cookie preferences panel accessible via the footer of datumcloud.net.

## 8. Data Retention

We retain Personal Data only as long as necessary for the purposes for which it was collected, or as required by law. Typical retention periods are:

- Prospect and lead data: up to three (3) years after last meaningful contact, unless you object earlier.
- Customer account data: for the duration of the customer relationship plus the statutory limitation period applicable under French law.
- Billing and accounting records: ten (10) years, as required by French commercial law.
- Security logs: twelve (12) months, unless a longer period is required for incident investigation.
- Marketing consents and opt-outs: retained as long as necessary to demonstrate compliance with applicable law.

## 9. Your Rights Under the GDPR

Subject to the conditions and limitations set out in the GDPR, you have the right to:

- **Access** the Personal Data we hold about you (Article 15).
- **Rectification** of inaccurate or incomplete Personal Data (Article 16).
- **Erasure** (“right to be forgotten”) of Personal Data in the circumstances specified in Article 17.
- **Restriction** of processing in the circumstances specified in Article 18.
- **Data portability** for Personal Data processed on the basis of consent or contract (Article 20).
- **Object** to processing based on legitimate interests, including direct marketing (Article 21).

- **Withdraw consent** at any time, without affecting the lawfulness of processing based on consent before its withdrawal (Article 7(3)).
- **Lodge a complaint** with a supervisory authority, in particular the CNIL (Commission nationale de l'informatique et des libertés), or the authority in the EU Member State of your habitual residence, place of work, or place of the alleged infringement (Article 77).

To exercise your rights, please contact us at [privacy@datumcloud.net](mailto:privacy@datumcloud.net). We will respond within one (1) month of receiving your request, or inform you of any extension required by the complexity or number of requests.

## 10. Security of Personal Data

We implement appropriate technical and organizational measures to protect Personal Data against unauthorized access, alteration, disclosure, or destruction. These measures include encryption in transit and at rest, strict access controls, regular security audits, employee training, and incident response procedures. No method of transmission over the Internet is 100% secure; however, we continuously work to protect Personal Data and will notify affected individuals and competent authorities of personal data breaches in accordance with Articles 33 and 34 of the GDPR.

## 11. Children's Privacy

The Service is intended for business use and is not directed to individuals under the age of 16. We do not knowingly collect Personal Data from children. If you become aware that a child has provided Personal Data to us, please contact us and we will take steps to delete such information.

## 12. Automated Decision-Making

We do not use Personal Data for automated decision-making that produces legal or similarly significant effects on individuals, within the meaning of Article 22 of the GDPR.

## 13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. We will post the updated version at [datumcloud.net](https://datumcloud.net) with a revised effective date, and where changes are material, we will notify affected individuals through the Service or by email.

## 14. Contact Us

For questions about this Privacy Policy or to exercise your rights, please contact:

### **ASS GROUP SARL**

Attention: Data Protection Officer

Email: [dpo@datumcloud.net](mailto:dpo@datumcloud.net)

General inquiries: [privacy@datumcloud.net](mailto:privacy@datumcloud.net)

Website: <https://datumcloud.net>

You may also lodge a complaint with the French data protection authority: **CNIL (Commission nationale de l'informatique et des libertés)**, 3 Place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07, France ([www.cnil.fr](http://www.cnil.fr)).

— End of Privacy Policy —