



Privacy Policy

As a provider of innovative digital services, we are particularly concerned about the protection of our customers' personal data.

Below you will find VIANOVA's Privacy Policy, which explains our practices and commitments regarding the processing of your personal data, in particular in accordance with the [General Data Protection Regulation \(RGPD\)](#).

Aware of the importance of clear and transparent information in this respect, we have included various tables and visuals to help you better understand and exercise your rights.

This policy was last updated on October 1st, 2020.

1. Who is responsible for processing your data?

The web site accessible at the address vianova.io is published and technically managed by the company VIANOVA SAS (hereafter "VIANOVA"), a simplified joint stock company registered under the number 831 679 733, and whose head office is located at 55 rue la Boétie, 75008 Paris, France.

When you browse this site and/or exchange information with VIANOVA (for example, for the purposes of informing you about its products and services), personal data concerning you is collected and processed by VIANOVA.

VIANOVA is responsible for this collection and processing of your data in accordance with the [General Data Protection Regulation \(GDPR\)](#).

This means that we are your point of contact for any questions or concerns relating to this collection or processing. You can write to us in this regard at dpo@vianova.io.

Important : VIANOVA designs and markets services based on the processing of personal data, such as mobility data analysis and visualization services for local authorities, enabling them to better manage mobility flows on their territories.

As a simple service provider, VIANOVA is not, from the point of view of the RGPD, responsible for the data processing implemented within the framework of these services. This is the responsibility of the local authority concerned, insofar as it alone determines the use it intends to make of the data through our services.

For any question related to the collection and processing of your data within the framework of our services (if, for example, you are a resident of a city using our services and wish to exercise your rights with respect to your data), we therefore invite you, in accordance with the RGPD, to contact the representative of the city concerned (for example, the services of the city council or the public establishment in charge of transport).

However, you can consult our [GDPR Statement](#) to better understand how, as a subcontractor of local authorities, we act to ensure data protection in compliance with the GDPR.

2. What data is collected about you, and for what purposes?

a. Connection to vianova.io (http request)

When you connect to the [vianova.io](#) website, a certain amount of data is automatically collected by the site host concerning your terminal (computer, smartphone, tablet) and your browser. This includes in particular your IP address.

This data is collected for the purpose of ensuring the connection between your terminal and the site's servers, as well as subsequently to detect bugs and cyber attack attempts.

The collection and processing of this data is thus justified by VIANOVA's legitimate interest in providing a site that is functional, secure and adapted to the different types of terminals and browsers available on the market, in accordance with article 6.1.f) of the RGPD.

b. Contact form and chat on the vianova.io website

The website contains a form and a chat room allowing you to contact VIANOVA, in particular for the purpose of receiving documentation on our products and services.

To be able to send us a message via this contact form, it is mandatory to indicate your name, your email address and the organisation to which you belong, as well as the content of your message. To write to us via the chat, you just have to write your messages. This data (which includes the content of the messages exchanged) is necessary for us to be able to understand and process your request, and to offer you a presentation of our services if necessary.

The collection and processing of this data is thus justified by VIANOVA's legitimate interest (article 6.1.f) RGPD) in promoting its products and services and responding to commercial solicitations.

c. Cityscope Newsletter

You can subscribe to our newsletter, called Cityscope, to receive information about our products, services and events, as well as more general information about urban mobility. To do so, you can use the registration module on the vianova.io website.

As this is a newsletter intended primarily for professional contacts, the use of your email address for the purpose of sending it to you is justified by VIANOVA's legitimate interest (article 6.1.f) RGPD) in promoting its activity in general.

If you are not a professional in the mobility sector (for example: if you are a private citizen interested in our services), then the sending of the newsletter is based on your consent (article 6.1.a) RGPD), which you express by registering via the vianova.io website. You may withdraw this consent at any time by unsubscribing via the appropriate link included in the newsletter.

d. Relationship management with our customers, prospects and partners

We are naturally likely, in the context of our relations with our customers, prospects and partners (including in particular mobility operators), to collect personal data relating to our interlocutors.

This data mainly includes the surname, first name, email and postal addresses and telephone numbers of our contacts, as well as copies of all written correspondence with them.

This data is necessary for us to ensure the proper management and follow-up of these relationships. Their collection and processing are thus based on VIANOVA's legitimate interest (article 6.1.f) of the RGPD), which consists in ensuring the promotion of its products and services, as well as the monitoring of its exchanges with its partners.

► Summary table

Collected data	Purpose (intended or possible use of the data)	Rationale for the purpose in terms of the DPGR	Maximum retention time of data in a form that allows you to be identified
Information relating to your Internet browser and your terminal (http request)	Allow your connection to the vianova.io website; detect bugs and attempted cyber-attacks	VIANOVA's legitimate interest (article 6.1.f) GDPR)	Legally applicable statute of limitations (in principle 5 years) (retention of data as evidence for possible litigation)
Data entered by you in the contact form and/or the chat tool	Reply to your messages and requests sent via the contact form and/or the chat tool	VIANOVA's legitimate interest (article 6.1.f) GDPR)	Legally applicable statute of limitations (in principle 5 years) (retention of data as evidence for possible litigation)
Your email address	Send you our Cityscope newsletter	If you are a professional: VIANOVA's legitimate interest (article 6.1.f) RGPD) If you are not a professional: your consent (section 6.1.a) EPMR)	Until you unsubscribe from the newsletter, or at the latest 3 years after the last contact received from you.

Your full name, first name, email and postal address and telephone number, and copies of our written correspondence	Manage our relationships with our customers, prospects and partners (including mobility operators)	VIANOVA's legitimate interest (article 6.1.f) GDPR)	Clients and partners: 5 years following the end of our contractual relationship (data retention as evidence in case of a possible litigation) Prospects: 3 years following the last contact received from you
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3. Who has access to your data? With whom is it shared?

Your data is hosted by various professional service providers that we use (hosting of the vianova.io website, hosting of our professional messaging services, drive services). VIANOVA's teams and employees may have access to it within the framework and limits of their functions.

Some of your data may also be hosted or at least consulted by the following persons and organizations:

- Technical service providers assisting VIANOVA for the maintenance and evolution of the vianova.io website;
- VIANOVA's legal advisors, including its outsourced data protection officer.

These service providers are all located in the European Union.

4. What rights do you have to control the processing of your own data?

You have a number of rights provided for in the regulations, just like any other person whose personal data we collect and process.

You will find details of these rights below. A summary table is also proposed to you below.

You can exercise these rights simply by writing directly to our data protection officer at the following e-mail address: dpo@vianova.io. Please remember to indicate in your email the nature of the right you wish to exercise and the reasons that justify, if applicable, your request to exercise this right.

a. Right of access

You have the right to request a copy of the personal data we hold about you, in an easily understandable format, as well as a copy of this policy on a durable medium.

b. Right of rectification

You have the right to ask us to correct, complete or update the data we have about you, if it seems to you to be inaccurate, incomplete or out of date.

In this case, we would be grateful if you would spontaneously communicate to us, as far as possible, the new information necessary to carry out the requested correction, completion or update.

c. Right to withdraw consent

If you subscribe to our newsletter as a non-professional, you have the right to withdraw your consent to receive this newsletter at any time, without justification. To do so, you can use the unsubscribe link contained in each issue of the newsletter.

d. Right of opposition

With regard to the processing of your data based on VIANOVA's legitimate interest (see above), you have the right to object for reasons relating to your particular situation. In other words, you may request VIANOVA to stop any of these processing operations on your behalf, stating the particular reasons justifying this request from your point of view.

However, VIANOVA may refuse to comply with your request if the continuation of such processing is necessary for compelling reasons from our point of view (for example: if the data concerned is necessary for the protection and defence of VIANOVA's rights in court).

Opposition (if it is based on valid reasons and there are no compelling reasons to oppose it) will result in the cessation of the processing for the future, but not necessarily in the destruction of the data concerned: in order to obtain such destruction, you must exercise your right to erasure under the conditions described below, it being specified that the latter is subject to limitations, for example, again due to the need to retain the data for the protection and defence of the interests of VIANOVA in court.

Good to know : You do not need to show any particular reason to oppose the receipt of our newsletter. You can do so by using the unsubscribe link contained in each issue of this newsletter.

e. Right to delete

You can ask us to delete all or part of the data we have about you, as long as at least one of the following conditions is met:

- You have withdrawn your consent to receive our newsletter in accordance with point c. above, and furthermore wish VIANOVA to delete your email address.
- You have objected to further processing in accordance with point d. above and would also like VIANOVA to delete the data concerned.
- The data concerned is no longer necessary for any of the purposes set out above.
- You consider that VIANOVA has collected and/or processed the data concerned in a manner contrary to the law.
- The deletion of the data concerned is imposed as a legal obligation.
- The data concerned relates to a person who was under fifteen (15) years of age at the time of the collection of the data.

Please note, however, that VIANOVA has the right to object to the deletion of certain data when their retention is necessary for particularly important reasons, such as the protection and defence of its interests in court.

Please also note that, instead of deleting the data, we may choose to completely and irreversibly anonymize the data. In this way, we are entitled to store this data in a format that no longer allows you to be identified (e.g. for statistical purposes).

f. [Right to limitation of treatment](#)

If you do not, for example, exercise your right of deletion, you can also ask VIANOVA to "set aside" certain data concerning you, i.e. to keep this data separately, without using it any further (unless legally required to do so).

You can make such a request if at least one of the following conditions is met :

- The data concerned appears to you to be inaccurate and you would prefer that VIANOVA stops using it until it has been checked and corrected if necessary.
- You have exercised your right to object in accordance with point d. above, and you would prefer VIANOVA to stop using the data concerned for the time necessary to verify the validity of your objection.
- You consider that VIANOVA has collected and/or processed the data concerned in a manner contrary to the law, but still prefer that we retain the data rather than delete it.
- The data concerned is no longer required for any of the purposes set out above, but you still wish VIANOVA to retain the data for the purpose of defending your interests in court.

In these cases, we will put the data "in quarantine" for the necessary period of time, e.g. by means of a marking "*Do not use - Right to limitation*".

g. [Right to data portability](#)

If you are a non-professional and have subscribed to our newsletter, you can ask us to send you a copy of the data collected in this context in a customary computer format, allowing it to be reused by you or another service provider.

This "right of portability" differs from the right of access in that its purpose is not to obtain a copy necessarily readable by yourself, but rather a reusable copy of the data, in particular with a view to a change of service provider.

h. [Right to set guidelines for the fate of your data after your death](#)

Finally, you have the right to tell us how you would like us to handle your data in the unfortunate event of your death.

In particular, you can ask us to destroy all your data (subject to any imperative need for conservation that we may have, for example for the purposes of defending VIANOVA's rights in court), or to transmit a copy of all such data to a person of your choice.

You may also designate any person of your choice to be responsible for the execution of these "last wishes"; this person need not necessarily be one of your heirs or even the executor of your estate.

► Summary table

Your rights	What they allow you to obtain	Treatments/data concerned	Conditions, exceptions or limitations
Right of access	A legible and comprehensible copy of the data available to VIANOVA concerning you, as well as a copy of this Policy on a durable medium.	All	None
Right of rectification	La rectification, la mise à jour ou la complétion de données vous concernant	All	Clearly indicate the data to be corrected, completed or updated, as well as the new data where applicable.
Right to withdraw consent	Stopping the sending of our newsletter to your email address	Sending the newsletter to non-professionals	None
Unconditional right of opposition	Stopping the sending of our newsletter to your email address	Sending the newsletter to professionals	None
Right of opposition for reasons related to your particular situation	The cessation of the processing of your data for the future (except for the sending of the newsletter)	Treatments based on a legitimate interest of VIANOVA (see above) (excluding sending the newsletter)	Explain the reasons for discontinuing treatment based on your particular situation.
Right to delete	The deletion of your data, or their complete and irreversible anonymization	All	See the relevant assumptions in the text above
Right to limitation of treatment	Retention of your data without further use	All	See the relevant assumptions in the text above
Right to data portability	A copy of your data in a common computer format, allowing you or a service provider of your choice to reuse it.	Data collected when sending the newsletter to non-professionals	Clearly indicate, if applicable, the identity of the person or organization to whom you would like VIANOVA to send a copy of the data.
Right to set guidelines for the fate of your data after your death	The respect of your "last wishes" with regard to your personal data (for example: their deletion or transmission to any person of your choice)	All	Clearly indicate the persons responsible for following up on the proper execution of your instructions, who will be our interlocutors after your death.

Do you consider that we have not responded satisfactorily to your request, or that we are processing your data unlawfully?

Of course, we invite you first of all to get in touch with VIANOVA, so that we can discuss the problem together and try to solve it together in the best possible way.

However, if you wish to do so, you have the right to refer the matter to the competent authority for data protection in France, namely the Commission Nationale de l'Informatique et des Libertés (CNIL), via its website [cnil.fr](https://www.cnil.fr) or by post at the following address CNIL - 3, place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07.

This right may be exercised at any time and does not incur any costs for you, apart from the cost of sending postal mail if necessary, and any costs of assistance or representation if you choose to be assisted in this procedure by a third party.