



**attestation légale**  
ONCE FOR ALL

# PRIVACY POLICY

APPLICATION DATE : JANUARY, 2021

---



## Privacy Policy

The Onceforall digital platform (hereinafter the «Platform») accessible via the website <https://platform.onceforall.com/> (hereinafter the «Site») published and hosted by the OFA company (hereinafter referred to as «OFA») allows legal entities (hereinafter referred to as «Organisations») to establish and maintain an administrative file authenticated and updated by the OFA teams to ensure its distribution within its network (hereinafter referred to as “Service”).

In the context of the use of this Platform, the personnel of the «Client» and / or «Supplier» companies are required to transmit personal data concerning it (hereinafter the «Users»).

We place the utmost importance on the confidentiality of your information and personal data. This privacy policy was founded in compliance with the laws, regulations and standards in force and explains what personal data is processed by the Platform, how they are processed, by whom and for what purposes.

This Privacy Policy is therefore intended to apply to any person who uses the Service. The content and data of a part of our Service, are also available to simple Internet browsers on the website [www.onceforall.com](http://www.onceforall.com) («Visitors»).

OFA is particularly interested in protecting the personal data of its users by relying on Regulation No. 2016/679, known as the General Data Protection Regulation (GDPR).

### This document describes

1. What information we collect and how we collect it
2. How your personal data is protected
3. What we do with the personal data we collect
4. The legal basis on which the processing of your personal data is based
5. When and how we share your personal data with third parties
6. The retention periods of your personal data
7. The transfer of personal data abroad
8. The measures implemented to guarantee the security and confidentiality of data
9. Implementation of User Rights
10. The evolution of the Privacy Policy
11. How to contact us for help with your personal data

### 1. Quelles sont les informations que nous recueillons et comment nous les collectons :

The personal data is collected as follows:

#### Regarding the Users :

- First and last name;
- Address;
- Phone number;
- Email address;
- Login and password;
- IP address;
- Technical cookies;

#### Regarding the Organisations :

- Identifiers & passwords for the relevant platforms only if the collection service is enabled
- Identity documents
- RSI / Financial information / Social declaration
- Foreign employees (Outside the EU / Schengen area) containing :
  - First and last name;
  - Country of nationality
  - Hiring Date
  - Type and number of residence permit

## How do we collect them?

We collect this data from your registration on the Platform and / or during an exchange with our customer service by phone and / or email. The data is also provided by Users of the Service directly on the Platform by uploading them. We also collect data for commercial solicitation purposes from public and paid information sources or through our invitation and notification system.

### Use of statistical tools to improve the quality of service:

Please note that OFA also uses Hotjar® and Google Analytics® for statistics purposes. These tools are designed to analyse traffic and user behaviour on the platform. We use these tools to make our statistics more reliable and improve your user experience.

## 2. How your personal data is protected

### Security of your personal data

OFA provides safeguards that consist of the implementation of technical and organizational security measures to protect your data against loss, theft, use and unauthorized access, alteration and destruction.

These measures are subject to regular updates and tests according to the state of the art of good practices in the field of personal data protection.

## 3. What we do with the personal data we collect

Generally speaking for all Users connecting to the platform:

- Access and management of your account on the platform
- Customer support and user support
- Communication with OFA or other Platform Users
- Operational Management and Optimization of the Platform
- Sending of commercial information
- Management of possible disputes between parties
- Automated user profiling for market research, statistics, service improvement or platform

Specifically for **depositor** type accounts:

- Visualization and validation of your file
- Sharing documents with other users of the platform

For **foreign employees**:

- Visualization and validation of the list
- Sharing the document with other users of the platform

## 4. The legal basis on which the processing of your personal data is based

OFA offers a service of collection, authentication and return of the necessary documents in particular to the respect of the national legislation in the fight against the concealed work and administrative conformity.

OFA is also based on the need to use your personal data to offer you products, content and services that may interest you in the context of your professional activity. We also rely on the need to process your data for internal purposes such as auditing, data analysis, and research to improve our services, platform, and internal processes.

Finally your consent constitutes a legal basis for the processing of your personal data and OFA may process your data for legitimate purposes on our part as long as it does not affect your rights and freedoms in accordance with the regulations in force.

## 5. When and how we share your personal data with third parties

### Sharing of personal data between Users:

The personal data of the User may be shared with other Users for the purposes of the Service.

The Client and Supplier companies declare that they comply with the current regulation in their country and in regard with GDPR.

They undertake to make available to OFA and any User, their privacy policy in this area and to make every effort to process the personal data transmitted in compliance with these conditions.

In addition, when the User responds to a call for tenders or agrees to transmit his data to another User via the Platform, his / her contact details are transmitted to the other User concerned, who is responsible for data processing: in this context, OFA may act as a subcontractor for the so-called Order-Giving and OFA's client companies, provided that OFA retains this data on behalf of its Clients and according to its instructions.

### Sharing users' personal data with OFA subcontractors and third-party companies:

The personal data of the User may be shared with OFA subcontractors and third-party companies, in the following cases:

- When OFA uses the services of providers to provide assistance, advertising, payment services or accommodation. These service providers have limited access to the data as part of the performance of these services and have a contractual obligation to use them in accordance with the provisions of the applicable rules on the protection of personal data. But also, when OFA has entered into a partnership with a third-party company for the purpose of promote interoperability between related solutions. The list of partner companies can be found at simple request from the User to OFA,
- If required by law, OFA may transmit data to respond to claims against the Platform and comply with administrative and judicial procedures,
- If OFA is involved in a merger, acquisition, asset transfer or bankruptcy proceeding, it may be required to assign or share all or part of its assets, including personal data. In this case, the Users would be informed, before the personal data are transferred to a third party.

In addition, Users recognize that OFA may transmit the personal data provided by Users to third parties for the sale of market research as soon as they are anonymised.

## 6. Retention period

Personal data shall be stored only for the period necessary to fulfil the purposes mentioned above or to enable OFA to fulfil its legal obligations.

As part of its legal obligation of vigilance, the Client must keep a record of the documents for administrative and legal reasons. In this context, OFA will retain access to the documents transmitted by the Supplier and collected by the Client on the Platform, during the entire use of the Service and for a maximum of fifteen (15) years from the filing of the document. In the event of the termination of the Contract between OFA and the Client for any reason whatsoever, the data belonging to the Suppliers and collected by the Client will no longer be accessible to the Client. OFA is not under any obligation to save and retain these documents. OFA is only an intermediary and only acts as a subcontractor in the sense of the GDPR and under the instructions of the Client as soon as he keeps the data on dedicated servers on their behalf.

Recordings of telephone calls, indicated by an announcement at the beginning of the conversation, are kept for a maximum of 2 months.

## 7. Transfer of personal data outside of the EU:

The collected data can be transferred to Mauritius for processing (data visualization, collection, data entry) via our subcontractor Infolegale. As Mauritius is not a country recognized by the European Commission as enjoying an adequate level of protection, a convention for the proper management of personal data has been signed in order to ensure a sufficient level of protection.

## 8. The measures implemented to guarantee the security and confidentiality of data

Respect for security and data protection is essential for all our employees and our service providers. OFA implements organizational, technical, software and physical measures regarding digital security to protect personal data against alteration, destruction and access unauthorized. However, it should be pointed out that the Internet is not a completely secure environment and the Platform cannot guarantee the security of the transmission or storage of information on the Internet.

## 9. Implementation of User Rights

In application of the regulations regarding personal data, Users have the following rights:

- They can update or delete the data that concerns them by logging into their account and configuring the settings of this account;
- They can delete their account and their personal data, by contacting customer service. It should be noted that the information shared with other Users can remain visible and accessible on the Platform even after the deletion of their account,
- They can exercise their right of access to know their personal data, by writing to the email address: [notification.rgpd@attestationlegale.fr](mailto:notification.rgpd@attestationlegale.fr). In this case, before the implementation of this right OFA may request proof of the identity of the User in order to verify its accuracy,
- If the personal data held by OFA are inaccurate or for any request they may request the update of information by writing to the email address :

for France : [contact@attestationlegale.fr](mailto:contact@attestationlegale.fr) - +33 4 72 38 32 58  
for Germany : [kontakt.de@onceforall.com](mailto:kontakt.de@onceforall.com) - +49 30 20314 199

## 10. The evolution of the Privacy Policy

OFA reserves the right to make any changes to this Privacy Policy at any time. If a modification is made to this Privacy Policy, OFA undertakes to publish the new version on its Site.

Any significant changes will be reported to Users by email or by an information banner posted on the Platform, in particular to give Users the opportunity to review the changes before they take effect. If the User wishes to oppose any of these changes, he may do so by terminating his access to the Platform, by contacting the customer service. If the User has used the Service after posting or sending notice of changes to these terms, this means that the updated terms and conditions are accepted.

## 11. How to contact us for help with your personal data

To find out more about our Privacy Policy, you can contact the Data Protection Officer at the following address:

For France : the Data Protection Officer :  
[notification.rgpd@attestationlegale.fr](mailto:notification.rgpd@attestationlegale.fr)

For Germany, the customer service :  
[kontakt.de@onceforall.com](mailto:kontakt.de@onceforall.com)