

Privacy Policy

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At FullEnrich, respect for our customers' and users' privacy and personal data is at the core of our commitments. One of our actions to achieve this is to provide you with detailed information about how we collect and process your personal data through this privacy policy. You will find these details as you continue reading.

Who is the Data Controller?

This privacy policy covers the purposes and processing carried out by FullEnrich as a data controller. For information about the purposes and processing carried out by FullEnrich as a data processor, please consult the Data Processing Agreement (hereinafter "DPA").

FullEnrich (FullEnrich Corp, headquartered at 28 Geary St, STE 650, Suite #346, San Francisco, CA 94108, United States) provides its users with a data enrichment solution to facilitate contact and communication with their stakeholders. FullEnrich offers several features such as a browser extension, API, web application, and website (hereinafter the "Services").

As part of its activities, FullEnrich processes personal data of customers, users, prospects, candidates, and website visitors.

When Does FullEnrich Collect Personal Data?

Depending on the purposes of processing, FullEnrich collects personal data at different times.

FullEnrich notably collects personal data in the following situations:

- during candidate searches and receipt of job applications;
- during prospect research, appointment scheduling, and communications;
- during webinar organization and newsletter subscription;
- when entering into contracts with customers, suppliers, partners, and other contractors, as well as during payment processing, communications with them, and Service delivery;
- during user assistance and support requests;
- when users create an account, log into the web application, and use the Services;
- when visitors browse FullEnrich's website;
- when receiving data subject rights requests.

What Data Does FullEnrich Process?

As part of its activity and Service provision, FullEnrich processes the following personal data:

- identification data including name, first name, date of birth, gender. These may be necessary for account creation and contract conclusion;
- contact data including email address and phone number. These may be necessary for account creation and contract conclusion;
- application data including professional background, education, experience, resumes, and cover letters;
- professional data including job positions, companies, or professional needs;
- browsing data including cookie data, IP address, logs, user journey;
- usage data including service utilization, user feedback and reviews, and session history;
- user device identification data including browser type, operating system, and processor;
- payment data including banking information, amounts due, invoices. These are necessary for contract conclusion and service provision. Without this information, FullEnrich cannot credit the account;
- support data including support needs and customer communications. Description of difficulties encountered by the user is essential for finding an appropriate solution.

What Are FullEnrich's Processing Purposes, Legal Bases, and Retention Periods?

The table below provides concise, clear, and precise answers to these questions.

Here's what each column represents:

- purposes correspond to the objectives pursued by processing personal data. FullEnrich processes personal data for specific, determined, and legitimate purposes;
- personal data corresponds to the data described in the previous section. FullEnrich processes relevant and necessary data for achieving the pursued purposes;
- legal bases correspond to the grounds on which FullEnrich relies to have the right to process personal data;
- retention periods correspond to the time during which FullEnrich processes personal data. Periods are determined based on the time necessary to achieve the purposes.

{processing-purposes-table}

Who Are the Recipients of the Data?

As part of its activities, FullEnrich may need to transmit your personal data to recipients. These are either internal or external recipients to FullEnrich.

Internal Recipients

These are employees and people working for FullEnrich who need access to data to perform their assigned tasks. For example, the tech team to respond to technical support requests.

External Recipients

These are either data processors that FullEnrich uses to carry out its activities or third parties. For example, a data processor may be the company providing the CRM or online payment tool, and a third party may be a law firm, accounting firm, or administration.

FullEnrich commits to concluding a DPA with each of its processors to ensure they comply with applicable data protection regulations and maintain the confidentiality of the data they process.

FullEnrich may also need to share personal data when required by legal, regulatory, or administrative or judicial decision, or in case of audits conducted in the context of investment, sale, or transfer of all or part of FullEnrich's activities.

Does FullEnrich Transfer Data Outside the European Union?

As part of its activities, FullEnrich and its processors may transfer data outside the European Union, particularly to the United States.

FullEnrich ensures that transfers are carried out either under an adequacy decision or under the European Commission's standard contractual clauses in their June 4, 2021 version, or through any other transfer instrument explicitly authorized by applicable data protection regulations. Thus, when transfer occurs to the United States, FullEnrich first checks the Data Privacy Framework list. If not listed there, FullEnrich verifies the existence and application of standard contractual clauses. To obtain a copy of the transfer instrument, you can contact FullEnrich at support@fullenrich.com.

What Are the Rights of Data Subjects?

Individuals whose data is processed by FullEnrich can exercise the following rights:

- right of access to access and obtain information and a copy of data processed by FullEnrich;
- right to object to oppose FullEnrich's use of your data for a specific purpose;
- right to rectification to request FullEnrich to update personal data;
- right to erasure to request FullEnrich to delete personal data;
- right to restriction to request FullEnrich to limit processing carried out on personal data;
- right to data portability to retrieve data you provided to FullEnrich or request its transmission to a third party;
- right to establish post-mortem directives regarding the fate of personal data after death.

When processing is based on consent, it is also possible to withdraw consent.

To exercise these rights, simply contact FullEnrich at: support@fullenrich.com. Please indicate the nature of the right you wish to exercise.

It is also possible to file a complaint with the CNIL.

What Security Measures Does FullEnrich Implement?

To ensure the security of personal data it processes, FullEnrich implements technical and organizational measures to ensure the confidentiality, availability, access, and integrity of processed personal data.

For example, FullEnrich implements measures to ensure users use strong passwords, that strict access control exists, and that connection logs are encrypted at rest and retained for one year.

How Are Cookies Handled?

FullEnrich has implemented a specific policy regarding trackers and cookies. It can be consulted from the Legal & Privacy Center or directly at [our Cookie Policy](#).

Privacy Policy Modifications

This privacy policy may be subject to modifications and updates to take into account changes in FullEnrich's activities and Services. It is recommended to consult it regularly to stay up to date with the latest developments.