



OpenDataSoft

DATA PRIVACY MANIFESTO

OUR COMMITMENT TO
PROTECTING YOUR DATA

IN 7 PRINCIPLES

WHAT DO OPENDATASOFT DO TO PROTECT YOUR DATA?



OpenDataSoft is a world leader in the data sharing market. Numerous communities and companies already use our solutions to simplify the management, publication and distribution of their data internally, as open data or to specific parties within their ecosystems. OpenDataSoft enables these organizations to focus on the basics: stimulating the creation of new services and generating new business opportunities by making the most of their data.

The world of data sharing is, by necessity, an interconnected world in which public and private actors, either directly or indirectly, provide information that may contain personal data. OpenDataSoft wants to make the protection of privacy a priority in all circumstances. To accomplish this, we involve all stakeholders in making processing operations compliant and provide expert assistance to each of our customers.

The aim of this Manifesto is to present the main practices implemented by OpenDataSoft regarding personal data protection. It is the basis of all the standards, guidelines, internal policies and codes of conduct adopted by OpenDataSoft. Each of our employees, regardless of their position within the company hierarchy, acts as both the Manifesto's advocate and protector.

It consists of 7 fundamental principles from which all OpenDataSoft's personal data protection commitments flow.

PRINCIPLE #1

ACT IN ACCORDANCE WITH THE LAWS AND REGULATIONS

In all circumstances, all OpenDataSoft employees must abide by international, European, national, moral and ethical regulations and obligations pertaining to data protection and data processing compliance.

All those involved in the processing performed by OpenDataSoft must abide by the substance of the specific rules stipulated in **Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data**, subject to the mandatory provisions set forth by applicable laws and local practices.

PRINCIPLE #2

RESPECT THE DATA OF THOSE WHO USE OUR SERVICES

For OpenDataSoft, the health of its customer relationships depends on how we respect the data with which our users trust us. This requires us to take strong technical and organizational measures to live up to our commitments, and make no commitment that OpenDataSoft is unable to honor.

Whenever a user sends data to OpenDataSoft, the resulting processing operations are guided by the principles of transparency, loyalty and security.

The services offered by OpenDataSoft are developed taking into account the concept of **“Privacy by Design”**. From the initial design of our services and throughout all the improvements made to them, we guarantee the protection of privacy using proven targeted technical and legal analyses.

PRINCIPLE #3

PROVIDE CLEAR AND TRANSPARENT INFORMATION

Winning a customer's trust in the activities and services offered by OpenDataSoft is one of our primary objectives.

Customer trust is acquired and maintained particularly by establishing complete transparency in the data processing operations performed by OpenDataSoft. We are committed to providing clear information and instructions in order to increase our customers' understanding and respond to all their requests as promptly as possible.

PRINCIPLE #4

ACT HONESTLY AND PROMOTE A CULTURE OF INTEGRITY

Honesty and integrity govern both interprofessional relations and day-to-day business relationships. It is imperative that each of our employees acts honorably in all circumstances and contributes to promoting our integrity-based business culture.

When choosing its partners, OpenDataSoft takes care to maintain high standards in terms of respecting privacy.

OpenDataSoft also informs and advises its customers on how its values comply with personal data protection.

PRINCIPLE #5

EMBRACE TRUE DATA GOVERNANCE

OpenDataSoft's commitments regarding data protection are championed at the highest level of management: our CEO, CTO and COO are all active participants in the compliance process. They have equipped OpenDataSoft with the tools needed to ensure true data governance.

The Data Protection Officer (DPO) ensures compliance with personal data regulations and advises OpenDataSoft on the compliance of its processing operations. The DPO also plays a proactive role in drafting new data processing proposals and raising employee awareness daily on matters relating to Data Privacy.

The "Personal Data Ethics and Compliance" Committee (PDECC) regularly arranges meetings between the various employees tasked with supervising personal data processing in order to evaluate OpenDataSoft's compliance. This committee helps to ensure that ethics and compliance are built into OpenDataSoft's vision, strategy, management and practices.

The "Data Breach" Committee (DBC) aims to coordinate security measures in the event of a computer vulnerability in order to immediately implement the solutions necessary for limiting its impact on our services. The committee's members include the key OpenDataSoft employees as well as all the partners who ensure that our services are operational, so that effective overarching security measures can be implemented.

PRINCIPLE #6

PROVIDE A HIGH LEVEL OF SECURITY FOR OUR SERVICES

Keenly aware of cyber-risk issues, OpenDataSoft has chosen to adopt a “**Security by Design**” approach by incorporating the highest possible level of security into the design of each of its products.

Dealing with risks requires our teams to fully consider and evaluate the relevance and seriousness of each identified element so that the risk management system is pragmatic and clear-sighted.

The technical and organizational measures implemented by everybody involved in processing, whether they work internally or externally for OpenDataSoft, are monitored in order to make the security system rigorously consistent.

PRINCIPLE #7

CONTINUOUSLY IMPROVE OUR PERFORMANCE

Evaluating the implementation of compliance-related systems is consistent with our continuous improvement approach.

In this regard, OpenDataSoft has set up a **“Personal Data Ethics and Compliance”** Committee consisting of key participants in processing operations. The Committee’s role is to determine and oversee the measures deployed to comply with personal data protection requirements.

Every year, a general compliance audit is performed to thoroughly evaluate the deployment of the measures taken by OpenDataSoft.

OpenDataSoft ensures that individual and structural measures are taken if a failure is detected in the implemented compliance system. All those involved must be alert to any small signs or information that may indicate a breach of the personal data protection rules.

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