

Privacy Notice

Privacy Notice

Information about Citilog’s collection and use of your personal data

Citilog S.A.S. and our subsidiaries are committed to protecting your privacy and using your personal data in accordance with applicable data privacy legislation and Citilog’s privacy policy [\[link\]](#). Please take a few minutes to read through the information below to understand why we collect and use your personal data. References in this privacy notice to “Citilog”, “we”, “us”, and “our” are references to Citilog S.A.S. We may provide this privacy notice in different languages. In case of any conflicts or inconsistencies between a non-English version of the privacy notice and the English version, the English version takes precedence. The privacy notice is available at www.citilog.com/privacy.

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WHAT IS PERSONAL DATA?

Personal data is any information that can be used, alone or together with other data, to uniquely identify any living human being, such as your name, or any email addresses or phone numbers related to you personally.

WHAT PERSONAL DATA DO WE COLLECT AND USE, FOR WHAT PURPOSES AND ON WHAT LEGAL GROUNDS?

If you are an employee of or otherwise represent a company to which Citilog sells or provides products or services.

Contact details. Typically your name, email address(es) and phone number(s).
Employment details. Typically the name and contact details of your employer and your job title.
Other data that you intentionally share. Information about you that you voluntarily submit to us in for example free text fields, web forms and other contexts.

As applicable, we use this personal data for the following purposes:	Legal grounds for our collection and use of your personal data:
<p>To send ‘transactional information’ to you. This is typically information directly related to commitments we may have towards you/your company based on the partnership and/or contract that we have with you/your company.</p>	<p>This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to sustain the business relationship with your company.</p>
<p>To provide you with marketing communications, where you have opted in to receive such communications (including information about us, our products, solutions and services, competitions and promotions). These can be shared via electronic means (for example, SMS, emails and online advertising) and via post.</p>	<p>This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to market, promote and demonstrate our business, products, solutions, services, competitions, events and similar and to provide you and/or your company with relevant product, solution and service offerings and any other information about us and/or our products that you may seek or we think might be of interest to you/your company.</p>
<p>To do other things that you have explicitly asked us to do, for example if you chose to opt in to one or more specific activities that we offer.</p>	<p>If you have opted in to a specific activity that we offer, this use, including the collection of the personal data needed to do it, is necessary for the performance of the contract we have with you – that is, our obligation to provide to you or enable you to take part in the offered activity.</p>
<p>We use your contact details and employment details to execute and maintain, and perform obligations under the agreement between us and your company, including providing products and services such as updates or support and/or hosting services.</p>	<p>This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to uphold, maintain and administrate the contractual relationship that we have with your company.</p>
<p>We may use your contact details and employment details to check (screen using designated computer software) whether you or your company are barred under any laws or regulations from doing business with us and our group of companies, including but not limited to using our services (for example if you or your company are on any applicable sanctions lists or based in a country that is subject to an embargo).</p>	<p>This use, including the collection and use of the personal data needed to do it, is necessary for our compliance with relevant laws and regulations regarding sanctions lists for natural persons and organizations and embargos (legal obligations), that we have to follow. It is also necessary for the purpose of our legitimate interest to ensure that our group companies comply with such legal obligations.</p>

If you are an employee of or otherwise represent a company that supplies products, solutions and/or services to Citilog.

Contact details. Typically your name, email address(es) and phone number(s).
Employment details. Typically the name and contact details of your employer and your job title.
Other data that you intentionally share. Information about you that you voluntarily submit to us in for example free text fields, web forms and other contexts.

As applicable, we use this personal data for the following purposes:	Legal grounds for our collection and use of your personal data:
To send 'transactional information' to you. This is typically information directly related to commitments we may have towards you/your company based on the partnership and/or contract that we have with you/your company.	This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to sustain the business relationship with your company.
To do other things that you have explicitly asked us to do, for example if you chose to opt in to one or more specific activities that we offer.	If you have opted in to a specific activity that we offer, this use, including the collection of the personal data needed to do it, is necessary for the performance of the contract we have with you – that is, our obligation to provide to you or enable you to take part in the offered activity.
We use your contact details and employment details to execute and maintain, and perform obligations under the agreement between us and your company.	This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to uphold, maintain and administrate a contractual relationship that we have with your company.
We may use your contact details and employment details to check (screen using designated computer software) whether you or your company are barred under any laws or regulations from doing business with us and our group of companies, including but not limited to using our services (for example if you or your company are on any applicable sanctions lists or based in a country that is subject to an embargo).	This use, including the collection and use of the personal data needed to do it, is necessary for our compliance with relevant laws and regulations regarding sanctions lists for natural persons and organizations and embargos (legal obligations), that we have to follow. It is also necessary for the purpose of our legitimate interest to ensure that our group companies comply with such legal obligations.

If you, yourself or through a third party, provided Citilog with your contact details to get general information about us or our products, to explore possible business opportunities, etc. (you may for example have given a Citilog employee your business card at a trade show or submitted an inquiry to us online).

Contact details. Typically your name, email address(es) and phone number(s).
Employment details. Typically the name and contact details of your employer and your job title.
Other data that you intentionally share. Information about you that you voluntarily submit to us in for example free text fields, web forms and other contexts.

As applicable, we use this personal data for the following purposes:	Legal grounds for our collection and use of your personal data:
To provide you with marketing communications, where you have opted in to receive such communications (including information about us, our products, solutions and services, competitions and promotions). These can be shared via electronic means (for example, SMS, emails and online advertising) and via post.	This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to market, promote and demonstrate our business, products, solutions, services, competitions, events and similar and to provide you and/or your company with relevant product, solution and service offerings and any other information about us and/or our products that you may seek or we think might be of interest to you/your company.
To do other things that you have explicitly asked us to do, for example if you chose to opt in to one or more specific activities that we offer.	If you have opted in to a specific activity that we offer, this use, including the collection of the personal data needed to do it, is necessary for the performance of the contract we have with you – that is, our obligation to provide to you or enable you to take part in the offered activity.
We may use your contact details and employment details to check (screen using designated computer software) whether you or your company are barred under any laws or regulations from doing business with us and our group of companies, including but not limited to using our services (for example if you or your company are on any applicable sanctions lists or based in a country that is subject to an embargo).	This use, including the collection and use of the personal data needed to do it, is necessary for our compliance with relevant laws and regulations regarding sanctions lists for natural persons and organizations and embargos (legal obligations), that we have to follow. It is also necessary for the purpose of our legitimate interest to ensure that our group companies comply with such legal obligations.

If you visit Citilog's premises.

Contact details. Typically your name, email address(es) and phone number(s).
Employment details. Typically the name and contact details of your employer and your job title.
Other data that you intentionally share. Information about you that you voluntarily submit to us in for example free text fields, web forms and other contexts.
Video, photos and audio material. Video, photos and audio recorded at Citilog's premises by network video camera and software products under development.

As applicable, we use this personal data for the following purposes:	Legal grounds for our collection and use of your personal data:
To keep a record of who is entering and leaving the premises.	This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to maintain a visitors record and control who is currently visiting the premises.
To do other things that you have explicitly asked us to do, for example if you chose to opt in to one or more specific activities that we offer.	If you have opted in to a specific activity that we offer, this use, including the collection of the personal data needed to do it, is necessary for the performance of the contract we have with you – that is, our obligation to provide to you or enable you to take part in the offered activity.
Video, photos and (if specifically stated) audio material is processed in order to test the functionality and features of Citilog's network video camera and software products.	The processing is necessary for the purpose of Citilog's legitimate interest to test the functionality and features of its products, as part of Citilog's research and development work. If Citilog has obtained your consent prior to the recording, the legal ground is that consent.

Citilog's core business is the development of video analytics for professional traffic management industry. ~~Citilog's core business is the development of network video solutions for professional IP video surveillance.~~ As part of the development process, it is of great importance to test the functionality and features of some of our network video camera, sensors and software products. We do so by installing products under development at various places at our premises. Citilog has concluded that such testing activities are necessary for the success of Citilog's business, and that it brings great value to our research and development work. This means that when visiting Citilog, and by moving around at our premises, you may take part in the development process of Citilog's products. Whenever Citilog is conducting video recordings in such areas, ongoing recordings will be indicated by signs, directing you to this privacy notice.

If not specifically indicated otherwise, Citilog will only record video and photo material. Audio recordings will be subject to additional information signs and will only be conducted in closed off spaces dedicated for that purpose. You will not be subject to audio recordings unless you choose to enter such clearly marked recording areas.

The material recorded for R&D purposes will never be processed in order to analyze the behaviour or track the pattern of movement of a certain individual but is strictly limited to the testing and evaluation of features and functionality of the Citilog products, such as resolution, audio and video compression, operating conditions and audio streaming.

When possible, we will obtain the consent for processing for R&D purposes from all concerned individuals (instead of relying on legitimate interest). In such cases, the legal basis for such processing is the consent of the individual.

If you visit any of Citilog's external recording sites.

Video, photos and audio material. Video, photos and audio are sometimes recorded outside Citilog's premises by network video camera and software products under development.

As applicable, we use this personal data for the following purposes:	Legal grounds for our collection and use of your personal data:
Video, photos and (if specifically stated) audio material is processed in order to test the functionality and features of Citilog's network video camera and software products.	<p>The processing is necessary for the purpose of Citilog's legitimate interest to test the functionality and features of its products, as part of Citilog's research and development work.</p> <p>If Citilog has obtained your consent prior to the recording, the legal ground is that consent.</p>

To be able to test our products we occasionally conduct recordings in publicly accessible areas. We may record you as you pass the recording area. If we can identify you on the recorded material, we have collected personal data about you. Whenever Citilog is conducting video recordings in such areas, ongoing recordings will be indicated by signs, directing you to this privacy notice.

If not specifically indicated otherwise, Citilog will only record video and photo material. Audio recordings will be subject to additional information signs and will only be conducted in closed off spaces dedicated for that purpose. You will not be subject to audio recordings unless you choose to enter such clearly marked recording areas.

Video, photos and audio recordings involving identifiable individuals will never be processed in order to analyze the behaviour or track the pattern of movement of a certain individual but is strictly limited to the testing and evaluation of features and functionality of the Citilog products, such as resolution, audio and video compression, operating conditions and audio streaming.

If there is no need to include identifiable individuals in the Recorded Material, the Recorded Material will be subject to an anonymization process.

If you do not belong to any of the above categories of individuals but you are still an employee of, or otherwise represent, a company or organization that Citilog has established contact with, for example a member of the press.

Contact details. Typically your name, email address(es) and phone number(s).
Employment details. Typically the name and contact details of your employer and your job title.
Other data that you intentionally share. Information about you that you voluntarily submit to us in for example free text fields, web forms and other contexts.

As applicable, we use this personal data for the following purposes:	Legal grounds for our collection and use of your personal data:
To send 'transactional information' to you. This is typically information directly related to commitments we may have towards you/your company based on the partnership and/or contract that we have with you/your company.	This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to sustain the relationship with you or your company.
To do other things that you have explicitly asked us to do, for example if you chose to opt in to one or more specific activities that we offer.	If you have opted in to a specific activity that we offer, this use, including the collection of the personal data needed to do it, is necessary for the performance of the contract we have with you – that is, our obligation to provide to you or enable you to take part in the offered activity.

WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

Citilog operates globally and we may share your personal data with our group of companies and business partners – but only for the purposes described in this privacy notice. This means that we may transfer your personal data to organizations in countries within and outside the European Union and the European Economic Area. We will not transfer any of your personal data to organizations in countries outside of the European Union and the European Economic Area (third country) without ensuring appropriate safeguards for the protection of your personal data, for example the existence of a so called 'adequacy decision' by the Commission or the inclusion of the so-called 'standard contractual clauses' (as approved by the European Commission from time to time) in a contract between us and the third country recipient company of your personal data. When sharing your personal data with our Swedish parent company Axis Communications AB ("Axis"), your personal data will only be processed in accordance with Axis' privacy notice available at www.axis.com/privacy.

Video, photos and audio recordings collected for R&D purposes will be used by Citilog internally and will not be distributed to any third party. Only those employees and consultants of Citilog who are directly involved in the development of Citilog products, and

with a need to process the recorded material in order to fulfil their work tasks, will have access to the recorded material.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

General.

We will not use your personal data for any longer than needed in order to fulfil the purposes described in this privacy notice. After that, we will delete or permanently de-identify your personal data unless required or entitled by law to retain it, or parts of it.

Personal data in video- and audio recordings.

Citilog will only store the video- and audio material recorded for security purposes for 3 days before being deleted, unless there is an incident captured which need further investigation.

Citilog will only store video, photos and audio recorded for R&D or marketing purposes, which is recorded at Citilog's premises and which has not been anonymized, for 6 months after it has been recorded. After that, it will be deleted from Citilog's servers, unless needed for further R&D purposes.

Citilog will only store the video, photos and audio material recorded outside Citilog's premises and which has not been anonymized for 2 months after it has been recorded. After that, it will be deleted from Citilog's servers, unless needed for further R&D purposes.

WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA?

Citilog S.A.S., incorporated under the laws of France, corporate registration number 412472912, is the data controller of your personal data collected and used for the purposes described in this privacy notice. This means that Citilog S.A.S. is responsible for collecting and using your personal data in accordance with applicable law. Citilog has its principal place of business at 42/46 Avenue Aristide Briand, 92220 Bagneux, France. You can reach Citilog's data protection office at dataprotection@citilog.com.

When you use Citilog's services you may, depending on and as part of such services, submit to or give us access to certain content, and the services may display such content, which Citilog does not own or control. Examples of such data are image and video materials and other information about yourself and/or others, including any personal data contained therein, that you submit as part of using a service ('User Content'). For the purposes of this privacy notice and unless specified otherwise in any other terms applicable to such services, User Content is not the same thing as the personal data that we collect and use as a data controller according to this privacy notice. You, not Citilog, are the controller of any User Content and we will only process it on your behalf according to your instructions and applicable law. Your submission and our processing on your behalf of User Content are governed by Citilog's General Terms of Use and any applicable service specific terms of use.

WHAT ARE YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA HELD BY US?

You have a right to get information on what personal data we have about you, access this data, request that we erase certain parts or all of your personal data, request that we restrict the use of or stop using your personal data, and have your personal data resubmitted to you in a structured and accessible format.

If you wish to exercise any of these rights, go to www.citilog.com/privacy and submit your request. If you have any questions regarding your personal data that you believe were not answered in this privacy notice, you may contact our data protection office at dataprotection@citilog.com.

Please note that if you ask us to erase or restrict the use of any of your personal data, we may not be able to continue providing services to you.

Please also note that if you want us to erase or restrict the use of personal data relating to video- and audio recordings, you should specify the time and place for such recording to make it possible for us to amend or remove sequences involving such personal data.

If you have given your written consent to the processing, you have the right to withdraw the consent provided by you at any time by contacting us. If your consent is withdrawn, we will no longer process your personal data for the purpose that you had given your consent to.

Should you be dissatisfied with our collection and use of your personal data, please let us know and we will do our best to address your complaints. Your privacy is very important to us, and we always strive to protect and secure your personal data in the best possible way. Should you feel that we have failed in this ambition, you are entitled to lodge a complaint with the French Data Protection Authority (Fr., Commission Nationale de l'Informatique et des Libertés (CNIL)), or such other supervisory authority as may be determined in the future.
