



## **Privacy Policy**

Full Platform

10/03/2026

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## 1. Introduction

*Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, also known as the General Data Protection Regulation sets out the legal framework applicable to the processing of personal data.*

*The GDPR strengthens the rights and obligations of data controllers, data processors, data subjects and data recipients.*

- 1 Fullll (hereinafter referred to as 'we', 'us' or 'our') is the publisher of the platform and the modules it offers (hereinafter referred to as 'the Platform').
- 2 This Privacy Policy describes how we process personal data as a data processor on behalf of our Clients. In this capacity, we act on the instructions of our Clients (the "data controllers") with respect to the data that users provide to us via the Platform.

## 2. Legitimate and proportionate use of your data

- 3 When we process personal data, we do so for specific purposes: each data processing operation pursues a legitimate, specific and explicit purpose.
- 4 We undertake to collect and use only data that is adequate, relevant and limited to what is necessary for the purposes for which it is processed.

## 3. Purpose and nature of the processing

- 5 As the Platform's publisher, fullll acts as the Client's data processor for the processing of personal data necessary for the provision and operation of the services.
- 6 In this context, fullll determines neither the purposes nor the essential means of such data processing. It is therefore solely the Client's responsibility, in its capacity as the data controller, to define and ensure the validity of the legal bases associated with the operations carried out via the Platform.
- 7 The data is processed as follows:
  - Collecting, recording, storing, hosting, using, consulting, modifying, communicating, disseminating, limiting or destroying personal data.
- 8 Personal data is processed as part of the use of the Platform by users, in particular for the following purposes:
  - Accounting management
  - Social management (payroll and declarations)
  - Invoicing management
  - Managing services and monitoring activity

## 4. Personal data we process

- 9 Fullll collects and processes the following categories of personal data:
- Data identifying individuals, such as name, address, phone number, and email address;
  - Data relating to the use of the Platform services;
  - Data relating to the order(s) for SaaS services and/or services from Fullll: transaction number, details of the SaaS service(s) and/or services ordered, etc.;
  - Data relating to the use of the Platform's support service.
- 10 The mandatory nature of the personal data to be provided is indicated at the time of collection. If you refuse to provide the mandatory data, Fullll will not be able to provide you with the SaaS services and/or the services you requested.
- 11 In addition, you may provide us with the personal data of a third party, in particular if you are a director. In this context, we remind you that you are required to inform this person of the communication and processing of their personal data by Fullll and to communicate this policy to them.

## 5. Data recipients

- 12 The recipients of your data are :
- Authorised Fullll employees;
  - Fullll's service providers and subcontractors insofar as they are concerned;
  - The competent authorities or courts.
- 13 We ensure that only authorised persons have access to this data. Fullll applies a strict authorisation policy to ensure that only authorised persons have access to data.
- 14 Fullll applies a strict authorisation policy to ensure that only authorised persons have access to data.
- 15 In the event of a request for access to data from the competent authorities or courts, we undertake to:
- Inform you immediately of the receipt of such a request, unless we are expressly prohibited from doing so by law. Such prohibitions may relate to national security investigations, ongoing criminal investigations, or legal proceedings under judicial confidentiality.
  - Do not respond directly to the request, but forward it to the data controller, who is the only person authorised to respond to it.
  - To assist the data controller, as far as possible, in responding to the request, in accordance with our contractual and legal obligations.
  - Not to disclose data without the explicit prior authorisation of the data controller, except where legally required to do so.
  - To limit the disclosure of data to that which is strictly necessary to meet the legal request.
  - Document all stages of the application process, in compliance with our confidentiality obligations.
- 16 These measures constitute our commitment to protecting your data while complying with our legal obligations as a data processor.

## 6. How long we keep your data

- 17 We store personal data processed via our Platform:
  - For as long as is necessary to provide our services;
  - In accordance with the instructions of the data controller;
  - In compliance with applicable legal obligations.
- 18 At the end of these periods, we delete or anonymize the data in accordance with the data controller's instructions, unless there is a legal obligation to retain it.
- 19 When fulll performs anonymization operations, these operations irreversibly eliminate any possibility of directly or indirectly identifying the individuals concerned. The data resulting from these operations no longer constitutes personal data within the meaning of the GDPR.

## 7. Personal data security

- 20 We pay particular attention to the security of personal data.
- 21 We implement technical and organisational measures appropriate to the degree of sensitivity of the personal data, in order to ensure the availability, integrity and confidentiality of the data and to protect it against any malicious intrusion, loss, alteration or disclosure to unauthorised third parties.
- 22 For example, Fulll makes access to your administrator or user space on the platform conditional on the entry of a user name and a strong password subject to our rules of complexity. Please note that each account holder is responsible for the confidentiality, quality and strength of this password. It must not be shared with a third party.
- 23 Fulll also guarantees that its staff and any other person who processes your personal data will comply with the internal rules and procedures relating to the processing of personal data, and in particular the technical and organisational security measures put in place to protect your personal data.
- 24 You can refer to our Security Assurance Plan for details of measures such as data encryption and backups.
- 25 We periodically carry out technical security checks on the Platform.

## 8. Processing by third parties

- 26 When we use a service provider, we only disclose personal data to them once we have ensured that they are able to meet our security and confidentiality requirements.
- 27 In compliance with our legal and regulatory obligations, we enter into contracts with our subcontractors that precisely define the terms and conditions under which they process personal data, in accordance with the regulations on the protection of personal data.
- 28 The subcontractors authorised to process all or part of the personal data are listed in [General data protection policy](#) on fulll.fr.

## 9. Cookies

- 29 The Platform's cookies are subject to a specific policy, which can be accessed from the Platform's login page.

## 10. Your rights

- 30 The persons concerned by the data processed via the Platform have rights (access, rectification, deletion, etc.) which they may exercise with the data controller (our customer). We undertake to assist the data controller in managing these requests.

### 10.1 Your right of access

- 31 You have the right to be informed about the processing of your data.
- 32 Nous veillons à vous fournir toutes les informations nécessaires, incluant notre identité en tant que sous-traitant, les finalités du traitement et la durée de conservation.
- 33 You have the right to access all the information concerning you in the Platform and to obtain a copy of the information concerning you. We undertake to facilitate the exercise of this right in collaboration with the data controller.

### 10.2 Your right of rectification

- 34 You may request the correction of inaccurate or incomplete data. We will take the necessary steps to make these corrections, on the instructions of the data controller.

### 10.3 Your right to erasure ('right to be forgotten')

- 35 The 'right to be forgotten' allows you to request the deletion of your personal data, under certain conditions. You may ask us to delete your personal data in the cases provided for by legislation and regulations. We will carry out this deletion on the instructions of the data controller, unless we are legally obliged to retain the data.

### 10.4 Your right to restriction of processing

- 36 You may ask us to temporarily freeze the use of some of your data in the cases provided for by legislation and regulations. We will put in place the necessary technical measures to comply with this restriction.

## 10.5 Your right to object

- 37 You may object, for reasons relating to your particular situation, to the processing of your personal data. We will respect this objection if instructed to do so by the data controller.

## 10.6 Your right to data portability

- 38 You have the right to port the personal data you have provided to us.

## 10.7 Your right to lodge a complaint

- 39 You have the right to lodge a complaint with the CNIL via [its website](#) or by post (3 place de Fontenoy TSA 80715 - 75334 PARIS CEDEX 07) on French territory, without prejudice to any other administrative or legal remedy.

## 10.8 Your right to set post-mortem instructions

- 40 You have the possibility of defining specific directives relating to the conservation, deletion and communication of your personal data which will be applicable after your death. These specific directives only concern the processing carried out in the context of the use of the Platform and will be limited to this area only, on the instructions of the data controller.
- 41 Once this person has been designated by the authorities, you also have the right to define general directives for the same purposes.

## 10.9 How to exercise your rights

- 42 As a data processor, we facilitate the exercise of data subjects' rights on behalf of our customers, the data controllers. If you wish to exercise your rights (access, rectification, erasure, restriction, portability, objection), please contact the data controller concerned directly.
- 43 Upon documented instruction from the data controller, we undertake to:
- Assist the data controller in responding to these requests, within the limits of our technical resources;
  - Implement the technical measures necessary to respond to requests to exercise rights, in accordance with the instructions received;
  - Keep an up-to-date register of requests to exercise rights and the action taken, in compliance with our confidentiality obligations.

## 11. Contact

44 If you have any questions about this policy or the protection of personal data, please contact our Data Protection Officer:

- Email: [dpo@fulll.fr](mailto:dpo@fulll.fr)
- Address: fulll - DPO  
14 rue Rhin et Danube  
69009 LYON

## 12. Modification of this document

45 This policy may be updated from time to time. We invite you to consult it regularly on the Platform. The version date is shown on the first page.