

aloalto Privacy Policy

Last update: 19/10/2023

How we protect your privacy

on our website(s) and applications

At aloalto and its affiliated services, we are committed to safeguarding your privacy. We provide various services, including a SaaS web and mobile application for hosting real estate-related data. The data we collect is crucial for the functioning and security of our services and the protection of all our users. This policy aims to explain what information is collected, why it is collected, and how we use it.

Information we collect

We collect personal data directly from our users during registration and interaction with our services. The information we collect includes:

Account & Contact Data: When you register on our website, use our products, subscribe to our services, or complete a contact form, you provide us with information such as your name, company name, company number, email address, and, occasionally, your phone number, postal address (for invoicing or delivery), business sector, and your interest in aloalto, along with a personal password. We do not store credit card information; trusted third-party PCI-DSS-compliant payment processors handle this.

Job Application Data: When applying for a job on our website or through an employment agency, we collect your contact information (name, email, phone) and any information you voluntarily provide in your introduction letter and Curriculum Vitae. We will request additional personal details if we extend a job offer, while adhering to legal obligations and personnel management requirements. We never collect sensitive information like racial or ethnic origin, political opinions, religious beliefs, trade union membership, or sexual life.

Browser Data: When you visit our website and access our online services, we detect and store your *browser language and geolocation* in order to customize your experience according to your country and preferred language. Our servers also passively record a summary of the information sent by your browser for statistical, security and legal purposes: *your IP address, the time and date of your visit, your browser version and platform, and the web page that referred you to our website.*

Your browser may also be used to store and retrieve your current session data, with the help of a session cookie (see also the **Cookie** section for more details).

Form protection: some forms on our website may be protected by Google reCAPTCHA. This technology relies on heuristics that are based on technical characteristics of your browser and device, and may also use specific Google cookies. See also Google Privacy Policy and Terms of Use in the **Third Party Service Providers** section below.

Databases with customer data: When you subscribe to aloalto and create your own account (for example by starting a Free Trial), any information or content you submit or upload into our database is your own, and you control it fully.

This data will often include personal information, for example: *your list of employees, your contacts, your customers, your tenants, your messages, financial and descriptive data related to real estate you own or you manage on behalf of third parties, pictures, videos etc.* We only ever collect this information on your behalf, and **you always retain ownership and full control on this data**.

How we use this information

Account & Contact Data: We use your contact information in order to provide our services, to answer your requests, and for billing and account management reasons. We may also use this information for marketing and communication purposes (our marketing messages always come with a way for you to opt-out at any time). We also use this data in aggregated/anonymised form in order to analyze service trends.

If you have registered to participate in an event published on our website, we may transfer your *name, email address, phone number and company name* to our local organizer and to the sponsors of the event for both direct marketing purposes and in order to facilitate the preparations and booking for the event.

If you have expressed interest in using aloalto or otherwise asked to be contacted by an aloalto service provider, we may also transfer your *name, email address, phone number and company name* to one of our official **Partners** in your country or region, for the purpose of contacting you to offer their local assistance and services.

Job Application Data: We will only process this information for our recruitment process, in order to evaluate and follow-up with your application, and in the course of preparing your contract, if we decide to send you a job proposition. You may contact us at any time to request the deletion of your information.

Browser Data: This automatically recorded data is anonymously analyzed in order to maintain and improve our services. Google reCAPTCHA may also be used for security purposes, in order to prevent abuse of our services. In that case we only process the anonymous score that reCAPTCHA determines based on your browser and device.

We will only correlate this data with your personal data when required by law or for security purposes, if you have violated our Acceptable Use Policy.

Customer Database: We only collect and process this data on your behalf, in order to perform the services you have subscribed to, and based on the instructions you explicitly gave when you registered or configured your service and your aloalto account.

Our Helpdesk staff and engineers may access this information in a limited and reasonable manner in order to solve any issue with our services, or at your explicit request for support reasons, or as required by law, or to ensure the security of our services in case of violation of our Acceptable Use Policy in order to keep our services secure.

Accessing, Updating or Deleting Your Personal Information

Account & Contact Data: You have the right to access and update personal data you have previously provided to us. You can do so at any time by connecting to your personal account on aloalto.com. If you wish to permanently delete your account or personal information for a

legitimate purpose, please contact our **Helpdesk** to request so or use the “Delete account” button in the aloalto Account Settings. We will take all reasonable steps to permanently delete your personal information, except when we are required to keep it for legal reasons (typically, for administration, billing and tax reporting reasons).

Job Application Data: You may contact us at any time to request access, updates or deletion of your application information. The easiest way to do it is to reply to the last message you exchanged with our Human Resource personnel.

Customer Database: You can manage any data collected in your databases hosted on aloalto.com at any time, using your administration credentials, including modifying or deleting any personal data stored therein.

At any time you can export a complete backup of your data by simple request to our Helpdesk, in order to transfer it, or to manage your own backups/archive. You are responsible for processing this data in compliance with all privacy regulations.

You may also request the deletion of all your data through our helpdesk, at any time or use the “Delete account” button in the aloalto Account Settings.

Safety Retention Period: we retain a copy of your data in our backups for safety reasons, even after they are destroyed from our live systems. See **Data Retention** for more details.

Security

We realize how important and sensitive your personal data is, and we take a great number of measures to ensure that this information is securely processed, stored and preserved from data loss and unauthorized access. Our technical, administrative and organizational security measures are described in details in our **Security Policy**.

Third Party Service Providers / Subprocessors

In order to support our operations we rely on several Service Providers. They help us with various services such as payment processing, web audience analysis, cloud hosting, marketing and communication, etc.

Whenever we share data with these Service Providers, we make sure that they use it in compliance with Data Protection legislation, and that the processing they carry out for us is limited to our specific purpose and covered by a specific data processing contract.

Below is a list of the Service Providers we are currently using, why we use them, and what kind of data we share with them.

A. Subprocessors

These third-party service providers are processing data for which aloalto is Controller or Processor, on behalf of aloalto.

Important: due to the great variability in resources and services provided by these subprocessors, aloalto Customers cannot select the subprocessor that will be used to process their data. They can however choose their main hosting *region* (see the **Data Location** section).

Subprocessors	Purpose	Shared Data
Amazon Web Services, Inc. Privacy & Security	Infrastructure and hosting of aloalto software and databases	Currently hosted by AWS: Production data from aloalto.com and its affiliate services, including aloalto web and mobile apps, Backup data for all aloalto cloud services. Data Center Certifications: ISO 27001, ISO 27017, ISO 27018, SOC 1, SOC 2, SOC3, PCI-DSS, HIPAA, CISPE, CSA STAR .
Kinsta.com Privacy & Security	Infrastructure and hosting of aloalto website	Currently hosted by Kinsta: aloalto WordPress website and database. Kinsta is hosted on Google Cloud Platform.

B. Third-party Processors and Controllers

These third-party service providers are processing data for which aloalto is a Controller, as Processors, on behalf of aloalto, or they are receiving such data as Controllers, for the specific purpose of performing the services they have been contracted to provide.

Service Provider	Purpose	Shared Data
Google reCAPTCHA Privacy & Security	Form protection.	Used by Google reCAPTCHA: Browser and device characteristics, Google cookies.
Calendly Privacy & Security	Scheduling of demo/meeting on aloalto.com.	Shared with Calendly: Any personal info entered by the user in the scheduling form: name and contact info, reason for request, etc.
Connective NV eSignatures	Digital signature of documents	Shared with Connective: Documents uploaded for signing and identification details. Details available here .
CloudFlare Security & Privacy Cookie Policy	Distributed caching of static resources and images of aloalto.com.	Used by CloudFlare: Browser and device characteristics, CloudFlare cookies.
MailChimp / Intuit Privacy & Security	Mail campaigns	Used by MailChimp: Email campaigns to inform our clients about new features, updates, security issues or marketing purposes. It's always possible to opt-out from these campaigns.
DeepL Privacy & Security	In-app translation services	Shared with DeepL: words, sentences or terms that users request to be translated.
PostBird Privacy and security	Online mailing services	Shared with PostBird: Documents uploaded for mailing, identification details and mail tracking.
Marker.io Privacy	Application feedback and bug reporting service	Shared with Marker.io: Screenshots of the aloalto application, aloalto browser and

Service Provider	Purpose	Shared Data
		network data and any personal information entered by the user in the feedback form.
Google Maps & Places API Services Privacy	Postal address retrieval, points of interest and map display services.	Shared with Google: Postal addresses entered by the user.
Ponto Privacy and security	Banking and payment transaction import services	Shared with Ponto: All bank transaction data from bank accounts added to aloalto and linked to the Ponto user account.
MyBanx.io Privacy and security	Banking and payment transaction import services	Partagé avec MyBanx.io: All bank transaction data from bank accounts added to aloalto and linked to the MyBanx user account.
Twilio Privacy and security	SMS sending services	Shared with Marker.io: SMS content and recipient telephone numbers.
Google Privacy and security	Authentication services	Shared with Google: User contact details including email address, name and basic profile information.
Meta (Facebook) Privacy and security	Authentication services	Shared with Meta: User contact details including email address, name and basic profile information.

Data Retention

Account & Contact Data: we will only retain such data as long as necessary for the purpose for which it was collected, as laid out in this policy, including any legal retention period, or as long as necessary to carry out a legitimate and reasonable promotion of our products and services.

Job Application Data: If we do not hire you, we may keep the information you provide for up to 3 years in order to contact you again for any new job proposition that may come up, unless you ask us not to do so. If we hire you, your personal information will be stored for the duration of your employment contract with us, and afterwards, during the applicable legal retention period that applies in the country where we employed you.

Browser Data: we may retain this data for a maximum of 12 months, unless we need to keep it in relation with a legitimate concern related to the security or performance of our services, or as required by law. Any server-side session information is kept only for 3 months when it is actively used, otherwise it is discarded after 7 days.

Customer Data: we will only retain this data as long as necessary for providing the services you subscribed to. For data hosted on the aloalto, if you cancel the service your data is kept deactivated for 3 months (the grace period during which you can change your mind), and then destroyed.

Safety Retention Period: As part of our **Security Policy**, we always try to preserve your data from accidental or malicious deletion. As a result, after we delete any of your personal information (Account & Contact Data) from our database upon request from you, or after you delete any personal information from our database (Customer Database), or if you delete your entire data, it is not immediately deleted from our backup systems, which are secured and inalterable. The

personal data could remain stored for up to 12 months in those backups, until they are automatically destroyed.

We commit not to use those backup copies of your deleted data for any purpose except for maintaining the integrity of our backups, unless you or the law require us to do so.

Physical Data Location / Data Transfers

Hosting Services

Hosting Locations: customer data are hosted in the aloalto Region closest to where they are based, and can request a change of region (subject to availability):

- Europe (Ireland, Frankfurt, Paris)

Backup Locations: backups are replicated on multiple zones in order to meet our Disaster Recovery objectives, and may be located in the following countries, **regardless of the original hosting region:**

- Ireland
Note: it is **not** possible to choose or restrict the backup locations for aloalto, backups replication has been standardized for all aloalto clients.

For customers concerned about EU data protection regulations, countries with a sign in the above lists are in EU or currently subject to an **adequacy decision from EU authorities**.

International Staff

In some cases, the personal data mentioned in this Privacy Policy may be accessed by staff members of aloalto SA subsidiaries in other countries. Such access will always be done for the same purposes and with the same privacy and security precautions as if it was done by our own local staff, so all the guarantees we provide still apply.

We use **EU Standard Contractual Clauses** to bind our subsidiaries in a way that offers sufficient safeguards on data protection for the limited and temporary data transfers that occur for such access.

Third Party Disclosure

Except as explicitly mentioned above, we do not sell, trade, or otherwise transfer your personal data to third parties. We may share or disclose aggregated or de-identified information, for research purposes, or to discuss trends or statistics with third-parties.

Cookies

Cookies are small bits of text sent by our servers to your computer or device when you access our services. They are stored in your browser and later sent back to our servers so that we can provide contextual content. Without cookies, using the web would be a much more frustrating experience. We use them to support your activities on our website, for example your session (so you don't have to login again) or your shopping cart.

Cookies are also used to help us understand your preferences based on previous or current activity on our website (the pages you have visited), your language and country, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

We also use third-party services such as Google Analytics, who set and use their own cookies to identify visitors and provide their own contextual services. For more information regarding those third-party providers and their Cookie Policy, please see the relevant references in the **Third-Party Service Providers** section.

So far, aloalto stores a very limited number of categories of cookies when visiting our website. Our website will work properly even if the visitor rejects or discards cookies. This may change in the future versions of our website as follows :

Category of Cookie	Purpose
Session & Security	<p>Authenticate users, protect user data and allow the website to deliver the services users expect, such as maintaining the content of their cart, or allowing file uploads.</p> <p>The website will not work properly if you reject or discard those cookies.</p>
Preferences	<p>Remember information about the preferred look or behavior of the website, such as your preferred language, region and timezone. Your experience may be degraded if you discard those cookies, but the website will still work.</p>
Interaction History	<p>Used to collect information about your interactions with the website, the pages you've seen, and any specific marketing campaign that brought you to the website. We may not be able to provide the best service to you if you reject those cookies, but the website will work.</p>
Advertising & Marketing	<p>Used to make advertising more engaging to users and more valuable to publishers and advertisers, such as providing more relevant ads when you visit other websites that display ads or to improve reporting on ad campaign performance.</p> <p>Note that some third-party services may install additional cookies on your browser in order identify you.</p> <p>You may opt out of a third-party's use of cookies by visiting the Network Advertising Initiative opt-out page. The website will still work if you reject or discard those cookies.</p>
Analytics	<p>Understand how visitors engage with our website, via Google Analytics. Learn more about Analytics cookies and privacy information.</p> <p>The website will still work if you reject or discard those cookies.</p>

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. Each browser is a little different, so look at your browser's Help menu to learn the correct way to modify your cookies, or look at the links below.

- Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Edge: <https://support.microsoft.com/en-us/help/4468242/microsoft-edge-browsing-data-and-privacy>
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
- Opera: <https://help.opera.com/en/latest/web-preferences/#cookies>

We do not currently support Do Not Track signals, as there is no industry standard for compliance.

Policy Updates

We may update this Privacy Policy from time to time, in order to clarify it, to reflect any changes to our website, or to comply with legal obligations. The "Last Updated" mention at the top of the policy indicates the last revision, which is also the effective date of those changes.

Contacting Us

If you have any question regarding this Privacy Policy, or any enquiry about your personal data, please reach out to the aloalto Helpdesk or contact us via email at admin@aloalto.com or by post:

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