

Pelago Software

Privacy Policy

Version 1.3

This privacy policy will explain how our organization uses the personal data we collect from you when you use our website and our applications.

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What data do we collect?

Pelago Software collects the following data:

As a data controller, for sales and marketing purposes, Pelago Software collects the following data based on consent

- Personal identification information (Name, email address, phone number, title, address)

As a data controller, to execute commercial contracts, Pelago Software collects the following data on a mandatory basis

- Personal identification information (Name, email address, phone number, title, address)

As a data controller, to offer the Pelago application service, Pelago Software collects the following data on a mandatory basis:

- Data change log (who has changed what when)
- User connections (who has accessed what when)

As a data processor, to offer the Pelago application service, Pelago Software collects the following data on a mandatory basis:

- Personal identification information (Name, email address, optional picture)
- Transformation360™ data
- Customer level activity data generated through use of the application, to the extent such data relates to customer content and business operations

How do we collect your data?

You directly provide Pelago Software with most of the data we collect. We collect data and process data when you:

- Register online or place an order for any of our products or services.
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.

- Use or view our website via your browser's cookies.
- Use the Pelago app

Pelago Software may also receive your data indirectly from the following sources:

- Marketing automation partners
- Business partners

How will we use your data?

Pelago Software collects your data so that we can:

- Process your order and manage your account.
- Email you with special offers on other products and services we think you might like.
- Measure the adoption of the Pelago application
- Trace what happened in case of an issue

Pelago Software does not use your personal data for profiling or automated decisions.

If you agree, Pelago Software will share your data with our partner companies so that they may offer you their products and services. The list of partners may be obtained by writing to us at the address mentioned in the section "Contact Us".

When Pelago Software processes your order, it may send your data to, and also use the resulting information from, credit reference agencies to prevent fraudulent purchases.

How do we store your data?

Pelago Software securely stores your data in the cloud (hyperscaler and market leading SaaS providers).

We may transfer and process your personal data in countries outside of your country of residence, including the United States. When we do so, we ensure that appropriate safeguards are in place to protect your data in accordance with applicable data protection laws. These safeguards may include the use of standard contractual clauses approved by the European Commission or other legally recognized mechanisms that ensure an adequate level of protection for your personal data.

Pelago Software will keep your data for 5 years or the duration defined in a contract between you and Pelago Software. Once this time period has expired, we will delete your data by removing the file or the record.

Marketing

Pelago Software would like to send you information about products and services of ours that we think you might like, as well as those of our partner companies, such as system Integrators, consulting firms, and technology vendors.

If you have agreed to receive marketing, you may always opt out at a later date.

You have the right at any time to stop Pelago Software from contacting you for marketing purposes.

If you no longer wish to be contacted for marketing purposes, contact us at contact@pelagosoftware.com or use the relevant online form.

What are your data protection rights?

Pelago Software would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request Pelago Software for copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right to request that Pelago Software correct any information you believe is inaccurate. You also have the right to request Pelago Software to complete the information you believe is incomplete.

The right to erasure – You have the right to request that Pelago Software erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that Pelago Software restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to Pelago Software's processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that Pelago Software transfer the data that we have collected to another organization, or directly to you, under certain conditions.

In the case of data that is mandatory to perform the service, exercising your rights may impact your ability to use the service.

Where Pelago Software processes your personal data on behalf of a Client (typically your employer or organization) within the Pelago application, that Client is the data controller for such processing. In this case, please direct your data protection requests to that Client in the first instance. Pelago Software will assist the Client in responding to your request, in accordance with its obligations as a data processor.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email:

contact@pelagosoftware.com

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Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology

For further information, visit allaboutcookies.org.

How do we use cookies?

Pelago Software uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website

What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:

- **Functionality** – Pelago Software uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- **Advertising** – Pelago Software uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. Pelago Software sometimes shares some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.

How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

Privacy policies of other websites

The Pelago Software website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

Children's data

The Pelago Software services and website are not directed at children under the age of 16. Pelago Software does not knowingly collect personal data from children under 16. If you are a parent or guardian and believe your child has provided personal data to us, please contact us at the email address listed below so we can take appropriate action.

Data breach notification

In the event of a personal data breach likely to result in a risk to the rights and freedoms of data subjects, Pelago Software will notify the relevant supervisory authority (CNIL in France) within 72 hours of becoming aware of the breach, in accordance with Article 33 of the GDPR. Where the breach is likely to result in a high risk to data subjects, Pelago Software will also notify affected data subjects without undue delay, in accordance with Article 34 of the GDPR.

Changes to our privacy policy

Pelago Software keeps its privacy policy under regular review and places any updates on this web page. Where changes are material, Pelago Software will use reasonable means to notify active users, such as by email or via a notice on the Pelago application or website. This privacy policy was last updated on April 29 2026.

How to contact us

If you have any questions about Pelago Software's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us with the email below. We have not named a Data Protection Officer, as Pelago Software does not meet the mandatory criteria for appointing one under Article 37 of the GDPR.

Email us at: contact@pelagosoftware.com

How to contact the appropriate authority

Should you wish to report a complaint or if you feel that Pelago Software has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office - CNIL in France.

<https://www.cnil.fr/en/contact-us>

