

AUGMENTA WEBSITE PRIVACY POLICY

Version 1.7 | Effective date: 18 August 2026

This Policy explains how Augmenta SAS processes personal data in connection with augmenta.tech and designer.augmenta.tech. For privacy questions or requests, contact legal@augmenta.tech.

1. Policy Scope

This Privacy Policy explains how Augmenta SAS ("Augmenta", "we", "us" or "our") processes personal data in connection with augmenta.tech and designer.augmenta.tech (together, the "Websites").

Augmenta SAS is the data controller for the processing described in this Policy.

Augmenta SAS

36 rue Emile Decorps

69100 Villeurbanne

France

Privacy and data-protection enquiries: legal@augmenta.tech

This Policy concerns the Websites. Personal data processed by the Augmenta application itself is covered by the separate Augmenta Application Privacy Policy.

2. Personal data we collect

The personal data we process depends on how you use the Websites and the information you choose to provide.

2.1 Website accounts

When you create or use an Augmenta website account, we may process:

- first and last name;
- email address;
- authentication information, including a protected password hash;
- job function;
- company name and company type or business activity;
- business or postal address, postal code, city and country;
- account status and preferences; and

- account creation, login and account activity information.

Website accounts may now or in the future enable features such as application downloads, access to Augmenta Designer, access to customer resources, and direct contact with Augmenta without asking you to enter the same information again. Account features may evolve over time.

Account records are currently stored in the Websites' WordPress database hosted by Bluehost.

2.2 Contact forms, enquiries and business relationships

When you contact Augmenta, submit a website form, request information, discuss a project, request a quotation, or otherwise interact with our commercial or technical teams, we may process:

- your name and business contact details;
- company and job information;
- country or location;
- the contents of your message or request;
- information relating to your requirements, project or equipment needs; and
- subsequent correspondence and follow-up information.

Information submitted through website forms may be transferred to Zoho CRM so that Augmenta can manage enquiries, prospects and customer relationships. Augmenta uses an EU-hosted Zoho CRM environment, and the relevant CRM data is stored in the European Union.

2.3 Newsletter

If you voluntarily subscribe to the Augmenta newsletter, we may process your email address, name where provided, subscription status, the date and source of your subscription or consent, and information necessary to administer delivery, unsubscribe requests and suppression preferences.

Augmenta uses Mailchimp to manage and send newsletters. Newsletter subscription is voluntary and is separate from creating an Augmenta account or using an Augmenta product.

2.4 Augmenta Designer

Augmenta Designer enables users to create, load, configure, download and share system or scene configurations. Configuration data is not necessarily personal data, but it may become personal data if it is linked to an identifiable account or individual.

If you create a shareable link or otherwise choose to share a configuration, you should treat the link as shareable information and avoid including personal, confidential or sensitive information unless you intend to disclose it to the recipient.

2.5 Technical, authentication and security data

When you access the Websites, Augmenta and its service providers may automatically process technical information necessary to operate and secure the services, including:

- IP address;
- browser, device and operating-system information;
- requested pages and resources;
- date and time of requests;
- authentication and session information;
- security events and failed login attempts;
- server logs; and
- cookies or similar technical identifiers required for website functionality and security.

2.6 Google reCAPTCHA

Some forms use Google reCAPTCHA to protect the Websites against spam, automated submissions, abuse and malicious activity. When reCAPTCHA is used, Google may process technical and interaction information necessary to assess whether a request is legitimate. This may include IP address, browser or device information and interaction signals. Google processes this information in accordance with its own applicable privacy terms.

2.7 Third-party media and external content

Some pages may contain links to or embedded content provided by third parties such as YouTube or Vimeo. If you open, activate or load third-party content, the relevant provider may receive technical information such as your IP address and browser information and may use its own cookies or similar technologies. Processing carried out independently by those providers is governed by their own privacy policies.

3. How we obtain personal data

We obtain personal data primarily:

- directly from you when you create an account, complete a form, subscribe to the newsletter or contact Augmenta;

- automatically from your browser or device when you use the Websites; and
- from our service providers where necessary to operate the Websites, maintain account or subscription status, manage an enquiry or protect the Websites.

4. Why we process personal data and our legal bases

We process personal data only where we have an appropriate purpose and legal basis under applicable data-protection law.

Purpose	Examples	Legal basis
Operate the Websites and requested functionality	Page delivery, accounts, login sessions, downloads and Designer access	Article 6(1)(b) GDPR where necessary to provide a service requested by you; Article 6(1)(f) for administration and operation
Create and manage accounts	Registration, authentication, password recovery and account administration	Article 6(1)(b) and Article 6(1)(f) GDPR
Respond to enquiries	Contact requests, product questions, support, quotations and projects	Article 6(1)(b) where you request pre-contractual steps; otherwise Article 6(1)(f) GDPR
Manage prospects and customer relationships	CRM records, follow-up and business communications	Article 6(1)(f) GDPR - our legitimate interest in managing and developing Augmenta's business
Send newsletters	News, product information and marketing emails	Article 6(1)(a) GDPR - your consent

Protect the Websites	Authentication security, reCAPTCHA, abuse prevention, fraud prevention and security logs	Article 6(1)(f) GDPR - our legitimate interest in protecting our systems, users and services
Comply with law and preserve evidence	Legal, accounting, regulatory, compliance and dispute records	Article 6(1)(c) GDPR where required by law; Article 6(1)(f) where necessary to establish, exercise or defend legal rights

Where we rely on legitimate interests, we consider whether the processing is necessary and proportionate and whether your rights and interests override those interests. Where processing is based on consent, you may withdraw your consent at any time without affecting processing carried out before withdrawal.

5. Newsletter and direct marketing

For visitors subscribing through the Websites, marketing newsletters are based on a clear and voluntary opt-in. You may unsubscribe at any time using the unsubscribe mechanism included in our emails or by contacting legal@augmenta.tech.

Unsubscribing from marketing does not prevent Augmenta from sending messages that are necessary to administer an account, respond to a request, perform a contract or comply with legal obligations. We do not require newsletter subscription in order to create an account, download software or contact Augmenta.

6. Cookies and similar technologies

6.1 Necessary and functional technologies

The Websites use cookies or similar technical mechanisms required to operate website and account functionality. These may include technologies used to maintain login sessions, authenticate users, remember necessary website state, provide requested functionality and protect the Websites.

You may control cookies through your browser settings, although disabling necessary cookies can prevent account or website features from functioning correctly.

6.2 Security technologies

Google reCAPTCHA is used on certain forms to protect against automated submissions, spam and abuse. reCAPTCHA may process technical information and may use cookies or similar identifiers as part of its security functionality.

6.3 Analytics, advertising and profiling

At the effective date of this Policy, Augmenta does not use personal data collected through the Websites for behavioral advertising or targeted advertising profiling. If Augmenta later introduces non-essential audience-measurement, advertising, profiling or similar tracking technologies, we will update our information and, where required, obtain consent before activating them.

6.4 Third-party media

YouTube, Vimeo or similar third-party content may use cookies or other technologies when their content is loaded or activated. Their processing is governed by their own privacy practices.

7. Who has access to personal data

7.1 Augmenta personnel

Personal data is accessible only where reasonably necessary for the purposes described in this Policy. Authorized personnel working for or under the supervision of Augmenta SAS may access personal data on a need-to-know basis. This may include authorized personnel working from Augmenta's Montreal office under the responsibility and supervision of Augmenta SAS.

7.2 Service providers

Augmenta uses service providers that may process personal data on our behalf, including:

- Bluehost - hosting and infrastructure for augmenta.tech and designer.augmenta.tech, including the WordPress environment in which website accounts are stored;
- Zoho CRM - management of website enquiries, prospects and customer relationships. Augmenta's Zoho CRM data is hosted in the European Union;
- Mailchimp - newsletter subscription management and email distribution;
- Google reCAPTCHA - spam, fraud and automated-abuse prevention on website forms; and
- YouTube and Vimeo - where third-party video or media content is linked or embedded.

We may also use professional advisers, technical contractors or other service providers where necessary to operate the Websites, comply with law or protect Augmenta's rights. Service providers acting on our behalf are expected to process personal data only for appropriate purposes and subject to applicable contractual and data-protection requirements.

8. Resellers and other third parties

Augmenta does not provide website account information or information submitted through Augmenta forms to its resellers or integrators for their independent marketing purposes.

If Augmenta proposes to introduce you to a reseller, integrator or other third party, or to share information with such a party for a particular project, we will do so only where there is an appropriate legal basis and with appropriate transparency.

Augmenta does not sell personal data collected through the Websites.

9. International data transfers

Some Augmenta personnel and service providers operate internationally. Personal data may therefore be accessed or processed outside the European Economic Area (EEA), including where authorized Augmenta personnel in Canada access information or where international service providers process information in another country.

Augmenta's Zoho CRM environment is hosted in the European Union. Other providers, including Mailchimp, Google and hosting or infrastructure providers, may involve processing outside the EEA depending on the service used and its infrastructure.

Where applicable data-protection law requires safeguards for an international transfer, Augmenta relies on an appropriate transfer mechanism. Depending on the circumstances, this may include an adequacy decision, the European Commission's Standard Contractual Clauses, an applicable certified data-transfer framework, or another legally recognized mechanism.

You may contact legal@augmenta.tech for additional information about safeguards applicable to relevant international transfers.

10. How long we keep personal data

Augmenta does not intend to retain personal data indefinitely. Retention depends on why the information was collected, applicable legal requirements and whether information is needed to establish, exercise or defend legal rights.

Category	Normal retention approach
Active website account	For as long as the account remains active and necessary to provide the service.

Inactive website account	Normally deleted or anonymized after approximately 3 years of inactivity, unless a longer period is justified by a continuing relationship, legal obligation, security need or legal claim.
Contact form or non-customer enquiry	Up to 3 years after collection or the last meaningful contact.
Prospect information in Zoho CRM	Up to 3 years after collection or the last meaningful contact from the prospect, unless a customer relationship develops.
Newsletter subscriber data	Until consent is withdrawn or, as a general rule, up to 3 years from the last relevant interaction or contact, unless consent is renewed.
Marketing objection / suppression record	At least 3 years, and longer where reasonably necessary to ensure the objection or unsubscribe request continues to be respected.
Technical and security logs	Normally up to 6 months, unless a longer period is necessary to investigate a security incident, fraud, abuse or legal claim.
Designer data associated with an account	For as long as necessary to provide the relevant feature or until deletion where deletion functionality is available, subject to backup and security retention.
Customer, contractual, accounting and legally required records	For the duration of the relevant relationship and any additional period required by applicable law or necessary for legal claims.

When personal data is no longer required, we delete it or anonymize it where reasonably practicable. Some information may remain in restricted backups for a limited period before normal rotation or deletion.

11. Security

Augmenta uses reasonable technical and organizational measures designed to protect personal data against unauthorized access, disclosure, alteration, loss or destruction. Depending on the processing, measures may include access controls, account authentication, password hashing, HTTPS encryption, infrastructure and network security, anti-spam and anti-abuse measures, backups, security logging and contractual requirements for service providers.

No method of Internet transmission or electronic storage is completely secure, and absolute security cannot be guaranteed. If Augmenta becomes aware of a personal-data breach, we will assess it and make notifications to affected individuals and supervisory authorities where required by applicable law.

12. Your data-protection rights

Subject to the conditions and limitations provided by applicable law, you may have the right to:

- obtain confirmation as to whether Augmenta processes your personal data and obtain access to it;
- correct inaccurate or incomplete personal data;
- request deletion of personal data;
- request restriction of processing;
- object to processing based on legitimate interests;
- object at any time to direct marketing;
- receive certain personal data in a portable format where the right to data portability applies; and
- withdraw consent where processing is based on consent.

To exercise your rights, contact legal@augmenta.tech. We may request additional information where reasonably necessary to verify your identity before acting on a request. We will respond within the period required by applicable data-protection law.

You also have the right to lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL) in France or, where applicable, another competent supervisory authority.

13. Automated decision-making and profiling

Augmenta does not currently use personal data collected through the Websites to make decisions based solely on automated processing that produce legal effects or similarly significant effects on individuals. We do not use website personal data for behavioral profiling or targeted advertising.

Security services such as reCAPTCHA may automatically assess whether website activity appears legitimate or automated for the limited purpose of preventing spam, fraud and abuse. This security assessment is not used by Augmenta to make legal or similarly significant decisions about individuals.

14. Children

The Websites and services covered by this Policy are intended primarily for professionals, businesses and adult users. They are not directed at children, and Augmenta does not knowingly seek to collect personal data from children through website accounts, contact forms or newsletter subscriptions.

If you believe that a child has provided personal data to Augmenta inappropriately, please contact legal@augmenta.tech.

15. External websites

The Websites may contain links to websites and services operated independently by third parties. Augmenta is not responsible for the privacy practices of those third parties. We encourage you to review the privacy information provided by a third party when leaving an Augmenta-controlled website.

16. Changes to this Privacy Policy

We may update this Privacy Policy to reflect changes to the Websites, services, providers, business operations or legal requirements. When we make material changes, we will update the version or effective date shown at the beginning of the Policy and provide additional notice where appropriate. Earlier versions may be retained for compliance and record-keeping purposes.

17. Contact

For questions about this Privacy Policy, the processing of your personal data or the exercise of your privacy rights, contact:

Augmenta SAS

36 rue Emile Decorps

69100 Villeurbanne

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legal@augmenta.tech