

LES 100 VŒUX

Updated on 16/05/2022

PRIVACY POLICY

This "Privacy Policy" forms an integral part of our General Terms and Conditions of Sale, available in the "GTC" section of the Website (see <https://les100voeux.fr/cgv>).

It illustrates the strong commitment of LES 100 VŒUX SAS to the respect of your privacy and the protection of your personal data which may be collected and processed during your use of the Website (hereinafter the "Data").

Your Data may not be collected or processed without your prior, voluntary, and informed consent.

For consent to be voluntary and informed, it must be given with full knowledge of the facts, i.e. by a person who is sufficiently informed of the consequences of his/her consent, both qualitatively (right to understanding) and quantitatively (right to information).

With this in mind, we have drawn up this "Privacy Policy" in order to:

- Inform you, beforehand and transparently, about the Data that may be collected and how it may be used
- Enable you to browse the Site in complete confidence and to use the functionalities that we offer you with peace of mind
- Inform you of all the rights you have regarding the Data we may collect, in the event that you have previously given us your consent to their processing by ticking the acceptance box provided for this purpose

This "Privacy Policy" is structured as follows:

Article 1 - Data sent to the Site

Article 2 - Data collected by the Site

Article 3 - Legal basis and purposes of Data processing

Article 4 - Recipients of Data

Article 5 - Data security

Article 6 - Data retention

Article 7 - Third-party sites

Article 8 - Rights of access, modification, and deletion of Data

Article 9 - Confidentiality relating to children

Article 10 - Updating the Privacy Policy

Article 11 - Additional questions

ARTICLE 1 - DATA SENT TO THE SITE

All personal information that you voluntarily put online (in your profile or in messages) is not accessible to the public and cannot be collected and used by third parties.

ARTICLE 2 - DATA COLLECTED BY THE SITE

The Data collected and subsequently processed by our Site is that which you voluntarily transmit to us when you open your User account (the "Account"), via the Registration Form, and concerns at least (i) a valid e-mail address and/or an identifier chosen by you (for example your first and last names), and (ii) a password also chosen by you to access your Account.

Certain advanced functionalities of the Site may also, for authentication purposes, require you to provide additional Data, such as your first and last names, your postal address, and your telephone number, particularly in connection with your purchases of products on the Site. This information is required, for example, in the "Account Details" and "Addresses" sub-headings of your User Account (see our General Terms and Conditions).

Your consent to the processing of your Data transmitted in the context of the Use of the Site will result from the validation of the opening of your User Account as part of the registration procedure, as well as from the validation of your product order, if any, by ticking the box provided for this purpose on the Site (see our T.G.V.).

The Data automatically collected by the Site is your IP address (your computer's Internet address), which is associated with the version of your browser software, the address of the page displayed, and the date of your request.

Browsing the Site may also lead to the automatic installation of cookies on your connection terminal (computer, tablet, or smartphone). Cookies are small texts sent by a website to your browser and stored on your computer. They enable our servers to identify you and offer you personalised information and automatically connect you to our services. They are also used to simplify your browsing and improve the ergonomics of the Site.

However, you may refuse the installation of cookies on your connection terminal by modifying the relevant parameters of your browser software, but such a refusal may prevent you from accessing certain services on the Site.

These cookies and their use are the subject of a dedicated Policy drawn up by the Company, which you can consult now in the "Cookies Policy" section of the Site.

ARTICLE 3 - LEGAL BASIS AND PURPOSES OF DATA PROCESSING

The Data identified as mandatory in the Registration Form, but also in the product order process provided for in the GTC, are necessary in order to benefit from the Site's functionalities. We will use this information to manage and maintain our Site, to enable you to benefit from personalised features, and to process any reports or correspondence from you.

The Data collected automatically by the Site enables us to compile statistics on visits to its web pages.

We do not use your e-mail address or any other information likely to identify you personally without your consent, either to send advertising or marketing messages, except as part of a specific programme or function that you can activate or block beforehand.

In order to provide you with and improve our Site and its functionalities, but also to help us better protect you, communicate information to you and propose new offers likely to interest you, we implement various processing operations whose legal bases are as follows: contractual performance, your consent, our legal and regulatory obligations and the Company's legitimate interests.

The purposes associated with each of these legal bases are listed below:

A) On the basis of the performance of pre-contractual measures taken at your request and/or the performance of the contract you have entered into, we carry out processing for the following purposes:

- 1) the management of your project openings and your orders on the Site, including, in particular, the confirmation and validation of your order as well as its follow-up (*with, in particular, the sending of an order confirmation e-mail, including the details of the order and the contact data*)
- 2) the management of our relationship with you, as a User of the Site, including in particular:
 - creating your personal account on the Site (*including sending you a welcome e-mail*)
 - resetting your password (*by sending you a password reset e-mail*)
 - use of the Site and the functionalities offered (*in this context, the Company may in particular send the User emails to inform them of changes to the Site or send them newsletters to which they have subscribed*)
 - managing communications and monitoring exchanges with Users

B) On the basis of your consent, we carry out processing for the following purposes:

- 1) the sending of communications relating to promotions and offers, personalised or otherwise, by electronic means (*in this context, the Company may send the User emails to inform them of the existence of various products and/or services that it offers directly or through one of its partners, in parallel with the Site, and which may be of interest to the User*)
- 2) the management of cookies subject to consent
- 3) managing your participation in our events, games, and competitions

C) In order to comply with our legal and regulatory obligations, we carry out processing operations for the following purposes:

- 1) compliance with the regulations applicable to our business
- 2) general accounting management
- 3) keeping invoices and other compulsory documents relating to transactions in accordance with our obligations
- 4) management of responses to official requests from public or judicial authorities authorised for this purpose
- 5) managing requests to exercise rights

D) Based on our legitimate interests, we carry out processing for the following purposes:

- 1) the management of your requests for information and complaints (*in this context, the Company may respond by e-mail to Users who request assistance in logging on to the Site, modifying or accessing their Account, or for any remark or suggestion submitted to the Company via the "Contact Us" section available on the Site*)
- 2) preventing and combating fraud, in particular, credit card fraud, including managing the consequences of such fraud (*in this context, the Company may send the Customer User e-mails in order to verify his/her identity and request, where applicable, a copy of any official document enabling it to be verified*)
- 3) to establish any means of proof necessary for the defense of the Company's rights;
- 4) the production of statistics and analyses in order to improve the use of the Site and/or the Services offered;
- 5) the management of cookies not subject to consent;
- 6) the conservation of computer traces in order to detect security incidents as a preventive measure.

The purposes pursued on the basis of our legitimate interests are always in compliance with your rights and freedoms.

If we need to process your data for purposes other than those listed in the paragraph above, we will inform you in advance and take any additional steps that may be necessary.

Please note:

- None of the processing operations listed above are intended to lead to any automated decision being taken about you, including profiling.
- At certain times, we may ask you for your consent to use your Data for certain very specific purposes (new purpose, modification, or deletion of an existing purpose). You are of course free to accept or refuse this request.
- At any time, you may decide to withdraw your consent to all or part of the processing operations listed above by changing some of the settings available on your Account profile page or by sending your request to the Company (in the context of exercising your rights as set out in Article VIII below). However, you must bear in mind that certain parts of the Site and certain Services will then be unavailable.

ARTICLE 4 - RECIPIENT OF DATA

The Company undertakes to protect your privacy and the confidentiality of your Data.

As a result, we undertake never to share or disclose your Data to third parties, except in the following limited situations:

- When we are obliged to do so by a judicial authority, police authorities and generally by any administrative authority authorised by law.
- When you have given us your prior consent to share all or part of this information (in particular as part of your access to our telephone technical assistance services for IT, provided by our Partners).
- When you contravene our General Terms and Conditions of Sale (we are thus able to transmit your IP address to access providers for identification purposes - and thus obtain your possible deregistration - or even, if we deem it necessary given the nature of your abuse, transmit your IP address directly to the competent authorities).

ARTICLE 5 - DATA SECURITY

We attach great importance to the security and protection of Users' Data and implement all the technical and organisational measures necessary to (i) limit the risks of loss, deterioration or misuse (ii) and prevent any violation thereof.

In order to guarantee optimum security, the Company uses standard 256-bit SSL (Secure Socket Layer) technology. The use of the SSL protocol, one of the most effective and widely used encryption methods currently available, ensures maximum protection of your Data.

In addition, as part of this security policy, we would like to inform you that:

- Your User account is protected by a personal password stored encrypted in our database.
- A secure cookie system is available to you to make any attempt to steal your cookies ineffective.
- Your e-mail address is accessible only to the Site administrator and to our webmasters if you have agreed to be contacted by e-mail.
- In accordance with the provisions of the RGPD, we will notify the supervisory authority (CNIL) of any breach of personal data of which we may be the victim despite our security measures and will inform you, where appropriate, of any breach concerning your Data in particular, if this breach entails a high risk for your rights and freedoms.

ARTICLE 6 - DATA STORAGE

Your Data is stored by the Site host and is kept for the time strictly necessary to manage the commercial relationship between us, in compliance with the purposes set out in Article III of this "Privacy Policy" and only to the extent authorised by the regulations in force.

After this period, the data will be anonymised and kept for statistical purposes and will not be used in any way whatsoever.

ARTICLE 7 - THIRD PARTY SITES

You may access, via links on the Site, the sites of third parties (whether or not they are Partners of the Company) which are not governed by these data protection provisions. You are therefore invited to examine the rules applicable to the use and disclosure of information that you may have communicated on these sites.

ARTICLE 8 - RIGHTS TO ACCESS, MODIFY AND DELETE DATA

The Company complies with the regulations applicable to the processing of personal data, and in particular the French Data Protection Act no. 78-17 of 6 January 1978, as amended (*hereinafter referred to as the "Data Protection Act"*), and the European Data Protection Regulation no. 2016/679 of 27 April 2016 (*hereinafter referred to as the "RGPD"*).

In accordance with the Data Protection Act and the GDPR, you have the following rights at all times:

- A right of access: you can, by proving your identity, obtain communication of the data concerning you and check their accuracy.
- A right of rectification: if this information is inaccurate, you may demand that it be rectified, completed, updated, blocked or deleted.
- A right to erasure ("right to be forgotten"): you may obtain the erasure, as soon as possible, of data concerning you.
- A right to the limitation of processing: in certain cases provided for by the regulations, you may obtain the limitation of the processing of data concerning you.
- A right to data portability: you may, under the conditions laid down by the regulations, request that data concerning you be transferred to another data controller, without the Company that originally collected the data being able to object.
- A right to object: you may object to your personal data being processed or refuse to allow your personal data to be passed on to third parties.

You may exercise these rights either by post addressed to the Company at the following address:

LES 100 VŒUX SAS
1 rue du bois de Tillet
60800 Crépy-en-Valois
France

Or by e-mail to the following address: contact@les100voeux.com

For any further information you may require on these protective provisions, or to lodge a complaint with a supervisory authority, please contact the Commission Nationale de l'Informatique et des Libertés (CNIL) at the following address:

C.N.I.L.
3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07
Telephone: + 33 (0)1 53 73 22 22

Website: <https://www.cnil.fr>

Contact link: <https://www.cnil.fr/fr/contacter-la-cnil-standard-et-permanences-telephoniques>

We would also like to inform you that (i) you may choose not to transmit your Data to the Site. In this case, you will be able to browse freely on the Site, but certain parts of the Site and certain functionalities will then be unavailable (for example, placing an order for products) (ii) at any time, you can update or correct your personal information in the profile page of your Account (in particular via your "Dashboard").

ARTICLE 9 - CONFIDENTIALITY RELATING TO CHILDREN

The Site and the Services are accessible only to users who have reached the age of majority, i.e. 18 years of age or over. We therefore do not authorise users under the age of 18, nor do we knowingly

collect the personal data of any minors under the age of 18, who are subject to specific protection under the RGPD.

ARTICLE 10 - UPDATES TO THE PRIVACY POLICY

The Company may modify this "Confidentiality Policy" at any time.

All changes to this "Privacy Policy" will be posted on this page. If the changes are significant, the Company undertakes to provide you with a more substantial notice (notification by e-mail, for example).

ARTICLE 11 - ADDITIONAL QUESTIONS

If you have any further questions about this privacy policy, please contact us via the "Contact" section of the Site or by sending us an e-mail to contact@les100voeux.com.

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