

RCS Aix-en-Provence 800 475 683 - 4095 Route d'Eguilles - 13090 Aix en Provence

# Legal notice, Data protection Policy & Cookies

Following the entry into force of the General Data Protection Regulation (GDPR), TAKE OFF, a subcontractor company in the collection and processing of personal data, provides transparent information about the use made of personal data within its organization.

## I. LEGAL NOTICE ABOUT THE WEBSITE

The sections dedicated to the Weber-Stephen France SAS brand in the "je-participe.fr" website are published by the company TAKE OFF as a subcontractor commissioned by the following editorial manager: Weber-Stephen France SAS whose head office is located at 17 allée Rosa Luxemburg, 95610 Eragny-sur-Oise, registered under number 428124978, hereinafter "The Organizing Company".

The controller is Weber-Stephen France SAS - 17 allée Rosa Luxemburg, 95610 Eragny-sur-Oise.

The host of the above websites is Jaguar network - 70 Chemin du Passet, 13016 Marseille - FRANCE (Siren 439099656 - <u>contact@jaguar-network.com</u>)

# II. DATA PROTECTION POLICY

As part of contractual relations, TAKE OFF organizes different types of promotional offers (refund offers, bonus offers, games, loyalty programs, etc.). To this end, personal data on final or intermediary customers, or prospects are collected and recorded by our company as data controller (or as a subcontractor according to specific contractual conditions) commissioned by the sponsor.

#### 1. Data collected according to the needs of the offer:

- Personal data: first name, last name, , postal address, email address.
- Company's data: Company name, postal address, VAT number.
- Opt-in proof: consent to receive communication for commercial purpose (or else), email address, IP address, date and time of the consent.
- Proof of purchase documents: receipts, invoices, delivery form...
- Banking information: IBAN and BIC number (or Swift or Sort Code).
- 2. Purpose of collection and processing:
  - Technically organize promotional offers of all types;
  - Identify participants and check the compliance of requests;
  - Make a bank transfer or send gifts when necessary
  - Manage requests or complaints from participants;
  - Establish monitoring and reporting for sponsors and establish associated invoicing;

• Establish a file containing fraudulent files to block them in the event of a repeat offense;

#### 3. Data retention period :

Outside of a specific contractual period, the maximum data retention period is set at 1 year after the end of management of the operation. We point out, however, that opt-in proof (email, IP address, date, time, subject of consent) can be kept for up to 3 years.

#### 4. Recipient of the data:

Only internal or outsourced operational or logistics staff, project managers and Management in the event of a complaint are authorized to have access to the recorded data.

After consent, personal data may be transmitted to our sponsor who may keep them for a maximum period of 3 years after inactivity of the prospect relationship.

Information about our contacts of all types (customers, suppliers, partners, etc.) may be transferred to partners for the purpose of resolving complaints or controls: outsourced lawyers, accounting firms, institutions, etc. if necessary.

#### 5. Lega basis for the use and processing of personnal data:

- The data subject's consent for the processing of personal data, Article 6 (1) (a), Article 7 GDPR.
- Processing personal data as a necessity for the fulfilment (performance) of a contract in return for payment or free of charge, Article 6 (1) (b) GDPR. This shall also apply to processing operations necessary for the implementation of pre-contractual measures.
- The processing is necessary for the fulfilment of a legal obligation to which we are subject, Article 6 (1) (c) GDPR.
- The processing is necessary to safeguard a legitimate interest of our company or a third party and if the interests, fundamental rights, and fundamental freedoms of the data subject do not outweigh the above-mentioned interests, Article 6 (1) (f) GDPR.

## 6. Data storage and secured IT architecture:

Our data and that of our customers are hosted in France in our secure premises and our Jaguar network outsourced datacenter located in France and certified iso27001, HDS and PCI-DSS: https://www.jaguar-network.com/produit/datacenter

The data that we collect can also transit outside the EU via American tools (in particular Gmail Pro, Gdrive and Frontapp) authorized to receive data from Europe (at least certified Privacy Shield as well as iso27001 in most cases) and guaranteeing the protection of privacy.

## 7. Your rights:

You have the right of access under Article 15 GDPR, the right to rectification under Article 16 GDPR, the right to erasure under Article 17 GDPR, the right to restriction of processing under Article 18 GDPR, the right to object under Article 21 GDPR and the right to data portability under Article 20 GDPR. You also have the right to lodge a complaint with the competent supervisory authority. Once you have given your consent to processing, you can withdraw it at any time for the future by sending an email to <u>dpo@take-off.fr</u> or by post to TAKE OFF - Service DPO, CS 40593, 13595 AIX EN PROVENCE CEDEX 3.

# III. COOKIES POLICY :

A cookie is an element that is used to record information relating to the user's navigation on the website. It does not identify the user.

There are different types of cookies:

- **Strictly necessary cookies**: these cookies allow you to browse the Site and are essential for the Site to function properly. Their deactivation will cause difficulties in using the Site and will result in preventing access to certain features.
- **Functional cookies**: these cookies allow us to remember your preferences and choices in order to personalize your experience on the Site.
- **Performance and statistical cookies**: these cookies collect information on how Users use the Site (the number of visits, the number of pages viewed, visitor activity) via the Google Analytics and Facebook analysis tools. These cookies also allow us to identify and solve problems with the functioning of the Site and to improve it.

Once we have received your consent for the use of cookies, we store a cookie on your device(s) to remember your choice for your next visits to our Website. If at any time you do not want information about your browsing behaviour to be used, you can "opt out" by changing your browser settings as described below. You can also opt-out by accessing the link Cookies Settings on our website. Change your browser settings You can prevent your browsing from being tracked generally by adjusting your browser settings, browsing in 'private mode' or using browser add-ons. You can find out how to do this by visiting the relevant support page for your browser, or by using the help function on your browser:

<u>Edge</u>

<u>Chrome</u>

Mozilla Firefox

Internet Explorer

<u>Safari</u>

<u>Opera</u>