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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 <u>www.echo-promo.eu</u> website, hereinafter, "The Website", and the sections dedicated to the ECHO brand in the "je-participe.fr" website are published by the company TAKE OFF as a subcontractor commissioned by the following editorial manager: YAMABIKO EUROPE SA whose head office is located at Avenue Lavoisier 35 - 1300 WAVRE - BELGIUM, registered under number 0477.194.468, hereinafter "The Organizing Company".

The publication director is Pascal Kieffer.

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:

- Personnal data : Civility, frist name, last name, date of birth, postal address, email address, phone number.
- 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 ou 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 consent of the persons concerned;
- Or the execution of a service contract or an accepted commercial proposal;
- Or the execution of our general conditions of sale with our customers;
- Or the legal obligation linked to current legislation;
- Or our legitimate interest as the organizer of cash back offers;
- Or the possible legitimate interest of a client who assigns us;
- Or the legitimate interest of the people concerned.

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 :

In application of European laws and the law of January 6, 1978 (relating to computers, files and freedoms), you have the rights to access, rectify, limit, port and delete your personal data. as well as the right to oppose their processing for legitimate reasons. You can exercise all of these rights by email to the address dpo@take-off.fr, or by post to TAKE OFF - Service DPO, CS 40593, 13595 AIX EN PROVENCE CEDEX 3. You also have rights to withdraw your consents at any time and to lodge a complaint with the Commission Nationale Informatique & Libertés (CNIL), in particular on its website www.cnil.fr.

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:

Edge

<u>Chrome</u>

Mozilla Firefox

Internet Explorer

<u>Safari</u>

<u>Opera</u>