

- **Consent**

Consent is one of the six legal bases provided for by the GDPR authorizing the implementation of personal data processing.

[extract from the GDPR - Article 4 Definition - §11] It is defined as "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her".

Furthermore, under Recital 42 of the GDPR, which clarifies the requirement of freedom of consent set out in Article 4, "consent should not be considered to have been freely given if the data subject does not have a genuine freedom of choice or is unable to refuse or withdraw consent without prejudice."

For further information on the concept of consent, please refer to Chapter IV: Rights and obligations specific to processing in the electronic communications sector - Article 82

<https://www.cnil.fr/fr/la-loi-informatique-et-libertes#article82>

- **Data collection and protection**

Your data is collected by the company Ecritel.

Personal data means any information relating to an identified or identifiable natural person (data subject); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to a name, an identification number or to one or more specific factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity.

The personal information that may be collected on the website is primarily used by the publisher to manage its relationship with you and, where applicable, to process your orders. It is recorded in the publisher's customer file, and the file thus created from personal data is declared to the CNIL.

A data protection officer is available to answer any questions you may have regarding the protection of your personal data. He or she can be contacted at the following address: dpo@ecritel.net.

- **Right of access, rectification and dereferencing of your data**

In accordance with the regulations applicable to personal data, users have the following rights:

- **Right to access:** They can exercise their right of access, to know the personal data concerning them, by writing to the following email address: contact@ecritel.net. In this case, before implementing this right, the Platform may request proof of the user's identity in order to verify its accuracy.
- **Right to rectification:** If the personal data held by the Platform is inaccurate, users may request that the information be updated.
- **Right to data deletion:** Users may request the deletion of their personal data, in accordance with applicable data protection laws.
- **Right to restriction of processing:** Users may request the Platform to restrict the processing of their personal data in accordance with the provisions of the GDPR.
- **Right to object to data processing:** Users may object to their data being processed in accordance with the provisions of the GDPR.
- **The right to data portability:** Users may request that the Platform provide them with the personal data they have provided in order to transmit it to a new Platform.

You can exercise this right by contacting us at the following address:

Ecritel France 84 rue Villeneuve 92110 Clichy – France or by email: dpo@ecritel.net.

All requests must be accompanied by a photocopy of a valid, signed identity document and include the address at which the publisher can contact the applicant.

The response will be sent within one month of receipt of the request. This one-month period may be extended by two months if the complexity of the request and/or the number of requests requires it.

In addition, and since Law No. 2016-1321 of October 7, 2016, individuals who wish to do so have the option of organizing the fate of their data after their death. For more information on this subject, you can consult the CNIL website: <https://www.cnil.fr/>.

Users can also file a complaint with the CNIL (French Data Protection Authority) on the CNIL website: https://www.cnil.fr. We recommend that you first contact us via the Platform before filing a complaint with the CNIL, as we are available to resolve your issue.

- **Use of data**

The personal data collected from users is intended to provide the Platform's services, improve them, and maintain a secure environment. The legal basis for processing is the execution of the contract between the user and the Platform. More specifically, the uses are as follows:

- User access and use of the Platform;
- Management of the Platform's operation and optimization;
- Implementation of user support;
- Verification, identification, and authentication of data transmitted by the user;
- Prevention and detection of fraud, malware (malicious software), and management of security incidents;
- Management of potential disputes with users;

- **Data Retention Policy**

The Platform retains your data for the duration necessary to provide you with its services or assistance.

Within a reasonable or required time to satisfy legal or regulatory obligations, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions, we may also retain some of your information as needed, even after you close your account or we no longer need to provide services to you.

- **Sharing personal data with third parties**

Personal data may be shared with third-party companies exclusively in the European Union, in the following cases:

- when the Platform uses the services of service providers to carry out security audits. These service providers have limited access to user data, as part of the performance of these services, and have a contractual obligation to use them in accordance with the provisions of the applicable regulations on the protection of personal data;
- if required by law, the Platform may carry out the transmission of data to respond to claims made against the Platform and to comply with administrative and judicial procedures;



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