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# Privacy Policy

## **SEZAME'S PRIVACY POLICY**

*Document updated on August 31st 2022*

Sezame ("**Sezame**", "**our**", "**we**" and "**us**") and our partners respect your privacy.

Please read this privacy policy carefully to understand how your personal data is collected, processed and stored when you use this Sezame website, which can be accessed via the url <https://joinsezame.com/fr>.

All personal data collected on this website are processed under the responsibility of the company Sezame, SAS with a share capital of 1000 €, registered in the Trade and Companies Register of Nice under the number 914716220, and having its registered office at 10 RUE BLACAS, 06000 NICE.

In the sense of the regulations applicable to personal data, Sezame is therefore responsible for processing.

This privacy policy describes:

1. How Sezame uses your personal data
2. How Sezame shares your personal data
3. How Sezame protects your personal data
4. Where Sezame hosts and transfers your personal data
5. How you can exercise your rights regarding your personal data
6. Updates to the privacy policy
7. How to contact us

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### **I. How Sezame uses your personal data**

Sezame may use your personal data for the following purposes:

- (1) To create your customer account on this website
- (2) To manage orders for products and/or services
- (3) Publish and manage your opinions and/or comments left on the website
- (4) Send you our newsletter, if you have subscribed to it
- (5) Respond to your contact request made from our website

The data collected is necessary for the execution of the contract entered into with Sezame when you use our website to order the products and/or services available for sale on the website.

The processing of your personal data in order to send you our newsletter is, however, based solely on your consent to receive our newsletter, which you may withdraw at any time. If you do not consent to receive the newsletter, please note that this will not prevent you from creating your customer account and placing orders on our website.

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## II. How Sezame shares your personal data

Within Sezame, and with regard to each processing purpose, your personal data is collected, processed and stored by authorised Sezame personnel, solely within the scope of their respective competences, and in particular by the customer service, marketing and IT departments.

We do not share personal data with other companies, organisations and individuals unless one of the following circumstances applies:

(1) **Sharing with prior consent:** after obtaining your consent, Sezame will share the information you have authorized with the specific third parties or categories of third parties informed at the time of collecting your consent.

(2) **Sharing with our service providers:** Sezame may also disclose your information to companies that perform services for us or on our behalf. These service providers include companies that provide IT services such as our web host or email service provider, delivery services for our products, or that perform marketing activities on our behalf. These service providers may use your information solely for the purpose of providing services to you on behalf of Sezame.

(3) **To fulfill a legal obligation, sharing in accordance with laws and regulations:** Sezame, may share your information as required by laws and regulations, to resolve legal disputes, or as required by judicial or administrative authorities under the law.

Sezame will ensure the legality of any sharing of personal data by entering into data processing agreements with the companies with whom your personal data is shared, obliging them to comply with this privacy policy and to take appropriate security and confidentiality measures when processing personal data.

## III. How Sezame protects your personal data

Sezame attaches great importance to the security of your personal data and has adopted standard industry practices to protect your personal data from unauthorised access, disclosure, use, modification, damage or loss.

We have also taken the necessary precautions to ensure the security and confidentiality of the data by our host, and in particular to prevent it from being distorted, damaged or communicated to unauthorised persons.

Sezame also adopts the following organisational measures:

(1) We adopt reasonable and practicable measures to ensure that the personal data collected is minimal and relevant as necessary, having regard to the purposes for which it is processed.

(2) We will keep your personal data for as long as is strictly necessary for the purpose for which it is being processed, unless retention of your data is required or permitted by law. For example, we retain data relating to the fulfilment of your orders for the period required by law for the retention of accounting records, i.e. a maximum of 10 years from the relevant exercise.

(3) We deploy access control mechanisms to ensure that only authorised personnel can access your personal data.

In the event of a personal data breach, Sezame will comply with the legal and regulatory requirements applicable to the notification of personal data breaches to the relevant supervisory authorities and/or data subjects.

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## IV. Where Sezame hosts and transfers your personal data

Your personal data will be hosted within the hosting infrastructure of our hosting provider, Amazon Web Services, located in Germany.

Where such transfers exist, we ensure that these transfers of personal data are regulated in accordance with applicable law to ensure an adequate level of data protection, either through an adequacy decision of the European Commission or through legal instruments such as data transfer agreements incorporating the European Commission's Standard Contractual Clauses.

If you have any queries regarding the recipients and transfers of data by us outside the European Union, please contact us at the addresses set out in the "How to contact us" section below.

## V. How you can manage your rights regarding your personal data

You have the right to access, rectify, erase, limit and object to the processing of your personal data, as well as the right to define directives concerning the fate of your data after your death and the right to the portability of your personal data.

You may contact us at any time at the addresses indicated in the "How to contact us" section below in order to exercise your rights with regard to personal data in accordance with the applicable regulations. You must indicate which right you wish to exercise and all the details necessary for us to respond to your request.

These rights are exercised in accordance with the applicable regulations.

- **The right of access** means that you can ask us at any time to tell you whether we are processing personal data about you and, if so, to tell you what personal data is involved and the nature of the processing.

- **The right of rectification** means that you can ask us to rectify your personal data if it is inaccurate. You may also request that your personal data, if incomplete, be completed insofar as this is relevant to the purpose of the processing in question.

- **The right to erasure** means that you may request the erasure of your personal data, in particular when:

- (i) Their retention is no longer necessary for the purposes for which they were collected;
- (ii) Your personal data is processed on the basis of your consent, you wish to withdraw that consent, and there is no other legal basis for processing;
- (iii) You have objected to the processing of your personal data and therefore wish to have it erased;
- (iv) Your personal data has been unlawfully processed;
- (v) Your personal data must be erased in order to comply with a legal obligation which is provided for either by European Union law or by French law.

- **The right to restriction** means that you can ask us to restrict the processing of your personal data:

- (i) Where you challenge the accuracy of your personal data for a period of time that allows us to verify the accuracy of your personal data;
- (ii) Where, following a processing operation established as non-compliant, you prefer the restriction of processing to the complete erasure of your personal data;

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(iii) where we no longer need your personal data for the purposes of processing but it is still necessary for the establishment, exercise or defence of legal claims

(iv) Where you have objected to the processing of your personal data and you wish to restrict the processing for the period of time necessary for us to verify whether the legitimate reason you are invoking is justified.

Limiting the processing means that the processing of your personal data will be limited to the storage of the relevant personal data. We will not carry out any further operations on the personal data in question.

- **The right to object** means that you may object to the processing of your personal data, where such processing is based on the pursuit of Sezame's legitimate interests. The right to object can be exercised provided that you can prove a legitimate reason relating to your particular situation. We will then cease the processing in question unless there are legitimate and compelling reasons to continue it in accordance with the applicable regulations.

- **The right to set out instructions** on what to do with your data after your death allows you to make known your instructions on the retention, erasure and disclosure of your personal data after your death.

- **The right to portability** means that you can request that we receive your personal data in a structured, commonly used and machine-readable format and transmit it to you, or request that we transmit it directly to a third party of your choice where this is legally and technically possible.

Where we process your personal data on the basis of your consent, you may withdraw your consent at any time by contacting us at the addresses listed in the "How to contact us" section or by clicking on the unsubscribe link in any of our communications.

However, the withdrawal of your consent does not call into question the validity of the processing carried out prior to this withdrawal.

## VI. Updates to this privacy policy

Sezame reserves the right at any time to modify or update, in whole or in part, this privacy policy, due to changes in applicable regulations on the protection of personal data or data processing.

Any substantial changes to the privacy policy will be notified to you by e-mail when you have provided us with a valid e-mail address and will be published on the website. We recommend that you regularly read this privacy policy so that you are fully aware of our commitments to the security and protection of your personal data.

## VII. How to contact us

If you have any questions, comments or suggestions, please contact us by visiting the contact us page or by submitting them to [contact@joinsezame.com](mailto:contact@joinsezame.com).

Or by post to 10 RUE BLACAS, 06000 NICE.

If you are not satisfied with Sezame's response to a request to exercise your rights in accordance with Article V above, or if you wish to report a breach of the applicable data protection regulations, you have the right to lodge a complaint with the CNIL by post (CNIL - 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07) or on its website ([www.cnil.fr](http://www.cnil.fr)), or with the data protection authority of the country in which you usually live or work.