

DOCUMENT EXPLANATORY MEMO

	GDPR COMPLIANCE TEMPLATE DOCUMENT LIBRARY		
Document number	11	Document name	Website – Personal Data Protection Policy
Document use		Persons concerned by the document	
This document must be used when the company has created a website on which data collection forms (e.g. contact / newsletter subscription form) exists or when cookies are installed on the site.		Customers and website visitors	
Document context	<p>The objective of the document is to inform people about processing and more specifically collection of data by the company. This is a GDPR notification requirement.</p> <p>This document can be used when the company creates a website on which data collection forms (e.g. contact / newsletter subscription form) exists or when cookies are installed on the site.</p>		
Terms of use of the document	<p>On each website, the data protection policy must be accessible via a “Personal data” link at the bottom of the page of the website and accessible via all the site’s pages.</p> <p>This must be a separate link from the “Legal notices - General terms of use” link.</p>		
Department responsible for the document’s implementation	Communication Department		

PERSONAL DATA MANAGEMENT POLICY

FAYAT SAS is committed to protecting its customers' personal data and ensuring the highest level of protection.

To provide its service, FAYAT SAS collects personal data from visitors to its FAYAT SAS website as well as from customers in stores.

FAYAT SAS, as Data Controller, undertakes to comply with the provisions of Regulation (EU) No. 2016/679 of 27 April 2016 on the protection of personal data (GDPR) and the law No. 78-17 of 6 January 1978 as amended.

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1. IDENTITY OF THE DATA CONTROLLER

The company collecting the personal data and carrying out the data processing is:

FAYAT SAS, an SAS (French simplified joint-stock company) with capital of €110,000,000, whose registered head-office address is 137 Rue du Palais Gallien, Bordeaux, SIREN (French company registration number) 595 750 589.

2. PURPOSES OF DATA COLLECTION AND LEGAL BASIS

FAYAT SAS ensures that it has one or more of the following legal bases for collecting personal data:

- the execution of a contract (e.g. to process and send an order or to open and manage a FAYAT customer account), or;
- the performance of a legal obligation (e.g. keeping invoices), or;
- where it is in FAYAT SAS's legitimate interest, or;
- where the customer has given his/her consent to the collection of the data.

FAYAT SAS's legitimate interest must not conflict with the rights and freedoms of Customers. Examples of legitimate interests mentioned in the GDPR include fraud prevention, direct marketing and data sharing within a group of companies.

FAYAT SAS collects and processes the personal data of its customers to carry out the following processing operations:

Purposes of processing implemented by FAYAT SAS	Legal basis
<ul style="list-style-type: none"> Customer, visitor, prospect, candidate, local authority, business, journalist, etc. relations management (telephone / e-mail) 	<ul style="list-style-type: none"> Legitimate interest
<ul style="list-style-type: none"> Customer satisfaction management 	<ul style="list-style-type: none"> FAYAT SAS's legitimate interest in improving service quality
<ul style="list-style-type: none"> Statistical work, analysis, selection and segmentation of customers, visitors, prospects, candidates, local authorities, businesses, journalists, etc. to improve our understanding of customers, visitors, prospects, candidates, local authorities, businesses, journalists, etc.; 	<ul style="list-style-type: none"> FAYAT SAS's legitimate interest in improving its knowledge of its customers.
<ul style="list-style-type: none"> Sending targeted commercial offers by email, SMS on social networks, other websites or any other medium; 	<ul style="list-style-type: none"> Customer consent Legitimate interest for paper-based prospecting mailings
<ul style="list-style-type: none"> Site traffic measurement (mobile and desktop) and mobile applications; 	<ul style="list-style-type: none"> FAYAT SAS's legitimate interest in improving its knowledge of its customers.
<ul style="list-style-type: none"> Setting up competitions and advertising them; 	<ul style="list-style-type: none"> Legitimate interest
<ul style="list-style-type: none"> Sharing information with business partners; 	<ul style="list-style-type: none"> Execution of the contract between a Customer and FAYAT SAS Customer consent (for electronic prospecting operations)

3. INDIVIDUAL RIGHTS

3.1. What rights can be exercised?

Under Articles 15 to 22 of Regulation 2016/679 of 27 April 2016, any natural person whose data have been collected may exercise the following rights:

- A right of access
- A right of rectification
- A right to object to the processing of their data and to delete their data
- A right to oppose profiling
- A right to limitation of processing
- A right to data portability

The Customer may also formulate instructions relating to the storage, erasure and communication of their personal data after their death in accordance with Article 40-1 of Law 78-17 of 6 January 1978. These guidelines may be general or specific.

When FAYAT SAS detects a violation of personal data likely to create a high risk for the Customer's rights and freedoms, the Customer will be informed of this violation promptly.

Finally, the Customer may withdraw his/her consent at any time.

3.2. How can you exercise them?

These rights can be exercised with the company FAYAT SAS, which collected the personal data as follows:

- By electronic means, at the following address: dpo@fayat.com

The request must indicate the name, first name, postal address, email, and, if possible, the customer reference.

After verifying your identity, FAYAT SAS sends a reply within one month after you exercise your right. In some cases, due to the complexity of the request or the number of requests, this period may be extended by an extra month, making a total of 2 months.

These rights may in certain cases provided for by the regulations be subject to exceptions.

In the event of a non-response or unsatisfactory response, the data subject may refer the matter to the data protection supervisory authority (CNIL: www.cnil.fr).

4. DATA RECIPIENTS

Your data are sent to FAYAT SAS partners who can process the data on their behalf (they are recipients), or only on behalf of and according to FAYAT SAS's instructions (they are subcontractors).

The recipients of the data are:

- payment institutions (banks)
- business partners for business development purposes. To view the list of business partners, [click here](#).

FAYAT SAS also uses subcontractors for the following operations:

- secure payment on the site
- the fight against fraud
- the shipment of orders and parcels
- carrying out technical maintenance and development operations on the FAYAT IT website, internal applications and the central information system.
- collection of customer opinions
- sending sales prospecting emails
- call centre management

5. DATA TRANSFERS OUTSIDE THE EUROPEAN UNION

For certain operations, personal data may be transmitted to companies located in countries outside the European Union. Prior to the transfer outside the European Union, and in accordance with the regulations in force, FAYAT IT ensures the security of these data transfers.

Transfers outside the European Union can be made in particular within the framework of the following activities:

Activity	Country of destination of the data	Supervision of data transfer
The processing of data around social media	United States	Privacy Shield
Cloud Office Solution	United States / Japan / Canada / Australia	Binding Corporate Rules
CRM management solution and prospecting	United States	Privacy Shield

6. DATA RETENTION PERIOD

FAYAT SAS has established precise rules concerning the length of time for which Customers' personal data are kept. As a matter of principle, unless otherwise required by law, data shall be kept for as long as necessary to fulfil the purposes for which it was collected.

The storage periods used are as follows:

- Prospect data (person who has never made a purchase) is stored for three years after the last contact from the prospect;
- Customer data is kept for three years from the last purchase;
- Cookies for audience measurement, targeted advertising and sharing on social networks are stored on the customer's device or computer for a period of 13 months;
- Purchase invoices are kept for 10 years.

7. COLLECTION OF DATA FROM MINORS

FAYAT SAS does not collect data on minors under 16 years of age without the consent of the holder of parental authority who himself or herself communicates the data.

8. COMMERCIAL PROSPECTING

FAYAT SAS uses your contact information to send you targeted advertising, in particular by email, post, SMS or on social networks.

FAYAT SAS complies with the rules laid down by Directive 2002/58/EC of 12 July 2002, which provides for the prior collection of express consent from the customer to send commercial prospecting by electronic means (email or SMS).

Thus, when creating your account on the site, you are expressly asked for your consent to receive offers from FAYAT SAS by email.

FAYAT SAS will not send you personalised solicitations by email or SMS if you have not consented.

There is an exception when, without having given his/her prior consent, the Customer may nevertheless be approached if he/she is already a customer of FAYAT SAS and the purpose of the prospecting is to offer similar products or services if he/she was able to oppose this at the time of collection.

In all cases, the customer has the option to oppose the receipt of these requests by carrying out the following actions:

- For e-mail, by clicking on the unsubscribe link provided in each email;
- For SMS, by sending the message SMS stop to the number indicated in it;
- By contacting customer services.

FAYAT SAS has the possibility of contacting you by phone to propose offers on products or services. If you do not wish to be solicited, you have the option to register on the list of opposition to telephone sollicitation available on the website www.bloctel.gouv.fr