

## **Personal Data Protection Policy**

### Introduction:

As part of its commercial activity, Reforest'Action collects and processes personal data in order to provide information and services to its contributors and partners.

The purpose of this privacy policy is to govern the processing of personal data by Reforest'Action.

With a presence in France and abroad, Reforest'Action is committed to respecting the legislation and regulations in force concerning the protection of personal data, more specifically:

- regulation EU 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data (GDPR);
- the French Data Protection Act and Order No. 2018-1125 of 12 December 2018 on the protection of personal data amending Act 78-17 of 6 January 1978 on data processing, data files and individual liberties and various provisions concerning the protection of personal data.

Thus, in accordance with the regulations in force, the data controller undertakes to process the personal data of its users in a fair, lawful and transparent manner for specific, explicit and legitimate purposes.

### 1. Definitions

Personal data, hereinafter 'Personal Data', are defined according to Article 4 1§ of the GDPR as any information relating to an identified or identifiable natural person.

Processing of personal data, hereinafter 'Processing', is defined within the meaning of Article 4 §2 of the GDPR, as any operation or set of operations carried out using automated processes and applied to data or sets of data, such as collection, recording, storage, consultation and use.

The User is designated, within the meaning of Article 4 1) of the GDPR, as a natural person who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, identification number or online identifier.

### 2. Who is responsible for processing the data collected?

Reforest'Action acts as a data controller in the collection and processing of personal data.

The registered office of Reforest'Action , a simplified joint stock company, is located at 10 rue Daguerre 92500 Rueil Malmaison. The company is registered in the RCS [Trade and Companies Register] of Nanterre under number 494 438 146 and represented by the company SMHEART registered in the RCS of Nanterre under number 821 463 908, whose manager is Stéphane Hallaire.

As a data controller, Reforest'Action ensures a high level of protection for the Personal Data of data subjects at all stages of processing (collection, storage, destruction, etc.).

### 3. What data is collected, and for what purpose?

During your interactions with Reforest'Action and as a User, you may be asked to provide information about yourself. In accordance with the principle of minimisation and privacy by default, only the data necessary to fulfil the following purposes are collected:

*Data you provide directly:*

- Personal data, namely surname, first name, telephone number, email and postcode, in order to benefit from communications sent by Reforest'Action;
- Professional data necessary to respond to a job offer, such as CV, qualifications and employment history, may be collected;
- Any other information that you wish to bring to the attention of Reforest'Action.

*Data we collect during our business relationship:*

- Data relating to the personal area, namely the encrypted usernames and passwords allowing connection to the personal area;
- Financial transaction data, within the framework of a payment and in order to perform contractual obligations, encrypted information relating to the payment method and data necessary for delivery may be collected;
- Photographs of persons who agree to be published in '*Live des Reforest'Acteurs*';
- Communication data, i.e. email address when subscribing to a newsletter.

*Data we collect automatically:*

- Browsing data, in particular cookies collected automatically, whether technical cookies necessary for browsing the website, statistical cookies or, on the basis of consent, advertising cookies or those necessary for redirection to our social networks.

### 4. For what purposes, and on what legal basis?

In accordance with the principle of data minimisation established by Article 5 c) of the GDPR, only the data necessary to fulfil the previously established purposes are collected. Thus, processing of personal data is established for the following purposes:

- Subscription to the newsletter, monitoring of Reforest'Action's news and information on forestry and environmental issues, on the basis of the User's consent (*article 6 §1 a) of the GDPR*)
- Creation of a personal area on the site <https://www.reforestaction.com/> for the performance of contractual obligations (*Article 6 §1 c) of the GDPR*)
- Viewing job offers in order to carry out pre-contractual measures and the possible holding of a job interview (*Article 6 §1 c) of the GDPR*)
- Collection of cookies on the basis of consent (*Article 6 §1 a) of the GDPR*)
- Publication of contributors' photos on the basis of consent (*Article 6 §1 a) of the GDPR*)
- Performance of agreements and online payment for the performance of contractual obligations (*Article 6 §1 c) of the GDPR*)

Your participation is anonymous. But if you agree, you have the option of making your name and photograph public. These elements may be displayed on the 'Live des Reforest'Acteurs' sidebar. You have the option of withdrawing your consent at any time through the personal area.

5. How long is the data kept?

According to Article 5 d) of the GDPR, personal data collected and processed for the aforementioned purposes will be kept for a limited period of time that is strictly necessary for the fulfilment of the intended purposes.

Data concerned	Purpose	Retention period
Identification data	Business and marketing information  Operation of and access to the personal account on the site	3 years from the last contact with the User
Professional data	Applying for a job offer	2 years from the last contact with the applicant
Financial transaction data and contact information	Fulfilment of contractual obligations and connection to the personal area	Life of the contract plus the applicable limitation period
Photography	Identification on 'Live des Reforest'Acteurs'	Duration of validity of consent
Browsing data	Collection of cookies when browsing the website	13 months from collection

6. What types of measures are taken to protect the security, integrity and confidentiality of data?

Reforest'Action undertakes to take all technical and organisational measures to ensure the protection and security of Personal Data, in particular against any loss, alteration, distribution or illegal use.

Reforest'Action ensures that such measures are in place for all operations carried out within the framework of its processing, and in particular during the collection, storage and hosting of Personal Data.

In this respect, Reforest'Action also ensures that the third parties it may use (technical service providers, suppliers, etc.) respect this requirement to protect the User's Personal Data by implementing appropriate measures, in accordance with the GDPR. Technical and organisational measures implemented may include the use of secure registration forms, encryption and/or restricted access to Personal Data.

Reforest'Action asks you to be very careful when providing your Personal Data to third parties, as well as your personal usernames and passwords allowing access to the site and the application.

Certain messages or solicitations received may come from ill-intentioned persons seeking to obtain personal information about the User for fraudulent use (*phishing*). If the User receives a message that appears to be a *phishing* attempt, they are advised not to respond to it and not to open any attachments, images or links contained in the message.

#### 7. Which subcontractors do we use?

Within the framework of its commercial activity, Reforest'Action may have to use subcontractors for whom it undertakes to maintain an adequate level of protection.

Furthermore, all transfers of personal data to subcontractors located outside the European Union are regulated and provide all appropriate guarantees, in particular through the European Commission's standard contractual clauses which ensure an adequate level of protection and the protection of your fundamental rights.

#### 8. What are the User's rights?

You have a right of access, rectification and opposition as well as erasure and portability when your data has been collected on the basis of consent and/or during the performance of a contractual obligation.

To exercise these rights, you must send your request, proving your identity (surname, first name, username), to the following postal address: Reforest'Action - 10 Rue Daguerre 92500 Rueil Malmaison or email address: [rgpd@reforestaction.com](mailto:rgpd@reforestaction.com).

In the event of a dispute, the data subject has the right to make a request directly to the competent supervisory authority (CNIL).

#### 9. Use of cookies

A cookie is a small computer file stored and read when viewing a website or mobile application, regardless of the type of terminal used (phone, computer, tablet, etc.).

Its purpose is to collect information relating to your browsing and to send you tailored content. Only the issuer of a cookie can read the information contained therein, for the period of its validity

The deposit of cookies other than purely technical ones is subject to obtaining your consent. In order to manage cookies as closely as possible to your wishes, we ask you to take into account the purpose of the cookies, specified below, when choosing your settings.

The website uses cookies for the following purposes:

- **Purely technical and necessary for the functioning of the site:** These cookies allow the Site to function in an optimal and secure manner. They can also remember some of your choices, when you want them to.
- **Social Networks:** To check if you are connected to third party services (Facebook, Twitter, Instagram, LinkedIn).
- **Targeting:** To allow us, retrospectively or in real time, to target (email campaigns, database enrichment) users who browse our Site.



- **Audience measurement:** To track statistical data on traffic to the Site (i.e., how users use the Site and to improve the Site's services) and to help us measure and study the effectiveness of our online interactive content, features, advertisements and other communications.

Through these cookies, these third parties may collect and use your browsing data for their own purposes, in accordance with their privacy policy.

You can, at any time, withdraw your consent for the deposit of cookies during your browsing on our Site.