

PERSONAL DATA AND COOKIE CHARTER

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The company LAGARDERE GLOBAL ADVERTISING, simplified joint-stock company with capital stock of 40,000,00 euros, registered at the Paris Trade and Companies Registry under the number 350 277 059, with the headquarters located at 2 rue des Cévennes 75015 Paris France (hereafter the “**Publisher**”), is the publisher of the following websites (the “**Site**”):

<https://us.elle-vancleefarpels-alhambra.com>

<https://fr.elle-vancleefarpels-alhambra.com>

<https://me.elle-vancleefarpels-alhambra.com>

<https://cn.elle-vancleefarpels-alhambra.com>

<https://kr.elle-vancleefarpels-alhambra.com>

<https://jp.elle-vancleefarpels-alhambra.com>

<https://tw.elle-vancleefarpels-alhambra.com>

<https://hk.elle-vancleefarpels-alhambra.com>

Any person having access to the Site, regardless of their status (private individual or professional), location, methods of connection to the Site, object and purpose of their access to the Site and/or use of the Services is a user (hereinafter “**User**” or “**You**”).

I. **PERSONAL DATA CHARTER**

The purpose of this personal data charter (the “**Charter**”) is to inform the User of the Site of the reasons and terms for processing his personal data (the “**Personal Data**” or “**Data**”) on the Site. The Personal Data are information which enable to identify the User directly or indirectly.

1. **ACCEPTANCE OF THE PERSONAL DATA CHARTER**

The Publisher may modify the Charter at any time in order to comply with any regulatory, jurisprudential, editorial or technical developments.

Before browsing, we suggest that you refer to the latest version of the Charter. You can find out if there has been any alteration since your last consultation by checking the date on the top of the page.

2. **PRELIMINARY INFORMATION**

The processing of the Personal Data is carried out in accordance with applicable regulations, and in particular the European Regulation “GDPR” (no. 2016-679 relative to the protection of physical persons with regards to the processing of data of a personal nature and the free flow of this data) and the

“Information and Freedom” law, (law no.78-17 of 6th January 1978 relative to IT, files and freedom, amended, and any regulation that completes or substitutes these regulations (hereinafter “**Rules on Information and Freedom**”).

The Publisher is responsible for the processing of your Data on the Site, as specified below. Processing implies the use of a piece of Data (e.g., consultation, collection, etc.)

3. PROCESSING FOR WHICH THE PUBLISHER IS RESPONSIBLE

When the User browses the Site, Data is likely to be collected and processed in order to enable access to certain Site services (hereinafter the “**Services**”) for the purposes of administration and business management.

a) Which Personal Data is indirectly collected on the Site?

Generally speaking, it concerns Personal Data from Cookies or other similar technologies. For further information on Cookies and their settings, the User is invited to consult the Cookies Charter available below.

This concerns more especially the Data relative to browsing meaning the Data collected during the browsing of the Site on behalf of the Publisher. The Publisher collects two types of browsing data:

- Connection Data such as the date, the time of connection and/or browsing, the type of browser, the browser language, the IP address.
- Geo-tracking Data referring to the data collected upon activation of geo-tracking systems when you connect to the Site. This geo-tracking service uses Data, such as GPS signals, device sensors, WiFi access points and cell tower identifiers, to calculate or estimate your precise position.

b) Why do we collect your Personal Data?

The reason(s) for which Data is collected on the forms are specified upon collection.

The purpose of Data and information from Cookies, whose storing to your device is subject to authorization, are indicated in the information banner present upon first connection and described in greater detail in the Cookies Charter available below.

Generally speaking, the purposes and retention periods differ according to the Services. The purposes and retention periods may be as follows, it being specified that only the Data necessary for each of these purposes are collected. The purposes pursued by the Publisher and the corresponding retention periods are:

Purpose	Retention period	Legal basis
Analytical management of the activity (audience measurement, etc.)	13 months from the deposit of the cookie	Legitimate interest

Personal Data may be collected for other purposes for some special or temporary services. Wherever necessary, information on said processing will be specified in a special document upon collection of this Personal Data.

Your Personal Data will not be kept by the Publisher beyond the duration strictly necessary for the purposes pursued as stated in the present Charter and this in accordance with the Data-processing Regulation and Freedoms and the applicable laws.

Your Data will be deleted or definitively anonymized when the retention periods expire.

Upon expiration of the retention periods for the main purpose of the processing, the Data may be archived and kept for the duration of the legal prescription in order to defend our rights or for the duration of the retention period imposed by the law.

Archiving implies that the Data will no longer be available online but will be extracted and stored on an autonomous and secure medium.

c) Who are the recipients of the Personal Data collected?

The Database created upon subscription to Services is strictly confidential. The Publisher undertakes to take all the necessary precautions, organizational measures and use all the appropriate techniques to preserve the security, integrity and confidentiality of Data and in particular, prevent it from being deformed, damaged or accessed by unauthorized third-parties.

Recipients of Personal Data for the purposes sought by the Publisher: in order to achieve the purposes of processing that they pursue, the Publisher needs accredited persons to be able to process the Data. As such the accredited services of the Publisher and its sub-contracted service providers are recipients bound to confidentiality, and authorized to access the Data collected within the framework of use of the Service.

Data transferred to authorities and / or public bodies: pursuant to the regulations in effect, Data may be transferred to the competent authorities upon request and in particular to public bodies, exclusively in response to legal obligations, court officers, ministerial officers and organisms assigned to carry out debt recovery, as well as within the context of searches for perpetrators of offenses committed over the Internet.

d) Protected transfers outside the European Union

Information from Cookies and similar technologies may be transferred outside the European Union with a view to its hosting and processing within the context of advertising purposes or of audience measurement. You can find further information on this point and the guarantees in place to ensure compliance of these transfers with the Rules on Information and Freedom for each partner in the Cookie Charter available below.

e) What are your rights and how to exercise them?

Pursuant to the Rules on Information and Freedom and within its limits, you have a right of access, rectification, deletion and in particular, a right to request the deletion of Data if it was collected when you were a minor, of opposition, limitation and portability of Data that concerns you.

When the processing of Data is carried out on the basis of your **consent**, you may withdraw that consent at any time.

When the processing is based on the **legitimate benefit** of the Publisher or of a third-party, you may oppose processing at any time, for reasons relating to your specific situation.

You have the opportunity to define instructions relative to the use of your Personal Data after your death.

The exercise of these rights may take place at any time with the Publisher at the following address: donneespersonnelles@lagardere.com.

You can also write to this address to the data protection officer appointed by Lagardère Média News or by sending him a letter to the address at the top of this document.

Personal Data that will be communicated within the context of your exercising your right of access and of portability, will be done privately and confidentially.

When you send a request to exercise a right, you must identify yourself by any means. If there is any doubt about your identity, we may ask you for additional information that appears necessary, including a photocopy of an identity document bearing the signature of the person concerned.

You may also file a complaint with the CNIL at the following address: 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07.

f) Security

The Publisher takes the appropriate measures in technical and organisational terms to prohibit unauthorised access to, or divulging of, your Data to unauthorised persons.

In the event of a request for deletion, the Publisher will respond within the legal period in order to proceed with the deletion of Data but shall not be held responsible for any residual traces that may potentially be found over the Internet.

II. COOKIES CHARTER

The present cookies charter (hereinafter the “**Charter**”) is to inform the User of the reasons and terms for processing information relative to your browsing of the Site, likely to be recorded in files called “cookies” or similar tools (hereinafter “**Cookies**”).

1) WHAT IS A “COOKIE”?

A Cookie or any similar tracker is a tracker likely to be saved to your device (computer, tablet or smartphone) and / or when you consult a service with browsing software, via the Site.

A Cookie allows its issuer, during its period of validity, to recognize the device in question each time the device accesses digital content bearing Cookies from the same issuer, and depending on the type of Cookie, to collect additional, indirectly identifying information, on your behavior within the services.

In the event that the computer is used by several individuals, for example in the same family with the same browser, the Cookie is assigned to the browsing information of all the individuals having used the device, without distinction.

There are different types of cookies:

- session cookies that disappear as soon as you leave the Site;
- permanent cookies that remain on your terminal until their lifetime expires or until you delete them using your browser's functions.

You are informed that, during your visits to the Site, other types of trackers than cookies may be used such as:

- identifiers generated by a software or an operating system or hardware identifier (mac address, unique hardware identifier, advertising identifier).
- invisible pixels, a web beacon is a tiny graphic image, invisible to the user, on a web page or in an email.

Pixels can recognize certain types of information, such as when a pixel is used in an e-mail, the time and date of the e-mail consultation. When placed on a web page, it may also provide a description of the page on which it is placed or collect technical information about your terminal equipment.

Pixels are used to:

- analyze the navigation on the Site
- measure the visits of a page
- measure the impact of an emailing campaign
- know the behavior of users to better target them with advertising.
- to measure the amount generated by advertisements.

All of these technologies are referred to as "cookies" in the rest of this document, except where each technique is referred to.

2) WHO USES COOKIES?

Cookies are set by us or by the Publisher or its partners.

In the case where cookies are deposited by us via the Site, these cookies are referred to as "first-party cookies".

When cookies are deposited by third parties such as our partners from a domain other than the Site, these cookies are referred to as "third party cookies".

3) WHY ARE COOKIES PLACED ON THE PUBLISHER'S WEBSITES?

a) Strictly necessary cookies

The sole purpose of these cookies is to enable or facilitate electronic communication or are strictly necessary for the provision of an online communication service at your express request. These cookies cannot be deactivated, and are not subject to the collection of your consent. They are cookies that allow:

- to measure and analyze the audience (cookies not subject to consent)
- view or listen to content on the Site (video, audio, interactive content ...)
- to adapt the presentation of the Site to the display preferences of your consultation terminal (language used, display resolution, operating system used, etc.)
- to implement security measures.

b) Audience and traffic analysis cookies

These cookies allow, via different tools to analyze the uses on the Site, to identify visitors, to analyze interactions on the Site and to improve the user experience as well as to optimize their ergonomics, their navigation and their contents.

4) HOW TO MANAGE THEM?

We use several cookies when using the Site. Some cookies are necessary for navigation on the Site and are deposited without your consent. You cannot set them.

Others are deposited only after having obtained your consent.

The list of the purposes of the cookies allowing you to know which ones are subject to your consent or not is specified in the information banner displayed when you first access the Site and on the parameter setting module.

5) CONSENT ON COOKIES

When you first visit our Site, you will be offered the option of accepting, refusing the cookies or set the cookies.

When you accept the deposit of cookies, a consent cookie is set. If you do not want cookies to be installed or read on your terminal, a refusal cookie will be deposited on your equipment, so that we can record the information that you have opposed the use of cookies.

The refusal or consent to the deposit of cookies is based on the deposit of a cookie that allows us to know that you refuse or accept them. Therefore, if you delete all the cookies stored on your equipment, we will no longer know which consent or refusal you have given and it will be like resetting them.

The next time you visit or load a page of the Site you will be asked to set your cookie preferences again.

The choice you make is valid for a period of 6 months from the expression of your choice. However, if we refer to new partners, we will re-display the module for setting your choices so that you can consent or refuse the deposit of cookies by these new partners.

You can change your choices at any time by clicking on the parameter setting module.

6) EXERCISING YOUR CHOICES

Some Cookies are issued and operated by third party partners of the Publisher for purposes that these third parties determine.

You will find more information on the purposes of the cookies deposited by third parties, by reading the privacy policies of these partners that you will find linked in the module of parameter setting of the Cookies.

7) OTHER WAYS TO EXERCISE YOUR CHOICES

VIA INTERPROFESSIONAL OPPOSITION PLATFORMS: In addition to the cookie management module displayed when you first connect to the Site, you can manage and modify the use of cookies at any time via the inter-professional opposition platforms:

VIA GOOGLE ANALYTICS: The use of Google Analytics implies a transfer of collected Data from Google Analytics' Cookies outside the European Union to the United States. Google is a member of the programme called *Privacy Shield*, which has been recognised by the European Commission as offering an adequate level of protection to data of a personal nature transferred by a European entity to businesses in the United States. You can access its cookie management tool here <https://tools.google.com/dlpage/gaoptout?hl=en-GB>.

VIA THE BROWSER SETTINGS: For Cookie preferences, the settings for each browser are different. They are described in your browser's help menu, which will tell you how to edit your cookie preferences.

- For Internet Explorer™: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>
- For Safari™: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
- For Chrome™: <https://support.google.com/chrome/answer/95647?hl=en&hlrm=en>
- For Firefox™: <https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox>

However, we would like to draw your attention to the fact that by setting your browser to refuse Cookies, certain functionalities, pages and areas of our Site, which require the use of Cookies, will not be accessible, for which we cannot be held responsible.

8) DURATION OF VALIDITY

The cookies deposited via our Site have a validity period of 13 months from their deposit. Your consent or refusal is valid for 6 months unless you change your mind before this term. The statistical data resulting from the use of cookies are kept for 25 months.

9) MODIFICATION OF THE PRESENT POLICY

This Charter is regularly updated. The User is invited to refer to it regularly.