



## PRIVACY POLICY

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As the publisher of an influencing platform that is available to the widest possible range of users, we are particularly concerned with the protection of our visitors and users' personal data.

You will find below the privacy policy of our website and the yoo.paris platform, which explains our practices and commitments in terms of personal data processing.

**This policy was last updated on January 21, 2020.**

# PREAMBLE

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## Who is responsible for processing your data?

The [yoo.paris](https://yoo.paris) website and the platform it grants access to are edited and managed by the company WOÔ, a simplified joint-stock company with a single partner, registered with the Trade and Companies Register under the number 814 542 288 and headquartered at 11 avenue Parmentier, Paris 11th (75011) (hereinafter “WOÔ”).

As far as the protection of your personal data, WOÔ is therefore **responsible for processing your data**.

### What does this mean?

WOÔ is your dedicated contact for any question relating to the protection of your data within the framework of the website and the platform.

You can easily contact us about such matters by email at [privacy@yoo.paris](mailto:privacy@yoo.paris).

**Note:** If you use the YOÔ platform as an influencer and take part in advertising campaigns as such, your data will be shared with the advertiser or organisation behind the campaign.

In this case, the company/organisation shares with WOÔ the responsibility for processing your data, under applicable laws and regulations.

**This will not change anything for you:** WOÔ remains your designated contact for any question relating to the protection of your personal data and your privacy, within the framework of the platform.

## How is this Policy organised?

For the sake of clarity, information relating to the processing of your personal data is presented separately, depending on the nature of your use of the website and the platform (**click to access the right section**):

- ▶ **YOU ARE A SIMPLE VISITOR ON THE YOÔ.PARIS WEBSITE..... 3**
- ▶ **YOU ARE AN INFLUENCER, OR WISH TO BECOME ONE ..... 10**
- ▶ **YOU ARE AN ADVERTISER’S REPRESENTATIVE..... 17**

## ► YOU ARE A SIMPLE VISITOR ON THE YOÔ.PARIS WEBSITE

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The [yoo.paris](https://yoo.paris) website contains public sections that allow you to discover the platform and get in touch with WOÔ. These public sections involve collecting and processing a certain amount of personal data, such as technical data that is necessary to ensure the correct display of the website.

In addition, WOÔ has set up certain audience measurement tools in order to better understand and interact with website visitors. These tools are also likely to collect a certain amount of personal data about you.

Below you will find all the relevant information regarding this.

**NB :** If you visit the [yoo.paris](https://yoo.paris) website in order to register as an influencer or an advertiser's representative, please refer to the second section ("*You are an influencer or wish to become one*") and to the third section of this policy ("*You are an advertiser's representative*") respectively.

### 1. Which data is collected about you, for what reasons, and how long is it stored for?



**Some personal data is necessary to let you connect to the [yoo.paris](https://yoo.paris) website, as well as to detect connection or display errors and cyber-attack attempts:** this data is mainly your IP address, as well as other technical information about your connection device (e.g. your computer, tablet or smartphone) and your Internet browser ("*connection logs*").

This information is automatically detected and collected by the website host, namely the company **GANDI**. It is stored by the latter for a period of twelve (12) months, after which it is deleted.

Its collection and use are justified in that they are necessary for WOÔ's pursuit of a legitimate interest, which consists in providing a functional website that adapts to the various devices and browsers on the market, all in accordance with article 6.1.f) of the General Data Protection Regulation (GDPR).



**In addition, the use of the "*Contact*" and "*Join us*" links on the website, which allow you to send an email directly to the addresses [hello@yoo.paris](mailto:hello@yoo.paris) and [work@yoo.paris](mailto:work@yoo.paris), require that you provide your email address at the very least, in order to ensure that your message is sent and to allow us to respond if necessary.**

In principle, we will store this information, as well as the content of your message and any attachments, for the time that is necessary to process your message, i.e. the time required to reply to it (if a response from WOÔ is necessary).

Your consent hereby justifies that we receive and process this data, consent expressed by your choice to send your message after having been duly informed of its processing conditions, in accordance with article 6.1.a) of the General Data Protection Regulation (GDPR).



If, however, the message sent via the form is illegal, suspicious or prejudicial to WOÛ or one of its employees, the information it contains may be stored for a longer period which may extend to the end of the limitation period applicable under civil or criminal law (e.g. in the case of an insulting or defamatory message sent via the contact form).

This long-term storage is justified by WOÛ and its employees' legitimate interest in obtaining proof they can use to assert their rights, including in the context of legal proceedings, in accordance with article 6.1.f) of the General Data Protection Regulation (GDPR).



Finally, the [yoo.paris](https://www.yoo.paris) website uses different types of "cookies", for technical reasons and for audience measurement purposes on the website's different pages and contents. Cookies are very small files, saved on your device (computer, smartphone, tablet, etc.) and automatically detected by web servers when you visit the [yoo.paris](https://www.yoo.paris) website.

In accordance with the specifically applicable regulations, cookies which are not purely technical in nature are never saved without your consent. This consent is requested from you via a "cookie banner" that appears when you first visit the [yoo.paris](https://www.yoo.paris) website. In compliance with the regulatory provisions relating to personal data protection, your consent will be requested again 13 (thirteen) months after your initial acceptance.

You can then change these preferences at any time, by using your web browser's settings. In order to do so, we recommend you refer to your software's documentation: [Mozilla Firefox](#); [Internet Explorer](#); [Google Chrome](#); [Opera](#); [Safari](#).

Cookies used on the website make it possible to collect data relating to your navigation (pages visited, visit duration, etc.), and thus facilitate future visits to the website.

This data is personal. Its collection and use are justified by WOÛ's legitimate interest in improving user experience and better knowing its website's audience, in accordance with article 6.1.f) of the General Data Protection Regulation (GDPR).

In any event, cookies' lifetime (the period during which they are stored on your device) does not exceed the following durations:

- 2 (two) weeks for "authentication" cookies;
- 2 (two) years for "Google Analytics" cookies;
- 2 (two) years for "Drift" cookies;
- 1 (one) year for "cookie consent".

Thus, personal data collected via these cookies has a lifespan that does not exceed those mentioned above.

► A table to better understand... the data we collect:

Purpose (reason for collection)	Data collected	Processing justification under the law	Data storage duration
Allow connection to the website and the latter's correct display on your device (computer, smartphone, tablet, etc.)	Technical information relating to your device (IP address, device type) and to your browser (browser version)	WOÛ's legitimate interest in offering a functional website adapted to the market's different devices and browsers (GDPR, article 6.1.f))	Twelve (12) months from each connection to the website

Obtain individual statistics relating to your navigation on the website (audience measurement) and improve user experience	Information relating to your browsing activity (pages visited, content viewed, visit duration, etc.) collected through cookies	WOÛ's legitimate interest in improving user experience and better knowing its website audience (GDPR, article 6.1.f))	Thirteen (13) months from the storage of cookies
Receive and process the messages you send by email via the website's "Contact" and "Join us" contact links	Your email address and any information you consider useful to include in your message	Your consent, expressed by your sending of an email (GDPR, article 6.1.a))	Until complete and final processing of the message (especially if it calls for a response from WOÛ or additional exchanges)
Ensure the preservation and defence of the rights and interests of WOÛ and its employees in court, e.g. with regard to abusive or defamatory messages sent by email.	Your email address and the content of your message, when this message has specific content justifying its storage as evidence	WOÛ and its employees' legitimate interest in protecting and defending their rights, including in the context of legal proceedings (GDPR, article 6.1.f))	Legally applicable civil or criminal limitation period (if several actions are possible: the longest duration applicable to any of these actions)

## 2. Who has access to your data? Who is it shared with?

With the exception of cookies (see below), all the data collecting through the [yoo.paris](https://yoo.paris) website is hosted by the company GANDI, and by the company HEROKU for the application, whose servers are all located within the European Union.

It is accessible by WOÛ employees for the purpose of their missions.

With the exception of GANDI, HEROKU and their respective employees, the only people or organisations likely to receive or view this personal data are:

- WOÛ's technical providers responsible for [yoo.paris](https://yoo.paris)'s website maintenance and development;
- WOÛ's legal advice, in order to get legal advice or assistance in the defence of its rights or those of its employees;
- French, European, international or foreign jurisdictions who would order WOÛ to communicate this data to them, or to which WOÛ would choose to communicate it voluntarily in order to defend its rights or those of its employees.

It cannot be excluded that some of these jurisdictions or authorities may be located in countries outside the European Union (or that they be international organisations by nature), although the probability of this is relatively weak.

In such a situation, we will take appropriate measures to ensure that the concerned jurisdiction or authority guarantees sufficient protection of the data entrusted to us.

These measures will consist in an in-depth analysis of the validity of the injunction received and, if necessary, in a consultation with the French reference authority (CNIL), prior to any sharing of the data.

### **Particular case for cookies:**

Some cookies used on the website are provided and managed by a third-party company, namely DRIFT ([drift.com](https://drift.com)). Data collected via these cookies is therefore accessible and processed by this company, in an effort to improve your user experience.

These cookies are intended to be applied to various website frequentation measures. For example, audience measurement cookies allow us to gather anonymous traffic statistics from our website, in order to continuously improve your experience navigating [yoo.paris](https://yoo.paris).

### 3. What rights do you have to control the processing of your data?

Like any other person from whom we collect and process personal data, you have a number of rights granted to you by regulation.

These are outlined below.

You can easily exercise these rights, by getting in touch with us at [privacy@yoo.paris](mailto:privacy@yoo.paris).

Remember to outline in your email the nature of the right you wish to exercise and the reasons that justify, if appropriate, your request to exercise such right.

#### a. Right of access

You have the right to ask us for a copy of the personal data we have about you, in an easily understandable format, as well as a copy of this policy on a durable medium.

#### b. Right to rectification

You have the right to ask us to correct, complete or update the data we have about you, should it appear to be inaccurate, incomplete or obsolete.

In this case, and as much as possible, we would be grateful if you would spontaneously communicate to us the new information necessary to proceed with the correction, completion or update request.

#### c. Right to withdraw consent (email contacts)

**Regarding the processing of data that you send to us by email via the “Contact” and “Join us” links on the site**, to the extent that this processing is subject to the lawfulness of your consent, you can withdraw this consent at any moment, without cost or justification.

Withdrawal of your consent results in the termination of future data processing, but not necessarily the destruction of this data: in order to have your data destroyed, you must exercise your right to erasure under the conditions described below, that specify that erasure has limitations due for example to the need to keep this data for the protection and defence of our interests in court.

Note in particular that we may continue to store some of our email communications as evidence, despite the withdrawal of your consent, when we identify a particular risk related to the nature or content of the message, based on WOÛ’s legitimate interest in guarding such proof. If you wish to challenge this long-term retention, then you must exercise your right to object (see below).

#### d. Right to object (technical data, data from cookies and messages kept as evidence)

**Regarding the processing of technical information necessary to your connection to the website and its proper display, data collected through cookies as well as messages sent via the contact form which we**

**would keep as evidence**, as long as this processing is justified by a legitimate interest specific to WOÛ, you have the right to object to such processing for reasons relating to your particular situation.

In other words, you may ask WOÛ to terminate one and/or the other processing of your data, by explaining the particular reasons which justify this request from your point of view.

However, WOÛ may refuse to comply with your request, if the continuation of this processing is necessary for compelling reasons from our point of view (e.g. if the data concerned is necessary to the preservation and defence of WOÛ's rights in court).

The objection (if it is based on valid reasons and that there are no compelling reasons against it) will result in the termination of future processing, but not necessarily in the destruction of the data concerned: in order to obtain such destruction, you need to exercise your right to erasure under the conditions described below, that specify that erasure has limitations relating for example to the need to keep this data for the protection and defence of WOÛ's interests in the context of a legal dispute, either current or anticipated.

#### e. Right to erasure

You may ask us to erase all or part of the data we have about you, provided that at least one of the following conditions is met:

- **Regarding the processing of messages that you send us by email via the "Contact" and "Join us" links, except those that appear necessary to be kept as evidence:** you have withdrawn your consent to the continuation of such data processing and now wish WOÛ to destroy this data.
- **Regarding the processing of technical information necessary to your connection to the website and its proper display, data collected through cookies as well as messages sent via the contact form that we would keep as evidence:** you object to the continuation of such data processing and also wish WOÛ to destroy this data.
- The data concerned no longer appears necessary for any of the purposes set out in point 1 above.
- You consider that WOÛ has collected and/or processed this data in an unlawful manner.
- The erasure of the data concerned is imposed as a legal obligation.
- The data concerned relates to a person who was less than eighteen (18) years old when the data was collected.

Note however that WOÛ is entitled to object to the deletion of certain data, when its conservation is necessary for particularly important reasons, such as the protection and defence of its interests in court (e.g. in the event of receiving a defamatory or abusive email).

Also note that we may choose, rather than delete the data, to proceed to its complete and irreversible anonymization. This way, we will be entitled to keep this data in a format that no longer identifies you (e.g. for statistical purposes).

#### f. Right to restrict processing

If, for example, you cannot exercise your right to erasure, you may also ask WOÛ to "set aside" some of your data, i.e. to store this data separately without using it anymore (except for legal obligations).

You can make such a request when at least one of the following conditions is met:

- The data concerned appears to be inaccurate, and you would prefer that WOÛ stop using it in the time necessary to check and correct it if necessary.
- You have exercised your right to object (see above), and you prefer that WOÛ stop using it while checking the merits of your objection.
- You consider that WOÛ has collected and/or processed data in an unlawful manner, but still prefer that we keep the data rather than delete it.
- The data concerned is no longer necessary for any of the purposes outlined above, but you wish for WOÛ to keep it anyway for the purposes of defending your interests in court.

In these cases, we will put the data “in quarantine” for as long as necessary, for example by means of a “Do not use – Right to restrict” mention.

### g. Right to data portability (contact form, cookies)

Regarding the data that you send by email via the “Contact” and “Join us” links on the website, you may ask us to send you a copy of this data in a standard digital format, allowing it to be reused by you or another service provider.

This “right to portability” is different to the “right of access” in that its purpose is not to obtain a copy that is necessarily readable by yourself, but a *reusable* copy of the data, e.g. with an intention to change service providers.

### h. Right to define directives concerning the fate of your data after your death

Finally, you have the right to tell us how you want us to handle your data in the unfortunate event of your death.

For instance, you may ask us to proceed with the destruction of all your data (subject to the imperative conservation needs that we may have, e.g. for the purposes of defending WOÛ’s rights in court), or even to transmit a copy of all this data to a person of your choice.

You can also designate any person of your choice as responsible for carrying out these “last wishes”; this person does not necessarily have to be one of your heirs or even the executor responsible for your estate.

► A table to better understand... your rights:

Your rights	What they allow you to obtain	Concerned data	Conditions, exceptions or limitations
Right of access	A readable and understandable copy of the data WOÛ has about you, as well as a durable copy of this policy	All	None
Right to rectification	The rectification, updating or completion of data concerning you	All	Clearly indicate the data that requires to be corrected, completed or updated, as well as the new data if necessary

Right to object	The termination of future data processing concerning you	Technical information necessary to your connection to the website, data collected through cookies and sent via the contact form kept as evidence	Explain the reasons relating to your particular situation which justify the termination of processing
Right to withdraw consent	The termination of future data processing concerning you	Messages that you send to us by email via the "Contact" and "Join us" links, except those that appear necessary to keep as proof	None
Right to erasure	The deletion of your data, or its complete and irreversible anonymisation	All	See the relevant scenarios in the text above
Right to restrict processing	The conservation of your data without further use	All	See the relevant scenarios in the text above
Right to data portability	A copy of your data in a standard digital format, allowing it to be reused by yourself or a service provider of your choice	Messages that you send to us by email via the "Contact" and "Join us" links, except those that appear necessary to keep as proof	Clearly indicate, if applicable, the identity of the person or organization to whom you wish WOÛ to send a copy of the data
Right to define directives concerning the fate of your data after your death	Respect for your "last wishes" with regard to your personal data (e.g. its deletion or transmission to any person of your choice)	All	Clearly indicate the people responsible for monitoring the proper execution of your directives, who will be our point of contact after your death

**Do you consider our response to your request unsatisfactory, or that we are processing your data unlawfully?**

Of course, we encourage you to approach WOÛ so that we can discuss the issue and try to solve it together as best we can. To do so, you can email us at [privacy@woo.paris](mailto:privacy@woo.paris).

However, you have the right, if you wish, to seize the competent authority for data protection in France, namely the **National Commission for Data Protection (CNIL)**, via their website [cnil.fr](http://cnil.fr) or by post to the following address: CNIL – 3, place de Fontenoy – TSA 80715 – 75334 PARIS CEDEX 07.

This right can be exercised at any time and does not incur any cost to you, apart from postage, and any cost for assistance or representation should you choose to be assisted in this procedure by a third party.

## ► YOU ARE AN INFLUENCER, OR WISH TO BECOME ONE

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To be able to use the platform as an influencer, you must first complete the entire registration process, accessible at the following address: [https://www.yoo.paris/influencers/sign\\_in](https://www.yoo.paris/influencers/sign_in).

Once registered, the influencer can complete their profile and participate in advertising campaigns via their social media accounts.

Registration and use of the platform thus involve a certain amount of personal data processing. You will find all the useful information about this below.

If you are looking for information relating to the processing of your data as part of your navigation on the [yoo.paris](https://www.yoo.paris) website as a simple visitor (such as information relating to cookies), please refer to the first section of this policy ("*You are a simple visitor on the yoo.paris website*").

### 1. Which data is collected about you, for which reasons and how long is it stored for?



**First of all, some data is necessary to complete your registration to the platform.** Therefore, we will ask you to enter your Instagram username and to authorise us to collect some data linked to your account on this social network (profile data, number of followers and last 200 posts to date); this is necessary to ensure that you have at least once social media account, and to be able to track your performance on that network as part of advertising campaigns.

Secondly, we will ask you to enter your date of birth and then complete your influencer profile, by adding some information such as your contact details, your lifestyle or your professional activity. Some of this information is compulsory, some is optional: the distinction is clearly indicated in your profile editing form.

In this context, we suggest that you associate your YOÛ influencer account with your social media accounts (other than Instagram). This is purely optional and only allows us, with your consent, to access your username on these networks, the number of followers you have and the content of your last 200 posts to date on each network.

All this information provided during registration (which you can easily add or modify later) helps us better define your influencer profile, in order to offer you advertising campaigns that best match your personality and preferences.

The collection and processing of this data is thus justified, for compulsory data, by the need to have it provide you with YOÛ's services in accordance with the General Conditions of Influencer Use (as outlined in article 6.1.b) of the General Data Protection Regulation) and, for optional data, by your consent (article 6.1.a) of the General Data Protection Regulation).

Like in particular YouTube, which allows you to connect more easily also via the services of YouTube API. The latter has General Conditions of Use that can be viewed at the following link: <https://www.youtube.com/terms>. YouTube API Services also has a Privacy Policy specific to their operation, available at the following link: <https://policies.google.com/privacy>.

We will store this data until you modify/delete it, or you delete your account, and then archive it for the limitation period legally applicable to an administrative, civil or criminal action which would question WOÔ's responsibility (see below).



Depending on the social media accounts you have linked your YOÔ influencer account to (i.e. your Instagram account at the very least), we will collect information relating to the content you post on these networks and their performance (engagement rate), in order to establish visible statistics from your profile (section "View my statistics").

These statistics are mainly for you, but will also be useful to us to assess the overall success of the advertising campaigns in which you have participated, as well as your own individual performance in the context of these campaigns, in order to better determine the other advertising campaigns we could invite you to take part in.

The collection and analysis of this data is justified, for data from Instagram, by the need to have it in order to provide you with YOÔ's service, in accordance with the General Conditions of Influencer Use (as outlined in article 6.1.b) of the General Data Protection Regulation) and, for data from other social networks, by your consent (article 6.1.a) of the General Data Protection Regulation), which you express when choosing to link your YOÔ influencer account to your relevant social media account.

We will keep this data until you delete your account (or, for data from social networks other than Instagram, until you withdraw your consent to the collection of this data), and then archive it for the limitation period legally applicable to an administrative, civil or criminal action which would question WOÔ's responsibility (see below).

We may also keep, with no time limitation, aggregated statistical data relating to the campaigns you have taken part in, as soon as this data no longer makes it possible to identify you.



Finally, in anticipation of any dispute relating to your use of the platform or your participation in an advertising campaign, such a dispute relating to content that you have posted in violation of the rights of a third party, General Terms of Influencer Use or applicable laws and regulations, we may collect and use all relevant information as evidence for the proper management of this dispute.

This includes the contentious content itself, its date and time of publication, as well as its post statistics. We may also store and use our written communications with you as evidence in this same context.

Collection, conservation and use of such information as evidence is justified by the legitimate interest of the company WOÔ to assert its rights in court, and/or to defend itself against any action or challenge arising from a third party, in accordance with article 6.1.f) of the General Data Protection Regulation (GDPR).

We will keep this information on a case-by-case basis for the duration of the potential litigation, which may extend until the end of the period of civil, criminal or administrative limitation applicable to such litigation.

► A table to better understand... the data we collect:

Purpose (reason for collection)	Collected data	Legal justification for processing	Data storage duration
Register as an influencer on the platform	Data marked as compulsory to register, including data linked to your Instagram account (username, follower count, content of the last 200 Instagram posts to date)	Allow you to access and use the YOÔ platform in accordance with the General Conditions of Influencer Use (GDPR, article 6.1.b))	Until you delete/modify the data concerned or delete your account, then for the legally applicable period of civil, administrative or criminal limitation
Invite you to participate in advertising campaigns tailored to your personality and preferences	Data marked as optional during registration, including data linked to your social media accounts other than Instagram (username, follower count, content of the last 200 posts to date on each network)	Your consent (GDPR, article 6.1.b))	
Monitor your performance in the context of advertising campaigns; assess the overall success of these campaigns	Nature and performance statistics of the content published, as part of advertising campaigns, via your Instagram account	Allow you to use the YOÔ platform in accordance with the General Conditions of Influencer Use (GDPR, article 6.1.b))	Until you delete your account, then for the legally applicable period of civil, administrative or criminal limitation
	Nature and performance statistics of the content published, as part of advertising campaigns, via the social media accounts (other than Instagram) to which you have linked you YOÔ account	Your consent (GDPR, article 6.1.b))	
Ensure the preservation and defence of WOÔ's rights and interests in court	All data relating to your use of the platform, your participation in advertising campaigns, or in our written communications, the prolonged conservation of which would appear necessary or relevant as evidence, in the context or anticipation of any litigation	WOÔ's legitimate interest in protecting and defending its rights, including in the context of legal proceedings (GDPR, article 6.1.f))	Duration of the dispute, which may extend to the end of the civil, criminal or administrative limitation period applicable to such a dispute

## 2. Who has access to your data? Who is it shared with?

All collected data is stored on GANDI and HEROKU's servers, located in the European Union.

It is accessible to WOÛ employees for the purpose of their missions.

With the exception of GANDI, HEROKU and their respective employees, the only people or organisations likely to receive or view this personal data are:

- Advertisers (brands) in the context of advertising campaigns to which you can be invited to participate via the platform, when these advertisers have a right of scrutiny or select themselves the influencers with whom they wish to collaborate;
- WOÛ's technical service providers responsible for ensuring the platform's maintenance and development;
- WOÛ's legal team, in order to obtain legal advice or assistance in the defence of its rights;
- French, European, international or foreign jurisdictions or authorities who would order WOÛ to communicate it to them, or to whom WOÛ would choose to communicate it voluntarily in order to defend its rights or those of its employees.

In some rare cases, we may be obliged to transfer some of your data to recipients located outside the European Union.

This can be the case when advertisers (brands) are based outside the European Union and are given information about you in connection to their advertising campaigns. In this case, we will implement appropriate guarantees to ensure that the transfer of your data outside the European Union does not have a negative impact on its protection; these measures may consist in contractual agreements with the advertisers concerned, on the basis of templates approved by the competent national and European authorities.

However, it cannot be excluded that a jurisdiction or authority who orders us to communicate some data is located outside the European Union (or is an international organisation by nature), although the probability of such a scenario is relatively low. In such a situation, we will take appropriate measures to ensure that the jurisdiction or authority concerned guarantees sufficient protection of the data communicated. These measures will consist in an in-depth analysis of the validity of the injunction received, and, if necessary, in a consultation with the French reference authority (CNIL), prior to any communication of the data.

## 3. What are your rights in terms of controlling the processing of your own data?

Just like any other person from whom we collect and process personal data, you have a number of rights provided by regulation.

You will find the details of these below.

You can exercise these rights easily by writing to us by email at [privacy@woo.paris](mailto:privacy@woo.paris).

Remember to indicate in your email the nature of the right you wish to exercise and the reasons that justify your request to exercise this right.

**Good to know:** You can also view and modify some of your data directly from your profile on the platform or delete it entirely.

#### a. Right of access

You have the right to request a copy of the personal data we have about you, in an easily understandable format, as well as a copy of this policy on a durable medium.

#### b. Right to rectification

You have the right to ask us to correct, complete or update the data we have about you, in the event that it appears to be inaccurate, incomplete or obsolete.

In this case, we would be grateful if you would spontaneously communicate to us, as much as possible, the new information necessary to proceed with the requested correction, completion or update.

#### c. Right to withdraw consent (data marked as optional during registration; social media other than Instagram)

**Concerning data that was marked as optional during registration and data collected through other social networks than Instagram**, since this publication is subject to the legality of your consent, you can withdraw your consent anytime, with no cost or justification.

Withdrawal of your consent leads to the termination of future processing, but not necessarily to the destruction of this data: to have your data destroyed, you must exercise your right to erasure under the conditions outlined below, it being specified that this knows limitations due for instance to the need to keep data for the protection and defence of our interests in court.

Note that we may continue to store some information relating to feedback as evidence, despite the withdrawal of your consent, when we identify a particular risk of dispute or litigation related to the publication of this feedback, on the basis of WOÛ's legitimate interest in guarding against this evidence. If you wish to challenge this long-term retention, then you must exercise your right to object (see below).

#### d. Right to object (data stored as evidence)

**Regarding the data we store as long-term evidence for a possible dispute**, considering this long-term storage is justified by a legitimate interest specific to WOÛ, you have the right to object to such processing for reasons related to your particular situation.

In other words, you may ask WOÛ to terminate the processing of this data by explaining the particular reasons which justify this request from your point of view.

However, it may happen that WOÛ refuses to comply with your request, if the continuation of such processing is necessary for compelling reasons from our point of view (e.g. if the data concerned is necessary to the preservation and defence of WOÛ's rights in court).

Objection (if it is based on valid reasons and that there is no compelling reason against it) will result in the termination of future processing, but not necessarily to the destruction of the data concerned: to have your data destroyed, you must exercise your right to erasure under the conditions outlined below, it being

specified that this knows limitations due for instance to the need to keep data for WOÛ's protection and defence in the event of litigation, either ongoing or anticipated.

#### e. Right to erasure

You may ask us to erase all or part of the data we have about you, provided that at least one of the following conditions is met:

- **Regarding data marked as optional during registration, and data collected through social networks other than Instagram:** you have withdrawn your consent to the storage of this publication and now wish WOÛ to proceed to the destruction of the data concerned.
- **Regarding the data that we store in the long term as evidence for a possible dispute:** you have objected to the prolonged storage of this data and, in addition, want WOÛ to proceed to its destruction.
- The data concerned no longer appears necessary for any of the purposes outlined above.
- You consider that WOÛ has collected and/or processed your data in an unlawful manner.
- The erasure of the data concerned is imposed as a legal obligation.
- The data concerned relates to a person who was younger than fifteen (15) when the data was collected.

Note, however, that WOÛ is entitled to object to the deletion of some data, when its conservation is necessary for particularly important reasons, such as the protection and defence of its interests in the context of legal proceedings.

Also note that we may choose, rather than delete the data, to proceed to its complete and irreversible anonymisation. This way, we are entitled to store this data in a format that no longer identifies you (e.g. for statistical purposes).

#### f. Right to restrict processing

If, for instance, you cannot exercise your right to erasure, you may ask WOÛ to "set aside" some of your data, that is to say keep this data separately, without using it anymore (except for legal obligations).

You can make such a request when at least one of the following conditions is met:

- The data concerned appears to be inaccurate, and you would rather WOÛ stopped using this data while checking it and modifying it if necessary.
- You have exercised your right to object (see above) and would rather WOÛ stopped using this data while checking the merits of your objection.
- You consider that WOÛ has collected and/or processed your data in an unlawful manner, but still prefer that we keep this data rather than delete it.
- The data concerned is no longer necessary for any of the purposes outlined above, but you would rather WOÛ kept it anyway for the purposes of defending your interests in court.

In these cases, we will put this data in quarantine for as long as necessary, for example by means of the mention "*Do not use – Right to limitation*".

### g. Right to data portability

You can request a copy of the data provided during registration and in the context of your use of the platform in a standard digital format, allowing it to be reused by yourself or another service provider.

This “right to portability” is different to the right of access in that its purpose is not to obtain a copy that is necessarily readable by yourself, but a *reusable* copy of the data, e.g. in the event of you wanting to switch service providers.

### h. Right to define directives concerning the fate of your data after your death

Finally, you have the right to tell us how you want us to handle your data in the unfortunate event of your death.

You may ask us to proceed with the destruction of all your data (subject to the imperative needs of conservation the we may have, e.g. for the purposes of defending WOÔ’s rights in court), or even to transmit a copy of this data to a person of your choice.

You can also designate any person of your choice as responsible for carrying out these “last wishes”; this person does not necessarily have to be one of your heirs or even the executor responsible for your estate.

► A table to better understand... your rights:

Your rights	What they allow you to obtain	Concerned data	Conditions, exceptions or limitations
Right of access	A readable and understandable copy of the data WOÔ has about you, as well as a durable copy of this policy	All	None
Right to rectification	The rectification, updating or completion of data concerning you	All	Clearly indicate the data that requires to be corrected, completed or updated, as well as the new data if necessary
Right to object	The termination of future data processing concerning you	Data stored in the long-term as evidence for possible litigation	Explain the reasons relating to your particular situation which justify the termination of processing
Right to withdraw consent	The termination of future data processing concerning you	Data marked as optional during registration; data collected through social networks other than Instagram	None
Right to erasure	The deletion of your data, or its complete and irreversible anonymisation	All	See the relevant scenarios in the text above
Right to restrict processing	The conservation of your data without further use	All	See the relevant scenarios in the text above
Right to data portability	A copy of your data in a standard digital format,	All	Clearly indicate, if applicable, the identity of

	allowing it to be reused by yourself or a service provider of your choice		the person or organization to whom you wish WOÔ to send a copy of the data
Right to define directives concerning the fate of your data after your death	Respect for your "last wishes" with regard to your personal data (e.g. its deletion or transmission to any person of your choice)	All	Clearly indicate the people responsible for monitoring the proper execution of your directives, who will be our point of contact after your death

**Do you consider our response to your request unsatisfactory, or that we are processing your data unlawfully?**

Of course, we encourage you to approach WOÔ so that we can discuss the issue and try to solve it together as best we can.

However, you have the right, if you wish, to seize the competent authority for data protection in France, namely the **National Commission for Data Protection (CNIL)**, via their website [cnil.fr](http://cnil.fr) or by post to the following address: CNIL – 3, place de Fontenoy – TSA 80715 – 75334 PARIS CEDEX 07.

This right can be exercised at any time and does not incur any cost to you, apart from postage, and any cost for assistance or representation should you choose to be assisted in this procedure by a third party.

## ► YOU ARE AN ADVERTISER’S REPRESENTATIVE

In order to use the platform as an advertiser’s representative, you must first complete the entire registration process, which is accessible at the following address: [https://www.yoo.paris/brand\\_members/sign\\_in](https://www.yoo.paris/brand_members/sign_in).

Once registered, representatives can access performance statistics for advertising campaigns carried out by influencers on behalf of their advertisers.

Registration and use of the platform thus involve a certain amount of data processing. You will find all the useful information regarding this below.

If you are looking for information relating to the processing of your data as part of your navigation on the [yoo.paris](https://www.yoo.paris) website as a simple visitor (such as information relating to cookies), please refer to the first section of this Policy (“*You are a simple visitor on the yoo.paris website*”).

### 1. Which data is collected about you, for what reasons and how long is it stored for?



**First of all, some of this data is necessary to complete your registration on the platform.** For instance, we will ask you to provide your brand name and contact details, it being specified that it is recommended you use your professional contact details. If you have been invited to register on the platform by a person working for the same brand as you, your email address will already be registered, because it was shared with us by that same person at the time their invitation was sent.

This data is mandatory because it is necessary to allow you to use the platform in accordance with the conditions of use specific to advertisers (signed with your brand’s legal representative), and to allow us to communicate with you concerning the advertising campaigns (briefs) you will create.

The collection and processing of this data is thus justified by WOÔ’s legitimate interest as a company to provide its services to the brands that make up its client base, and more generally to manage its customer relations, in accordance with article 6.1.f) of the General Data Protection Regulation (GDPR).

We will store this information until the deletion of your account or the termination of our business relations with your brand, with a complementary period equivalent to the legally applicable civil, criminal or administrative limitation period (see below).



We will also keep a copy of the briefs you create via the platform, and more generally a record of your actions on the platform, in order to gather evidence of your proper use of the service in anticipation of any dispute or litigation.

The storage period will be, for this data stored as evidence, aligned with the longest limitation period applicable to an administrative, civil or criminal action that is likely to engage WOÔ’s

responsibility, or that of the organisation or company on which you depend or yourself, in connection with your use of the platform.

This long-term preservation is justified by WOÛ's legitimate interest in securing useful evidence to assert and defend its legal rights, in accordance with article 6.1.f) of the General Data Protection Regulation (GDPR).

► A table to better understand... the data we collect:

Purpose (reason for collection)	Collected data	Legal justification for processing	Data storage duration
Ensure your registration on the platform as an advertiser's representative; manage our customer relations, e.g. in the context of advertising campaigns	Information required in the registration form, including your brand name and contact details	WOÛ's legitimate interest in offering its services to the brands that make up its client base, and in managing its customer relations (GDPR, article 6.1.f))	Until the deletion of your account or the termination of our business relations with your brand, then for an additional period equivalent to the legally applicable civil, criminal or administrative limitation period (see below)
Ensure the preservation and defence of WOÛ's rights and interests in court	All data relating to your use of the platform, the prolonged retention of which appears necessary or relevant as evidence in the context or anticipation of any dispute or litigation	WOÛ's legitimate interest in protecting and defending its rights, including in the context of legal proceedings (GDPR, article 6.1.f))	Limitation period applicable to an administrative, civil or criminal action likely to engage WOÛ's responsibility, or that of the organisation or company on which you depend, or yourself, in connection to your use of the platform

## 2. Who has access to your data? Who is it shared with?

All the data collected is stored on WOÛ's servers, hosted by the company GANDI and located in the European Union.

It is accessible to WOÛ employees for the purpose of their missions.

With the exception of GANDI and its employees, the only people or organisations likely to receive or view this personal data are:

- WOÛ's technical service providers responsible for ensuring the platform's maintenance and development;
- WOÛ's legal advice in order to obtain legal advice or assistance in the defence of its rights;
- French, European, international or foreign jurisdictions or authorities who would order WOÛ to communicate it to them, or to which WOÛ would choose to communicate it voluntarily in order to defend its rights or those of its employees.

It cannot be excluded that some of these jurisdictions or authorities may be located in countries outside the European Union (or that they are international organisations by nature), although the probability of this is relatively weak.

In such a situation, we will take appropriate measures to ensure that the jurisdiction or authority concerned guarantees sufficient protection of the data entrusted to us.

These measures will consist in an in-depth analysis of the validity of the injunction received, and if necessary, in a consultation with the French reference authority (CNIL), prior to any sharing of the data.

### 3. What are your rights in terms of controlling the processing of your own data?

Like any other person from whom we collect and process personal data, you have a number of rights provided by regulation.

You will find the details of these below.

You can exercise these rights easily, by writing to us by email at [privacy@woo.paris](mailto:privacy@woo.paris).

Remember to indicate in your email the nature of the right you wish to exercise and the reasons that justify your request to exercise this right.

**Good to know:** You can also view or edit some of your data directly from your profile in the platform or delete it entirely.

#### a. Right of access

You have the right to request a copy of the personal data we have about you, in an easily understandable format, as well as a copy of this policy on a durable medium.

#### b. Right to rectification

You have the right to request that we correct, complete or update the data we have about you, in the event that it appears to be inaccurate, incomplete or obsolete.

In this case, we would be grateful if you would spontaneously communicate to us, as much as possible, the new information necessary to proceed with the requested correction, completion or update.

#### c. Right to object

Considering the processing of your data is justified by a legitimate interest specific to WOÛ, you have the right to object to such processing for reasons related to your particular situation.

In other words, you may ask WOÛ to terminate the processing of this data by explaining the particular reasons that justify this request from your point of view.

However, it may happen that WOÛ refuses to comply with your request if the continuation of such processing is necessary for compelling reasons from our point of view (e.g. if the data concerned is necessary to the preservation and defence of WOÛ's rights in court).

Objection (if it is based on valid reasons and that there is no compelling reason against it) will result in the termination of future processing, but not necessarily to the destruction of the data concerned: to have your data destroyed, you must exercise your right to erasure under the conditions outlined below, it being

specified that this knows limitations due for instance to the need to keep data for WOÛ's protection and defence in court.

#### d. Right to erasure

You may ask us to erase all or part of the data we have about you, provided that at least one of the following conditions is met:

- You have objected to the processing of this data and also wish for WOÛ to proceed to its destruction.
- This data no longer appears necessary for any of the purposes outlined above.
- You consider that WOÛ has collected and/or processed this data in an unlawful manner.
- The erasure of the data concerned is imposed as a legal obligation.
- The data concerned relates to a person who was younger than fifteen (15) when the data was collected.

Note, however, that WOÛ is entitled to object to the deletion of some data, when its conservation is necessary for particularly important reasons, such as the protection and defence of its interests in the context of legal proceedings.

Also note that we may choose, rather than delete the data, to proceed to its complete and irreversible anonymisation. This way, we are entitled to store this data in a format that no longer identifies you (e.g. for statistical purposes).

#### e. Right to restrict processing

If, for instance, you cannot exercise your right to erasure, you may ask WOÛ to "set aside" some of your data, i.e. to store this data separately without using it anymore (except for legal obligations).

You can make such a request when at least one of the following conditions is met:

- The data concerned appears to be inaccurate, and you would prefer that WOÛ stop using it in the time necessary to check and correct it, if necessary.
- You have exercised your right to object (see above), and you prefer that WOÛ stop using it while checking the merits of your objection.
- You consider that WOÛ has collected and/or processed data in an unlawful manner, but still prefer that we keep the data rather than delete it.
- The data concerned is no longer necessary for any of the purposes outlined above, but you wish for WOÛ to keep it anyway for the purposes of defending your interests in court.

In these cases, we will put the data "in quarantine" for as long as necessary, for example by means of a "Do not use – Right to restrict" mention.

#### f. Right to define directives concerning the fate of your data after your death

Finally, you have the right to tell us how you want us to handle your data in the unfortunate event of your death.

For instance, you may ask us to proceed with the destruction of all your data (subject to the imperative conservation needs that we may have, e.g. for the purposes of defending WOÛ’s rights in court), or even to transmit a copy of all this data to a person of your choice.

You may also designate any person of your choice as responsible for carrying out these “last wishes”; this person does not necessarily have to be one of your heirs or even the executor responsible for your estate.

► *A table to better understand... your rights:*

Your rights	What they allow you to obtain	Concerned data	Conditions, exceptions or limitations
Right of access	A readable and understandable copy of the data WOÛ has about you, as well as a durable copy of this policy	All	None
Right to rectification	The rectification, updating or completion of data concerning you	All	Clearly indicate the data that requires to be corrected, completed or updated, as well as the new data if necessary
Right to object	The termination of future data processing concerning you	All	Explain the reasons relating to your particular situation which justify the termination of processing
Right to erasure	The deletion of your data, or its complete and irreversible anonymisation	All	See the relevant scenarios in the text above
Right to restrict processing	The conservation of your data without further use	All	See the relevant scenarios in the text above
Right to define directives concerning the fate of your data after your death	Respect for your “last wishes” with regard to your personal data (e.g. its deletion or transmission to any person of your choice)	All	Clearly indicate the people responsible for monitoring the proper execution of your directives, who will be our point of contact after your death

**Do you consider our response to your request unsatisfactory, or that we are processing your data unlawfully?**

Of course, we encourage you to approach WOÛ so that we can discuss the issue and try to solve it together as best we can.

However, you have the right, if you wish, to seize the competent authority for data protection in France, namely the **National Commission for Data Protection (CNIL)**, via their website [cnil.fr](http://cnil.fr) or by post to the following address: CNIL – 3, place de Fontenoy – TSA 80715 – 75334 PARIS CEDEX 07.

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