

# Privacy Policy

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## Preamble

This Privacy Policy is aimed at Users of the Site and the Solution published by SHOPPINGFEED and aims to inform them of the way in which their personal information may be collected and processed.

SHOPPINGFEED publishes and operates the website accessible at the following address: <https://www.shoppingfeed.com> (hereinafter "the Site") as well as the SHOPPINGFEED solution.

Respect for privacy and personal data is a priority for SHOPPINGFEED, which is why we undertake to process them in the strictest respect of the Data Protection French Act of January 6, 1978 (hereinafter "LIL Act") as amended and the General Data Protection Regulation (EU) of April 27, 2016 (hereinafter "GDPR").

In any case, we undertake to respect the following two essential principles:

- The User remains in control of his or her personal data;
- Data is processed transparently, confidentially and securely.

### **What is personal data?**

"Personal data" is any information concerning You which allows You to be identified directly or indirectly. For example, your first and last name can be used to identify You directly. Your email address allows you to be identified indirectly.

### **What is treatment?**

The word "processing" designates any operation, or set of operations, relating to personal data, whatever the process used (collection, recording, organization, conservation, adaptation, modification, extraction, consultation, use, communication by

transmission, broadcast or any other form of making available, reconciliation or interconnection, locking, erasure or destruction, etc.).

## Article 1. Definitions

- « **Subscription** »: designates any subscription to the Solution by a Client. The Subscription is governed by the General Terms and Conditions of Subscription.
- « **Back-Office** »: designates the interface provided by SHOPPINGFEED through which the Customer can administer and configure the feeds between their e-commerce Site and the Broadcast channels or Stores, and view order information;
- « **Broadcast channel** »: designates any media support and in particular videos, radio passages, TV passages implying a purchase following a dedicated communication, any mobile app, any platform, such as marketplaces, shopbots, social networks likely to disseminate the catalogs e-commerce site products;
- « **Client** »: designates any natural or legal person acting in a professional capacity and who subscribes to the Service, as well as any reseller agency or not of the Solution which manages subscriptions to the Solution for its own customers;
- « **End Customer** »: designates the Customer's customer purchasing its products via one of the Broadcast channels;
- « **General Subscription Conditions** »: designates the Contract governing the terms of subscription to the Solution as well as the provision of the Services offered by SHOPPINGFEED;
- « **Credentials** »: designates both the user's own identifier ("login") and the connection password ("password"), communicated after registering for the service;

- « **Store** »: designates any physical store of the Customer likely to be connected to the Solution;
- « **Services** »: designates all the services provided by SHOPPINGFEED allowing Customers to benefit from the Solution;
- « **E-commerce site** »: designates the online sales site from which the Customer markets its products.
- « **Site** »: designates the Website accessible at the address <https://www.shoppingfeed.com/>.
- « **Solution** »: designates the software published by SHOPPINGFEED, allowing the processing of the product catalog of the e-commerce Site, the sending and reception of data relating to the product catalog of the Customer's e-commerce Site to the Broadcast channels or Stores and the reporting of end customer data present in orders;
- « **User** »: designates any person who accesses and browses the Site and who uses the Solution, whether they are a Customer, an End Customer, or a simple Internet user.

## Article 2. Identity and contact details of the data controller

The person responsible for processing your data is the company SHOPPING-FLUX, a simplified joint stock company registered in the Créteil Trade and Companies Register under number 531 496 339 whose head office is located at 35 rue de la Gare, 94230, Cachan, France. (*Hereinafter "SHOPPINGFEED"*).

SHOPPINGFEED has the status of data controller for the following processing operations:

- o The management, operation and provision of the Site and the Solution
- o Management of the execution of Services
- o Management of Subscription payment
- o Sending newsletters and other commercial communications

- o Managing requests for rights arising from the GDPR and the amended French Data Protection Act
- o The proper functioning and permanent improvement of the Site, its functionalities and the Solution

**SHOPPINGFEED** has the status of Data processor (who acts on behalf of the Client) for the following processing operations:

- o Transfer of data relating to End Customer orders.

Legal reminder:

The data controller is, within the meaning of the French Data Protection Act and the GDPR, the person who determines the means and purposes of the processing.

The data processor is a person processing personal data on behalf of the controller, he acts under the authority of the controller and on the instructions of the latter.

Having said this, this confidentiality policy concerns the data processing carried out by SHOPPINGFEED in its capacity as data controller.

### **Article 3. Contact details of our data protection officer**

Our Data Protection Officer (hereinafter “DPO”) is there to respond to all requests, including the exercise of rights, relating to your personal data.

You can contact our DPO:

- Or by email to the following address: [dpo@shoppingfeed.com](mailto:dpo@shoppingfeed.com);
- Either by mail: *to the attention of the DPO, Shoppingfeed, 35 rue de la gare, 94230 CACHAN, FRANCE*

The Data Protection Officer's mission is to inform, advise and monitor SHOPPINGFEED's compliance in carrying out processing operations carried out via the Site.

In accordance with data protection regulations, the DPO acts as the point of contact:

- Towards the persons concerned for all matters relating to data processing carried out by SHOPPINGFEED or the exercise of your rights;

- Vis-à-vis the CNIL as part of its cooperation mission. The DPO may also contact this authority to request an opinion or prior consultation on all matters concerning the protection of personal data.

#### **Article 4. Collection and origin of data**

As part of the provision of the Services, SHOPPINGFEED collects and processes personal data relating to Users.

This data comes directly from Users.

In all cases, you are informed of the purposes for which your data is collected by us via the various online data collection forms, emails, notifications on the Site which may be sent to you.

Data on Users collected by SHOPPINGFEED is processed in accordance with the purposes intended during collection in compliance with the Framework relating to the processing of personal data implemented for the purposes of managing commercial activities published by the CNIL.

When necessary, we undertake, depending on the case, to obtain your consent and/or allow you to object to the use of your data for certain purposes, such as, for example, placing third-party cookies on your terminals ( mobile phone, computer, tablet) for the purposes of measuring the audience of our site and our application and to offer you job offers.

#### **Article 5. Consent**

As part of compliance with the principles of privacy by design and privacy by default, SHOPPINGFEED ensures that the necessary consents have been collected during User registration.

#### **Article 6. Purposes and legal bases of processing**

When the legal basis used for the processing operations carried out by SHOPPINGFEED is based on the pursuit of a legitimate interest, the User has the

possibility, upon simple request, of obtaining information relating to the balancing of interests.

Your various data is collected by SHOPPINGFEED to ensure:

Purpose	Legal basis	Personal data category	The duration of the conversation
The management, operation and provision of the Site and the Solution	Contract	Identification data, contact information	Customer: Duration of the Contractual relationship + 5 years from termination  Site user: 3 years from the last contact with SHOPPINGFEED
Managing support for Shoppingfeed users	Contract	Identification data, contact information	3 years since the creation of the support request for information base purposes for future cases.
IP address management	Legitimate interest	IP address	3 months in production, then archiving tokenized.
Management of the execution of Services	Contract	Identification data, contact information	Duration of the Contractual relationship + 5 years in interim archive from termination.
Subscription payment	Legitimate interest	Identification data, contact	For payments by bank card, in accordance

management		information, financial data	<p>with article L.133-24 of the French Monetary and Financial Code, this data may be kept for the purpose of proof in the event of a possible dispute of the transaction or complaint, in intermediate archives, during a period of thirteen (13) months following the debit date (duration extended to 15 months for deferred debit payment cards).</p> <p>In any case, the data relating to the PAN and visual cryptogram is not stored and the data relating to the expiry date is deleted when its expiry date is reached.</p>
Management of our financial and accounting obligations	Legal obligation	Identification data, financial data	Duration of the Contractual relationship + 10 years in intermediate archive
Sending newsletters and other commercial communications	Consent	Contact information	The data used in the context of sending emails and other alerts are kept until consent is withdrawn or for a period of three (3) years from the end of the commercial relationship if the

			<p>User is a Customer.</p> <p>If the User is not a Customer, the data used in the context of sending emails and other alerts are kept until consent is withdrawn or for a period of three (3) years from the day of the User's last contact with SHOPPINGFEED.</p> <p>Then, the User's data is stored for a period of five (5) years for evidentiary purposes in accordance with the legal and regulatory obligations to which SHOPPINGFEED is subject.</p>
Sending alert communications on data feeds	Consent	Identification data, contact information	Until consent is withdrawn or 3 years from the individuals' last contact with SHOPPINGFEED
Management of requests for rights arising from the	Legal obligation	Identification data, contact information	Data relating to the management of rights requests

<p>GDPR and the amended French Data Protection Act</p>			<p>are kept for the entire period necessary to process the request. They are subsequently archived for the period of criminal limitation applicable in intermediate archiving.</p>
<p>The proper functioning and permanent improvement of the Site, its functionalities and the Solution</p>	<p>Consent</p>	<p>Connection data, navigation data.</p>	<p>Cookies and other commercial trackers may be placed on the User's terminal for a maximum period of thirteen (13) months. Beyond this period, the raw attendance data associated with an identifier is either deleted or anonymized.</p> <p>The information collected via cookies and trackers is kept for a period of twenty-five (25) months. Beyond this period, this data is deleted or anonymized.</p>

## Article 7. Recipients of your data

Within the limits of their respective responsibilities and for the purposes mentioned in article 6, the main people who will be likely to have access to your data are the following:

- Authorized personnel from the various SHOPPINGFEED services (administrative, accounting, marketing, sales, logistics and IT services) and the Contentserv group, to which SHOPPINGFEED belongs ;
- Payment Service Providers;
- The companies responsible for managing the Site;
- Where applicable, the authorized personnel of our subcontractors;
- Where applicable, the courts concerned, mediators, accountants, auditors, lawyers, bailiffs, debt recovery companies, police authorities in the event of theft or judicial requisition, assistance;
- Third parties are likely to place cookies on your terminals (computers, tablets, mobile phones, etc.) when you consent.

Your personal data is not communicated, exchanged, sold or rented without your express prior consent in accordance with applicable legal and regulatory provisions.

Certain categories of people have access to the data collected:

The Payment Service Provider: Stripe;  
Storage location: EU

The Payment Service Provider: Gocardless;  
Storage location: EU

Host: Amazon Web Services;  
Storage location: EU

Host: KASPR;  
Storage location: EU

Host: HUBSPOT;  
Storage location: EU

Host: PLANHAT;  
Storage location: EU

Host: ZOHO;  
Storage location: EU

Host: Zendesk;  
Storage location: EU

Host: Oneflow  
Storage location: EU

Host: Winbound  
Storage area : EU

For any request for additional information, you can send a request for additional information to our Data Protection Officer by email to [dpo@shoppingfeed.com](mailto:dpo@shoppingfeed.com) or by mail “for the attention of the DPO, Shoppingfeed, 35 rue de la gare, 94230 CACHAN, France”.

## **Article 8. Transfer of data outside the European Union**

SHOPPINGFEED undertakes not to transfer User data outside the European Union.

In the event that SHOPPINGFEED should do so, it would inform Users indicating the measures taken to control this transfer and ensure respect for the confidentiality of their data.

## **Article 9. Duration of data retention**

We keep your data only as long as necessary for the purposes pursued, as described in article 6, and summarized in this table:

## Article 10. Your rights

In accordance with the French Data Protection Act and the GDPR, you have the following rights ([learn more](#)) :

- permission to access ([article 15 GDPR](#)), rectification ([article 16 GDPR](#)), updating, completeness of your data.
- right to erasure (or “right to be forgotten”) of your personal data ([article 17 GDPR](#)), when they are inaccurate, incomplete, equivocal, out of date, or the collection, use, communication or retention of which is prohibited.
- right to withdraw your consent at any time ([article 7 GDPR](#)).
- right to limitation of the processing of your data ([article 18 GDPR](#)).
- right to object to the processing of your data ([article 21 GDPR](#)).
- right to portability of the data you have provided to us, when your data is subject to automated processing based on your consent or on a Contract ([article 20 GDPR](#)).
- right not to be subject to a decision based exclusively on automated processing ([article 22 of the GDPR](#)).
- right to define the fate of your data after your death and to choose whether we communicate (or not) your data to a third party that you have previously designated ([article 85 LIL](#)). In the event of death and in the absence of instructions from you, we undertake to destroy your data, unless their retention proves necessary for evidentiary purposes or to meet a legal obligation.

You can exercise your rights:

- by email to the following address: [dpo@shoppingfeed.com](mailto:dpo@shoppingfeed.com) ;
- by mail to the following address: *to the attention of the DPO, Shoppingfeed, 35 rue de la gare, 94230 CACHAN ;*

Finally, you can also lodge a complaint with the supervisory authorities and in particular the [CNIL](#) or any other competent authority.

## Article 11. Connection data and cookies

For the proper functioning of the Site and the Services, we use connection data (date, time, Internet address, visitor's computer protocol, page viewed) and cookies (small files saved on your computer) allowing you to be identified, to memorize your consultations, and to benefit from audience measurements and statistics, particularly relating to the pages consulted.

By browsing our site, you accept that SHOPPINGFEED installs this type of so-called "technical" cookies which have the exclusive purpose of allowing or facilitating electronic communication of your terminal equipment with our site, by facilitating management and navigation on it.

Our access to information stored in your terminal equipment or the recording of information therein will therefore only be in the following cases:

- Allow or facilitate communication by electronic means;
- When necessary for the provision of our online communication service at your express request.

If the browser allows it, you can deactivate these cookies at any time, following the procedure indicated by that browser. However, SHOPPINGFEED informs you that such deactivation may have the effect of slowing down and/or disrupting access to the website.

## Article 12. Minors

The SHOPPINGFEED Site and Services are not intended for minors. SHOPPINGFEED does not voluntarily collect personal data from minors under the age of 15.

If you are a parent or guardian and you believe that your child has provided us with personal data without your consent, please contact us by email at the dedicated address [dpo@shoppingfeed.com](mailto:dpo@shoppingfeed.com) or by paper mail to the address "for the attention of the DPO, 35 rue de la gare, 94230 CACHAN, France"

### **Article 13. Social networks**

When browsing the Site, Users can click on the icons dedicated to the social networks Facebook, LinkedIn, Twitter.

Social networks make it possible to improve the user-friendliness of the Site and help with its promotion through sharing.

When Users use these buttons, SHOPPINGFEED may have access to personal information that Users have indicated as public and accessible from their Facebook, LinkedIn or Twitter profile. However, SHOPPINGFEED does not create or use any database independent of Facebook, LinkedIn or Twitter, and does not exploit any data relating to your private life through this means.

In order to limit third-party access to your personal information on Facebook, LinkedIn or Twitter, we invite you to configure your profiles and/or the nature of your publications via dedicated spaces on social media in order to limit their use. hearing.

### **Article 14. Security**

SHOPPINGFEED respects the GDPR and the French Data Protection Act regarding the security and confidentiality of your data.

We implement all necessary technical and organizational measures to ensure the security of our processing of personal data and the confidentiality of the data we collect.

As such, we take all necessary precautions, taking into account the nature of the data and the risks presented by the processing, to preserve its security and, in particular, to prevent data from being distorted, damaged or accessed by unauthorized third parties.

As part of this policy, we actively monitor the Dark Web to detect any leaks of personal data of our customers and/or users. The results of this monitoring are sent in real time to our teams.

The verification procedure involves the following steps:

- Continuous Dark Web Monitoring: We use specialized tools to monitor Dark Web forums, marketplaces, and websites for sensitive information about our customers.
- Analysis of results: Our security team regularly reviews monitoring results. If personal data of our customers is detected, we take immediate measures to protect this information.
- Real-time notification: When a data breach is identified, we send a real-time notification to the specified security email address ([security@shopping-feed.com](mailto:security@shopping-feed.com)). This allows us to react quickly and take appropriate action.
- Quarterly Audit: We conduct a thorough audit of our monitoring and reporting process every quarter. This ensures that our procedures are up to date and effective.

In the event of a security incident that compromises the data of Amazon and/or all our partners, we undertake to notify the parties concerned within 48 hours of becoming aware of the incident. This notification will include detailed information on the nature of the incident, the data potentially affected, and the measures taken to remedy the situation.