Privacy Policy of Philibertnet.com

Philibertnet.com collects some Personal Data from its Users.

Owner and Data Controller

Philibert SAS 12 rue de la grange 67000 Strasbourg, France

Owner contact email: dpo@philibertnet.com

Types of Data collected

Among the types of Personal Data that Philibertnet.com collects, by itself or through third parties, there are: Usage Data; Trackers; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; various types of Data; first name; last name; date of birth; physical address; email address; password; state; ZIP/Postal code; city; billing address.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using Philibertnet.com.

Unless specified otherwise, all Data requested by Philibertnet.com is mandatory and failure to provide this Data may make it impossible for Philibertnet.com to provide its services. In cases where Philibertnet.com specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by Philibertnet.com or by the owners of third-party services used by Philibertnet.com serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through Philibertnet.com.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organisational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of Philibertnet.com (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Tag Management, Advertising, SPAM protection, Displaying content from external platforms, Traffic optimisation and distribution, Registration and authentication, Registration and authentication provided directly by Philibertnet.com, Platform services and hosting, Contacting the User, User database management, Remarketing and behavioural targeting, Commercial affiliation, Analytics, Hosting and backend infrastructure and Collection of privacy-related preferences.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Advertising

This type of service allows User Data to be utilised for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on Philibertnet.com, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers for identifying Users, behavioural retargeting i.e. displaying ads tailored to the User's interests and behaviour, or to measure ads performance. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Google Ads conversion tracking

Google Ads conversion tracking is an analytics service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Google Ads advertising network with actions performed on Philibertnet.com.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Meta ads conversion tracking (Meta pixel)

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Meta Audience Network with actions performed on Philibertnet.com. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt out</u>; Ireland – <u>Privacy Policy</u> – <u>Opt out</u>.

Microsoft Advertising (Microsoft Corporation)

Microsoft Advertising is an advertising service provided by Microsoft Corporation.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>.

Google Floodlight conversion tracking (Floodlight tag) (Google Ireland Limited)

Google Floodlight conversion tracking (Floodlight tag) is an analytics service provided by Google Ireland Limited that connects Data from the Google advertising services (i.e. Search Ads 360 and Campaign Manager 360) with actions performed on Philibertnet.com. Depending on the setup of the service, such Data might also be used for retargeting purposes.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt out</u>.

AFFILAE (NETILUM SARL)

AFFILAE is an advertising service provided by NETILUM SARL.

Personal Data processed: Trackers; Usage Data.

Place of processing: France – <u>Privacy Policy</u> – <u>Opt out</u>.

Analytics

The services contained in this section enable the Owner to monitor and analyse web traffic and can be used to keep track of User behaviour.

BEYABLE Analytics

Ce cookie permet le fonctionnement de BEYABLE Analytics, qui est un outil de web analyse conçu pour mesurer l'audience du site Internet, en récoltant de nombreuses données liées aux visites. Il permet de visualiser ces données dans des tableaux de bord analytiques, tout en respectant la vie privée et la confidentialité des données.

Politique de confidentialité : https://www.beyable.com/politique-cookies/

Meta Events Manager (Meta Platforms Ireland Limited)

Meta Events Manager is an analytics service provided by Meta Platforms Ireland Limited. By integrating the Meta pixel, Meta Events Manager can give the Owner insights into the traffic and interactions on Philibertnet.com.

Personal Data processed: Trackers: Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt out</u>.

Collection of privacy-related preferences

This type of service allows Philibertnet.com to collect and store Users' preferences related to the collection, use, and processing of their personal information, as requested by the applicable privacy legislation.

iubenda Privacy Controls and Cookie Solution (iubenda srl)

The iubenda Privacy Controls and Cookie Solution allows the Owner to collect and store Users' preferences related to the processing of personal information and in particular to the use of Cookies and other Trackers on Philibertnet.com.

Personal Data processed: Trackers.

Place of processing: Italy – Privacy Policy.

Commercial affiliation

This type of service allows Philibertnet.com to display advertisements for third-party products or services. Ads can be displayed either as advertising links or as banners using various kinds of graphics.

Clicks on the icon or banner posted on the Application are tracked by the third-party services listed below, and are shared with Philibertnet com

For details of which data are collected, please refer to the privacy policy of each service.

Affilae

Affilae est une plateforme qui permet de proposer aux blogueurs et créateurs de contenus ludiques un programme d'affiliation qui leur permet d'être rémunérés pour leur implication. Ce cookie permet donc de rémunérer par une commission les ventes générées à partir de liens d'affiliations de nos partenaires du monde ludique.

Les données recueillies par ce cookie sont anonymisées et ne sont pas utilisées à des fins publicitaires.

Politique de confidentialité : https://affilae.com/en/privacy-cookie-policy/

Contacting the User

Contact form (Philibertnet.com)

By filling in the contact form with their Data, the User authorises Philibertnet.com to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: email address.

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of Philibertnet.com and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

Google Maps widget

Google Maps is a maps visualisation service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows Philibertnet.com to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

YouTube video widget

YouTube is a video content visualisation service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows Philibertnet.com to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Google Fonts

Google Fonts is a typeface visualisation service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows Philibertnet.com to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Hosting and backend infrastructure

This type of service has the purpose of hosting Data and files that enable Philibertnet.com to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of Philibertnet.com.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Microsoft Azure (Microsoft Corporation)

Microsoft Azure is a hosting service provided by Microsoft Corporation.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: France – Privacy Policy.

Platform services and hosting

These services have the purpose of hosting and running key components of Philibertnet.com, therefore allowing the provision of Philibertnet.com from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data.

Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

PrestaShop (PrestaShop S.A.)

PrestaShop is a platform provided by PrestaShop S.A. that allows the Owner to build, run and host an e-commerce website.

Personal Data processed: email address; first name; last name; Tracker; Usage Data.

Place of processing: France – Privacy Policy.

Registration and authentication

By registering or authenticating, Users allow Philibertnet.com to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, Philibertnet.com will be able to access some Data, stored by these third-party services, for registration or identification purposes. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

Facebook Oauth

Facebook Oauth is a registration and authentication service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, and is connected to the Facebook social network.

Personal Data processed: Tracker; various types of Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Google OAuth

Google OAuth is a registration and authentication service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, and is connected to the Google network.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Registration and authentication provided directly by Philibertnet.com

By registering or authenticating, Users allow Philibertnet.com to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary for the provision of the service requested by the Users.

Direct registration (Philibertnet.com)

The User registers by filling out the registration form and providing the Personal Data directly to Philibertnet.com.

Personal Data processed: billing address; city; date of birth; email address; first name; last name; password; physical address; state; ZIP/Postal code.

Remarketing and behavioural targeting

This type of service allows Philibertnet.com and its partners to inform, optimise and serve advertising based on past use of Philibertnet.com by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioural targeting activity.

Some services offer a remarketing option based on email address lists.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Retail Rocket

RetailRocket participe à la génération de recommandations de produits personnalisées pour les sites Web, les applications mobiles et les e-mails, agrège et analyse le Big Data comportemental, fournit une segmentation des clients en fonction des intérêts des utilisateurs et d'autres paramètres.

Politique de confidentialité : https://retailrocket.net/privacy/

Google Ads Remarketing (Google Ireland Limited)

Google Ads Remarketing is a remarketing and behavioural targeting service provided by Google Ireland Limited that connects the activity of Philibertnet.com with the Google Ads advertising network and the DoubleClick Cookie.

In order to understand Google's use of Data, consult Google's partner policy.

Users can opt out of Google's use of Trackers for ads personalisation by visiting Google's Ads Settings.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy – Opt Out.

Google Ad Manager Audience Extension (Google Ireland Limited)

Google Ad Manager Audience Extension is a remarketing and behavioural targeting service provided by Google Ireland Limited that tracks the visitors of Philibertnet.com and allows selected advertising partners to display targeted ads across the web to them.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Facebook Remarketing

Facebook Remarketing is a remarketing and behavioural targeting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of Philibertnet.com with the Facebook advertising network.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out; Ireland – Privacy Policy – Opt Out.

SPAM protection

This type of service analyses the traffic of Philibertnet.com, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognised as SPAM.

Google reCAPTCHA

Google reCAPTCHA is a SPAM protection service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

The use of reCAPTCHA is subject to the Google privacy policy and terms of use.

Personal Data processed: answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Tracker; Usage Data.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Tag Management

This type of service helps the Owner to manage the tags or scripts needed on Philibertnet.com in a centralised fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

Google Tag Manager

Google Tag Manager is a tag management service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Traffic optimisation and distribution

This type of service allows Philibertnet.com to distribute their content using servers located across different countries and to optimise their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between Philibertnet.com and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

Cloudflare (Cloudflare Inc.)

Cloudflare is a traffic optimisation and distribution service provided by Cloudflare Inc.

The way Cloudflare is integrated means that it filters all the traffic through Philibertnet.com, i.e., communication between Philibertnet.com and the User's browser, while also allowing analytical data from Philibertnet.com to be collected.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>.

User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to Philibertnet.com, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving Philibertnet.com.

Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on Philibertnet.com.

Salesforce Marketing Cloud (Salesforce.com, inc.)

Salesforce Marketing Cloud is a User database management service provided by salesforce.com, inc.

Personal Data processed: Tracker, various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

Cookie Policy

Philibertnet.com uses Trackers. To learn more, Users may consult the Cookie Policy.

Further Information for Users

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period

whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- Object to processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have their Personal Data deleted or otherwise removed. Users have the right to obtain the erasure of their Data from the Owner.
- Receive their Data and have it transferred to another controller. Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of Philibertnet.com or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, Philibertnet.com may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, Philibertnet.com and any third-party services may collect files that record interaction with Philibertnet.com (System logs) or use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within Philibertnet.com and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through Philibertnet.com (or third-party services employed in Philibertnet.com), which can include: the IP addresses or domain names of the computers utilised by the Users who use Philibertnet.com, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilised by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using Philibertnet.com who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of Philibertnet.com. The Data Controller, unless otherwise specified, is the Owner of Philibertnet.com.

Philibertnet.com (or this Application)

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by Philibertnet.com as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

This privacy policy relates solely to Philibertnet.com, if not stated otherwise within this document.

Latest update: 8 March 2024