

# Data privacy for users of TIMEBANKPRO platform

Version 7.0 - march 8th 2020

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## Summary of our data privacy policy

Our company, SAS Local4People, publisher of this platform, undertakes to protect your user data, **not to transfer your data to advertisers or other third parties**, without notifying you in advance.e.

Certain data are **essential** for the operation of the service we offer (for example your first name, last name, city, email, password). Apart from your password, you cannot modify this data yourself, but you can do so by contacting us by email at our contact address or by post at the headquarters of our company (see contact details at the end of the document).

Other data **improve** the functioning of the service but are not essential, for example the data that you can enter in your profile (data such as your photo, your activities). This data can be **modified by yourself** in your profile (in online mode on the platform, tab at the top of the home page: First name -> My profile & confidentiality).

In accordance with **European GDPR regulation**, you have **the right to request access to your personal data, the right to rectify or erase it**, or a limitation of the processing relating to your person, or the right to oppose the processing and the right to data portability. You also have the right to lodge a complaint with a supervisory authority. For any question or remark or request regarding your user data, you can send us a request by email or post and we will get back to you within 48 hours. **A copy of your data to the download area of your computer or on your smartphone is available via the menu available connected mode:** tab at the top of the home page: First name -> My profile & confidentiality -> Download a copy of your data.

The necessary measures are taken to **secure** your data, in particular by our service provider OVH.com which hosts our platform on french territory.

For an overview of European regulations on user data protection (GDPR), you can consult: <https://gdpr.eu/what-is-gdpr/>

## 2) Data privacy policy details

### 2.1

## GDPR Implementation (General Data Protection Regulation)

This European regulation aims at **protecting your personal data and inform you of your rights** in terms of protection of your personal data.

Registration on our platform allows you to have access to services (the main service is, depending on the configuration chosen, an innovation challenge platform or a skills exchange platform, which can use time as currency, which is called a "timebank"). Registration on our platform also allows you to submit a project proposal, participate in existing projects, submit an offer or request for skills, consult the skills offers of other members of the platform depending on geographic location you are interested in, contact the platform's subscribers through a directory and internal messaging, and exchange skills with an internal virtual currency if it is activated.

**The recipients of data** are the data controller, namely our company, Local4People, and the subcontractor operating the hosting of the platform (namely the company OVH), as well as any person legally authorized to access the data ( court services, if applicable).

The duration of data processing is limited to the time during which you are subscribed to our platform, being understood that you can unsubscribe at any time, either directly by your user profile, or on request by email to the contact address indicated on our platform, or by post.

We only process your personal data if we have a legal basis to do so. The legal bases of the GDPR regulation that we use are the basis of the "contract" (article 6.1.b of the European regulation), and the basis of the "consent" (article 6.1.a of the European regulation).

## User data essential to service operation

These data are processed on the legal basis of the "contract" (article 6.1.b of the European regulation). The data that we collect and process on this legal basis are:

- your email, which is necessary to be able to validate your registration on the platform, by verifying that you are indeed the holder of this email. If you want to change your registration email, you can contact us by email or by post,

- your last name, which is necessary for the users of the platform to be able to identify you. If you want to change your name, or it has been misspelled, you can contact us by email or post,

- your first name, which is also necessary for users of the platform to be able to identify you. If you want to change your first name, or if it has been misspelled, you can contact us by email or post,

- your password, necessary to secure your access to the platform, and which you can modify in your user profile (in connected mode on the platform, tab at the top of the platform, First name -> My profile & privacy). Data exchanges between you and the platform are encrypted by the HTTPS protocol, to ensure the security and confidentiality of your data,

- your city of residence or work, as well as your country, are necessary to be able to classify the advertisements geographically. If you want to change your city or country, you can contact us by email or by post,

- project proposals in the context of innovation challenges (if this option is activated on your platform). These project proposals include a text in several sections describing the project, a date, a category, your city

and country, possible links to a video, to an additional description file, to a collaborative discussion space, to a website. , and optionally an image of your choice, or a default image offered by the platform, as well as optionally a logo. Project proposals also include a list of people who have wished to participate in projects. These project proposals can be modified and deleted by yourself in your user profile (in online mode on the platform, tab at the top of the platform, First name -> My Projects).

- the skills offers and skills requests that you offer on the platform, which include a text, a value in hours, a date, a category, your city and country, any reviews posted by other subscribers, and optionally an image of your choice, or a default image proposed by the platform. These offers and requests can be modified and deleted by yourself in your user profile (in connected mode on the platform, tab at the top of the platform, First name -> My offers, or First name -> My requests). An additional function of temporarily hiding an ad is also available to you, in which case your ad is no longer visible to other subscribers to the platform, without being deleted; You can reactivate your ad at any time,

- we collect in a directory internal to the platform the names, first names and cities and countries of the registrants: this is necessary for the operation of the service, in order to allow you to locate a user of the platform close to your place of residence or work, and to be able to exchange services with this person. If you no longer wish to appear in the platform directory, while remaining registered on the platform, you can request it by email or by post. In your profile, you can activate the "holiday" mode yourself (in online mode on the platform, tab at the top of the platform, First name -> My profile & privacy), in which case, you will no longer be visible to others. registered on the platform, without any of your data being erased. At any time, you can deactivate the "holiday" mode and become visible again,

- we collect the reviews deposited by the users of the platform following an exchange of skills. These reviews are necessary to develop trust between users of the platform. The reviews which have been left to you are visible to other users of the platform, and you can see them by looking at your profile in the directory (in online mode on the platform, tab "Directory", enter your first or last name in the search, then click on your directory card, and at the bottom of your card, you will find the opinions attributed to you). To ensure the impartiality of reviews, you cannot change a review yourself. If, however, you have a problem with a review,

you can contact us and we will try to find a solution, knowing that we are able to modify the reviews on an exceptional basis,

- we keep a strictly confidential copy of all exchanges of messages between users registered on the platform, and their dates and times, in order to guarantee that the platform remains "healthy" and that its use remains in accordance with our GCU (General Conditions of Use),

- we also keep a strictly confidential copy of the list of all skills exchanges made on the platform when using internal currency, as well as the reviews filed, in order to be able to respond to any dispute that may arise, and know the volume of use of the platform.

2.1.2

### **Data to improve service functioning**

These data are processed on the legal basis of "consent" (article 6.1.a of the European regulation). The data that we collect and process on this legal basis are:

- a photo of yourself that you are free to enter in your user profile (in connected mode on the platform, tab at the top of the platform, First name -> My profile & privacy), and to modify or delete at any time . This photo will be visible to other users registered on the platform (unless you have activated the "holiday" mode). This photo is not mandatory and the service works without this photo,

- the name of your activity or professional service that you are free to enter in your user profile (in connected mode on the platform, tab at the top of the platform, First name -> My profile & privacy), and to modify or delete at any moment. This professional activity or service name will be visible to other users registered on the platform (unless you have activated "holiday" mode). This professional activity or service name is in no way mandatory and the service operates without this professional activity or service name,

- your interests that you are free to enter in your user profile (in connected mode on the platform, tab at the top of the platform, First name -> My profile & privacy) and to modify or delete them at any time. These centers of interest will be visible to other users registered on the platform (unless you have activated "holiday" mode). These centers of interest are

in no way compulsory and the service operates without these centers of interests,

- your wish to be notified by email of private messages that you receive on the platform. In order to facilitate the functioning of the service, the notification is activated by default, and you can deactivate it at any time by a check box in your user profile (in online mode on the platform, tab at the top of the platform, First name -> My profile & privacy),

- we collect your favorite skills offers, which you have chosen by clicking on the heart-shaped logo visible on the service offers, an icon which is then filled in with a color when it was empty before. Your favorite skill offerings are not visible to other users. You can consult your favorite skills offers in your user profile (in connected mode on the First name -> My favorites platform). To remove a skillset from your favorites list, simply click on the heart icon again, which will no longer be filled. Other users registered on the platform cannot see that they are your favorite ads,

- your "currency reserve", that is to say the balance in hours on the internal currency's account on the platform, if virtual currency has been activated on your platform. By default, this balance is visible to other users, but you can hide it by activating the balance hiding function in your profile (in online mode on the platform, tab at the top of the platform, First name -> My profile & privacy) ,

- the detail of your virtual currency account if virtual currency has been activated on your platform: this detail with all your exchanges is not visible to other registrants on the platform. You can see it by consulting your profile in connected mode on the platform (tab at the top of the home page First name -> my account in "name of the currency on your platform »),

- the messages you have received and sent. They are not visible to other registrants on the platform. You can view and delete them in your profile (tab at the top of the First name home page -> My mailbox).

## Information and access to personal data

In accordance with Article 13 of the European Treaty, we remind you of your rights in terms of the management of your user data.

**The person responsible for processing your personal data** is our company, SAS Local4People (Maison des Entreprises, 4 rue Ampère, BP 30255, 22302 Lannion Cedex, email from the legal representative: [philippe.bouille@local4people.com](mailto:philippe.bouille@local4people.com)).

**The recipients of your data** are the employees of our company in charge of managing the platform.

**Your data is kept** for the time of your registration to the platform and is deleted when you unsubscribe.

**You have the right to ask** the data controller for access to personal data, rectification or deletion thereof, or a limitation of the processing relating to your person, or the right to object the processing and the right to data portability. You also have the right to lodge a complaint with a supervisory authority.

**A copy of your data to the download area of your computer or on your smartphone is possible via the menu available in connected mode:** tab at the top of the home page: First name -> My profile & privacy -> Download a copy of your data.

For data requiring your consent, described in the paragraph "Data to improve the operation of the service", you have the right to withdraw your consent at any time.

We do not hold any **sensitive data** (of health, genetic, biometric, philosophical, political, union, sexual orientation type), in accordance with article 9 of the European GDPR regulation, and we would have to delete these data, after notification of their authors, if they were communicated by users of the platform.

## Note on security and protection of personal data

In accordance with article 32 of the European RGPD regulations, our company, Local4people, as data controller, and our subcontractor (OVH.com) hosting the platform, implement the technical and organizational measures appropriate to ensure the security of your personal data, in particular by guaranteeing the confidentiality of the data (your data exchanges with our platform are encrypted with the HTTPS protocol), the integrity, the availability, and the resilience of the data processing services.

The data is regularly saved by our subcontractor OVH.com, which allows their recovery in the event of a technical or physical incident. OVH makes a backup of the database once a day and our company once an hour. Our application code is saved in a GitLab directory.

Our subcontractor OVH hosting the platform supports us in the implementation of European GDPR regulations by creating an annex relating to the protection of personal data in our contract, called "Data Processing Agreement" (DPA). This appendix is a mandatory contract between the data controller (our company Local4People) and a processor (OVH). This allows us to say what OVH is able to guarantee as a subcontractor to our company that publishes the platform. In this document you can find all the provisions relating to data protection at OVH. It can be viewed at the following link: [https://www.ovh.com/fr/support/documents\\_legaux/Annexe%20Traitement%20de%20données%20à%20caractère%20personnel.pdf](https://www.ovh.com/fr/support/documents_legaux/Annexe%20Traitement%20de%20données%20à%20caractère%20personnel.pdf)

The summary of OVH's commitments as a subcontractor can be viewed at the following link

: <https://www.ovh.com/fr/protection-donnees-personnelles/gdpr.xml>

Infrastructure security: our subcontractor OVH, hosting the platform, is committed to optimal security of its infrastructures, in particular by having implemented an information systems security policy and by meeting the requirements of several standards and certifications (PCI-DSS certification, ISO / IEC 27001 certification, SOC 1 TYPE II and SOC 2 TYPE II certificates, etc.). You can find all of these certifications and their precise scope on the dedicated OVH space:

<https://www.ovhcloud.com/fr/about-us/infrastructure-software/>

"Cookies" are small files, generally made up of letters and numbers, placed on your computer, tablet, smartphone, or similar equipment, when you use this equipment to visit our platform.

In order to avoid having to enter your email and password each time you use the platform, we use a session identification functional cookie, which stores your email and password. The duration of this cookie is 10 days.

You can block the use of most cookies by configuring your web browser accordingly (the way to do this depends on each browser).

We do not currently use cookies to measure the audience of the platform. For more information on cookies, you can consult: <https://www.cnil.fr/fr/site-web-cookies-et-autres-traceurs>, and contact us if you have specific questions.

**Case of resale of the publisher of this platform**

In the event of the resale or merger of our company, the management of your data will be the responsibility of the company having made the acquisition. By default, the same data privacy policy will apply. If, however, the acquiring company wishes to change the data privacy policy, it should notify you and ask for your explicit agreement with its new privacy policy.

## Changes to this privacy policy

We reserve the right to modify this privacy policy. If modified, this text is given a new reference and edition date at the beginning of the text. In order to facilitate your access to the platform, as we pointed out in the paragraph on "cookies", a connection cookie is set for a period of 10 days, which saves you from having to enter your email and password each time you want to access the platform. When this cookie expires, i.e. 10 days maximum and 5 days on average, we will ask you, the next time you reconnect to the platform, for your explicit consent by means of a check box and a link to the latest version of our data privacy policy. It is therefore your responsibility to verify that the version has not changed. If nevertheless we were led to make a deep modification and not mere details, we would then introduce an intermediate screen specifying the nature of this modification and asking for your explicit consent to this modification.

This version of our data privacy policy is version 7.0 of March 8th.

(End of data privacy policy document)