

PRIVACY POLICY

The company **LES GRANDS CHAIS DE FRANCE SAS** (hereinafter the "**Company**"), whose registered office is located at 1 rue de la Division Leclerc - 67290 PETERSBACH (France), registered in the SAVERNE Trade and Companies Register under number 315 999 201, represented by Mr. Joseph HELFRICH in his capacity as President, undertakes, as the data controller within the meaning of the General Data Protection Regulation (EU) No. 2016/679 of April 27, 2016 (GDPR), to respect the right to privacy, and in particular the personal data, of any person taking part in competitions organized by the Company (hereinafter the "**Participant(s)**").

The purpose of this Privacy Policy is to inform Participants of the manner in which the Company processes their personal data (hereinafter the "**Personal Data**"), and in particular to specify the methods of collection, use, storage and archiving relating to such Personal Data.

The Privacy Policy also informs Participants of their rights and where to exercise them.

The Company reserves the right to update its Privacy Policy at any time. Any new version will take effect as soon as it is posted online.

1. What Personal Data do we collect and how is it collected?

Personal Data is any information relating to an identified or identifiable natural person. It may include, for example, a surname, a first name, a nationality, an e-mail address, a telephone number, a photograph, a job title, an identification number, a postal address, beneficiaries, a person's gender, location data or an IP address.

The Company does not collect Personal Data from minors.

The Company collects Personal Data either directly from the Participant, in particular when entering the lottery: family name, first name, e-mail address, date of birth.

The Personal Data collected is necessary and not excessive in relation to the purpose of the processing.

In the event of written exchanges with the Participant, the Company may keep a written record of these exchanges within the time limits indicated in Article 6 of this Privacy Policy.

The Company may also collect Personal Data indirectly, when the Participant uses the Company's digital platforms from their electronic devices, including IP address or other browsing data (including browser, operating system, device model), social networks and the Company's contact forms, through cookies or browsing tracking technologies.

For more information on Cookies, the Company invites Participants to read its [Cookies Policy](#).

2. Why do we collect your Personal Data?

The Company, as lottery organizer and data controller, collects and uses Participants' Personal Data, in accordance with the applicable laws and regulations in force, in order to ensure the smooth running of the lottery.

These data collected may also be processed by the Company and/or other companies in the GCF Group, for commercial, marketing and/or communication purposes (newsletters if they subscribe to these, and prospecting), where applicable with the express consent of the Participant.

Thus, in the event of participation in a lottery with a purchase obligation, the Participant's express consent will not be required, as the Participant expresses its consent to receive offers for similar products by purchasing the product entitling it to participate in the lottery.

The Company may also collect data for statistical purposes concerning Participants in the lottery, such as information on the audience of a website or the geographic area where Participants in the lottery are located.

3. What is the legal basis for the processing?

The legal basis for the processing is the Participant's participation in the lottery organized by the Company. Participation in the lottery may be with or without an obligation to purchase.

When Personal Data is used for commercial prospecting purposes, the legal basis for the processing is the consent given by the Participant prior to any processing.

4. Who are the recipients of your Personal Data?

Participants' Personal Data may be disclosed to the recipients indicated below, who undertake to keep it confidential:

- the Company and its employees who need to have access to Participants' Personal Data, authorized to process it for the aforementioned purposes;
- other GRANDS CHAIS DE FRANCE Group affiliates involved in the processing of Personal Data;
- the Company's subcontractors acting on the Company's behalf and approved by the latter, in compliance with applicable French and European standards, in particular for hosting and IT support, the implementation of marketing campaigns, delivery services, etc.

The Company, in its capacity as Data controller, ensures that data recipients provide serious guarantees of security and confidentiality of the Personal Data transmitted.

The Company may also disclose Participant's Personal Data if required to do so by law or in the good-faith belief that such disclosure is reasonably necessary to comply with legal process, respond to claims, or protect the safety or rights of the Company, its Participants or the public.

5. Is your Personal Data transferred outside the European Union?

In principle, Personal Data is processed exclusively within the European Union. In the event that they are transferred outside the European Union or to a country deemed suitable by the European Commission, the Company will take all necessary measures to ensure their protection.

Thus, the Company will ensure that the Participant's Personal Data is protected during the transfer, and that third parties respect a high level of protection of the User's Personal Data, in accordance with European requirements.

6. How and for how long is your Personal Data stored?

Personal Data is stored in compliance with the applicable French and European standards.

Personal Data will be processed for the period necessary for:

- The purposes specified in article 2;
- Comply with legal and regulatory constraints;
- The period necessary to resolve disputes and to obtain performance of our contracts.

Thus, Personal Data will be kept until the date indicated by the rules of the lottery in question. This retention period may in no case exceed a period of six (6) years from the awarding of the prize(s). At the end of this period, it will be destroyed by the Company.

The Company will implement all technical and organizational measures necessary to protect the confidentiality and security of the Participant's Personal Data collected for the lottery.

These measures include keeping Personal Data in secure operating environments, which are not accessible to the public and which are only accessible to authorized Company personnel, as well as to specially authorized agents and contractors.

7. What are your rights with regard to the processing of Personal Data?

In accordance with French and European standards relating to the protection of Personal Data, and in particular the General Data Protection Regulation No. 2016/679 of April 27, 2016 (GDPR), the Participant may exercise a number of rights listed below at any time:

- The **right of information** concerning the use and storage of their Personal Data.
- The **right of access** to the processed Personal Data enables the Participant to know whether Personal Data concerning him or her is being processed and to obtain free communication of such data in an understandable format.
- The **right to rectification** of the Personal Data collected allows the Participant to correct inaccurate Data or to complete Data related to the purpose of processing.
- The **right to restriction of processing** of Personal Data enables the Participant to request the Company to limit the processing of his or her Personal Data, in certain circumstances, for example if he/she wishes to rectify Data or object to it being processed.
- The **right to erasure** ("right to be forgotten") of Personal Data enables the Participant to ask the Company to erase Personal Data concerning him/her, collected and used by the Company, within the limits provided by law.
- The **right to object** to processing of Personal Data enables the Participant to object to their Personal Data being used by the Company for a specific purpose, in particular for commercial prospecting or any communication resulting from the collection of Personal Data.

The **right to data portability** of Personal Data enables the Participant to recover the Personal Data he or she has provided to the Company, in a structured, commonly used and machine-readable format and/or to transmit this Data to a new data controller, by requesting the original data controller to proceed with the transfer, in certain situations.

In the event of a request by the Participant to exercise one of the aforementioned rights, the Company will consider said request as soon as possible, and will process it within one (1) month of the Participant's request at the latest.

The Participant also has the option of withdrawing his or her consent at any time for processing operations requiring it. In this case, the data will be anonymized deleted.

In such cases, the Participant will be asked to specify which of his or her rights he or she wishes to exercise, and to provide the Company with information for identification purposes in order to process the request and protect the Participant against any fraudulent requests from third parties.

Participants are reminded that deletion or anonymization are irreversible operations and that the Company is not subsequently able to restore them.

8. How to exercise your rights?

The Participant who wishes to make requests for the exercise of any of the rights relating to his or her Personal Data indicated above, may contact the Company's Data Protection Officer:

- By email using the email address: dpo@lgcf.fr
- Or by post to the following address:
[Les Grands Chais de France](#)
[Data Protection Officer](#)
[1, rue de la Division Leclerc,](#)
[67290 PETERSBACH.](#)

The User also has the possibility to submit complaints to the authority in charge of controlling Personal Data:

- In France, the User may contact the Commission Nationale de l'Informatique et des Libertés (the "CNIL"), whose website is accessible here: <https://www.cnil.fr/>
- For other states, the full list of local data protection authorities can be found on the following institutional website: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

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