

### **I / PRIVACY POLICY**

**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 Data Controller as defined by the General Data Protection Regulation (EU) no. 2016/679 of 27 April 2016 (GDPR), to respect the right to privacy and the personal data of any person taking part in the competitions organised 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 "**Personal Data**"), and to inform them of their rights.

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.

The Privacy Policy applies to all competitions (hereinafter referred to as "**Competitions**") organised by the Company, whether participation in the Competition is in person, via an electronic medium or a paper medium, or is via the dedicated Competition website.

#### **1. What Personal Data is collected and how is it collected?**

Personal Data is any information relating to an identified or identifiable natural person. The Company does not collect any data relating to minors.

The Company collects the Participant's identity and contact details, data relating to his/her participation and connection and browsing data. This information is necessary to verify the validity of the entry, to ensure compliance with the conditions for participation in the Competition and to guarantee that only one prize is awarded per household. Additional Personal Data, such as postal and/or telephone contact details or tracking data, may also be collected at a later date to enable the prizes to be delivered and to ensure that any complaints are dealt with.

Where applicable, the Company may ask for proof of identity, both at the time of participation in the Competition in order to verify that the Participant is over the age of majority, and when the prize is awarded, in order to ensure that it is actually given to the person designated as the winner. In addition, if the Competition provides for several winners, the Company reserves the right to request proof of address in order to verify that the winners do not live in the same household.

In the event of written exchanges with the Participant and the Company, whether by post, e-mail, private messaging on social media or any other communication channel, a copy of these exchanges may be kept in compliance with the retention periods provided in Article 6 of this Privacy Policy.

Before any Personal Data is collected, the Company will inform the Participant whether the information requested is mandatory or optional.

#### **2. Why do we collect your Personal Data?**

The Company, in its capacity as organiser of the Competition and Data Controller, collects and processes the Participants' Personal Data in accordance with the applicable laws and regulations in force in order to ensure the smooth running of the Game and award the prizes.

With their express consent, Participants' Personal Data may also be processed by the Company and/or its subsidiaries, for commercial, marketing and/or communication purposes, such as sending newsletters or canvassing.

However, in the event of participation in a Competition with an obligation to purchase, the Participant's express consent will not be required. The Company will communicate to Participants offers for products similar to the one they purchased when they took part, on the basis of its legitimate interest.

The Company may also collect certain data for statistical purposes, in particular information on the website audience or the geographical sector of the Participants in the Competition.

### **3. What is the legal basis for the processing?**

The Participant's participation in the Competition organised by the Company is based on his/her consent, which constitutes the legal basis for the processing of Personal Data. Participation 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, in principle, the prior consent of the Participant. However, in the context of a Competition with an obligation to purchase, where the Participant expresses his/her interest by purchasing a product, the legal basis for sending communications about similar products is the Company's legitimate interest in maintaining and developing its commercial relationship with the Participant.

### **4. Who will receive your Personal Data?**

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

- The Company and its employees who need to have access to Participants' Personal Data are authorised to process it for the aforementioned purposes;
- The Company's subsidiaries which may be involved in the processing of Personal Data;
- The service providers used by the Company, solely within the limits of their missions and attributions, namely (i) the service providers supplying the platforms or websites used, (ii) the service providers in charge of marketing, communication and, where applicable, the creation and organisation of the Competition, (iii) the service providers providing hosting and/or IT support services, (iv) the service providers providing transport and delivery services, as well as any other service provider useful in the management of the Competitions.

In its capacity as data controller, the Company ensures that the recipients of the data offer sufficient guarantees in terms of security and confidentiality.

In addition, the Company reserves the right to transmit the Participants' Personal Data to the competent authorities and to any administration or public body authorised to receive such data, in accordance with the applicable legal requirements.

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

In principle, Personal Data is processed exclusively within the European Union. However, it may be transferred to countries outside the European Union, including countries recognised as providing an adequate level of protection by the European Commission. In this case, the Company will take all necessary measures to guarantee a level of protection equivalent to that required by European regulations.

The Company will therefore ensure that the recipient entities implement appropriate guarantees to ensure the security and confidentiality of the Participant's Personal Data, in accordance with European requirements.

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

Personal Data is stored in accordance with applicable European standards.

They are processed for the period necessary for :

- The purposes set out in Article 2 ;
- Comply with legal and regulatory constraints;
- And, where applicable, the management of any disputes or the performance of our contracts.

Consequently, Personal Data will be kept until the date indicated in the rules of the Competition concerned. Under no circumstances may this retention period exceed a period of three (3) months

from the awarding of the prize(s). Thereafter, the Personal Data may be archived for the applicable statutory limitation period (maximum six (6) years), before being deleted by the Company.

In the event of a dispute, the Company may be required to process and retain the Personal Data of any data subject, on the basis of its legitimate interest in ensuring its defence, for the duration of the proceedings, whether amicable or judicial.

The Company implements all appropriate technical and organisational measures to guarantee the security and confidentiality of the Participant's Personal Data collected in the context of the Competition.

These measures include in particular the storage of Personal Data in secure environments, not accessible to the public, which access is strictly reserved to authorised members of the Company's staff, as well as to service providers or agents expressly authorised to intervene for this purpose.

## **7. What are your rights with regard to the processing of personal data?**

In accordance European regulations on the protection of personal data, and in particular the General Data Protection Regulation no. 2016/679 of 27 April 2016 (GDPR), the Participant has the following rights:

- **Right of access:** the Participant may obtain confirmation that his/her Personal Data is being processed and obtain free communication thereof in an understandable format.
- **Right of rectification:** Participants have the right to request rectification of their Personal Data if it is inaccurate, incomplete or obsolete. This right also allows Personal Data to be completed where this is necessary for the purposes for which it is collected or processed.
- **Right to limit processing:** the Participant may, in certain circumstances, ask the Company to limit the use of his/her Personal Data, for example if he/she wishes to rectify the Data or object to it being processed.
- **Right to erasure** ("right to be forgotten"): the Participant may ask the Company to delete his/her Personal Data, within the limits provided for by the Law.
- **Right to object:** the Participant may object, at any time, to the processing of his/her Personal Data for specific purposes, in particular commercial prospecting or communication resulting from the collection of Personal Data.
- **Right to portability:** the Participant may request to receive the Personal Data that he/she has provided to the Company, in a structured, commonly used and machine-readable format and/or to transfer this Data to another data controller, by requesting the initial data controller to carry out the transfer, where technically possible and subject to the conditions laid down by law.
- **Right to withdraw consent:** where processing is based on consent, the Participant may withdraw this consent at any time, without affecting the lawfulness of the processing carried out prior to this withdrawal.

**How to exercise your rights:** any request to exercise one of these rights must be sent to the Company. The Company undertakes to respond within one (1) month of receipt. In the event of a complex request, this period may be extended by a further two (2) months, in which case the Participant will be informed within the initial period of one (1) month.

It is expressly reminded that any deletion or anonymisation of Personal Data is irreversible and that the Company will not be able to restore it once the operation has been carried out.

## **8. How to exercise your rights**

Participants who wish to make requests to exercise any of the rights relating to their Personal Data indicated above may contact the Company's Data Protection Officer:

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

In order to process his/her request, the Participant must specify the right(s) he/she wishes to exercise and provide the Company with the information required to identify him/her. The Participant is informed that in the event of reasonable doubt as to his/her identity, proof of identity may be requested.

The Participant may also submit complaints to the authority responsible for controlling Personal Data:

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

As soon as the Participant uses the URL link dedicated to the Competition, both to participate in the Competition and to consult the legal documents applicable to said Competition, the Cookies Policy below applies.

## **II / COOKIES POLICY**

Subject to your consent where required by applicable law, the Competition website (hereinafter the "**Website**") uses cookies and similar technologies (hereinafter "**Cookies**").

The company **LES GRANDS CHAIS DE FRANCE SAS** (hereinafter the "**Company**"), undertakes to respect your privacy when using cookies on the Website.

### **A. WHAT IS A COOKIE?**

A cookie is a small text file that may be stored on a Participant's device - such as computer, tablet, mobile phone or any other internet-enabled device - by the websites the Participant visits.

Cookies are managed by the Participant's Internet browser, which stores them for a certain period of time and sends them back to the web server each time the Participant reconnects. Cookies have a limited lifespan and are deleted by the browser once they have expired. Only the company that deposits the cookie is likely to read or modify the information contained in this Cookie.

### **B. WHY DO WE USE COOKIES?**

The Company uses Cookies for different purposes. Some Cookies are necessary for the operation and your use of the Website; others have more incidental purposes.

To enable the Participant to assess the usefulness of a particular Cookie, a presentation of the different types of Cookies follows this paragraph.

### **C. WHAT COOKIES DO WE USE?**

Two types of Cookies may be present on our Website:

- **Cookies that are strictly necessary** for the proper operation of the Website in order to enable the use of its functions and services. You may not refuse their use, otherwise the Website may not be made available to you, nor may certain functions or services be offered.
- **Non-essential Cookies**, which do not affect the quality of your browsing or the basic functionality of the Website. These Cookies have several purposes, such as statistical analysis of information about Website users, such as the volume of visits and use, browsing patterns, the number of new visitors and Website performance. As indicated in paragraph "E. HOW CAN I MANAGE MY COOKIES ON THE WEBSITE", the effective use of these Cookies depends on your **express prior consent**, via a **box to be ticked on the Cookies banner** that appears when you arrive on the Website. The Participant may modify his/her preferences at any time by going to the "Cookie Management" section of the Website.

The following Cookies are present on our Website:

Type of Cookie	Cookie Name	Cookie placed by	Cookie Purpose	Expiry
Strictly Necessary	CookieConsent	Cookiebot	Stores the user's cookie consent state for the current domain	1 year
Strictly Necessary	wpEmojiSettingsSupports	Wordpress	This cookie is part of a bundle of cookies which serve the purpose of content delivery and presentation. The cookies keep the correct state of font, blog/picture sliders, color themes and other website settings.	until the end of the browsing session
Strictly Necessary	43bx06eo	Wordpress	Functional Wordpress cookie	5 days
Strictly Necessary	dtv7u51	Wordpress	Functional Wordpress cookie	5 days
Strictly Necessary	gis1aa6o	Wordpress	Functional Wordpress cookie	5 days
Strictly Necessary	MB leeftijdschecker	Mega Bite	Allowing or blocking content by age	until the end of the browsing session
Marketing	_ga	Google	Used to send data to Google Analytics about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.	2 years
Marketing	_ga_#	Google	Used to send data to Google Analytics about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.	2 years

#### **D. HOW LONG DOES A COOKIE LAST?**

##### **a. Conservation of choice**

The Participant's choices (both consent and refusal) will be stored for a maximum period of **6 months**.

##### **b. With regard to the maximum storage period for information recorded by Cookies on the terminal**

Cookies must be kept for a maximum and compulsory legal period of **13 months**. Once this period has expired, the Cookie will be deleted from the Participant's computer, unless the Participant has renewed his/her consent.

#### **E. HOW CAN I MANAGE MY COOKIES ON THE WEBSITE?**

With the exception of Cookies considered strictly necessary, the non-essential Cookies mentioned above are subject to the Participant's consent and will be installed on his/her device only if the Participant accepts them. At any time, the Participant may manage, deactivate or authorise Cookies by configuring his/her browser settings.

When the Participant refuses the use of cookies, certain functions, pages or areas of the Website may become inaccessible. The Company declines all responsibility for the consequences of this refusal on the browsing experience and access to services.

**Several options are available for managing Cookies, accepting and/or refusing them. The Participant may use :**

**a. The Website's Cookie manager**

The manager can be accessed from the Cookies information banner "Managing Cookies on the Website".

**ACCEPT ALL / CHANGE / DENY**

By setting his/her choices in the Cookies manager, the Participant accepts or refuses the use of Cookies in accordance with the Company's Cookies Policy.

The Participant is informed that, when he/she expresses his/her refusal, a refusal cookie is recorded on his/her terminal equipment in order to retain his/her choice. Similarly, when he/she consents to the installation of cookies, a consent cookie is stored. If the Participant deletes these cookies, his/her preferences will no longer be recognised and he/she will be asked to express his/her choice again.

**b. Internet browser settings**

Participants may at any time deactivate and/or delete these Cookies by modifying their browser settings, refusing them on a case-by-case basis or systematically.

Each browser has a different configuration for managing cookies and your choices. This is described in your browser's help menu, which will tell you how to modify your preferences with regard to cookies.

**- Safari:** In the **Safari** browser window, select the **Safari drop-down menu** and choose **"Preferences"**. Click on the **"Confidentiality"** icon. Select or deselect the **"Block all cookies"** box.

**- Opera :** In the **Opera** browser window, go to **"Settings"**. Click on **"Advanced"** in the left-hand sidebar, then click on **"Confidentiality and security"**. Under **"Confidentiality and security"**, click on **"Site settings"**. Click on **"Cookies and site data"**. Activate or deactivate **"Authorise sites to save and read cookie data (recommended)"**.

**- Chrome:** In the **Chrome** browser window, top right, click on **"More"**, then **"Settings"**. Click on **"Confidentiality and security"**, then on **"Third-party cookies"** and select your preferences.

**- Microsoft Edge:** In the **Microsoft Edge** browser window, top right, click on "...", then on **"Settings"**. In the menu on the left, click on **"Cookies and site authorisations"**. Under **"Cookies and stored data"**, click on **"Manage and delete cookies and site data"**, then select your preferences.

**- FireFox:** In the **Mozilla FireFox** browser window, click on the menu button and select **"Settings"**. Select the **"Privacy and Security"** panel. In the **"Enhanced protection against tracking"** section, select **"Personalised"** and tick the **"Cookies"** box. Use the drop-down menu to choose your preferences for the types of cookies to block.

**More information about cookies?**

On the Autoriteit Persoonsgegevens website:

<https://autoriteitpersoonsgegevens.nl/en/themes/internet-and-smart-devices/cookies>

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