

# **Privacy policy of the website:** **<https://ridetheverdon.com/en>**

## **ARTICLE 1: PREAMBLE**

This privacy policy applies to the website: [ridetheverdon.com](https://ridetheverdon.com).

The purpose of this privacy policy is to expose users of the website:

- How their personal data is collected and processed. Are to be considered as personal data all data that is likely to identify a user. This includes first and last name, age, postal address, e-mail address, and location of the user or IP address;
- What are the users' rights concerning this data;
- Who is responsible for the processing of the personal data collected and processed?
- To whom this data is transmitted;
- Possibly, the website's policy regarding "cookie" files.

This privacy policy complements the Legal Notice and the General Conditions of Use which users can consult at the following address:

<https://ridetheverdon.com/pdf/privacy-policy.pdf>

## **ARTICLE 2: GENERAL PRINCIPLES FOR DATA COLLECTION AND PROCESSING**

In accordance with the provisions of Article 5 of the European Regulation 2016/679, the collection and processing of data from users of the website comply with the following principles:

- Lawfulness, fairness and transparency: data may only be collected and processed with the consent of the user who owns the data. Whenever personal data is collected, the user will be informed that his/her data is being collected and for what purposes it is being collected;
- Limited purposes: the collection and processing of data is carried out to meet one or more of the purposes set out in these general conditions of use;
- Minimisation of data collection and processing: only the data necessary for the proper execution of the objectives pursued by the website are collected;
- Conservation of data reduced in time: data is kept for a limited period of time, of which the user is informed. When this information cannot be communicated, the user is informed of the criteria used to determine the retention period;
- Integrity and confidentiality of the data collected and processed: the data controller undertakes to guarantee the integrity and confidentiality of the data collected.

In order to be lawful, and in accordance with the requirements of Article 6 of European Regulation 2016/679, the collection and processing of personal data may only take place if it complies with at least one of the conditions listed below:

- The user has expressly consented to the processing;
- The processing is necessary for the proper performance of a contract;

- The processing meets a legal obligation;
- The processing is necessary to protect the vital interests of the data subject or of another natural person;
- The processing can be explained by a necessity related to the performance of a task carried out in the public interest or in the exercise of official authority;
- The processing and collection of personal data are necessary for the purposes of the legitimate and private interests pursued by the controller or by a third party.

### **ARTICLE 3: PERSONAL DATA COLLECTED AND PROCESSED IN THE CONTEXT OF NAVIGATION ON THE WEBSITE**

#### **A. DATA COLLECTED AND PROCESSED AND METHOD OF COLLECTION**

The personal data collected on the website ridetheverdon.com are as follows: Civility, First name, Surname, Telephone number, E-mail, Category of age. These data are collected when the user performs one of the following operations on the website:

- When the user makes an order on the website ridetheverdon.com;
- When the user wishes to create a personal account;
- When the user wishes to contact us via the contact form.

Furthermore, when a payment is made on the website, proof of the transaction, including the order form and invoice, will be kept in the website editor's computer systems.

The data controller will keep in its computer systems of the website and under reasonable conditions of security all data collected for a period of: 5 years.

The collection and processing of data is for the following purposes:

- To identify the user or the customer;
- To identify an order and the data necessary to send the parcel; to identify the user or the customer; to identify an order and the data necessary to send the parcel
- To be able to contact the customer to inform him about his order
- Allow the user to save time in his future steps to place an order or contact us

#### **B. TRANSFER OF DATA TO THIRD PARTIES**

The personal data collected by the website are not transmitted to any third party, and are only processed by the website editor. The website has an SSL certificate to ensure that the information and data transfer transiting through the website are secure. An SSL certificate ("Secure Socket Layer" Certificate) is intended to secure the data exchanged between the user and the website.

Furthermore, the data controller undertakes to notify the user in the event of rectification or deletion of the data, unless this would entail disproportionate formalities, costs and steps for the user.

In the event that the integrity, confidentiality or security of the user's personal data is compromised, the data controller undertakes to inform the user by any means.

### **C. THE DATA PROTECTION OFFICER**

In addition, the user is informed that the following person has been appointed Data Protection Officer: François Hémidy.

The role of the Data Protection Delegate is to ensure the proper implementation of national and supranational provisions relating to the collection and processing of personal data. He may also be appointed DPO (for Data Protection Officer).

The Data Protection Officer can be reached as follows:

By e-mail: [hello@ridetheverdon.com](mailto:hello@ridetheverdon.com)

## **ARTICLE 5: USER RIGHTS**

In accordance with the regulations concerning the processing of personal data, the user has the rights listed below.

In order for the data controller to comply with the user's request, the user is required to provide him/her with his/her first and last name and e-mail address.

The data controller is obliged to reply to the user within a maximum of 30 (thirty) days.

### **A. PRESENTATION OF THE USER'S RIGHTS IN TERMS OF DATA COLLECTION AND PROCESSING**

#### **a. Right of access, rectification and right to erasure**

The user may consult, update, modify or request the deletion of data concerning him/her, in accordance with the procedure set out below:

The user must send e-mail to the personal data controller, specifying the subject of the request and using the contact e-mail address provided above.

#### **b. Right to data portability**

The user has the right to request the portability of his/her personal data, held by the website, to another website, by complying with the procedure below:

The user must make a request for portability of his/her personal data to the data controller, by sending e-mail to the address provided above.

#### **c. Right to limit and oppose the processing of data**

The user has the right to request the limitation or to oppose the processing of his data by the website, without the website being able to refuse, unless it can demonstrate the existence of legitimate and compelling reasons, which may prevail over the interests and the rights and freedoms of the user.

In order to request the limitation of the processing of his/her data or to formulate an opposition to the processing of his/her data, the user must follow the following procedure:

The user must make a request for the limitation of the processing of his/her personal data to the data controller, by sending e-mail to the address provided above.

d. Right not to be subject to a decision based exclusively on an automated process

In accordance with the provisions of Regulation 2016/679, the user has the right not to be subject to a decision based exclusively on an automated process if the decision produces legal effects concerning him or her, or affects him or her significantly in a similar way.

e. Right to determine the fate of data after death

The user is reminded that he or she can organise what should become of his or her collected and processed data if he or she dies, in accordance with the law n°2016-1321 of October 7, 2016.

f. Right to refer the matter to the competent supervisory authority

In the event that the data controller decides not to respond to the user's request, and the user wishes to contest this decision, or, if he or she believes that one of the rights listed above is being infringed, he or she has the right to refer the matter to the CNIL (Commission National de l'Informatique et des Libertés, <https://www.cnil.fr>) or any competent judge.

## **B. PERSONAL DATA OF MINORS**

In accordance with the provisions of Article 8 of European Regulation 2016/679 and the French Data Protection Act, only minors aged 15 or over may consent to the processing of their personal data.

If the user is a minor under the age of 15, the consent of a legal representative will be required so that personal data can be collected and processed.

The website publisher reserves the right to verify by any means that the user is over 15 years of age, or that he will have obtained the consent of a legal representative before browsing the website.

### **ARTICLE 6: USE OF "COOKIES" FILES**

The website may use "cookies" techniques.

A "cookie" is a small file (less than 4 kb), stored by the website on the user's hard disk, containing information relating to the user's browsing habits.

These files enable it to process statistics and traffic information, facilitate navigation and improve the service for the user's comfort.

For the use of "cookie" files involving the saving and analysis of personal data, the consent of the user is necessarily requested.

This consent of the user is considered valid for a maximum period of 13 (thirteen) months. At the end of this period, the website will again request the user's consent to save "cookie" files on his hard disk.

a. User's opposition to the use of "cookie" files by the website

It is brought to the user's attention that he can oppose the recording of these "cookie" files by configuring his browser software.

For information, the user can find at the following addresses the steps to follow in order to configure his navigation software to oppose the recording of "cookies" files:

- Chrome: <https://support.google.com/accounts/answer/61416?hl=fr>
- Firefox: <https://support.mozilla.org/fr/kb/enable-and-disable-cookies-website-preferences>
- Safari: <http://www.apple.com/legal/privacy/fr-ww/>
- Internet Explorer: <https://support.microsoft.com/fr-fr/help/17442/windows-internet-explorer-delete-manage-cookies>
- Opera: <http://www.opera.com/help/tutorials/security/cookies/>

If the user decides to deactivate the "cookies" files, he will be able to continue his navigation on the website. However, any malfunction of the website caused by this manipulation could not be considered as being due to the website editor.

#### b. Description of the "cookies" files used by the website

The website publisher draws the user's attention to the fact that the following cookies are used during navigation:

- Name of the cookie: `_ga`, it allows to analyse the user's behaviour on the website.

### **ARTICLE 7: CONDITIONS FOR MODIFYING THE PRIVACY POLICY**

This privacy policy can be consulted at any time at the address below:

<https://ridetheverdon.com/pdf/privacy-policy.pdf>

The website publisher reserves the right to modify it in order to guarantee its conformity with the law in force.

Consequently, the user is invited to consult this privacy policy regularly to keep abreast of the latest changes that will be made to it.

However, in the event of a substantial modification of this policy, the user will be informed in the following manner:

By e-mail to the address provided by the user.

It is brought to the user's attention that the last update of this privacy policy took place on: 20/01/2020.

### **ARTICLE 8: ACCEPTANCE BY THE USER OF THE PRIVACY POLICY**

By browsing the website, the user certifies that he/she has read and understood this privacy policy and accepts its terms and conditions, in particular with regard to the collection and processing of his/her personal data and the use of "cookies" files.