

## DATA PRIVACY POLICY

### 1. Definition and Character of Personal Data

When you use the website [www.thefoodassembly.com](http://www.thefoodassembly.com) (hereafter, the “**Website**”), we may have reason to ask you to communicate personal data concerning you.

The term “**personal data**” designates all of the data which allows an individual to be identified directly or indirectly, or by aggregation of multiple data, which correspond in particular to your full name, pseudonym, photograph, electronic e-mail address, telephone numbers, date of birth, data concerning your transactions on the Website, as well as any information that We may request from you and which you desire to communicate to Us concerning you.

### 2. Identity of the party responsible for the collection and processing of the data

The party responsible for the collection and processing of your personal data is the company **EQUANUM** Ltd, a private limited company registered in England and Wales under the No. 8971115, with its registered office located at 300 High Holborn, Lincoln House, London WC1 7JH (referred to herein as: “**Us or We**”).

### 3. Objective of this Charter

This charter has the objective of informing you concerning the resources that We put in place to collect and process your personal data, in the most strict observance of your rights.

In this connection, We inform you that, in the collection and processing of your personal data, We comply with the existing legislation.

We draw your attention to the fact that We are only responsible for our use of your personal data, to the exclusion of any other collection and processing carried out directly by the Assembly Hosts and the Producers registered on the Website. The Assembly Hosts and the Producers are solely responsible for the observance of their legal and declaration obligations in connection with the processing of your personal data that they themselves carry out, using their own resources and for their own purposes.

#### **4. Collection and Processing of the Personal Data by EQUANUM Ltd**

We collect and process your personal data in order to meet one or more of the following purposes:

- (i) Manage your access to certain services accessible on the Website and your use of them,
- (ii) Carry out the management operations of the clients regarding the contracts, orders, deliveries, invoices, loyalty programmes, and client relations management,
- (iii) Create a file of the registered members, users, clients and prospects,
- (iv) Send newsletters, solicitations and promotional messages. If you do not wish this, We give you the facility to express your refusal on this subject when your data are collected,
- (v) Prepare commercial statistics and statistics on the frequentation of our services,
- (vi) Organise competitions, lotteries and all promotional operations, to the exclusion of online gambling and gaming,
- (vii) Manage the personal advisories concerning products, services or contents,
- (viii) Manage the unpaid sums and the possible disputes concerning the use of our products and services,
- (ix) Observe our legal and regulatory obligations.

We will inform you when collecting your personal data, if certain data must be provided or if they are optional. We will also inform you of the possible consequences of a failure to respond.

#### **5. Addressees of the Collected Data**

Only the personnel of our company, the services responsible for control (the statutory auditor, in particular), the Assembly Hosts, the Producers, our commercial partners, in the context of your contractual relationship with Us and our sub-contractors, shall have access to your personal data.

Your personal data may also be provided to public organisations exclusively to comply with our legal obligations, including court auxiliaries, ministerial officers and organisations responsible for the recovery of debts.

#### **6. Transfer of the Personal Data**

Your personal data will not be transferred, rented or exchanged in favour of third parties, subject to the provisions set out in Article 5 above.

## **7. Duration of Retention of the Personal Data**

- (i) Concerning the data relating to the management of clients and prospects:

Your personal data shall not be retained beyond the duration strictly necessary for the management of our commercial relationship with you. However, the data which allow a right or a contract to be proven or that must be retained in connection with a legal obligation shall be retained for the duration provided for by the law in force.

As concerns possible client prospecting operations, client data may be retained for a period provided for by the law in force following the end of the commercial relationship.

The personal data relating to a non-client prospect may be retained for a period provided for by the law in force after the collection or after the last contact from the prospect.

Following this period, We may re-contact you in order to learn whether you wish to continue receiving commercial solicitations.

- (ii) Concerning the identification documents:

In the event of exercising your right to access or rectification, the data relating to the identification documents may be retained for the duration provided for by the law in force. In the event of exercising your right of opposition, these data may be archived for the duration of the statute of limitations provided for by the law in force.

- (iii) Concerning the data relating to bank cards:

The financial transactions relating to the payment for purchases and the costs via the Website are entrusted to a payment service provider which ensures the correct processing and the security of them.

For the purposes of these services, this payment service provider may have cause to receive your personal data relating to the numbers for your bank cards, which it collects and retains in our name and on our behalf.

We do not have access to these data.

In order to allow you to make purchases regularly or to pay the costs relating to the Website, the data relating to your bank cards are retained while you are registered on the Website and at least until you make your last transaction.

By checking the box on the Website that is expressly provided for this effect, you give Us your express consent for this retention.

The data concerning the visual cryptogram or the CVV2 inscribed on your bank card are not stored.

If you refuse to have the personal data relating to your bank card numbers retained under the conditions cited above, our payment service provider shall not retain these data beyond the time necessary to process the transaction. For more information, We invite you to consult their [general conditions of use](#).

In any event, the data related to these may be retained, in the intermediary archives, as proof in the possible case of a challenge against the transaction, for the duration provided for by the law in force.

(iv) Concerning the management of the lists of oppositions to receiving prospecting:

The information allowing your right of opposition to be taken into account shall be retained for at least three years following your exercise of the right of opposition.

(v) Concerning the audience measuring statistics:

The information stored on the users' terminals or any other element used to identify the users and allowing them to be traced or to measure their frequentation shall not be retained beyond six months.

## **8. Security**

We inform you that We take all necessary precautions and all appropriate organisational and technical measures to preserve the security, integrity and confidentiality of your personal data and, in particular, to prevent them from being deformed, damaged or that an unauthorised third party may have access.

## **9. Consent**

When you choose to transmit your personal data, you are expressly granting your consent to the collection and the processing of these data in accordance with what is stated in this charter and the applicable legislation.

## 10. Access to your Personal Data

In accordance with the existing law, you have the right to obtain communication and, if necessary, the rectification or deletion of the data concerning you, by means of on-line access to your account. You may also contact Us at:

- e-mail address: [support@thefoodassembly.com](mailto:support@thefoodassembly.com)
- postal address: 300 High Holborn, Lincoln House, London WC1 7JH

It is recalled that all persons may, for legitimate reasons, oppose the processing of the data concerning them.

## 11. Cookies

Cookies are text files that are often encrypted and which are stored in your browser. They are created when the user's browser loads a given website: the website sends information to the browser, which then creates a text file. Each time the user returns to the same website, the browser recovers this file and sends it to the server of the website.

One may distinguish two types of cookies that do not have the same purposes: technical cookies and advertising cookies.

- Technical cookies are used throughout your browsing in order to facilitate and execute certain functions. A technical cookie may, for example, be used to remember the responses given in a form or the user's preferences with regard to the language or the presentation of an website, when such options are available.
- Advertising cookies may be created not only by the website which the user is visiting, but also by other websites disseminating advertising, announcements, widgets or other elements on the displayed page. These cookies may, in particular, be used to perform targeted advertising, namely advertising determined on the basis of the user's browsing.

We use technical cookies. They are stored on your browser for a maximum period of 13 months.

We do not use advertising cookies. However, if We need to use them in the future, We will inform you in advance and you will have the possibility to deactivate these cookies, if necessary.

We use Google Analytics, which is a statistical tool for analysing the audience and which generates a cookie allowing the number of visits to the Website to be measured as well as the number of pages viewed and the activity of the visitors. Your IP address is also collected in order to determine the country from which you are connecting. The duration for the retention of this cookie is stated in Article 7(v) of this charter.

We remind you that you have the possibility to oppose the deposit of cookies by configuring your browser. The configuration of each browser is different for the management of cookies. It is described in the help menu for your browser and will allow you to understand how to change your settings with regard to cookies. In order to do this, follow the links set out below:

- ❖ [Internet Explorer™](#)
- ❖ [Safari™](#)
- ❖ [Chrome™](#)
- ❖ [Firefox™](#)
- ❖ [Opera™](#)

Please note that an opposition to the deposit of cookies on your browser may however prevent the correct operation of the Website.

## **12. Modifications**

We reserve the right, at our sole discretion, to modify this charter in whole or in part at any time. These modifications shall enter into force as from the publication of the new charter. Your use of the Website following the entry into force of these modifications shall constitute acknowledgement and acceptance of the new charter. Otherwise, if this new charter is not acceptable to you, you must no longer access the Website.

## **13. Entry into force**

This charter entered into force on 13th April 2017.