

**PRIVACY POLICY**  
**UPDATE: NOVEMBER, 16<sup>TH</sup> 2016**

## **1 INTRODUCTION**

---

- 1.1 We are committed to safeguarding the privacy of our website visitors; in this policy we explain how we will treat your personal information<sup>1</sup>.
- 1.2 We assure you that the collection and treatment of your personal information is carried out in compliance with privacy in accordance to French Law (*law n°78-17, January 6th, 1978 relative à l'informatique, aux fichiers et aux libertés accessible on <https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000000886460>*) and with EU regulations on this matter.
- 1.3 Our website is registered with the National Commission for Computing (CNIL) under number 2007213 V 1
- 1.4 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

## **2 COLLECTING PERSONAL INFORMATION**

---

- 2.1 The requested information at the time of inscription on our website is necessary and mandatory for the purpose of the creation of your user's account. In particular, your e-mail address shall be used for the purpose of services administration and website management.
- 2.2 We may collect, store and use the following kinds of personal information:
  - (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths);
  - (b) information that you provide to us when registering with our website (including your email address);
  - (c) information that you provide when completing your profile on our website (including your name, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details);
  - (d) information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including your name and email address);
  - (e) information that you provide to us when using the services on our website, or that is generated in the course of the use of those services (including the timing, frequency and pattern of service use);
  - (f) information relating to any purchases you make of our goods and/or services or any other transactions that you enter into through our website (including your name, address, telephone number, email address and card details);
  - (g) information that you post to our website for publication on the internet (including your user name, your profile pictures and the content of your posts);

---

<sup>1</sup> This document was created using a template from SEQ Legal (<http://www.seqlegal.com>).

- (h) information contained in or relating to any communication that you send to us or send through our website (including the communication content and metadata associated with the communication); and
  - (i) any other personal information that you choose to send to us.
- 2.3 Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

### **3 USING PERSONAL INFORMATION**

---

- 3.1 Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.
- 3.2 By virtue of articles 32 of the abovementioned law, we inform you that:
  - (a) we, Lingwelink, are responsible for the use of your collected personal data ;
  - (b) your personal data are used for the exclusive purpose of satisfying your request in relation to our website.
- 3.3 Within that frame, we may use your personal information to:
  - (a) administer our website and business;
  - (b) personalise our website for you;
  - (c) enable your use of the services available on our website;
  - (d) send you goods purchased through our website;
  - (e) supply to you services purchased through our website;
  - (f) send statements, invoices and payment reminders to you, and collect payments from you;
  - (g) send you non-marketing commercial communications;
  - (h) send you email notifications that you have specifically requested;
  - (i) send you our email newsletter;
  - (j) send you marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology;
  - (k) deal with enquiries and complaints made by or about you relating to our website;
  - (l) keep our website secure and prevent fraud; and
  - (m) verify compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service).
- 3.4 All the headings with a \* are mandatory in order to use our services. Without answer, your demand won't be met;
- 3.5 If you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the license you grant to us.
- 3.6 Your privacy settings can be used to limit the publication of your information on our website, and can be adjusted using privacy controls on the website.
- 3.7 We will never supply your personal information to any third party for the purpose of their or any other

third party's direct marketing.

#### **4 DISCLOSING PERSONAL INFORMATION**

---

- 4.1 We may disclose your personal information to any of our employees' professional advisers, agents, insofar as reasonably necessary for the purposes set out in this policy.
- 4.2 We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.
- 4.3 We may disclose your personal information:
- (n) to the extent that we are required to do so by law;
  - (o) in connection with any ongoing or prospective legal proceedings;
  - (p) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
  - (q) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information ;
- 4.4 Except as provided in this policy, we will not provide your personal information to third parties.

#### **5 INTERNATIONAL DATA TRANSFERS**

---

- 5.1 Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy.
- 5.2 Information that we collect may be transferred to the following countries which do not have data protection laws equivalent to those in force in the European Economic Area: the United States of America, Russia, Japan, China and India.
- 5.3 Personal information that you publish on our website or submit for publication on our website may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.
- 5.4 You expressly agree to the transfers of personal information described in this Section.

#### **6 RETAINING PERSONAL INFORMATION**

---

- 6.1 This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.
- 6.2 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 Without prejudice to this Section, we will usually delete personal data falling within the categories set out below at the date/time set out below:
- card details will be deleted when deleting your account
- 6.4 Notwithstanding the other provisions of this Section, we will retain documents (including electronic documents) containing personal data:

- (a) to the extent that we are required to do so by law;
- (b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

## **7 SECURITY OF PERSONAL INFORMATION**

---

- 7.1 We will take reasonable technical and organizational precautions to prevent the loss, misuse or alteration of your personal information.
- 7.2 We will store all the personal information you provide on our secure (password- and firewall-protected) servers.
- 7.3 All electronic financial transactions entered into through our website will be protected by encryption technology.
- 7.4 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
- 7.5 You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

## **8 AMENDMENTS**

---

- 8.1 We may update this policy from time to time by publishing a new version on our website.
- 8.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 8.3 We may notify you of changes to this policy by email.

## **9 YOUR RIGHTS**

---

- 9.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
  - 9.2 the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).
- 9.3 We may withhold personal information that you request to the extent permitted by law.
- 9.4 You may instruct us at any time not to process your personal information for marketing purposes.
- 9.5 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.
- 9.6 By virtue of articles 39 and 40 of the abovementioned French law, you have a right to access, to rectify, to delete and to oppose to your personal information. You can exercise these rights at any moment by contacting the contact provided in Article 14.2

## **10 THIRD PARTY WEBSITES**

---

- 10.1 Our website includes hyperlinks to, and details of, third party websites.

10.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## **11 UPDATING INFORMATION**

---

Please let us know if the personal information that we hold about you needs to be corrected or updated.

## **12 COOKIES**

---

12.1 Our website uses cookies.

12.2 Every issue concerning cookies is treated in our Cookie policy.

## **13 DATA PROTECTION REGISTRATION**

---

13.1 We are registered as a data controller with the French Information Commissioner's Office.

## **14 OUR DETAILS**

---

14.1 This website is owned and operated by LingWeLink (SAS) a French simplify joint-stock company with share capital of €100,00, having our registered office at 12 chemin de Montfort, 78610 Le Perray en Yvelines, registered with the Versailles Trade and Companies Register under number 821 555 489, duly represented by Jean Philippe Hue, acting as president;

14.2 You can contact us by using our website contact form or by email to [jeanphilippe.hue@lingwelink.com](mailto:jeanphilippe.hue@lingwelink.com).

\* \* \*  
\* \*