

Privacy Policy

The protection of your privacy is important for Cafeyn which needs to collect your data in order to provide you with its personalised reading service tailored to your wishes.

By means of this privacy policy (hereinafter the “Policy”), Cafeyn undertakes to process, collect, disclose, transfer and retain your personal data, which is necessary to the privacy of the data subjects. It also provides you with control and choice tools to determine when and how your personal data is shared.

We therefore invite you to familiarise yourself with our personal data protection practices.

The Policy forms an integral part of the General Terms and Conditions of Sale and Use of the Service. Capitalised words have the meaning given to them in the article “Definitions” of the GTCSU. It may be amended at any time, in particular to comply with any legislative, regulatory, jurisprudential, editorial or technical changes.

1/ What is personal data?

Personal data is any information relating to an identified or identifiable natural person. This information may take the form of a name, an identification number, location data, an online identifier, etc.

2/ Who is responsible for the processing of your personal data?

The data controller is the natural or legal person who determines the purposes and means of the processing of your data, i.e. all the operations carried out on them (collection, consultation, storage, etc.). In other words, it is the person who decides why and how to process your personal data.

In this case, Lekiosque.fr SAS, a French *société par actions simplifiée* (simplified joint stock company) with share capital of €254,755, whose registered office is located at 26 rue Laffitte, 75009 Paris, registered in the Paris Trade and Companies Register under number 493 341 473, belonging to the Cafeyn group and known as “Cafeyn”, is responsible for the processing of your personal data.

3/ What are our commitments?

We process your personal data according to the terms of this policy and in accordance with applicable legislation.

More specifically, our group undertakes to:

- collect and process personal data in a fair, lawful and transparent manner;
- observe the purposes for which they were collected;
- keep them only for the period necessary to achieve these purposes;
- ensure their security and confidentiality;
- regularly update your data;
- respect your rights relating to the processing carried out.

Depending on your relationship with our company, the rules for processing personal data may be adjusted. The specific features applicable to your situation are set out following this policy.

4/ What personal data do we collect?

We collect your personal data in different ways.

4.1. Data transmitted by the User

For the creation of your account and the use of the Service, you send us the following data:

- data necessary for the creation of an account on Cafeyn such as your surnames, first names, email addresses, login credentials via third-party services (Facebook, Google+, Apple) and password allowing you to be identified (third-party services may also process your personal data as data controller, we invite you to consult their privacy policy for more information);
- your user account personalisation data such as your first names, names, postal addresses, telephone numbers, date of birth, favourite content;
- configuration data for your user account such as your privacy preferences (newsletter, partner offers and Cafeyn offers) as well as your notifications and sharing.

4.2. Data collected by Cafeyn

When you use our service, website or applications, we collect data relating to your connection, your browsing and your various interactions with us such as:

- data relating to the content you have read and your reading habits (articles read, number of pages read, start date of reading, single or double reading), or recorded in your user account, the nationalities of the stores you select (France, Italy, Canada, etc.); the catalogues you consult;
- subscription data such as your user number, your type of subscription;
- billing data for certain types of purchase. This data varies depending on the payment method chosen and depending on the company responsible for receiving the payment (i.e. Paypal, Apple's In-App Purchase);
- customer service interaction data. The latter may collect certain data in order to process your request. This data includes your login details, the date and reason for your request and the content of your exchanges with customer service.

4.3 Connection and navigation data

Data relating to any device used to access the Services. These data include:

- Data collected automatically:
 - the IDs or unique identifiers of the devices (including mobile) used to access the Service; the characteristics of the devices and software (type and version of the operating system, or the language used on the device) used to connect to the Service;
 - geolocation data via your computer or mobile;
 - data relating to connection to the Service (type of connection, Internet service provider, IP address, statistics on the pages of the Service displayed).
- Data via cookies and other trackers, details of which can be found [here](#).

4.4 Data collected via third parties

Some Users access the Service via a media library, library, their company or through offers distributed by mobile network operators or e-commerce companies, etc. (hereinafter the "Partner(s)").

In this context, some of their data is communicated by the Partner to Cafeyn in order to allow these Users to benefit from the Service for which they are eligible depending on the type of offer chosen.

5/ How do we use your personal data?

5.1 Purposes of processing your data

We use this data to provide, analyse, administer, improve and customise our service and marketing activities, to process your purchases, subscriptions and payments, and also to communicate with you on these or other topics. For example, this data can be used to:

- provide the Service and ensure its proper functioning;
- improve our service, content and advertising;
- provide you with the latest product announcements, software updates and upcoming Cafeyn events;
- provide you with a personalised offer tailored to your interests and reading habits;
- measure the attendance of the Service;
- manage the relationship between the User and customer service;
- produce statistics for the analysis, selection and segmentation of Users to improve the Services;
- send you important notifications, such as communications about purchases and changes to our terms and conditions and charters. As this information is important to your relationship with Cafeyn, you cannot object to receiving these communications;
- for internal purposes, for example for audits, data analysis and research to improve products, services and communications to Cafeyn users;
- if you participate in a similar lottery, competition or promotional event, we may use the information you provide in connection with the management of these programs;
- for maintaining the security of the site, applications and the Cafeyn Service in general.

Cafeyn may be required – by law, in the context of legal proceedings, litigation and/or a request from the public authorities of your country of residence or otherwise – to disclose your personal data. We may also disclose your data if we believe that for national security, law enforcement or other public interest purposes, disclosure is necessary or appropriate.

As for each user, we shall establish an individualised profile based on your activities on our Site or our Applications as well as on your interests in order to offer you the Service, the personalised recommendations of which are an integral part. This processing does not result in an automated individual decision that produces legal effects for you or affects you significantly.

We may also disclose information about you if we believe that such disclosure is reasonably necessary to enforce compliance with our terms and conditions or to protect our business or users. In addition, in the event of restructuring, merger or sale, we may transfer any personal information we collect to the relevant third party.

5.2 Recipients of your data

The personal data we collect on our website and our applications are dedicated to us as data controller.

However, Cafeyn or one of its business partners may occasionally exchange such personal data and use it in accordance with this Policy. They can also combine them with other information to

provide and improve their products, services, content and advertising.

Cafeyn only shares your personal data with its service providers and strategic partners, in particular for the purposes listed above in order to optimise your experience on our site and our applications. Cafeyn therefore shares personal data with companies that provide services such as information processing, fulfilment of customer orders, delivery of products, management and development of customer data, provision of customer service, assessment of your interest in our products and services and carrying out customer satisfaction or development surveys.

In this case, Cafeyn ensures that the service provider complies with the legislation in force concerning the protection of personal data so that it does not use them for purposes other than those indicated by Cafeyn. These companies are obliged to protect your data and may be located in any country in which Cafeyn operates, in compliance with the General Data Protection Regulation (“GDPR”).

As of activation of the service, your account will be governed by the respective confidentiality undertakings of Cafeyn and its service provider. Personal data will only be shared by Cafeyn to provide or improve its products, services and advertisements; it will not be shared with third parties for marketing purposes.

6/ How long do we keep your data?

The personal data collected are retained for the period strictly necessary to achieve the purposes referred to above. Beyond this period, they will be retained for exclusively statistical purposes and will not give rise to any exploitation of any kind whatsoever. They may be archived for an additional period in accordance with the applicable limitation periods or pursuant to legal obligations to which Cafeyn may be subject. They will then be anonymised (re-identification of your data will be impossible).

Information stored under [cookies](#), or any other element used to identify you and to enable their traceability as well as raw footfall data associating an identifier, will not be retained beyond thirteen months.

The data used to provide you with personalised reading recommendations is not retained for more than 180 days.

7/ How do we secure your data?

Cafeyn takes precautions – including administrative, technical and physical measures – to protect your personal data against loss, theft and misuse, as well as unauthorised access, disclosure, alteration and destruction.

Cafeyn online services use the Secure Sockets Layer (SSL) security protocol on all web pages on which personal data is collected. To make purchases from our Service, it is your responsibility to use an SSL browser. This will preserve the confidentiality of your personal data when transmitted over the Internet.

8/ What are your rights?

You can ensure that your contact details and preferences are accurate, complete and up to date by logging into your user account. With regard to other personal data, we strive in good faith to give you access to ask us to correct the data if it is inaccurate or to delete it, if Cafeyn is not required to retain it by law or for legitimate business purposes.

Articles 14 to 22 of Regulation 2016/679 of 27 April 2016 grant you the following rights:

- A right of access to data;
- A right to rectify data;
- A right to object to the collection and processing of data;
- A right to erasure of your data;
- A right to limit the collection and processing of your data;
- A right to data portability.

You also have the right to provide instructions regarding the retention, erasure and communication of your data in the event of death.

You may exercise these rights by sending a request by email to dpo@cafeyn.co or by post to the following address: LEKIOSQUE.FR SAS – Legal Department – 10 Boulevard Haussmann 75009 Paris.

You are informed that exercising certain rights, including rights to opposition and erasure, may restrict or prevent access to and/or use of the Cafeyn Services.

We may refuse to process requests that are excessively repetitive, require disproportionate technical efforts, jeopardise the confidentiality of third party data, requests that are extremely difficult to implement or for which access is not otherwise required by applicable law.

Cafeyn reserves the right to verify the identity of the User.

In the event that you consider that we are not complying with our obligations and commitments, or your rights, you may file a complaint with the [CNIL](#).

9/ Other provisions

When you use certain Cafeyn products, services or apps or participate in a Cafeyn forum, chat or social networking service, the personal data you share is visible to other users who can read, collect and use it. You are responsible for the personal data you decide to submit in these circumstances. For example, if you enter your name and email address on a forum, this information will be public. You should be careful when using these features.

Minors

We do not knowingly collect the personal data of children under the age of 13. If we are informed that we have collected the personal data of a child under the age of 13, we will take steps to delete this information as soon as possible. For children under 15 years of age, parental consent will be required before their personal data are processed.

Third party sites and services

Cafeyn websites, products, applications and services may contain links to third-party websites, products and services. Our products and services may also use or offer products or services from third parties. Information collected by third parties, which may include elements such as location data or contact details, is governed by their privacy charters. We invite you to read the privacy charters of these third parties.

Transfer of data outside the European Union

For the purposes set out above, personal data may be transferred to companies based outside the European Union, in which case Cafeyn will make every effort to ensure that the security measures required by European regulations are applied prior to any transfer.

Protecting your privacy: a company-wide commitment

In order to protect the security of your personal information, we communicate these confidentiality and security rules to each of our employees and apply a very strict policy in this area within our company.

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