

Privacy Policy

Protecting your privacy is important to Readly, and we want to ensure your confidence in how we collect and use your personal data.

To this end, we have designed this privacy policy (hereinafter the “Policy”) to provide you with the simplest and most transparent information possible on this subject, as well as the control and choice tools available to you to determine when and how your personal data is shared.

The Policy applies to all possible uses of our Platform on any device. It may be modified at any time, in particular to comply with any legislative, regulatory, jurisprudential, editorial, or technical developments.

We also invite you to read our [Terms and Conditions](#) of Sale and Use, which apply to all uses of our Service. Words beginning with a capital letter have the meaning given to them in the “Definitions” section of the Terms and Conditions of Sale and Use.

1/ What is personal data?

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

2/ Who is responsible for processing your personal data?

The data controller is the natural or legal person who determines the purposes and means of processing your data, i.e. all operations performed on it (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, a simplified joint stock company with capital of €254,755, registered with the Paris Trade and Companies Register under number 493 341 473, with its registered office at 26

rue Laffitte, 75009 Paris, belonging to the Cafeyn group, is the data controller for your personal data.

3/ What are our commitments?

We process your personal data in accordance with the terms of this policy and in compliance with applicable law.

More specifically, our group undertakes to:

- collect and process personal data in a fair, lawful, and transparent manner;
- comply with the purposes for which it was collected;
- keep it only for as long as necessary to fulfill those purposes;
- ensure its security and confidentiality;
- update your data regularly;
- respect your rights regarding the processing carried out.

4/ What categories of personal data do we collect?

We collect several categories of personal data in different ways.

The specific personal data within each category that is collected may change as the Service improves, but will always be processed in accordance with our commitments.

4.1. Data transmitted by the User

To create your account and use the Service, you provide us with the following data:

- identification data for creating an account on Readly, such as your email address and password, which allow us to identify you, or login credentials provided by third-party services (Facebook, Google, Apple). These third-party services may also process your personal data as data controllers. We invite you to consult their privacy policies for more information.
- personalization data for your user account, such as your username, gender, postal address, year of birth, and favorite content;

- settings data for your user account, such as your notifications or privacy preferences (newsletters, partner offers, Readly offers, and your cookie choices. To learn more about our cookie policy, [click here](#)).

4.2. Data collected by Readly

When you use our Service, our website, or our 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 or saved to your user account and your reading habits; the nationality of the store you select; the catalogs you view;
- data relating to your subscription, such as your user number and subscription type;
- billing data for certain types of purchases. This data varies depending on the payment method chosen and the company responsible for receiving the payment (i.e., PayPal, Apple In-App Purchase, or Google);
- customer service interaction data. Customer service 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 browsing data

Data relating to any device used to access the Services. This data includes, in particular:

- Data collected automatically:
 - Device-related data such as unique device identifiers (including mobile devices) used to access the Service; device and software characteristics (operating system type and version, or language used on the device) used to connect to the Service;
 - geolocation data via your computer or mobile device;
 - Service connection data (connection type, Internet service provider, IP address, statistics on the Service pages 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 through their membership of a media library, library, through their company, through offers distributed by mobile network operators or e-commerce companies, etc. (hereinafter referred to as the “Partner(s)”).

In this context, certain usage data is communicated by the Partner to Readly in order to allow these Users to access the service to which they are eligible based on the type of offer chosen.

Depending on the case, the Partner may act as a separate or joint data controller, in accordance with the agreements concluded between the parties and the applicable regulations.

4.5 Use of the Service by Minors

When the Service is used by a minor, personal data is processed under the responsibility of the parent or legal guardian who created the account, in accordance with applicable laws.

Certain features may be adapted or limited for profiles intended for minors.

5/ How do we use your personal data?

5.1 Purposes of processing your data

The following table provides information on:

- The purposes for which we process your personal data;
- The legal basis on which we process your personal data;
- Which categories of processing are linked to which purpose.

Purpose of processing	Legal basis	Categories of personal data
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Provide the Service and ensure its proper functioning	Performance of a contract	<ul style="list-style-type: none"> ● Identification data ● Personalization data ● Settings data ● Data relating to the content you have read and your reading habits ● Data relating to your subscription ● Billing data ● Device-related data ● Service connection data ● Data collected via third parties
Improving our Service and content	Legitimate interest	<ul style="list-style-type: none"> ● Personalization data ● Settings data ● Data relating to the content you have read and your reading habits ● Data relating to your subscription ● Billing data ● Data relating to interactions with customer service ● Device-related data ● Geolocation data ● Service connection data
Improving our ads	Legitimate interest	<ul style="list-style-type: none"> ● Identification data ● Data relating to your subscription
Send the latest product announcements, software updates, and service events	Performance of a contract and Legitimate interest	<ul style="list-style-type: none"> ● Identification data ● Personalization data ● Data relating to your subscription ● Data relating to your user account settings
Customize and tailor the offer to your interests and reading habits	Performance of a contract	<ul style="list-style-type: none"> ● Identification data ● Personalization data ● Data relating to your subscription

	<p>We create an individualized profile for each user based on your activities on our Site or Applications and your interests in order to offer you the Service, of which personalized recommendations are an integral part. This processing does not result in an automated individual decision that produces legal effects concerning you or significantly affects you.</p>	<ul style="list-style-type: none"> ● Data relating to your user account settings ● Data relating to the content you have read and your reading habits
<p>Measuring the Service's visitor numbers</p>	<p>Legitimate interest</p>	<ul style="list-style-type: none"> ● Personalization data ● Data relating to the content you have read and your reading habits ● Device-related data ● Geolocation data ● Service connection data
<p>Manage the relationship between the User and customer service</p>	<p>Performance of a contract and Legitimate interest</p>	<ul style="list-style-type: none"> ● Identification data ● Personalization data ● Settings data ● Data relating to the content you have read and your reading habits ● Data relating to your subscription ● Billing data ● Device-related data ● Service connection data ● Data collected via third parties
<p>For internal purposes, such as audits, data analysis, and research to improve the products, services, and communications to users of the Service.</p>	<p>Legitimate interest</p>	<ul style="list-style-type: none"> ● Personalization data ● Settings data ● Data relating to the content you have read and your reading habits ● Data relating to your subscription

		<ul style="list-style-type: none"> • Data relating to interactions with customer service • Device-related data • Geolocation data • Service connection data
Send important notifications, such as communications about purchases and changes to our terms and policies.	Performance of a contract and Legitimate interest	<ul style="list-style-type: none"> • Identification data • Personalization data • Data relating to your subscription • Billing data • Data collected via third parties
In connection with the management of a lottery, contest, or similar promotional event	Performance of a contract	<ul style="list-style-type: none"> • Identification data • Personalisation data
Securing the site, applications, and the Service in general	Legitimate interest	<ul style="list-style-type: none"> • Identification data • Data relating to the content you have read and your reading habits • Data relating to your subscription • Billing data • Data relating to interactions with customer service • Device-related data • Geolocation data • Service connection data
To diagnose and resolve issues with the Service	Performance of a contract	<ul style="list-style-type: none"> • Identification data • Data relating to the content you have read and your reading habits • Data relating to your subscription • Billing data

		<ul style="list-style-type: none"> • Data relating to interactions with customer service • Device-related data • Geolocation data • Service connection data
For marketing, promotional, and advertising purposes	Consent	<ul style="list-style-type: none"> • Identification data • Personalization data • Settings data • Data relating to the content you have read and your reading habits • Data relating to your subscription • Billing data • Device-related data • Geolocation data • Service connection data • Data collected via third parties
To comply with contractual obligations with third parties.	Legitimate interest	<ul style="list-style-type: none"> • Identification data • Personalization data • Data relating to the content you have read and your reading habits • Device-related data • Geolocation data

Readly may be required to disclose your personal data due to legal requirements, legal proceedings, disputes, and/or requests from public authorities in your country of residence or elsewhere. We may also disclose your data if we believe that disclosure is necessary or appropriate for reasons of national security, law enforcement, or other matters of public interest.

We may also disclose information about you if we believe that such disclosure is in our legitimate interest in that it is reasonably necessary to enforce our terms and conditions or protect our

business or users. In addition, again in our legitimate interest, in the event of a 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 applications is processed by us as the data controller.

However, Ready or one of its business partners may sometimes exchange this personal data and use it in accordance with this Policy. They may also combine it with other information in order to provide and improve their products, services, content, and advertising.

Ready only shares your personal data with its service providers and strategic partners (this may include online advertising platforms such as Meta Platforms and Google, when we perform data matching operations to exclude our existing users from certain campaigns or to measure the effectiveness of our marketing activities. These platforms then act as separate data controllers), and companies in the Cafeyn group, including LeKiosque.fr, in particular for the purposes listed above in order to optimize your experience on our site and our applications. Ready therefore shares personal data with companies that provide services such as information processing, customer order fulfillment, product delivery, customer data management and development, customer service provision, assessment of your interest in our products and services, and customer satisfaction or customer development surveys.

In this case, Ready ensures that the service provider complies with current legislation on personal data protection so that it does not use the data for purposes other than those specified by Ready. These companies are obliged to protect your data and may be located in any country in which Ready operates, in accordance with the General Data Protection Regulation (GDPR).

Once the service is activated, your account will be governed by the respective confidentiality commitments of Ready and its service provider. Personal data will only be shared by Ready to

provide or improve its products, services, and advertising; it will not be shared with third parties for marketing purposes.

6/ How long do we keep your data?

The personal data collected is kept for the period strictly necessary to achieve the purposes set out above. Beyond this period, it will be kept for statistical purposes only and will not be used in any way whatsoever. It may be archived for an additional period in accordance with the applicable limitation periods or in accordance with legal obligations to which Readly may be subject. It will then be anonymised (making it impossible to re-identify your data).

In any event, in the event of inactivity for a period of 3 years, personal data will be deleted or anonymised.

Certain data, in particular billing and accounting data, may be retained for the applicable legal period in tax and accounting matters.

Information stored in [cookies](#), or any other element used to identify you and enable your traceability, as well as raw traffic data associated with an identifier, will not be retained for more than thirteen months.

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

7/ How do we keep your data secure?

Readly takes precautions – including administrative, technical, and physical measures – to protect your personal data from loss, theft, and misuse, as well as unauthorised access, disclosure, alteration, and destruction. Readly online services use SSL (Secure Sockets Layer) security protocol on all web pages where personal data is collected. To make purchases from our Service, it is your responsibility to use an SSL browser. This will ensure that your personal data remains confidential 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 make every effort in good faith to give you access so that you can ask us to correct any data that is inaccurate or delete it, unless Ready is 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:

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

You also have the right to communicate instructions regarding the storage, deletion and communication of your data in the event of death. You can exercise these rights by sending a request by email to dpo@readly.co or by post to the following address: LEKIOSQUE.FR SAS – Legal Department – 26 rue Laffitte 75009 Paris. You are informed that the exercise of certain rights, in particular opposition and erasure, may restrict or prevent access to and/or use of the Service.

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

Ready reserves the right to verify the User's identity.

If you believe that we are not complying with our obligations and commitments, or your rights, you may lodge a complaint with the [CNIL](#).

9/ Other provisions

The Service may contain links to third-party websites, products and services. Our products and services may also use or offer third-party products or services. Information collected by third parties, which may include items such as location data or contact details, is governed by their privacy policies. We encourage you to read the privacy policies of these third parties.

For the purposes set out above, personal data may be transferred to companies located outside the European Union, in which case Readly will make every effort to ensure that the security measures required by European regulations are applied prior to any transfer. When personal data is transferred outside the European Union, in particular to the United States in connection with the use of advertising platforms such as Meta Platforms or Google, these transfers are governed by the mechanisms provided for in the applicable regulations, such as the adequacy decision relating to the EU-US Data Privacy Framework when the recipient is certified under it, or the conclusion of standard contractual clauses adopted by the European Commission.

Protecting your privacy: a company-wide commitment

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

Last updated

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