

**ANEMONE PRIVACY POLICY -  
OCTOBER 2022**

ANEMONE, a simplified joint stock company, registered in the Paris Trade and Companies Register under number 918 889 544, whose registered office is located at 69 avenue de Suffren, 75007 Paris (hereinafter referred to as "**ANEMONE**") pays particular attention to the protection of personal data and undertakes, within the framework of this privacy policy (hereinafter referred to as the "**Privacy Policy**"), to protect them in accordance with applicable regulations and in particular Regulation (EU) No. 2016/679 of April 27, 2016, known as the "General Data Protection Regulation" or "GDPR", and Law No. 78-17 of January 6, 1978, as amended, known as the "Data **Protection Act**" as amended (hereinafter the "**Applicable Data Protection Law**").

ANEMONE publishes a mobile application and a website (hereinafter the "**Platform**") which consists of an online professional social network specialized in the cultural and creative industries. Also, the purpose of the Platform involves an exchange of data, including personal data (hereinafter the "**Personal Data**") (i) between users of the Platform regardless of their status (e.g. student, teacher, recruiter, collaborator, partner, etc.) (hereinafter the "**Data Subjects**"), and (ii) between the Data Subjects and ANEMONE.

The processing of Personal Data through the Platform is carried out by ANEMONE, as the data controller, according to the applicable Data Protection Law. Therefore, ANEMONE commits itself to respect at all times the legal and regulatory requirements, and to process the Personal Data only in the following conditions.

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**ARTICLE 1. MAPPING OF PERSONAL DATA PROCESSING**


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ANEMONE operates the following processing of Personal Data of the Data Subjects:

<b>Purpose</b>	<b>Legal basis</b>	<b>Categories of data processed</b>
Management of the opening and use of the account	Execution of conditions general terms of use	Name and surname E-mail address Mobile number
Creating a public profile	Execution of conditions general terms of use	Name and surname Photograph  City, region Life professional (CV, experiences, etc.)
Use and management of the messaging service	Execution of conditions general terms of use	Name and surname Photograph Any Personal Data that could be communicated during the exchanges

Newsletter	Consent	E-mail address
Reply to announcements (job offers, projects, events, etc.) posted by other users	Consent	Last name, first name All Personal Data transmitted to the user who published the ad
Publication announcements (job offers, projects, events, etc.)	Execution of conditions general terms of use	Name, first name of a person from contact Phone number of a contact person E-mail address of a person of contact
Operational management of the platform by ANEMONE (support and after-sales service in particular)	Execution of conditions general terms of use	All Personal Data processed through the Data Subject's account Any information that could be transmitted by the Person Concerned to the support service
Communication of ANEMONE with the Person Concerned by any means available on the Platform (contact email, contact telephone, etc.)	Consent (communication off-account communication); Fulfillment of the terms and conditions of use (for users with an account)	Email address First and last name Any information that will be communicated by the Person Concerned when making contact
Improvement of performance and functionalities of the Platform	Legitimate interest of ANEMONE	Data statistics Name and first name IP address Connection logs
Litigation management	Legitimate interest of ANEMONE	All Personal Data
Fraud prevention and detection, malware and security incident management	Legitimate interest of ANEMONE and legal obligation	Connection logs IP address

The compulsory or optional nature of the Personal Data is specified at the time of collection. The compulsory communication of certain Personal Data is necessary for ANEMONE to implement the above-mentioned purposes. The optional data allow ANEMONE to know better the Person concerned in order to bring him/her services more adapted to his/her needs.

## **ARTICLE 2.RETENTION**

## **PERIOD OF PERSONAL DATA**

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The Personal Data of the Person Concerned are kept :

- With regard to Personal Data relating to the management of the account and browsing on the Platform: for the entire period during which the account is active on the Platform;
- With regard to Personal Data relating to cookies: during the lifetime of the corresponding cookies ;
- With regard to Personal Data relating to the newsletter: until you unsubscribe from the Person Concerned;
- With respect to communications between a user who does not have an account on the Platform and ANEMONE: for a period of three (3) years.

Beyond the above-mentioned periods, the Personal Data are archived by ANEMONE, in a secure environment, for the legal period of prescription for the purpose of proof for the establishment, exercise or defense of a right in justice.

## **ARTICLE 3. RECIPIENTS OF PERSONAL DATA**

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Unless required by law or court order, ANEMONE will never disclose, sell, rent or transmit the Personal Data it processes to third parties.

Without prejudice to the above, the Data Subject is informed that ANEMONE uses third party service providers to ensure part of the operational management of the Platform. For the purposes of performing their tasks, these third parties may receive Personal Data:

- The hosting provider of the Platform and its databases, Amazon Web Services, Inc. in its datacenters located in France, for the purpose of performing technical hosting and database management services. This service provider acts as  
The Data Subject shall be entitled to use the services of a "*subcontractor*" of ANEMONE in the sense of the Applicable Data Protection Law, on the instructions of ANEMONE, who shall communicate to the subcontractor the data that are strictly necessary for the performance of its tasks, in accordance with the contractual conditions signed with ANEMONE, which cannot derogate from the present article and which comply with the Applicable Data Protection Law. For further information on the processing of Personal Data by this hosting provider, the Data Subject is invited to read the privacy policy of the company Amazon Web Services, Inc. which can be found at the following address: <https://aws.amazon.com/fr/compliance/data-privacy/> ;
- Third-party cookie publishers, as provided below.

## **ARTICLE 4. SECURITY MEASURES IMPLEMENTED**

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ANEMONE undertakes to make its best efforts to :

- Ensure the physical and logical security of the servers on which the Platform is hosted and, in particular, the integrity of the network and servers against any external malicious act or any known computer attack. The servers are protected against intrusions by a firewall. Security updates for the operating systems and anti-virus software are installed regularly;
- Implement and maintain security and confidentiality measures of the Platform, which take into account the principles of protection of Personal Data, and are adapted to the risk generated by their processing on the rights and freedoms of Individuals

concerned, in accordance with the requirements of the Applicable Data Protection Law. These measures aim to (i) protect Personal Data from destruction, loss, alteration, disclosure to unauthorized third parties and (ii) ensure the restoration of the availability of Personal Data and access to it in a timely manner in case of physical or technical incident. ANEMONE also implements a procedure to regularly test, analyze and evaluate the effectiveness of the above mentioned security measures.

## **ARTICLE 5. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN UNION**

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Some of ANEMONE's partners and/or service providers mentioned in article 3 of the present document are part of groups of companies whose holding entity is located outside the European Economic Area. As a result, the personal data of the Data Subjects may be transferred to third countries (in particular the United States), in order to ensure the maintenance of the computer supports of the databases that the service providers process on behalf of ANEMONE.

The Data Subject is also advised that these companies may be subject to legal, governmental or judicial obligations to disclose data, including personal data, regardless of where such data is hosted.

ANEMONE ensures at all times that these transfers are made under appropriate and suitable conditions of security and confidentiality in order to guarantee a level of protection of the personal data of the Data Subject equivalent to the level required within the European Union, in accordance with the Applicable Law on Data Protection, in particular by concluding with them the standard contractual clauses adopted by the European Commission

## **ARTICLE 6. RIGHTS OF THE DATA SUBJECTS TO THEIR PERSONAL DATA**

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Data Subjects have the following rights at any time with respect to their Personal Data:

- **Right of access:** to obtain confirmation of the processing of his Personal Data as well as a certain amount of information on the processing, it being understood that this information is in any case given in the present document;
- **Right of rectification:** obtain the rectification of your Personal Data when they are inaccurate or incomplete;
- **Right to erasure**, also known as **the "right to be forgotten"**: to obtain the erasure of Personal Data when they are no longer necessary for the purposes for which they were collected or when the Data Subject objects to the processing of his/her Personal Data;
- **Right to the limitation of the processing:** to obtain the limitation of the processing of his/her Personal Data when the Data Subject disputes the accuracy of the data, when the retention period of the Personal Data has expired but the Data Subject still needs to retain the Personal Data for the establishment, exercise or defense of a legal claim, or if the Data Subject has objected to the processing;
- **Right to portability:** to obtain the communication of the Personal Data that the Data Subject has communicated to ANEMONE in a readable format, or to request ANEMONE to transmit the Personal Data that the Data Subject has communicated to another controller;

- **Right to object:** to object at any time, for reasons relating to his or her personal situation, to the processing of his or her Personal Data, in particular in the event that such objection concerns commercial prospecting, including profiling;
- **Withdrawal of consent:** withdrawing consent to the future processing of one's Personal Data by ANEMONE, when the processing is based on consent;
- **Right to lodge a complaint:** to lodge a complaint with the National Commission for Information Technology and Civil Liberties ("**CNIL**") if the Data Subject considers that the processing carried out by ANEMONE constitutes a violation of his/her Personal Data. The services of the CNIL can be contacted:
  - By phone : 01 53 73 22 22 ;
  - Via an online form available here: <https://www.cnil.fr/webform/nous-contact>

The rights of the Data Subjects on their Personal Data can be exercised at any time moment with ANEMONE by email at the following address: [contact@anemone.paris](mailto:contact@anemone.paris) .

#### **ARTICLE 7.HYPertext LINKS**

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The Platform may contain hyperlinks to third party websites. ANEMONE has no control over the content of third party websites referenced by hyperlinks. These websites are published by third party companies independent of ANEMONE. ANEMONE does not assume any responsibility for the content, advertising, services or any other information or data available on or from these websites. Consequently, the Person Concerned acknowledges that he/she is solely responsible for the access and use of these sites. ANEMONE shall not be liable for any damages or losses, whether actual or alleged, arising out of or in connection with the use of or reliance on any content, goods or services available on such sites.

#### **ARTICLE 8. MANAGEMENT OF COOKIES**

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ANEMONE uses cookies for the proper functioning of the Platform. A "cookie" is a small data file sent to the Data Subject's browser by a web server and stored on the hard drive of his/her computer or other computer medium. They are not likely to damage the said medium in any way.

The information collected through cookies is only and strictly intended for ANEMONE, in compliance with the Applicable Law on Data Protection.

ANEMONE uses the following cookies:

### **Strictly necessary cookies**

Some of the cookies used by ANEMONE are strictly necessary to make the Platform work properly. They are generally set only in response to actions performed by the Data Subject on the Platform and which require a request for services or filling in forms. The Data Subject may set his/her web browser to block the use of these cookies, but certain features of the Platform will no longer be accessible. These cookies do not store any personally identifiable information about the Data Subject.

<b>Name of the cookie</b>	<b>Shelf life</b>
XSRF-TOKEN	Duration of the navigation
hs	Duration of the navigation
svSession	Twelve months
SSR-caching	One minute
fedops.logger.X	Twelve months

The Data Subject may set his or her browser to accept or disable cookies, subject to the limitations set forth in this section.

Cookie instructions for the most commonly used browsers are available at the following links:

- Windows Internet Explorer® : <https://support.microsoft.com/fr-fr/help/17442/windows-internet-explorer-delete-manage-cookies>
- Mozilla Firefox : <https://support.mozilla.org/fr/kb/autoriser-bloquer-cookies-preferences-sites>
- Google Chrome : <https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DiOS&hl=fr>
- Apple Safari® (iPhone; iPad): <https://support.apple.com/fr-fr/HT201265>
- Apple Safari® (Mac): <https://support.apple.com/fr-fr/guide/safari/sfri11471/mac>
- Deactivation of Google Analytics: <https://tools.google.com/dlpage/gaoptout>

## **ARTICLE 9.SOCIAL NETWORKS**

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The Platform uses plug-ins from the following social networks:

- Instagram®, operated by Meta Platforms Inc;
- LinkedIn®, operated by Microsoft Inc;

When the Data Subject interacts with these plug-ins, his/her browser establishes a direct connection with the servers of the corresponding social network. The content of the plug-in is immediately transmitted by the Data Subject's browser to the social network and stored on its servers. By integrating this plug-in, the social network is informed that the Data Subject has visited the Platform. It can thus associate the Data Subject's browsing on the Platform with his or her user account on this social network, if applicable. If the Data Subject does not want the social network to collect data about him or her through the Platform and link it to his or her user account on the social network, the Data Subject must log out of the relevant social network before visiting the Platform. If the Data Subject is not a member of the social network, it is nevertheless possible that the social network collects and records his/her IP address.

In any case, ANEMONE has no control over the exact content of the data collected. The use of the plug-ins is exclusively operated by the respective social networks and is governed by their general terms of use, which are available at the following addresses

- For Instagram:  
[https://privacycenter.instagram.com/policy/?entry\\_point=facebook\\_help\\_center\\_ig\\_data\\_policy\\_redirect&coig\\_consent=1](https://privacycenter.instagram.com/policy/?entry_point=facebook_help_center_ig_data_policy_redirect&coig_consent=1) ;
- For LinkedIn: <https://fr.linkedin.com/legal/cookie-policy>.

Instagram® is a registered trademark and is owned exclusively by Meta Platforms Inc. LinkedIn® is a registered trademark and is owned exclusively by Microsoft Inc.