

Charter for personal data protection

CHARTER FOR PERSONAL DATA PROTECTION**The preamble**

Aleteia group, internet information site (hereinafter « the Services »).

Aleteia is committed to the policy of personal information protection. Therefore, Aleteia is committed to conform with the General Regulations on Personal Data Protection 2016/679 of April 27, 2016 (« RGPD ») and the legislation n°78-17 of January 6, 1978, concerning data processing, storing and freedoms (« Data processing and Freedoms » legislation) (the ensemble of « Regulations regarding the protection of data »).

The present Charter for personal data protection (hereinafter « the Charter ») is a part of an approach to achieve more transparency and trustworthiness.

The objective of the Charter is to present you all the information necessary to understand how Aleteia collects, processes and protects your personal data while you enjoy its Services and the options.

At any time, Aleteia may adjust the Charter depending on modifications or additions made to conform to all of the regulatory, legal, editorial and/ or technical developments. Before conducting any search, we advise you to refer to the latest version of the Charter.

ARTICLE 1. How and why your personal data is processed?

Personal data is a body of information, identifying you directly, or indirectly as a physical person. For example, it may include: *your last name, your first name, your date of birth, your gender, your postal address, your email address, the IP address of your computer, your telephone and credit card numbers, as well as your pictures, videos, the comments indicating your contacts, identifiers, both personal and secret passwords, etc.*

Whenever you access the Services, you may have to provide some personal data, if you are:

- *creating a user account on the Site;*
- *subscribing to one of our newsletters;*
- *subscribing to one of our Services;*
- *participating in one of the competitions we have organized;*
- *responding to a survey;*
- *sharing a link or the contents of our Services with one of your contacts.*

Providing this data may be mandatory in order to use some of our Services.

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The goal of collecting and processing your personal data is:

- *creating and managing your account;*
- *allowing you to benefit from our Services;*
- *contacting and informing you of your eventual wins in our competitions;*
- *responding to your questions;*
- *informing you about our new Services and offers;*
- *elaborating statistics on different pages of our Services that you visit;*
- *conforming to the current legislation in what concerns your participation in any group requiring moderation and fact checking (forums, discussion, contributions or all of online material you may download);*
- *detecting inappropriate use of our Services.*

ARTICLE 2. Who can use your personal data?

Your personal data is collected when you subscribe to our Services. It is reserved for Aleteia, and under particular conditions, may be shared with third parties.

❖ Aleteia

Your personal data is processed by Aleteia with the objectives described here below. Your personal information may be:

- communicated by Aleteia to its branches or other branches of Média Participations group; - provided to companies other than Aleteia, designated as its sub-contractors and executing one of the tasks described here above on its behalf, while Aleteia retains the control and the supervision of your personal data.

❖ Our partners with your consent

Third parties may use your personal data only with your consent.

If you check a box proposing products from our partners or if you actively respond to any offers, clearly manifesting your wish to receive them, your data will be shared with the partner(s) you've selected, allowing them to send you offers of their products or services by email or text.

Any partner, you have previously selected, may address you such offers until you inform them (in respecting the conditions they have outlined) that you no longer wish to receive their offers by email or text.

These partners bear the full responsibility for processing your personal data, once it has been communicated to them with your consent. It is their responsibility to conform to the current legislation, taking your rights and your eventual wishes into account.

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❖ Third parties authorized by law:

In specific cases prescribed by the legislation, your personal data may be communicated to the third parties legally authorized to obtain it: judiciary and government institutions, your internet providers, or a third party that sends cookies stored in your computer terminal (advertisement agencies, another editor, etc.).

We may also have to share your personal data with the third party, to protect or defend the rights of the data controller, to comply with the present provisions, or to protect your rights and/ or public interests, on the condition that this is authorized by law.

If the data controller is sold or partially sold to the third party, we reserve the right to transfer your data as an asset sold or otherwise disposed.

ARTICLE 3. How to access your personal data, modify it and/or delete it?**❖ Your rights**

You have the rights to your personal data. In accordance with the Regulation concerning data protection and within the framework imposed by the articles 12 to 22 of the RGPD, you:

- have the right to request access to the information of a personal nature that concerns you, as well as the right to have it modified or deleted—you may access and modify some of your personal information in your Account ;
- have the right to oppose processing of your personal data, demand that be restricted, and the right to transfer the information of a personal nature you've provided.

Furthermore, within the framework, imposed by article 22 of the RGPD, you have the right not to be a subject of decision based exclusively on online processing including that of profiling that may result in legal implications for the concerned or gravely affect them in a similar fashion.

Finally, we wish to remind you that, in any eventuality, you have the right to determine both general and specific criteria concerning the future use reserved to your personal information after your death.

❖ Exercising your rights

The simplest is to contact us on line. You can exercise your rights by:

- using the tools provided for this purpose and placed at your disposal by our Services;
- contacting us at the following address: rgpd@aleteia.org

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At all times if the need arises, you may withdraw your consent for the processing of your personal information, by clicking on the hyperlink, included for this purpose in all of the messages we address you.

The withdrawal of your consent does not compromise the legality of processing based on your consent given prior to this withdrawal.

If you are unable to access, modify or delete your personal information on line, you can address us your request in writing to: Aleteia, 57 rue Gaston Tessier 75019 Paris.

To prevent all unauthorized access, modification, deletion and identity theft, when it is possible, please include with your demand a document proving your identity. In a case of doubt as to your identity, we ask you to supply us an additional document –a copy of your identity card or your passport.

❖ A few points

Any unreasonable, excessive or inappropriate demand may be rejected.

Your demands must also include an address where you wish to receive our reply. Otherwise, if this proves necessary, we will send it to all of the addresses known to us. You will receive our reply in one month from the receipt of the demand. The delay may be extended to 2 months, based on the complexity and the number of demands.

We remind you that our partners bear the responsibility for your personal information and the respect of your rights, including that of declining to receive their offers.

If your personal information has been deleted, you must signal your inability to access and/or to order the products from the Site.

At any given time, you may modify your choices in your user account, in the section consecrated to the offers from the third parties. Your personal information won't be disclosed to our partners once your demand has been processed. However, your demand won't have any bearing on the data provided prior to your request. In such a case, you must directly address the concerned third party.

ARTICLE 4. How long does it take Aleteia to process your personal data?

Your personal data is stored by Aleteia and /or any of our subcontractors for diligent administration of the Services we propose. Your personal information is conserved for the duration, strictly necessary to achieve the objectives they have been collected for, in conformity with the current regulations.

For example, the data collected as a part of the subscription process to one of our newsletters, is conserved in order to send you such newsletters for as long as you have not unsubscribed.

Beyond this time, we will proceed:

- To delete it or safely dispose of it;
- To implement diligent data anonymization destined exclusively for the statistics that won't lead to exploitation of any other kind.

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ARTICLE 5. Where is your personal data stored and processed?

Aleteia attributes great importance to the protection of the personal information of its customers and subscribers, as well as to respecting the framework established by the Regulation concerning the protection of personal information.

Your personal data is processed by us or by our subcontractors in France and Italy. Wherever it is possible it is not transferred to the third countries.

ARTICLE 6. Whom you may contact concerning your data?

For all questions relating to your personal information, you may contact the Data Protection Officer designated by the Groupe Média Participations, who is qualified to identify all problems relative to the protection of personal information. Please, write to the following address: mp-dpo@media-participations.com

If you have not obtained a satisfactory response to your demand, you may submit your complaint to Commission Nationale de l'Informatique et des Libertés, which is the regulatory body in charge of enforcing the Regulation on personal information protection in France at <https://www.cnil.fr/fr/agir> or by writing to: Commission Nationale de l'Informatique et des Libertés, 3 Place de Fontenoy-TSA 80715, 75334 PARIS CEDEX 07.