

**PERSONAL DATA PROTECTION POLICY**

The company AREP (hereafter “AREP”) with registered office at 16 Avenue d’Ivry (75013 PARIS, FRANCE), publishes and makes available the [www.arep.fr](http://www.arep.fr) website (hereafter the “AREP website”) within their capacity as data controller.

The company can be contacted by email at [contact@arep.fr](mailto:contact@arep.fr) or by telephone on +33 (0)157 271 500.

#### 1. Processing operations carried out

The company carries out the following personal data processing operations via the AREP website:

- Management of the AREP website: processing based on AREP’s legitimate interest in ensuring data and network security
- Analysis of statistics generated by the relevant individuals using the AREP website (“web analytics”): processing based on consent
- Social media sharing functionalities: processing based on consent.

This processing does not result in any kind of automated decision-making in regard to the individuals concerned.

#### 2. The data processed and the individuals concerned

The individuals concerned by the processing operations mentioned above are all visitors to the AREP website.

“Cookies” are a type of technology that saves information about user browsing habits on Internet websites.

The data collected via cookies in order to manage the AREP website is linked to website browsing to ensure that the service provided functions correctly. The provision of this data is required for the provision of the AREP website. These cookies can technically be blocked in browsing settings, but this may cause some of our services to function incorrectly.

The data collected via cookies for the purpose of web analytics consists of elements that help the website operator to understand how the website works, how visitors interact with the site, and if there are any technical problems. This type of storage generally doesn’t collect information that enables the visitor to be identified. The provision of this data is optional, and the individuals concerned can object to its collection at any time.

The data collected within the scope of social media sharing functionalities includes the IP address, the operating system, and the browser type. The provision of this data is optional, and the individuals concerned can object to its collection at any time.

Within the scope of social media sharing functionalities, said social media networks are co-responsible for the processing of data. For more information, the individuals concerned can refer to the data protection policy of each of the following:

- [Twitter](#)

- [Instagram](#)
- [LinkedIn](#)

### 3. Data recipients

The data collected and processed within the scope of the processing operations mentioned above may be transmitted, in whole or in part, to the following recipients or recipient groups based on their respective needs:

- Internal departments (e.g. communications, IT, etc.)
- Technical subcontractors (e.g. the website host)
- Social media networks (Twitter, Instagram, LinkedIn) as jointly responsible for processing

### 4. Data retention

The data is stored for time periods that do not exceed those necessary in regard to the purposes for which it is processed. These are determined as follows:

- For cookies and other trackers used to manage the AREP website, the data is stored for a time period that does not exceed that specified in the legal directive
- For cookies and other trackers used for web analytics:
  - o The technologies that enable the individuals concerned to record their preferences (consent, refusal, or no response) have a lifespan not exceeding six months
  - o The data collected via these technologies is stored for a time period not exceeding 25 months
- For the cookies and other trackers used within the scope of social media sharing functionalities:
  - o The technologies that enable the collection of data have a lifespan not exceeding 13 months
  - o The data collected by AREP via these technologies is stored for a time period not exceeding 25 months
  - o The data collected by social media networks via these technologies is stored for a certain amount of time specified by each social media network, the information on which can be found in their respective data protection policies.

### 5. Security measures

The website host is Web Flow: <https://webflow.com/>

In relation to the nature of the personal data processed and the inherent risks, AREP takes the necessary and appropriate technical, physical, and organizational measures to ensure it remains secure and confidential.

AREP chooses subcontractors that offer guarantees in terms of quality, security, reliability, and resources in order to secure the processing operations carried out. The subcontractors undertake to respect the standards of security and confidentiality in force at AREP as a bare minimum, and to act only when instructed to do so by AREP.

In the event that the processing of personal data is transferred to countries located outside of the European Union, there are rules in force designed to ensure the protection and security of said data.

AREP only employs subcontractors located within European Union territories. Nevertheless, said subcontractors may use sub-processors located outside of the European Union. In the event that this occurs, the sub-processors are contractually required to comply with the data protection rules imposed by AREP as a bare minimum, and to act only when instructed to do so by AREP.

Any transmission of data that takes place within this context is based on the applicable guarantees, such as an adequacy finding made by the European Commission, the company's internal regulations, standard or contractual clauses on data protection, a code of conduct, or a certification mechanism.

#### 6. Rights of the individuals concerned

In accordance with the applicable regulations, the individuals concerned may exercise the following rights regarding their personal data:

- The right to withdraw consent at any time (e.g. via the unsubscribe link featured in every newsletter email)
- The right to access
- The right to correct
- The right to erase (“the right to be forgotten”)
- The right to purpose limitation
- The right to data portability
- The right to object
- The right to decide what happens to personal data following an individual's death.

These rights can be exercised by electronic means or by mail by writing to AREP's designated Data Protection Officer (**DPO**) at:

[dpo@arep.fr](mailto:dpo@arep.fr)

or

AREP  
For the attention of the DPO  
16 Avenue d'Ivry  
75013 PARIS  
FRANCE

The request must clearly indicate the first name(s) and surname(s), the nature of the request, and the address to which the response should be sent. In case of any reasonable doubt over the identity of the individual concerned, AREP can request them to prove their identity by any means necessary.

Without prejudice to any other administrative or legal remedy, any individual concerned has the right to lodge an appeal with a supervisory authority, in particular the member state in which their habitual residence or workplace is located, or where the infringement took place, if said individual believes that the processing of their personal data constitutes a violation of the applicable regulations. The competent supervisory authority in France is the French data protection authority (the “**CNIL**”).