

PRIVACY POLICY

BABILOU-FAMILY.COM WEBSITE

Access to certain sections of the babilou-family.com website (hereinafter the "Site") and any request for information from users of the Site may result in the disclosure of personal data concerning them.

This Privacy Policy is intended to inform each user of the Site, before he/she communicates personal data concerning him/her, about the conditions and the way in which the personal data he/she provides on this site are processed by Babilou and/or by the Babilou Group.

Babilou recognizes the importance of ensuring the protection and security of privacy and Personal Data and has established this Privacy Policy in accordance with the strictest criteria for the protection of personal data and any applicable regulations.

By accepting this Privacy Policy, the User consents to the collection and processing of his or her Personal Data under the conditions and in accordance with the procedures set out below.

1. Definitions of the terms

Capitalized terms have the meaning provided in the Glossary following this Policy.

2. Processing of Personal Data

2.1. This Privacy Policy applies to the Processing by Babilou, who acts as data controller, of Personal Data voluntarily provided by the User on the Site.

The provision of this data is optional. The information marked with an asterisk is required by Babilou to respond to the User's requests within the framework of the Site's functionalities.

Any information marked with an asterisk that is partial, inaccurate or missing makes it impossible for Babilou to provide the services or services requested by the User. However, the provision of partial or inaccurate information does not entail any consequences for the User.

The other information requested, for which the answer is optional, is intended to get to know you better and thus improve the services offered to you, while ensuring their safety.

2.2. The purposes of processing the Personal Data provided by Users via the Site will be as follows:

1. process and respond to the User's contact requests,
2. analyse the use of the pages of the Site.

2.3. The legal basis for these different processing operations is as follows:

- To answer your questions, the processing of your data is based on your consent;
- Finally, the processing related to the analysis of the ergonomics of our site and the production of statistics is based on our legitimate interest in cookies intended to improve and guarantee the proper functioning and security of our site, and on your consent for all other cookies (targeted advertising and communications, production of statistics). For more information, we invite you to consult the "cookies" section of the Site.

2.4. The table below describes:

- the purpose(s) of the processing operation,
- the persons concerned by the Processing operation,
- the categories of Personal Data Processed,
- the recipients of the Personal Data,
- the length of time for which Personal Data are kept.

Purpose(s)	Persons concerned	Data processed	Recipients of Personal Data	Period of retention of Personal Data
Request for contact	Site user	- First name - Last name - E-mail address - Telephone number - City	Babilou Sales department	5 years
Job application	Site user	- First name - Last name - City - Country - E-mail address - Languages spoken or read - CV - Cover letter - Other document	Babilou HR department	5 years

Analysis of page traffic on the Site	Site users	- Technical data : origin of the connection (access provider), IP address, type and version of the browser used.	Babilou Marketing Department	26 months
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2.5. Babilou undertakes to process Personal Data only for the purposes described above, to the exclusion of any other purpose. In particular, Babilou does not market or rent Personal Data to Third Parties.

3. Data Protection Officer

The Babilou Group has appointed a Data Protection Officer, Ms Marie-Victoire BARSİ, to carry out the tasks referred to in Article 39 of the GDPR. The Data Protection Officer can be contacted at the following address: dpo@babilou.com.

4. Technical and organisational measures

- 4.1. Babilou implements appropriate technical and organisational measures to ensure the protection of Personal Data and to provide the necessary guarantees for their Processing, in accordance with the requirements of the GDPR. In particular, Babilou takes all necessary precautions with regard to the nature of the Personal Data communicated to it and the risks presented by their Processing, in order to preserve their security and, in particular, to prevent them from being distorted, damaged or accessed by unauthorised Third Parties.
- 4.2. The technical and organisational measures taken by Babilou are regularly tested, analysed and evaluated in order to verify their effectiveness.

5. Third Party Requests

Babilou undertakes not to disclose Personal Data to Third Parties without the authorization of the Users, except in the event of an administrative or judicial request or injunction or pursuant to a legal or regulatory requirement.

6. Users' rights

- 6.1. In accordance with articles 15 to 21 of the GDPR, the User has the right:
- to obtain confirmation that Personal Data are or are not processed and, when they are, to access to said Personal Data,

- to rectify Personal Data that are inaccurate and to complete them in view of the purposes of the Processing,
- to obtain the deletion of Personal Data, in particular when:
 - o the Personal Data are no longer necessary for the purposes for which they were processed,
 - o the Personal Data have been unlawfully processed,
 - o Personal Data must be deleted to comply with a legal obligation,
- to limit the Processing of its Personal Data, in particular when their accuracy is contested or when the Processing is unlawful,
- the portability of its Personal Data, namely the right to receive the Personal Data, in a structured format, commonly used and readable by machine, in order to transmit them to another controller, provided that the relevant Processing of the Personal Data is carried out by means of automated (computer) processes.

6.2. In order to exercise any of his rights, the User must send a request to the Data Protection Officer:

- or by post addressed with acknowledgement of receipt to the following address: Babilou SAS, 60 avenue de l'Europe - 92270 Bois-Colombes and for the attention of the Data Protection Officer, Mrs Marie-Victoire BARSI.
- or by email, to the following address: dpo@babilou.com.

Babilou undertakes to acknowledge receipt of any request made in this respect by a User and to process it as soon as possible. It also undertakes to notify any recipient of the Personal Data to which it has been communicated with the consent of the Users of any rectification, deletion or limitation of the Processing, unless such communication proves impossible or requires disproportionate efforts.

6.3. In addition, Users have the right to file a complaint with a Control Authority, such as the CNIL in France.

7. **Confidentiality**

Babilou undertakes that each member of its staff authorised to Process Users' Personal Data shall be subject to strict obligations of confidentiality and protection of Personal Data, and in particular undertakes to :

- Process only the Personal Data strictly necessary for the purposes for which they are collected,
- that Personal Data are not processed for purposes other than those for which they were collected, except in the event of an administrative or judicial request or injunction or pursuant to a legal or regulatory requirement,
- take all measures in accordance with the uses and state of the art in order to avoid the misuse or fraudulent use of Personal Data and to preserve the physical and logical security of Personal Data;

- in the event of termination of his duties, return in full the data, computer files and any information medium relating to Personal Data,
- inform Babilou immediately and by any means whatsoever of any Personal Data Violation of which he becomes aware.

8. Subcontractors

The Babilou Group undertakes to use Subcontractors offering sufficient guarantees as to the implementation of appropriate technical and organisational measures so that the Processing of Personal Data meets the requirements laid down by the GDPR.

9. Transfer of Personal Data

Babilou does not transfer any Personal Data to a State that is not a member of the European Union or the European Economic Area.

10. Personal Data Violation

10.1. Babilou will inform each User concerned as soon as possible of any Violation of his Personal Data that may create a high risk to his rights and freedoms, in accordance with Articles 33 and 34 of the GDPR. This information includes a description of the likely consequences of the Violation, as well as the measures taken or planned by Babilou to remedy the Violation, including measures taken to mitigate any negative consequences.

10.2. However, the information referred to in the aforementioned Article 10.1 is not necessary if either of the following conditions is met:

- Babilou has implemented appropriate technical and organisational protection measures and these have been applied to the Personal Data affected by the said Violation,
- Babilou has taken further measures to ensure that the high risk to Users' rights and freedoms is no longer likely to materialise,
- It would require disproportionate effort.

10.3. Babilou shall notify the Control Authority as soon as possible and if possible within seventy-two (72) hours of becoming aware of any violation likely to create a high risk to Users' rights and freedoms.

11. General provisions

11.1. In the event of a conflict between this Privacy Policy and the general terms and conditions of use of a Babilou Group offer subsequently subscribed to by the

User, this Policy shall prevail, with regard to the Personal Data Processing described in Article 2.

11.2. If any provision of this Privacy Policy is found to be invalid or unenforceable, in whole or in part, under applicable laws and regulations, it will be excluded from this Policy without affecting the validity and enforceability of all other provisions.

11.3. The Privacy Policy may be modified by Babilou at any time, in particular due to technical or normative changes. If necessary, Babilou undertakes to communicate the new Privacy Policy to Users.

GLOSSARY

Affiliate:	Refers to any entity, French or foreign company controlling, controlled by or under the control of Babilou, as defined by Articles L. 233-1 and L. 233-3 of the French Commercial Code.
Control Authority :	Refers to an independent public authority established by a Member State pursuant to the GDPR; in France, the Supervisory Authority is the Commission Nationale de l'Informatique et des Libertés ("CNIL").
Babilou :	Refers to Babilou SAS, a simplified joint stock company with a share capital of €17,488,201.60, whose registered office is located at 60 avenue de l'Europe 92270 Bois-Colombes, registered in the Trade and Companies Register under number 795 245 729 RCS Nanterre, represented by its current Chairman CF Partners, itself represented by its Chairman Mr Rodolphe Carle.
Personal Data :	Refers to any information provided to the User on the Site that allows the User to be identified, processed by Babilou under the conditions defined by this Privacy Policy.
Babilou Group :	Refers to the Babilou Group, composed of Babilou and its Affiliates.
Applicable Regulations :	Refers to the GDPR and any applicable regulations of a Member State of the European Union regarding the protection of personal data, in particular French law n°78/17 of 6 January 1978, as amended (known as the "Loi Informatique et Libertés").
GDPR :	Refers to Regulation (EU) No 2016/679 of the European Parliament and of the Council of 27 April 2016 (the "General Data Protection Regulation").
Subcontractor :	Refers to any Third Party entity that processes Personal Data on behalf of Babilou and/or its Affiliates.
Edit :	Means any operation or set of operations performed or not performed using automated processes and applied to Personal Data, such as collection, recording, organization, storage, use, limitation, deletion or destruction.
Third parties :	Refers to any natural or legal person other than Babilou, its Affiliates and the User.

User(s) :	<hr/> <p>Refers to any natural person visiting the Site and providing Babilou via the Site with Personal Data concerning him/her.</p>
Violation of Personal Data:	<hr/> <p>Means a security breach resulting in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of or access to Personal Data.</p>