

Privacy Policy - External

The objective of this confidentiality policy is to inform France Télévisions Publicité's clients, suppliers and visitors of the manner in which their Personal Data will be processed in the absence of any contractual obligation to the contrary that may take precedence.

france•tvpublicité

Privacy Policy - External

Version	Author	Date	Action (creation/amendment)
Version 1	DPO Group	September 2020	Amendment

This confidentiality policy has been established for France Télévisions Publicité’s clients, suppliers and visitors.

Introduction

Our company, France Télévisions Publicité (hereafter “**We**” or “**Us**”), is an advertising sales network consisting of a number of Publishers, including France Télévisions, and whose business is to sell advertising space to Advertisers on the Media these Publishers use.

The objective of this confidentiality policy is to inform You - France Télévisions Publicité’s clients, suppliers and visitors - of the manner in which Your Personal Data are processed in the absence of any contractual obligation to the contrary that may take precedence (for example, Our General Terms and Conditions of Sale for our clients).

This confidentiality policy does not cover the processing of users’ personal data collected from the Media. For more information on this processing, You may access the specific Confidentiality Policy by clicking on this link: <https://www.francetvpub.fr/wp-content/uploads/2020/10/cvp-ftp-2021.pdf>.

This confidentiality policy covers in part the processing We perform on the images captured by the surveillance cameras on Our premises. For more information on this processing, You may access the specific Confidentiality Policy by contacting the DPO and/or Reception at Our premises.

We make every effort to update this confidentiality policy and complete it as needed. This confidentiality policy may therefore change over time.

1. Contact our Data Protection Officer

The contact information for Our Data Protection Officer is:

France Télévisions Publicité
The Ydès law firm - Data Protection Officer
delegueprotectiondonnees@francetvpub.fr

Feel free to contact this firm to ask any question this Confidentiality Policy may not address.

2. Definitions

For the purposes of this Confidentiality Policy, the terms “Data Controller”, “Data Processor”, “Processing”, “Data Subjects” and “personal data” (or “Personal Data”) have the same meaning as the meaning assigned to these terms in the Data Protection Regulations. We will also use the following definitions:

Advertiser	Means an individual or legal entity that wishes to place advertising on the Media to promote their products or services, if applicable through the
-------------------	--

Privacy Policy - External

	intermediary of agents (advertising agencies, for example). The Advertiser is the company that sponsors a campaign.
Intermediate Archiving/Archive	Means the migration of Personal Data, which still present an administrative interest to the Data Controller (for example, in the event of a dispute and/or a legal obligation), to a distinct database separated logically or physically and to which, in any event, access is restricted. This archive is an intermediate step before the Personal Data concerned is deleted or anonymized.
Specific Rights	Means the rights the Data Protection Regulations grant to Data Subjects regarding the processing of their Personal Data.
Publisher	Means the Publisher of a Medium who is a partner of France Télévisions Publicité.
France Télévisions Publicité, We, Us	Means the public limited company that has capital of €38,100, whose registered office is located at 64-70 Avenue Jean Baptiste Clément 92100 Boulogne Billancourt, and that is registered with the Companies and Trade Register of Nanterre under number 332 050 038.
Partners	Means the service providers - the processors - with whom We share Your Personal Data and who process said data in order to allow Us to achieve the objectives of the processing described in Article 7 of this Confidentiality Policy.
Confidentiality Policy	Means this document, which sets out Our privacy policy for Your Personal Data implemented by France Télévisions Publicité.
Data Protection Regulations	<p>Means, in particular:</p> <ul style="list-style-type: none"> • Directive 2002/58/EC concerning the processing of personal data and the protection of privacy in the electronic communications sector, amended by Directive 2009/136/EC of 25 November 2009, otherwise known as the “ePrivacy Directive”; • French Law No. 78-17 of 6 January 1978 relative to data protection and civil liberties, whose latest version is amended by French Law No. 2018-493 of 20 June 2018 relative to the protection of personal data, otherwise known as the “Data Protection Law”; • Resolution No. 2020-091 of 17 September 2020 adopting the guidelines relating to the application of Article 82 of the Law of 6 January 1978, as amended, to reading and writing operations in a user’s terminal (in particular, cookies and other trackers), otherwise known as the “Recommendation on cookies and other trackers”; • Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, otherwise known as the General Data Protection Regulation or the “GDPR”; • The recommendations of the CNIL and/or the Article 29 Data Protection Working Party (Art. 29 WP), which is now the European Data Protection Board (EDPB), in the form of notices, guidelines or decisions, which We attempt to apply based on their relevance.

Privacy Policy - External

Medium	Means any medium to distribute advertising space used to display the Advertisers' advertising, such as, without limitation, a Publisher's website, Your television before watching a France Télévisions program in replay, or a mobile app viewed from Your Terminal.
Terminal	Means, in accordance with Directive 2008/63/EC, the device (computer, tablet, smartphone, telephone, connected television, etc.) You use to view or see a Medium.
You (Your/Yours) or Data Subject	Means the individual whose Personal Data are processed and who may be, without limitation, an individual or a person who represents a legal entity who is a contact, provider, client, prospect, supplier, partner, journalist or participant in a Publisher's television game.

3. Personal Data collection source

We collect the Personal Data You communicate to Us spontaneously and/or that result from Our relations (e.g. in the framework of a commercial contract or prospecting, or a meeting in the context of our business activity, or the organization of events, or when You visit Our premises from the related videosurveillance recordings) and/or that are communicated to us by third parties (e.g. when a Database is purchased or more simply via recommendations) or Publishers (e.g. when You participate in a television game and We are responsible for the related prize).

4. What Personal Data are collected?

By definition, the Personal Data We collect and that relates to You may be diverse, notably if they are relevant:

Identity: Marital status; name or corporate name, first names; address (including the registered office and invoicing address); telephone number; fax number; email addresses; date of birth; internal processing code to identify the client; accounting ID code; SIREN number; twitter feed; contact photo; family, economic and financial status: whether married, number of people in the household, number and age of the child(ren) in the household; profession; business sector; socio-professional category; presence of pets;

Professional situation: Title, company, line managers, employees, former jobs;

Business relationship management: Documentation requests; requests for trial periods; services or packages purchased; services that are the subject of the order and invoice; quantity, amount, periodicity, date and amount of the order and invoice; invoice payment deadline; terms, and delivery and/or invoicing address; past services; origin of the sale (vendor, representative, partner, affiliate); the order; the invoices; correspondence with You and the after-sales department; Your comments and those of the individuals responsible for customer relations; open comments on You either internal or from third parties;

For solicitation purposes: Data required for customer loyalty programs, prospecting, studies, surveys, product and promotional tests, and any promotional activity;

Opinions: Data on Your comments related to Our business activity;

Privacy Policy - External

Payment methods: postal bank or bank account information, cheque number, bank card number, bank card expiry date, visual cryptogram;

Transaction: The data on the transaction, such as the transaction number, purchase details, advertising campaign and service purchased;

Invoices: Data on the payment of invoices: payment terms, discounts granted, receipts, balances and unpaid invoices;

Prizes: Data on the prizes You may win when You participate in a game (televised, via the internet, remote or otherwise) and for which We are in charge of delivering the prize/and or participate directly or indirectly in the organization thereof;

Data related to the physical and IT security of Our premises and Our business: i.e., notably, the videosurveillance images collected on our Premises, the data retrieved from Our wifi connection, the data set out in the reception form for visitors or the form on our websites, the computer data shared in digital interactions between You and Us (emails and/or electronic files and/or related data such as logs that You send to Us and/or that You and We share, including with Our employees).

We take data minimization principles into account. We therefore only collect and process your Personal Data that are strictly necessary for the purposes for which they are processed.

We do not collect sensitive Personal Data, within the meaning of the Data Protection Regulations, such as Personal Data that provide information on the racial or ethnic origin, political opinions, religious or philosophical beliefs, union membership, or that relate to the health, sex life or sexual orientation of the data subject, unless an exception is provided in the Data Protection Regulations and/or French law.

5. Legal grounds for the collection and Processing of Your Personal Data

In accordance with the Data Protection Regulations, the processing described in this Confidentiality Policy is based on a specific legal foundation.

5.1. You have consented to the processing of Your Personal Data for one or more specific objectives.

5.1.1. For example, We would like to invite You to an event We are organizing and want to know first whether You have allergies to food and/or whether there are foods You do not eat.

5.2. The processing is required for the enforcement of a contract to which You are a party or of precontractual measures taken at Your request.

5.2.1. For example, You contact Us to determine whether We are able to broadcast one of Your advertising campaigns on one of the Media for which we provide advertising sales services. As such, we will process some of Your Personal Data before any contract is signed.

Privacy Policy - External

5.2.2. Similarly, if We broadcast one of Your advertising campaigns on one of the Media for which we provide advertising sales services, We will share information with You, provide You with information on the broadcasting of this campaign, etc.

5.2.3. These Personal Data are therefore required to perform a certain number of processing tasks related to the enforcement of the contract between You and Us.

5.3. The processing is required to comply with a legal obligation incumbent on Us.

5.3.1. The processing of Personal Data may also be required to comply with a legal obligation incumbent on Us, for example, the retention of accounting and supporting documents for 10 years in accordance with Article L123-22 of the French Commercial Code, or the implementation of procedures to assess the situation of clients, leading suppliers and intermediaries in accordance with Article 17 of French Law No. 2016-1691 of 9 December 2016 on transparency, the fight against corruption, and the modernization of the economy.

5.4. The processing is required for the purposes of Our legitimate interests or those of a third party, unless Your interests and Your fundamental freedoms and rights take precedence.

5.4.1. We may have a legitimate interest that justifies the processing of Your Personal Data, such as, for example, the processing of Personal Data from our video surveillance system when you visit our premises or when We send You a certain amount of information as a journalist so that You can convey this information.

5.4.2. In this case, We ensure that this processing is in fact necessary to protect Our legitimate interests, and assess the consequences of this processing for the Data Subject, notably by taking the nature of the Data processed into account and the manner in which they are processed. For example, We have implemented a specific procedure to manage the processing of Personal Data related to our video surveillance system.

5.4.3. We ensure we do not disregard Your interests or Your fundamental rights and freedoms, and We allow you to object at any time to all or part of the processing described in this Confidentiality Policy and to exercise Your Specific Rights, as described in paragraph 9 - Specific Rights.

6. Personal Data retention period

Your Personal Data are retained for a period that is in line with the purposes for which they were collected. We have therefore organized our data retention policy as follows:

I- For Personal Data related to the management of clients and prospects:

The Personal Data related to clients are not retained beyond the period that is strictly required to manage the business relationship. However, the Data that may be used to prove a right or contract or that may be retained to comply with a legal obligation may be the subject of Intermediate Archiving for a period that does not exceed the period required to fulfil the purposes for which they are retained, in accordance with the laws in force.

Privacy Policy - External

The Data from clients used for commercial prospecting may be retained for three years after the business relationship ends.

The Personal Data related to a prospect who is not a client will be retained for a period of three years from the date We collect said data or the date of Your last contact.

At the end of these three-year periods, We may contact You again to ascertain whether You want to continue to receive commercial solicitations. In the absence of a positive, explicit answer from You, the Personal Data must be deleted or archived in accordance with the legal provisions in force, notably those provided by the French Commercial Code, Civil Code and Consumer Code.

II- For Personal Data related to the management of suppliers

The Personal Data used to enforce a contract will not be retained for longer than the term of said contract. However, the Data that may be used to prove a right or contract or that may be retained to comply with a legal obligation may be the subject of Intermediate Archiving for a period that does not exceed the period required to fulfil the purposes for which they are retained, in accordance with the laws in force.

III- For Personal Data related to the management of visitors

The Personal Data used in the framework of the video surveillance of the Data Controller's premises will not be retained for longer than fifteen (15) days.

The Personal Data used in the framework of having visitors attend the Data Controller's premises or in relation to the visitor's wifi connection will not be retained for longer than the period required to perform said processing.

However, the Data that may be used to prove a right or contract or that may be retained to comply with a legal obligation may be the subject of Intermediate Archiving for a period that does not exceed the period required to fulfil the purposes for which they are retained, in accordance with the laws in force.

IV- For Personal Data related to the prizes when You participate in a game (televised, via the internet, remote or otherwise) for which We are in charge of delivering the prize/and or participate directly or indirectly in the organization thereof

The Personal Data used in the framework of this processing will not be retained for longer than the period of said processing. However, the Data that may be used to prove a right or contract or that may be retained to comply with a legal obligation may be the subject of Intermediate Archiving for a period that does not exceed the period required to fulfil the purposes for which they are retained, in accordance with the laws in force.

7. Processing purposes

The Data must be collected for specific, explicit and legitimate purposes.

The purposes for the Processing identified to date are:

I- To perform activities related to the management of clients and suppliers regarding:

Privacy Policy - External

- Contracts;
 - Insertion orders;
 - Invoices;
 - Accounting, in particular the management of client accounts;
 - Monitoring client relations, such as the conduct of satisfaction surveys and the management of claims;
 - Management of the ADspace account and transactions conducted on the ADspace purchasing platform:
 - Supplier selection, notably for calls for tenders;
 - Selection of clients, to perform studies, surveys and product tests;
 - Selection of clients, to organize events, and send invitations and gifts;
 - Electronic signing of contracts;
- II- To conduct prospecting activities:
- Management of technical prospecting activities (notably including technical operations such as normalization, enrichment and deduplication);
 - Selection of individuals to perform customer loyalty, prospecting, study, survey, product test and promotional activities;
 - Soliciting;
 - Preparation of commercial statistics;
 - Organization of games/contests, lotteries or any promotional operation, but excluding online gambling, which is subject to the approval of the French regulatory authority for online games (*Autorité de régulation des jeux en ligne*);
 - Management of unpaid invoices and disputes as long as it does not relate to violations and/or does not result in a person being deprived of a right, service or contract;
 - Management of the opinions of individuals regarding the services or content;
- III- To perform operations related to the physical safety of Our Premises and the IT security of Our servers
- Filtering;
 - Automated controls;
 - Retention for test and analytical purposes;
 - Analysis and correlation;
 - Restrictions;
 - Video surveillance;
- IV- To perform operations related to the provision of prizes when You participate in a game (televised, via the internet, remote or otherwise) for which we are in charge of delivering the prize/and or participate directly or indirectly in the organization thereof
- Verification;
 - Organization;
 - Delivery;
 - Post-delivery service;
- V- To carry out activities of use for Our business activity:
- Processing of opinions and comments;
 - Processing of expense reports;
 - Communications on Our business activity;

Privacy Policy - External

- Invitations to events;

VI- To carry out activities that are essential for compliance with our legal obligations:

- The "Sapin Law";
- Tax and accounting obligations;
- The exercise of Specific Rights;
- Etc.

8. Storage of Your Personal Data and Transfer of Your Personal Data, where applicable, to Partners

8.1. Storage location for Your Personal Data

Every precaution has been taken to store Your Personal Data in a secure environment and to prevent said Personal Data from being distorted, damaged or accessed by unauthorized third parties.

8.2. Personal Data transfers

We ensure that only the respective authorized persons have access to Your Personal Data:

- Our personnel, authorized in accordance with their department (marketing department, sales department, departments responsible for customer relations and prospecting, administrative departments, logistics and IT departments, as well as their managers);
- The authorized personnel of departments responsible for audits (statutory auditors, departments responsible for internal audit procedures, etc.);
- France Télévisions (a public limited company with capital of €347,540,000, Companies and Trade Register of Paris No. 432766947, whose registered office is located at 7, Esplanade Henri de France 75015 PARIS), as the parent company;
- Our Partners;
- The agencies, judicial and ministerial officers, as part of their duty to collect receivables.

Some Personal Data may be transferred to states located outside of the European Economic Area. Each of these transfers is the subject of appropriate guarantees in accordance with the Data Protection Regulations in order to ensure they are lawful.

9. Your Rights

In accordance with the Data Protection Regulations, You have a right of access, a right to rectification, a right to erasure, a right to restrict processing, a right to data portability, a right to object and a right to define the outcome of Your Personal Data after you die.

9.1. Right of access

You have a right to obtain confirmation from Us that Your Personal Data have or have not been processed, and when they have been processed, access to said Personal Data and to the following information:

Privacy Policy - External

- Purposes of the Processing;
- Categories of Personal Data;
- Recipients or categories of recipients to whom the Personal Data have been or will be communicated;
- Whenever possible, the planned retention period for the Personal Data or, when this is not possible, the criteria used to determine said period;
- Your right to ask Us to rectify or erase the Personal Data, or limit the Processing of Your Personal Data, and the right to object to said Processing;
- The right to file a claim with the CNIL;
- Any information available regarding the source of the collection of Your Personal Data;
- The existence of automated decision-making, including profiling, and, at least in these cases, useful information on the underlying logic, as well as the planned scope and consequences for You of said processing.

When the Personal Data are transferred to a third country or an international organization, You have a right to be informed of the appropriate guarantees regarding said transfer.

Upon Your request, We will provide You with a copy of the Personal Data that are the subject of processing.

We may require the payment of reasonable expenses based on the administrative costs of any additional copy requested.

When You send Your request electronically, the information is usually provided in a common electronic format.

The right to obtain a copy of Your Personal Data may not prejudice the rights and freedoms of others.

9.2. Right to rectification

You may ask Us to rectify inaccurate Personal Data on You as soon as possible. You may also ask for incomplete Personal Data to be completed, including by providing an additional declaration.

9.3. Right to erasure

You may ask Us to erase Your Personal Data as soon as possible on one of the following grounds:

- The Personal Data are no longer required for the purposes for which We collected or processed in another manner said data;
- You withdraw Your consent to the processing of Your Personal Data, and there are no other legal grounds for the processing;
- Your exercise Your right to object under the conditions set out below, and no overriding legitimate reason for the processing exists;
- The Personal Data were processed unlawfully;
- The Personal Data must be erased to comply with a legal obligation;

Privacy Policy - External

- The Personal Data were collected from a child.

9.4. Right to restrict processing

You may ask Us to restrict the processing of Your Personal Data on one of the following grounds:

- We verify the accuracy of the Personal Data when You contest their accuracy;
- The processing is unlawful and You object to the erasure of the Personal Data and require the use thereof be limited;
- We no longer need the Personal Data for the purposes of the processing, but You still require them to uphold, exercise or defend your rights in court;
- You object to the processing under the conditions set out below, and We ascertain whether the legitimate purposes sought take precedence over the reasons You put forth.

9.5. Right to data portability

You may receive Personal Data on You from Us in a structured format that is commonly used and is machine-readable when:

- The Processing of the Data is based on consent or a contract, and
- The Processing is performed using automated processes.

When You exercise Your right to data portability, You have the right to have the Personal Data transferred directly to a data controller that you will appoint when technically possible.

The right to data portability may not prejudice the rights and freedoms of others.

9.6. Right to object

As stated in the preamble to this Confidentiality Policy, You have the right to object at any time to the processing of Your Personal Data for prospecting purposes, including profiling when said profiling relates to said prospecting.

If you want to object to the processing of Your Personal Data, You may exercise Your right to object in accordance with the terms of paragraph 10 below.

9.7. Post-mortem instructions

You may provide Us with instructions on the retention, erasure and communication of Your Personal Data after you die, which instructions may also be filed with "*a trustworthy certified digital third party*". These instructions - a type of "*digital will*" - may appoint a person in charge of the enforcement thereof, failing which Your heirs will be appointed.

In any event, You may inform Us at any time that, in the event of your death, You do not want Your Personal Data to be communicated to a third party.

10. Exercising Your Rights

To exercise Your Specific Rights and/or, if applicable, have this Confidentiality Policy read to you orally, You may send Your request by email or postal mail to our Data Protection Officer, whose contact information is as follows:

France Télévisions Publicité
The Ydès law firm - Data Protection Officer
64 Avenue Jean Baptiste Clément 92100 Boulogne Billancourt
delegueprotectiondonnees@francetvpub.fr

An answer will be sent to You within a maximum period of one (1) month following the date of receipt of Your request.

If needed, this period may be extended by two (2) months based on the complexity and/or number of requests, in which case we will inform You.

For requests to delete Your Personal Data and/or to exercise Your right to ask for the erasure of Your Personal Data, We may, whoever, retain them in an Intermediate Archive, within the meaning of the CNIL's Resolution No. 2005-213 of 11 October 2005, for the period required to fulfil Our legal, accounting, tax and evidentiary obligations.

You may file a claim at any time with the competent oversight authority (in France, the CNIL: www.cnil.fr)