

# Privacy Policy

#### Date of last update: 24/05/2024

This privacy policy sets out and informs you of how the Société d'Economie Mixte pour les Evènements Cannois (ciaprès la *"SEMEC"*) uses and protects the personal data you send us, where applicable, when using this website.

The terms and notions used throughout this privacy policy (hereinafter the "Policy") corresponds to those used throughout the General Data Protection Regulation 2016/679 of 27 April 2016 (hereinafter the "GDPR").

This Policy is subject to changes and modifications at any time by the SEMEC, notably to ensure compliance with any change in legislation, regulations, case law or technology. In such instances, the date of last update will be clearly visible at the top of the document. The Policy should, consequently, be regularly consulted to be aware of any such modifications and amendments.

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#### 1. Name of data controller

The data controller is the Société d'Economie Mixte pour les Evènements Cannois - Incorporated on the CANNES Trade and Companies Register under number 383 150 232, having its head office at: La Croisette CS 30051 - 06414 Cannes Cedex.

The SEMEC contract details are as follows:

<u>Telephone</u>: +33 (0)4 92 99 84 00

Email: rgpd@palaisdesfestivals.com

#### 2. Data Protection Officer (DPO)

Our data protection officer is Maître Julia PIRINOLI, a lawyer registered on the Grasse Bar Association.

Contact details: rgpd@palaisdesfestivals.com

#### 3. Purposes of processing

We only use your personal data for the following purposes:

- To provide information, services or others which you have requested (via the contact form, etc.)
- To collect information to help improve SEMEC websites, services and products (notably via cookies, etc.)

All processing activities undertaken and their respective purposes of processing are clearly outlined and can be consulted in the personal data processing table, available under <u>Appendix 1</u>.

#### 4. Legal basis of processing

Your personal data is only collected under those instances stipulated by regulations in force, namely the existence of a legitimate interest for use of your personal data and your respective consent for use.

In order to fulfil a legitimate interest, the data collected is only aimed at improving and guaranteeing access to our website, services and products. In all instances, we strive to ensure a permanent balance between our legitimate interests to undertake necessary and proportional processing, and your best interests and fundamental rights and freedoms.

These legal basis are separate and specific to the processing activity concerned and consequently all processing activities and their respective legal basis are clearly outlined and can be consulted in the personal data processing table, available under <u>Appendix 1</u>.

We hereby guarantee that only that data strictly necessary for those purposes defined under <u>article 3</u> is collected, meaning that failing any response by you when requested, the services and information requested may be affected.

#### 5. Category of personal data processed

Depending on the purpose of processing, the services and products requested, we may be led to process different categories of personal data:

- Identification details (surname, given name(s));
- Contact details (email address, telephone number);
- Website browsing details (cookies).

The personal data processed is separate and specific to the processing activity concerned and consequently all processing activities are clearly outlined and can be consulted in the personal data processing table, available under <u>Appendix 1</u>.

#### 6. Personal data recipients

We are the only recipients of your personal data. This personal data, whether in individual or aggregated format, is never sent to any third-parties, notwithstanding those sub-processors whose services we use for the proper performance of processing activities outlined under article 3. Under such circumstances, we guarantee and ensure full respect of regulations in force by these sub-processors.

Neither us nor our sub-processors sell your personal data.

#### 7. Term of storage of personal data

We only store your personal data for as long as is strictly required for the purpose of collection as defined under <u>article</u> <u>3</u>.

The terms of storage are separate and specific to the data concerned, and all processing activities undertaken and their respective terms of storage are clearly outlined and can be consulted in the personal data processing table, available under <u>Appendix 1</u>.

#### 8. Data protection

We both implement and guarantee appropriate technical and organisational measures in accordance with legislative provisions in force, to protect your personal data against alteration, accidental loss or illegal use, unauthorised use, disclosure and access. These measures consist of the following, without this list being exhaustive:

- The nomination of a data protection officer;
- Raising awareness of all employees to confidentiality and privacy requirements;
- Ensuring secure access to our premises and IT platforms;
- The implementation of a general company IT security policy;
- Secure data access, sharing and transfer;
- Implementation of a high degree of data protection requirements when selecting our sub-processors and partners.

### 9. Rights regarding personal data

### 9.1. Rights of data subjects

You have the following rights concerning your personal data:

- <u>**Right of access**</u>: To receive confirmation of the processing of personal data and a certain amount of information regarding processing activities, with it being understood that this information is in all instances provided in this document.
- **<u>Right of rectification</u>**: To request rectification of personal data when inaccurate or incomplete.
- <u>**Right of deletion**</u>: also referred to as the "right to be forgotten": to request deletion of personal data when no longer necessary for the purposes for which it was originally collected or the data subject objects to processing of his/her personal data.
- <u>Right to limited processing</u>: To request limited processing of personal data where the data subject challenges the accuracy of data, where the term of personal data storage has expired but the data subject still requires this personal data to be stored to observe, exercise or defend a right in court, or if the data subject as objected to processing.
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- <u>**Right of portability:**</u> To receive communication of personal data which the data subject has sent in a legible format, or to request that the SEMEC send all personal data which the data subject sent to another data controller.
- **<u>Right of refusal:</u>** To refuse, at any time whatsoever, on grounds related to one's personal circumstances, to the processing of personal data, and notably in such instance as this refusal concerns commercial canvassing, including profiling.
- <u>Withdrawal of consent</u>: To withdraw consent to future processing of personal data by the SEMEC, where processing is based on prior consent.

#### 9.2. How to claim your rights

To claim your rights, please send an email indicating your request to the following address: <a href="mailto:rgpd@palaisdesfestivals.com">rgpd@palaisdesfestivals.com</a>.

In accordance with article 12 of the GDPR and due to the obligation of security and privacy incumbent upon us in processing personal data, your request will be processed subject that you send us proof of ID, notably a front and reverse scan of a valid form of ID. This proof of ID will be immediately destroyed after processing of your request.

In all instances, an email will be sent to you to confirm receipt of your request. This will be processed within a maximum of one month.

Furthermore, at any time you can unsubscribe from our emails via the options available within our messages.

#### 10. Claims with the Data Protection Authority (CNIL)

If, despite our best efforts to protect the privacy and confidentiality of your personal data, you believe that your rights have not been respected, you can file a claim with the National Data Protection Authority (CNIL). You can send a claim electronically using the following link: <u>https://www.cnil.fr/fr/plaintes/internet</u> or by writing to: Commission Nationale de l'Informatique et des Libertés (CNIL), 3 Place de Fontenoy – TSA 80715 – 75334 PARIS CEDEX 07.

#### 11. Cookies

The SEMEC uses cookies for proper operation of this website and to supervise and analyse website traffic. A "cookie" is a small data file sent to the data subject's web browser by an online server and stored on the computer's hard disc or other electronic device. They do not cause any damage to said device.

The information collected by cookies is solely and exclusively used by the SEMEC in respect of Data Protection Legislation. Cookies from third-party editors (Google, Facebook, Twitter) allow these editors to access information collected by their cookies, in accordance with the terms and conditions outlined in the below table.

The data subject is free to agree to use of cookies in whole or in part (other than those cookies strictly necessary for website operation) used by the SEMEC. The data subject to choose the categories of cookies which s/he accepts from the first time s/he visits the website. Data subjects are also free to withdraw their consent to use of cookies at any time, by clicking the <u>following link</u>.

Data subjects can configure their web browser to accept or deactivate cookies.

Instructions regarding cookies settings on the most frequently used web browsers are available at the following links:

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

#### 12. Hypertext links

This website may contain hypertext links to third-party websites. The SEMEC does not have any control over the content of third-party websites listed by hypertext links. These websites are edited by third-party entities with no relation to the SEMEC. Consequently, the SEMEC waives all liability as to the content, advertisements, services or other information or data available on or using these websites. As a result, the data subject acknowledges to be responsible for accessing and using any such websites. The SEMEC waives liability for any damages or losses, whether confirmed or alleged, following or in relation to use or having trusted content, goods or services available on any such websites.

Data subjects are not permitted to create any hypertext links towards this website. The insertion of any hypertext links towards this website is only possible with the prior written consent of the SEMEC.

## Appendix 1 - List of processing activities

The below table summarises all processing activities regarding personal data which we undertake, the data collected accordingly, the term of storage, and the legal basis on which the processing activities are undertaken.

The terms of storage indicated under this appendix may be affected in the event of any dispute or if you have exercised those rights listed under <u>article 9.1 of this Policy</u>.

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Processing activities	Data collected	Legal basis	Purposes	Term of storage
Contact request	Surname, given name(s), email address	Legitimate interest	Responding to requests sent to our employees	6 months following the date of contact
Cookies	Website browsing details	Consent	Operation and optimisation of services Visitor statistics. Personalisation of content and ads	13 months