Tree structure [here](https://drive.google.com/file/d/1oaol-58-PYltp0CcqzYJLDgqlyZMQ71I/view?usp=sharing)

Draft/[formatting](https://www.prismamedia.com/espace-confidentialite/?preview_id=12925&preview_nonce=613f73c25b&_thumbnail_id=-1&preview=true)

**INTRODUCTION: WELCOME TO YOUR PERSONAL DATA PROTECTION PAGE**

The PRISMA MEDIA group is a news and content publisher, offering diverse products and services on various paper and digital magazine formats (known hereafter as **Media).** The Group also sells advertisement space visible on the different Media.

Note that the Digital Media may include applications, newsletters, websites, and/or any other digital media edited by PRISMA MEDIA.

For more information on our products and services, users can refer to the general terms and conditions of use [here]. When available, users may also refer to the General Terms and Conditions of Sale applicable to their subscribed services.

Within the framework of their activities, PRISMA MEDIA processes personal data defined by the current regulation, notably for its clients, subscribers, and users - natural legal persons who are consumers or professionals.

PRISMA MEDIA applies the current legal requirements in relation to personal data usage, notably:

* (Text in French)[the General Data Protection Regulation, no. 2016/679 of 27 April 2016, the amended “Information Technology and Civil Liberties” law no 78-17 of 6 January 1978,](file:///C:\Users\mzann\Documents\PrismaMedia\Prisma%20Media%20_%20FR-EN(UK)\en-GB\en-GB\(Text%20in%20French)%20https:\www.cnil.fr\fr\reglement-europeen-protection-donnees)
* The law “to instil confidence in the digital economy” (text in French) no. 2004-575 of 21 June 2004 ([article L. 34-5 of the Post and Electronic Communications Code](https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000042155961/))

The Group has also implemented ways to ensure continuous improvement regarding the compliance of their activities in view of the current legal requirements.

**TAB 1. MAIN POINTS: TRANSPARENCY, LEGAL RIGHTS, SECURITY, LISTENING TO YOUR NEEDS**

**1.1 TRANSPARENCY**

**Transparency through people's information within a unique and adaptive space**

This personal data protection site aims to:

* Share the main points created by PRISMA MEDIA group regarding personal data protection;
* Describe in detail the Prisma Media Connect (PMC) universes and Prismashop;
* Define the collection methods related to cookies and other trackers, as well as personal data usage relating to targeted advertisements;
* Expose the relationships that PRISMA MEDIA has with its partners and contractors;
* Explain the methods for opposing, deleting and withdrawing consent put in place by the PRISMA MEDIA group;

The contents of this site will be able to be modified at any time by the PRISMA MEDIA Group in order to take into account any changes in the current regulations, contracts, jurisprudence, services, editions or techniques. We recommend that you check the site regularly to stay up to date.

**Transparency through identifying those responsible for data processing**

PRISMA MEDIA group includes the PRISMA MEDIA company, as well as all of the existing and future subsidiaries in accordance with article L 233-1 of the French Commercial Code. Today, it includes the following legal entities:

* ***PRISMA MEDIA***, a Simplified Joint Stock company with a capital of €3,000,000 listed with the Commercial Trade Register of Nanterre under the number 318 826 187, with headquarters at 13 rue Henri Barbusse, 92230 Gennevilliers;
* ***CERISE MEDIA***, a Simplified Joint Stock Company with a capital of €39,361, listed with the Commercial Trade Register (RCS) of Nanterre under the number 507 388 155, with headquarters at 13 rue Henri Barbusse, 92230 Gennevilliers;
* ***UPLOAD PRODUCTIONS***, Simplified Joint Stock Company with a capital of €100,000, listed with the Commercial Trade Register (RCS) of Nanterre under the number 828 034 116, with headquarters at 13 Henri Barbusse, 92230 Gennevilliers
* ***EDITIONS PRESSE MAGAZINE 2000***, a Simplified Joint Stock Company with a capital of €217,500 listed with the Commercial Trade Register (RCS) of Nanterre under the number 302 518 659 with headquarters at 13 rue Henri Barbusse, 92230 Gennevilliers

**=> Within the framework of this site, whoever is responsible for processing the data will be named by the PRISMA MEDIA group, which comprises all the companies mentioned above.**

**Transparency through identifying processed data**

PRISMA MEDIA only processes data which is adequate, relevant, and limited to what is necessary in regards to the purposes for which they are being used.

*Data that is directly collected from internet users:*

Declarative data: this is information that is directly collected by PRISMA MEDIA when the internet user/client creates their personal account profile, when they use a service or a paid or free service provided by PRISMA MEDIA and/or when the user consents to having their data used for advertisement campaigns in line with the article L34-5 of the Postal and Telecommunications Code, within the framework of the current regulations.

Browsing and geolocation data: PRISMA MEDIA can collect (i) browsing data from internet users through cookies, tags and any other appropriate technical methods installed on the websites, and (ii) geolocation data from mobile applications in accordance with the current regulations and notably the methods for obtaining consent outlined by the CNIL(*Commission nationale de l’informatique et des libértes*), the French Information Commissioner’s Office in its recommendations.

Interactive Data: PRISMA MEDIA can collect from interactions with the user such as page openings and clicking on newsletter links or surveying activity linked to certain services. This information allows the company to adapt how they interact with the user and to understand what they might expect.

*Data collected indirectly through third parties:*

PRISMA MEDIA has agreements with third parties - partners which are listed under **TAB *5 “PARTNERS AND THIRD-PARTY RELATIONSHIPS”***, or the [subsidiaries of the Vivendi group](https://www.vivendi.com/wp-content/uploads/2022/11/Vivendi-Organigramme-simplifie-au-30-septembre-2022-version-accessible.pdf) to which the PRISMA MEDIA group belongs. These agreements may include acquiring new internet users, enrichment of existing profiles and/or establishing correspondences between the collected data through diverse sources to make up consolidated profiles and/or to create advertising segments.

*Predictive data:*

Predictive data comes from statistical analyses on the data described below and only for strictly accepted purposes. They allow for correcting and/or enriching internet users’ profiles through extrapolation.

**Transparency through a lawful basis of processing**

The main lawful basis used by the PRISMA MEDIA Group to process data within the framework of their activity, in accordance with the current regulation in the articles 6 to 9 of the GDPR are as follows:

***Consent:*** Consent is the express agreement of the person in question regarding the processing of their data. For it to be valid, the law demands it be free, clear, specific, and unequivocal. The methods for obtaining and preserving this consent are essential to data collection compliance. The internet user/client may at any time remove their consent.

***The existence of a legitimate interest***: The PRISMA MEDIA Group can base its data collection on a legitimate interest in processing its internet users’ and clients’ personal data. The legitimate interest in PRISMA MEDIA is linked to its business as a news and content publisher advertisement manager.

PRISMA MEDIA Group’s activities, historically based on the publication and sale of paper magazines and the marketing of associated advertising space, have been profoundly transformed by the internet and social media. Digitising publications and creating advertising space must obey a twofold requirement of digitally transforming the company’s activities and transferring/diversifying turnover. Digitisation revealed very different uses and expectations for publishers and users that are associated with the increased collection and processing of personal data.

Processing data based on a legitimate interest from the company responsible requires close attention to detail and a very rigorous methodology. The company must exercise a careful balance between its own interest as a private company and “the interests or fundamental freedoms and rights of users” and must also integrate “reasonable expectations” of these persons.

***Contractual execution:*** The commercial relationship based on a contract often implies processing personal data stemming from the creation the contract, for example sending a magazine through the mail to a subscriber. Using the services accessible on the PRISMA MEDIA Group websites is done according to the general terms and conditions of sale, and collecting data at this stage is considered to be in accordance with the contract linking the PRISMA MEDIA Group to the User.

***Legal obligation:*** Certain legal obligations may imply personal data processing.

**Transparency through the indication of pursued end goals**

The PRISMA MEDIA Group indicates within the framework of the internet users’ data collection the goals they are pursuing when processing this data, meaning their objectives, so that the user can understand the legitimacy of this data processing.

These objectives are related to the PRISMA MEDIA Group’s activities, the publishing of its publications and press services as well as advertising sales. For example, managing a paper magazine subscription (end goal) requires collecting the contact details of the subscriber, such as their name, surname address, etc.

The PRISMA MEDIA Group clarifies its end goals for its data processing when data is collected, or at another time when additional data collection is required.

**1.2 EXERCISING RIGHTS**

PRISMA MEDIA has assigned a data protection officer in charge of receiving and processing requests from users/customers/subscribers (Data Subjects) for the right to information, access, rectification, objection, erasure, limitation and portability.

Under the current regulations, Data Subjects may enjoy the following rights regarding the processing of their personal data:

* the right to access all of their personal data that the PRISMA MEDIA Group processes;
* the right to rectify inaccurate, incomplete, ambiguous or outdated data;
* the right to delete all of their personal data that the PRISMA MEDIA Group has processed, except data that is deemed necessary to defend the interests of the PRISMA MEDIA Group in court, or that must be conserved in accordance with legal obligations;
* the right to object to the processing of their personal data and to withdraw consent to receive information from PRISMA MEDIA Group or their partners;
* the right to portability to retrieve Data supplied or to transfer them to another service provider;
* the right to define directives regarding to what happens to their personal data after death;
* the right to lodge a complaint with the French Information Commissioner’s Office (CNIL).

**All of the methods for exercising rights (objection, deletion, consent withdrawal, etc.) are available under TAB 6 “*ERASURE, OBJECTION, CONSENT WITHDRAWL*” for easy and direct access for internet users.**

**1.3 DATA SECURITY**

PRIMSA MEDIA has implemented technical and organisational methods to protect Personal Data against accidental loss, destruction, deterioration, abuse, damages and illegal or unauthorised access.

As Personal Data is confidential, the PRISMA MEDIA Group limits their access to only the company’s employees or service providers who need access in order to process the data.

Any person with access to personal data must strictly adhere to the confidentiality policy and will face disciplinary action or sanctions if they do not respect these obligations.

When we must rely on subcontractors, service providers or when we transfer the personal data to partners, this type of communication falls under a specific contract to ensure the protection of this data.

In general, the PRISMA MEDIA Group respects all of its obligations regarding the security of personal data as stipulated by the CNIL and the French National Agency for Information Systems Security (*Agence Nationale de la sécurité des systemes d’information -* ANSSI).

**1.4 LISTENING TO USERS’ NEEDS**

The PRISMA MEDIA Group collects and processes users’ personal data to:

(i) adapt its products and services to the interests, needs, or uses of its users;

(ii) personalise and monetise its stock within the framework of advertisement campaigns on its Media based on users’ profiles and to measure the impact of these advertisement campaigns.

The PRISMA MEDIA Group has implemented a *client and user loyalty policy* to communicate with them while respecting the current regulations to improve their services and to adapt to the needs of their clients. The PRISMA MEDIA Group limits the number and frequency of emails, and reminds users of their ability to object to these emails. Sales canvassing is justified on a lawful basis of legitimate interest because it concerns persons who are already clients (or who were at one point) of the PRISMA MEDIA Group. This canvassing also only concerns similar products or services to those already provided by PRISMA MEDIA.

**TAB 2: THE PRISMA MEDIA CONNECT UNIVERSE**

Prisma Media Connect (PMC) is the unique user account offered by the PRISMA MEDIA Group to access digital services offered by their Digital Media. You can consult the description of the Prisma Media Connect account (in French) [here](https://www.prismaconnect.fr/presentation/).

**2.1 The PMC Universe**

On principle, access to a service offered by the Prisma Media Group on their Digital Media is subject to the creation of a PMC account.

As such, the PMC account was designed to help users subscribe to services linked to Prisma Media's Digital Media, to create a direct link between the reader and the editorial offices and to guide their services and data.

**2.2 End Goals and Lawful bases**

The table below presents a synthesis of the lawful bases for processing according to the end goal:

|  |  |  |
| --- | --- | --- |
| **No.** | **END GOAL** | **LAWFUL BASIS FOR PROCESSING** |
| **1** | PRISMA MEDIA CONNECT account creation and management (including automatic connection authentication) | Necessary data processing when **performing a contract** *(Article 6, §1, b of the GDPR)* |
| **2** | Subscription and management of Services associated with the PRISMA MEDIA CONNECT User Account (push notifications, paid digital subscriptions, Media Pass, etc.) | Necessary data processing when **performance a contract** *(Article 6, §1, b of the GDPR)* |
| **3** | Improving Services, user experience and loyalty operations (sales canvassing through electronic channels, for goods and services similar to those already purchased/subscribed to from the controller) and sales canvassing through postal services or automated calling systems leading to human interaction and telephone calls by the PRISMA MEDIA Group and/or their partners. | Necessary data processing for the purposes of the **legitimate interests** pursued by the controller (Article 6, §1, f of the GDPR) |
| **4** | Sales canvassing through electronic channels for goods or services that have not yet been purchased by the those targeted by the PRISMA MEDIA Group and/or their partners. | **Consent** of the data subject (Article 6, §1, a of the GDPR) |
| **5** | Targeted advertisement via the user profile on the Media | **Consent** of the data subject (Article 6, §1, a of the GDPR) |
| **6** | PRISMA MEDIA CONNECT security and system maintenance | Necessary data processing for the purposes of the **legitimate interests** pursued by the controller (Article 6, §1, f of the GDPR) |
| **7** | Management of outstanding payments, pre-litigation and litigation with clients | Necessary data processing for the purposes of the **legitimate interests** pursued by the controller (Article 6, §1, f of the GDPR) |

Insofar as the end goals 3. “improving User experience and Services”, and 6. “Ensuring PRISMA MEDIA CONNECT security and system maintenance” are based on the lawful basis of the **legitimate interest pursued by the PRISMA MEDIA Group**, these have been subjected to a specific study to balance PRISMA MEDIA Group's and internet users’ interests.

|  |  |  |
| --- | --- | --- |
| **PRISMA MEDIA’S INTERESTS** | **LEGITIMACY OF THE INTEREST** | **CONSEQUENCES FOR PERSONS** |
| **END GOAL 3: Improving services and users experience on PMC, loyalty and sales canvassing operations through the post or automated calls leading to human interaction and phone calls** | | |
| Getting to know clients by:  - obtaining their feedback to improve users’ experience by adapting to their needs, mainly through developing new functionalities;  - carrying out loyalty operations by sending pertinent emails to propose to users PRISMA MEDIA products and services that correspond to their interests;  - carrying out sales canvassing campaigns by sending physical mail and/or telephone calls by the PRISMA MEDIA Group or its partners. | Data is processed in compliance with the CNIL’s commercial management reference framework | **Improving PMC’s services and user experience:** When creating a PMC account, data processing which aims to improve its services and user experience constitutes a reasonable expectation for Clients. In order to strengthen these reasonable expectations, the PRISMA MEDIA group informs its users of its data processing in the information notices and in these Policy Guidelines.  In view of the above, the legitimate interest of the PRISMA MEDIA group to improve its services and user experience does not infringe on the fundamental rights and freedoms of the users.  **Sales canvassing for similar products and services by PRISMA MEDIA:** The data subjects who have subscribed or purchased products can reasonably expect that their data will be processed by the PRISMA MEDIA Group in order to send them sales solicitations for any similar product or service according to the provisions described in **TAB 1 paragraph 1.4.** This data processing should not surprise clients in the methods in which it is carried out or in the consequences of the processing insofar as these operations can be reasonably expected.  **Sales canvassing operations through the postal service and/or telephone calls by the PRISMA MEDIA Group or their partners:** The list of partners who have access to data files is accessible on **TAB 5 paragraph 5.3.** Canvassing by post or telephone is possible provided that the persons have been informed, at the time of collection, of the use of their data for canvassing purposes and are able to object to this use in a simple and free manner.  Provided that:  - Any person has the ability to object at any time to the processing in a simple manner using a clickable link in the email and are thus in control of their data and can exercise their rights.  - No sensitive data which is defined in the current regulation is collected or used for processing to improve services and user experience. |
| **END GOAL 6: PRISMA MEDIA CONNECT Safety and Maintenance** | | |
| Performing corrective and evolutionary maintenance to ensure PMC’s security | Ensuring the security of PMC’s systems and of the information contained with them. As such, the PRISMA MEDIA Group does not authorise access to data during maintenance operations, unless it is necessary to resolve anomalies. It is specified that this potential access will only be incidental, and no other operations will be carried out on the data during this maintenance procedure. | This processing does not qualify as intrusive in the individual sphere of users, and it is meant to reinforce the security of their data. |
| **END GOAL 7: Management of outstanding payments, pre-litigations, and litigations with clients** | | |
| Establishing the proof of a right or a contract, for example in case of a pre-litigation or litigation with clients. | Interest is compliant with the current legislation => determined in a clear, precise and real manner. | Only data that is necessary to manage outstanding payments will be processed (data linked to sales relations). Processing operations aiming to manage outstanding payments and litigations constitute reasonable expectations for clients. The present Guidelines informs Users of the potential processing of their Data for this end goal.  The CNIL’s reference document regarding sales management indicates that managing pre-litigations and litigations are based on a legitimate interest for the organisation.  Therefore, it appears that the legitimate interest of PRISMA MEDIA to manage its unpaid invoices and potential disputes with its customers **does not infringe on the fundamental rights and freedoms of its customers.** |

**2.3 Data collected and associated retention periods**

**It is specified that only the e-mail address of the Users is necessary for the creation of the PMC Account.** All other data on the form is optional.

By way of derogation, the subscription to certain services may entail, in compliance with the principle of minimisation, the collection of some necessary data regarding this service. Where applicable, this data will be processed in the performance of a contract or on the basis of your consent.

The PRISMA MEDIA Group saves all Personal Data for the duration required to carry out this end goal.

=> PLEASE NOTE: All of the data processed by the PRISMA MEDIA Group (apart from browsing/geolocation and predictive data) and belonging to a physical person is available in the user’s profile: this is the PMC user profile data.

The table below presents the categories of processed data, the relevant data regarding the end goal, the source of the data and the relevant retention period.

The rules for storage below are defined, except when a legal obligation stipulates that certain Data is stored for a longer duration.

At the end of the retention periods defined below, the PRISMA MEDIA Group will either delete the Data, irreversibly anonymise the data which renders it impossible to match it with a physical person in order to keep only the information necessary for analysis and statistical studies.

All user contributions published on the Media, for example in debate spaces, recipe comments, or any other contribution, will be kept after the end of the retention period while ensuring the anonymity of the contributor.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **DATA CATEGORIES** | **DETAILS OF THE COLLECTED DATA** | **SOURCE** | **RELATED END GOALS** | **RETENTION PERIOD** |
| **Identification data** | Email address | Direct collection from the User by the PRISMA MEDIA Group or indirect collection via the PRISMA MEDIA Group partners | End Goal 1: Creating and managing the PRISMA MEDIA CONNECT Account | Maximum duration of **3 years** starting from the last connection to the account, unless the user uses or has used one of the PRISMA MEDIA CONNECT’s services, in which case the application duration will start from the date of use of the relevant service |
| **Identification and contact data** | Name, First name, Nickname, Date of birth, Gender, Email address, Phone number, Postal address, All User Contributions when using the services | Direct collection from the User or indirect collection via the PRISMA MEDIA Group's partners | End Goal 2: Subscription and management of specific and intersectional Services associated with the PRISMA MEDIA CONNECT user account  End Goal 3: Improving Services  Sales canvassing and building loyalty  End Goal 4: sales canvassing through the post |
| **Connection data** | Username, Authentication information, Date of registration to a Service, Date of creation of PRISMA MEDIA CONNECT Account, Date of last activity, Date of validation of the Terms and Conditions and the Guidelines | Direct collection from the User in the context of the use of their account | End Goal 6: Ensure the security and maintenance of PRISMA MEDIA CONNECT  End Goal 2: Subscription and management of specific and intersectional Services associated with the PRISMA MEDIA CONNECT user account | **6 months** starting from the deletion of the Account |
| **Information on the Services subscribed to** | Types of services used, Date of subscription to the service, Date of last activity on the service, Subscriptions subscribed to, Dates of subscriptions subscribed to, Service usage statistics | Data generated by the User’s activity on the Media of the PRISMA MEDIA Group | End Goal 2: Subscription and management of specific and intersectional Services associated with the PRISMA MEDIA CONNECT user account  End Goal 3: Improving the Services and user experience | Duration of **3 years** starting from the last time a service was used or last expression of interest |
| **all data (including Behavioural Tracking via cookies and Geolocation (only for mobile applications))** | Name, First name, Nickname, Date of birth, Gender, Email address, Phone number, Postal address, All User Contributions when using the services  Types of services used, Date of subscription to the service, Date of last activity on the service, Subscriptions subscribed to, Dates of subscriptions subscribed to, Service usage statistics  Username, Authentication information, Date of registration to a Service, Date of creation of PRISMA CONNECT Account, Date of last activity, Date of validation of the Terms and Conditions and the Guidelines. | - Direct collection from the User by the PRISMA MEDIA Group or indirect collection via the PRISMA MEDIA Group's partners  - Data generated by the User's activity on PRISMA MEDIA Group’s Media | End Goal 5: Targeted advertisement via the user profile on the Media | Maximum duration of **3 years** starting from the last connection to the account, unless the user uses or has used one of the PRISMA MEDIA CONNECT’s services, in which case the application duration will start from the date of use of the relevant service |
| Browsing information (IP address, sites visited, pages/content visited, etc.), Geolocation data. |  | **6 months** starting from the deletion of the Account |

Please note: for paid services, a user is susceptible to save bank details. These are collected and processed within the framework of subscriptions by the payment service providers, those responsible for the processing of bank details, who may retain them according to nature of the order (i.e. staggered payments) and if the user wishes. The confidentiality policies are made available by the PRISMA MEDIA Group during the entire payment process. When the banking Data is stored by the PRISMA MEDIA Group, it is done so partially, rendering any other payment impossible, and are used only to track and identify an order.

**2.4 PMC account Connection Rules**

Access to the PMC account is secured through either a login (email address) and a password, or through by generating a connection link known as a ‘magic link’ sent to the user for a one-time, limited duration use, allowing them to safely connect to their account.

Internet users can connect to their PMC account using accounts that they hold for certain third party services such as Facebook, Google or Twitter according to the details in **TAB 5, Paragraph 5.6.**

To facilitate user navigation while ensuring the security of its data, the PRISMA MEDIA Group has set up three authentication rules: weak, normal, or strong depending on how the user use’s their account.

The weak and normal authentication is applicable for a period of six (6) months and tacitly renewable for the same periods in case the user is active and connected to his/her account on one of the Supports of PRISMA MEDIA during the last six (6) months.

Strong authentication is applicable for a period of one (1) hour, after which the user must move to a normal authentication unless they enter their email address and password again. Only the strong authentication allows the user to modify their personal information and to delete their PMC account. They will also have access, following a strong authentication, to subscribe to all of PMC’s paid services.

**2.5 Exercising rights**

Within the framework of PRISMA MEDIA CONNECT, we invite you to consult the table below to familiarise yourself with the applicable rights for each end goal:

|  |  |  |
| --- | --- | --- |
| **No.** | **END GOAL** | **APPLICABLE RIGHTS** |
| **1** | Creating and managing a User Account | * Right of erasure * Right to restrict processing * Right of portability * Right of rectification * Right of access |
| **2** | Subscription and management of specific and intersectional Services associated with the User Account | * Right of erasure * Right to restrict processing * Right of rectification * Right of portability * Right of access * Right to withdraw consent |
| **3** | Improving Services | * Right of erasure * Right to restrict processing * Right of portability * Right of access * Right of rectification * Right to object |
| **4** | Sales canvassing through profiling | * Right of erasure * Right to restrict processing * Right of rectification * Right of portability * Right of access * Right to withdraw consent |
| **5** | Targeted advertisement through the user profile on the Media | * Right of access * Right to withdraw consent |
| **6** | Ensuring the security and maintenance of information systems | * Right of erasure * Right to restrict processing * Right of portability * Right of access * Right of rectification * Right to object |

Internet users may refer to **TAB 6** for erasure, objection and to withdraw consent.

**TAB 3: PRISMASHOP PRODUCTS AND SERVICES UNIVERSE**

**3.1 Prismashop Universe**

Prismashop is the shop for managing one-off purchases and subscriptions for the PRISMA MEDIA Group. The Group has a website offering a number of products (i.e. press subscriptions).

PRISMA MEDIA Group collects personal data from PRISMASHOP users.

**3.2 End Goals and Lawful Bases**

The table below presents a synthesis of the lawful bases for processing according to the end goal:

|  |  |  |
| --- | --- | --- |
| **No.** | **END GOAL** | **LAWFUL BASIS FOR PROCESSING** |
| **1** | Creation and management of the User Account on Prismashop (including automatic user authentication) | Necessary processing to perform a **contract** *(Article 6 §1, b of the GDPR)* |
| **2** | Customer relationship management | Necessary processing to perform a **contract** *(Article 6 §1, b of the GDPR)* |
| **3** | Management of outstanding payments, pre-litigation and litigation with clients | Necessary processing to perform a **contract** *(Article 6 §1, b of the GDPR)* |
| **4** | Personalised sales canvassing based on the user’s profile through SMS and email by the PRISMA MEDIA Group or their partners. | **Consent** from the relevant person (Article 6, §1, a of the GDPR), |
| **5** | Improving Services, user experience and loyalty operations (sales canvassing through email for goods and services similar to those already purchases/subscribed to from the controller) and sales canvassing through the post and by telephone by the PRISMA MEDIA Group or their partners. | Necessary data processing for the purposes of the **legitimate interests** pursued by the controller *(Article 6, §1, f of the GDPR)* |
| **6** | Security and maintenance of Prismashop. | Necessary data processing for the purposes of the **legitimate interests** pursued by the controller (Article 6, §1, f of the GDPR) |

Processing identified as necessary for a legitimate interest by Prisma Media were part of a specific study to find a balance between PRISMA MEDIA’s interests and the interests of the data subjects. The purpose of this balancing is to ensure that the interests pursued by PRISMA MEDIA are legitimate and that they are balanced with the rights and interests of the Prismashop clients and Users. The table below synthesises the study carried out for each of the end goals.

|  |  |  |
| --- | --- | --- |
| **PRISMA MEDIA’S INTERESTS** | **LEGITIMACY OF THE INTEREST** | **CONSEQUENCES FOR PERSONS** |
| **END GOAL 5: Sales canvassing through the post and telephone calls** | | |
| Carrying out sales canvassing through the post and/or by telephone by PRISMA MEDIA or their partners. | PRISMA MEDIA informs persons of sales canvassing done by PRISMA MEDIA or their partners through the post or by telephone, as well as the methods to exercise their rights to object through the information notice available on the Prismashop account, on the subscription coupons and on the present Guidelines. The methods for exercising the right to object is also indicated in the announcements addressed to the relevant persons. | The list of partners who receive data files is available on TAB 5 paragraph 5.3.  The CNIL refence regarding sales management indicates that: sales canvassing through the post or by telephone is possible on the condition that the persons have been notified at the time their mailing address and/or telephone number was collected and informed of the use of their data for sales purposes and were able to object to this use in a simple and free manner.  Information, reasonable expectations, and the possibility of objecting to the processing at any time are elements that ensure that the processing does not infringe the fundamental rights and freedoms of PRISMA MEDIA's clients.  No sensitive data is collected. Only adults or authorised and capable minors can make orders and access products and services offered by PRISMA MEDIA and thus, see their data processed for this end goal of sales canvassing. |
| **END GOAL 5: Improving services and the Prismashop user experience and loyalty operations** | | |
| Getting to know clients by:  - obtaining feedback from clients to offer them the best experience possible by adapting to their needs and by continuously improving the Prismashop website, in particular through the development of new functionalities;  - carrying our loyalty operations in order to make users’ experience a unique adventure, for example by sending relevant emails to offer them products and services provided by PRISMA MEDIA that correspond to their interests; | - PRISMA MEDIA Group has determined their interest to improve its services in a clear manner. It does not seem feasibly to offer a personalized experience aimed at improving the user experience without collecting information on how they use the services, obtaining feedback, or studying usage statistics. Otherwise, Prismashop would appear to be a non-evolving tool and would not be able to retain its customers.  - the PRISMA MEDIA Group maintains an ongoing commercial relationship by promoting its products and services to their clients | When creating a Prismashop Client account, processing that has an end goal of improving services and user experience constitutes a reasonable expectation for Clients. In order to strengthen these reasonable expectations, PRISMA MEDIA informs their Users of the processing in the information notices and the present Guidelines.  In view of the above, it appears that the legitimate interest of PRISMA MEDIA to improve their services and user experience does not affect the fundamental rights and freedoms of users.  **Sales canvassing for similar products and services by PRISMA MEDIA Group:** The data subjects who have purchased subscriptions or products can reasonably expect that their Data will be processed by PRISMA MEDIA Group in order to send them sales notices for any similar product or service. It is understood that, at any time, the data subjects may object to the receipt of such solicitations as described in **TAB 7**.  This data processing should not surprise clients in the methods in which it is carried out or in the consequences of the processing insofar as these operations can be reasonably expected.  It is specified that no sensitive data as defined by the regulations in force is collected and used for the processing implemented to improve the services and user experience. |
| **END GOAL 6: Management of outstanding payments, pre-litigations, and litigations with clients** | | |
| Establishing the proof of a right or a contract, for example in case of a pre-litigation or litigation with clients. | Interest is compliant with the current legislation => determined in a clear, precise and real manner. | Only data that is necessary to manage outstanding payments will be processed (data linked to sales relations). Processing operations aiming to manage outstanding payments and litigations constitute reasonable expectations for clients. The present Guidelines informs Users of the potential processing of their Data for this end goal.  The CNIL’s reference document regarding sales management indicates that managing pre-litigations and litigations are based on a legitimate interest for the organisation. Therefore, it appears that the legitimate interest of PRISMA MEDIA to manage its unpaid invoices and potential disputes with its customers **does not infringe the fundamental rights and freedoms of its customers.** |
| **END GOAL 7: Security and maintenance of Prismashop** | | |
| Carrying out corrective and evolutionary maintenance operations to ensure the security of the Prismashop website. | Ensuring the security of the Prismashop systems and the information within. AS such, the PRISMA MEDIA Group does not authorise access to the data regarding maintenance operations unless this access is necessary to resolve anomalies. It is specified that this potential access will only be incidental, and no other operations will be carried out on the data during this maintenance procedure. | PRISMA MEDIA does not authorise access to data during maintenance operations unless this access is necessary to resolve anomalies. The impact of this incidental access on the rights and freedoms of the data subjects is limited, therefore we can consider that these processing operations are not intrusive within the individual sphere of the users. Additionally, the fact that PRISMA MEDIA ensures the security of its systems and networks should not surprise Clients. Consequently, the legitimate interest of PRISMA MEDIA to ensure the security of Prismashop does not infringe on the fundamental rights and liberties of the Clients. |

**3.3 Data collected and the relevant retention period**

Within the framework of PRISMASHOP's data collection, the PRISMA MEDIA Group respects the principle of minimising and storing this data for the necessary duration to carry out the end goal.

The table below presents the categories of processed data, the relevant data regarding the end goal, the source of the data and the relevant retention period. The rules for storing the data below are defined, unless there is a legal obligation to retain certain Data for a longer period.

At the end of this retention period defined below, PRISMA MEDIA Group will either delete the Data, or make it anonymous so that no person may be identified with this data and so that they can be used for analyses and statistical studies.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **DATA CATEGORIES** | **DETAILS OF THE COLLECTED DATA** | **SOURCE** | **RELATED END GOALS** | **RETENTION PERIOD** |
| **Identification and contact data** | Name, First name, Nickname, Date of birth, Gender, Email address, Telephone, Postal address, | Direct collection from the User by the PRISMA MEDIA Group or one of its partners | End Goal 1: Creation and management of the User Account on Prismashop (including automatic user authentication)  End Goal 2: Customer relationship management  End Goal 3: Management of outstanding payments, pre-litigation, and litigation with clients  End Goal 4: Personalised sales canvassing based on the user profile through the post, by SMS, telephone and email by the PRISMA MEDIA Group or its partners  End Goal 5: Improving services and user experience on Prismashop, loyalty operations  End Goal 6: Ensuring the security and maintenance of Prismashop | 3 years starting from the time of the last activity  For the end goal 3: duration of the statute of limitations or duration of the procedure until the time limits for appeal are exhausted |
| **Connection data** | Username, Authentication information, Date of registration to a Service, Date of creation of Prismashop Account, Date of last activity, Date of validation of the Terms and Conditions and the Guidelines | Direct collection from the User in the context of the use of their account | End Goal 1. Creation and management of the User Account on Prismashop (including automatic user authentication)  End Goal 2. Customer relationship management  End Goal 5: Improving services and user experience on Prismashop, loyalty operations  End Goal 6: Ensuring the security and maintenance of Prismashop | 3 years starting from the time of the last activity |
| **Information on the Services subscribed to** | Types of services used, Date of subscription to the service, Date of last activity on the service, Subscriptions subscribed to, Dates of subscriptions subscribed to, Service usage statistics | Data generated by the User’s activity on the Media of the PRISMA MEDIA Group | End Goal 1. Creation and management of the User Account on Prismashop (including automatic user authentication)  End Goal 2. Customer relationship management  End Goal 3: Management of outstanding payments, pre-litigation, and litigation with clients  End Goal 5: Improving services and user experience on Prismashop, loyalty operations  End Goal 6: Ensuring the security and maintenance of Prismashop | 3 years starting from the time of the last activity  For the end goal 3: duration of the statute of limitations or duration of the procedure until the time limits for appeal are exhausted |

Please note: Within the framework of the payments made on the PRISMASHOP website, banking data is collected and processed for subscriptions by the payment service providers who are responsible for processing this data, and may be retained according to the type of order (for example staggered payments) and the wishes of the client. The confidentiality policies are made available by the PRISMA MEDIA Group during the entire payment process. When this data is stored by the PRISMA MEDIA Group , this Banking data is only kept in a very partial manner, making any additional payment impossible and is used solely to track and identify an order.

**3.4 Rules for connecting to the Prismashop account**

Accessing the Prismashop account is secured through a login (email address) and a password. The password created must adhere to security criteria: it must contact at least 3 types of different characters (lowercase, uppercase, numbers and special characters). Explanations are provided in the FAQ on [How to connect to your account](https://www.prismashop.fr/service-clients.html?question=comment-connecter-mon-compte-prismashop).

Internet users can connect to their Prismashop account through the accounts they have on certain social networks such as Facebook or Google. As such, the PRISMA MEDIA Group may have access to certain information communicated to these social networks. An authorisation to access this profile data and to share the activities with these social networks will be requested from the user, who will be informed of the data used and how it is used and shared. However, any additional information that the PRISMA MEDIA Group will ask its users will not be communicated to these social networks.

A user's personal data is linked to a client number which identifies the user when in contact with PRISMA MEDIA’s client services.

Any changes made to the personal information linked to the account will trigger an email notification to address registered in the account details. If the email has been modified, a notification is sent to the new email address. More detailed explanations are available on the FAQ: [How to change my account details.](https://www.prismashop.fr/service-clients.html?question=comment-changer-identifiant-mon-compte-prismashop)

**3.5 Exercising of rights**

With the framework of Prismashop, please consult the table below for information on the applicable rights for each end goal:

|  |  |  |
| --- | --- | --- |
| **No.** | **END GOAL** | **APPLICABLE RIGHTS** |
| **1** | Creation and management of the User Account on Prismashop (including automatic user authentication) | * Right of erasure * Right to restrict processing * Right of portability * Right of rectification * Right of access |
| **2** | Customer relationship management | * Right of erasure * Right to restrict processing * Right of rectification * Right of portability * Right of access * Right to withdraw consent |
| **3** | Managing outstanding payments, pre-litigations, and litigations with clients | * Right of erasure * Right to restrict processing * Right of portability * Right of access * Right of rectification * Right to object |
| **4** | Personalised sales canvassing based on the user’s profile through SMS and email by the PRISMA MEDIA Group or their partners | * Right of access * Right to withdraw consent |
| **5** | Improving Services, user experience and loyalty operations (sales canvassing through email for goods and services similar to those already purchased/subscribed to from the controller) and sales canvassing through the post and by telephone by the PRISMA MEDIA Group or their partners | * Right of erasure * Right to restrict processing * Right of rectification * Right of portability * Right of access * Right to object |
| **6** | Ensuring the security and maintenance of Prismashop | * Right of erasure * Right to restrict processing * Right of portability * Right of access * Right of rectification * Right to object |

Internet users can refer to **TAB 6** for erasure, objection, and consent withdrawal.

**TAB 4: TRACKERS AND TARGETED ADVERTISEMENTS AT PRISMA MEDIA**

Digital Media includes, notably, Websites, Applications, newsletters, and all of digital media edited by PRISMA MEDIA Group.

PRISMA MEDIA Digital Media that is accessible free-of-charge uses a business model that is based on advertising. PRISMA MEDIA invests in creating original content by its journalists that is available to the public, who is their audience.

When Digital Media is consulted by users, the audience is monetised using advertisement space rented to advertisers and that is targeted and personalised based on the user profile and their browsing habits, information collected using **Cookies**/mobile identifiers or trackers on users’ fixed terminals or mobile devices.

As a publisher of Digital Media, PRISMA MEDIA is responsible for the information and for gathering its users’ consent to use cookies and other trackers on their account, as well as for the cookies used by third parties for a third-party account.

**4.1 Browser monitoring**

Monitoring users’ browsers can be done through various technology:

|  |  |
| --- | --- |
| **Relevant media** | **Trackers used** |
| **Cookies and other trackers on Websites (browser)** | - cookies,  - the result of a calculation of a unique fingerprint (calculating a unique identity of the terminal based on elements of its configuration and for tracking purposes),  - invisible pixels or “web bugs”,  - any other identifier generated by software or an operating system (serial number, MAC address, unique terminal identifier (UTI), or  - any set of data that is used to calculate a unique terminal fingerprint  - local storage and/or session storage or any other suitable solution |
| **Cookies and other trackers on Applications** | - Mobile advertising ID calls. On Apple environments, this identifier is called Apple IDFA (ID for Advertisers), and AAID (Android Advertising ID) for Android environments. This identifier has the same role as cookies.  - Geolocation calls (only for the Téléloisirs application)  - Local Storage or any other suitable solution |

According to the object (end goal) for installing cookies, it is possible that the user’s prior consent may not be required, and that installing cookies is founded on a lawful basis.

|  |  |  |  |
| --- | --- | --- | --- |
| *Cookies exempt from consent* | (1) “the exclusive purpose of enabling or facilitating communication by electronic means" or,  (2) "strictly necessary for the provision of an online communication service at the express request of the user".  (Article 82 of the amended Data Protection Act and CNIL Guidelines no. 2020-091 of 17 September 2020) | Browser cookies making browsing easier on Websites necessary to providing Purchased services *(i.e., session cookies, or flash cookies that allow a media reader to function if necessary to the Purchased services, etc.)* | Lawful basis: contractual performance |
| Cookies allowing to measure the audience to obtain anonymous traffic statistics.  Objectives: optimise ergonomics, browsing and content, detect browsing problems on Websites, improve performance and functionalities, except for other uses | Lawful basis: legitimate interest |

Cookies installed on user equipment from PRISMA MEDIA websites can be under the PRISMA MEDIA domain or third-party domains:

|  |  |  |
| --- | --- | --- |
| **Cookies deposited from Websites and Prisma Media Apps** | **Who deposits them?** | **Role** |
| *“Internal” or “first party” cookies* | deposited by the PRISMA MEDIA Group or their subcontractors under the PRISMA MEDIA Group domains  i.e., *voici.fr*  Please note, these could be left for a third-party account. | - browser tracking for consented to or otherwise authorised purposes,  - gathering information on users’ browsing habits,  - identifying multi-site users for consented to or otherwise authorised purposes |
| *“Third party” cookies* | deposited by third party partners under third party domains: partners listed in the Consent Management Platform  Certain partners have been contracted as listed in **TAB 5 paragraph 5.4** | - browser tracking for consented to or otherwise authorised purposes,  - gathering information on users’ browsing habits, |

**4.2 Prisma Media website access**

The PRISMA MEDIA digital business model relies on targeted advertising using the user’s profile.

When the [CNIL’s guidelines on the collection of consent for the installation of cookies and other trackers of 17 September 2020](https://www.cnil.fr/sites/default/files/atoms/files/lignes_directrices_de_la_cnil_sur_les_cookies_et_autres_traceurs.pdf) came into force detailing the abandoning of the scroll as a method of consent, **PRISMA MEDIA Group adapted its welcome strategy on its Websites,** and proposes the following welcome scenarios to internet users:

* **Accepting cookies allows the user to access all of the Website's contents for free**

When an internet user chooses to access content for free by accepting cookies, they consent to PRISMA MEDIA and their partners collecting browser data and behaviour using cookies or similar technologies (IP address, pages visited, or the dates and times of pages visited) to improve browsing and to make it more interesting, in order to:

* Store and/or access device information;
* Select a standard advertisement;
* Create a targeted advertisement for the profile;
* Select targeted advertisements;
* Create personalised content for the profile;
* Select personalised content;
* Measure the performance of an advertisement;
* Measure the performance of content;
* Perform market research to generate traffic;
* Develop and improve the product.
* **When a user refuses to install cookies, the user will see an offer to create a paid PMC account** which ensures an advertisement-free experience on all of PRISMA MEDIA Group’s Websites if they purchase a *PRISMA MEDIA PASS* at 1.99 euros per month (without tacit renewal). Subscription conditions are defined in the [General Sales Conditions](https://www.prismamedia.com/cgv-sans-pub/).

=> The user can browse without the installation cookies or trackers for targeted advertising.

=> PRISMA MEDIA will only deposit or use cookies which are strictly necessary to the proper functioning of the service, for statistics and for security purposes which fulfil the conditions for exemption of consent.

At the end of the one-month subscription without tacit renewal, the choice between two offers (free or paid) to access content will again be proposed to the user.

* **If neither of these offers are suitable to the user,** they will not be able to access the contents of PRISMA MEDIA Group's Websites.

PLEASE NOTE: As an exception, certain Websites have adopted a different welcome strategy. Internet users can click on *“Settings”, “Accept”* (i.e. Cookies)or *“continue without accepting”* (i.e. cookies). When they choose *“continue without accepting”*, no cookies for which prior consent is necessary for installation will be deposited on the terminal or processed.

**4.3 The end goals and the paid welcome strategy**

|  |  |  |
| --- | --- | --- |
| **No.** | **END GOAL** | **LAWFUL BASIS FOR PROCESSING** |
| **1** | Proceeding with depositing Cookies in accordance with the user's choice. | Article 6, §1, f of the GDPR: processing is  necessary for purposes of **legitimate interest**  pursued by the controller |
| **2** | Performing targeted advertising through the user profile for the Audience. | Article 6, §1, a of the GDPR: **Consent** of the data subject |
| **3** | Proposing personalised content through the user profile to the Audience. | Article 6, §1, a of the GDPR: **Consent** of the data subject |
| **4** | Developing and improving products and services. | Article 6, §1, a of the GDPR: **Consent** of the data subject |
| **5** | Ensuring the proper provision of the service and the proper functioning of the Websites and Applications | Necessary processing to **perform a** **contract** *(Article 6 §1, b of the GDPR)* |
| **6** | To measure the audience within the conditions provided by [CNIL’s guidelines](https://www.cnil.fr/sites/default/files/atoms/files/lignes_directrices_de_la_cnil_sur_les_cookies_et_autres_traceurs.pdf) on gathering consent to install cookies and other trackers from 17 September 2020. | Exempt: Article 6, §1, f of the GDPR: processing is  necessary for the **legitimate interests**  pursued by the controller.  Not exempt: Article 6, §1, a of the GDPR: **Consent** of the data subject |

**4.4 Gathering consent**

***The Consent Management Platform***

PRISMA MEDIA uses the *Consent Management Platform* (CMP) to manage consent and inform internet users on the data collected and allows them either accept or refuse the installation of cookies and other trackers.

PRISMA MEDIA will not deposit any cookies or trackers prior to giving internet users a choice, except cookies which are necessary to the proper functioning of the Website or the services asked for by the user.

Methods for withdrawing consent are provided in **TAB 6 Erasure, objection, and withdrawal of consent.**

***Consent shared between the PRISMA MEDIA Group’s Websites***

Within the framework of the welcoming strategy, PRISMA MEDIA established that the consent gathered from a person on one of the Websites for targeted advertising purposes is valid on all of the Websites of the PRISMA MEDIA Group, because these sites make up the *same online behavioural advertising network.*

As such, the PRISMA MEDIA Group has adopted an integrated operation within the company, which has led to the consideration that a single consent for all the Websites complies with the requirements of the regulation:

* Shared technical management of the operation of the Websites;
* A common user account;
* Mutual understanding of the advertising environment;
* Shared consent management with the service provider (Sourcepoint);
* Standardised compliance monitoring (tools used, shared Data Protection Officer, centralised management of the exercise of rights);
* A typology of the equivalent Websites (free published content);
* A similar business model based on targeted advertising.

Additionally, Users are informed of the scope of their consent and the perimeters of the Prisma Websites concerned, mainly through the following methods:

* A link accessible in the CMP appears on the first page and links to the list of Websites on which their consent is valid;
* Withdrawal of consent on one of the Websites is equivalent to the withdrawal of consent on all of the Websites;
* A banner/pop-up informing the user during browsing that their consent has already been given on another Website in the ecosystem.

The context defined by the PRISMA MEDIA Group ensures the validity of the consent obtained.

**4.5 Transparency and Consent Framework (TCF) of the Interactive Advertising Bureau (IAB)**

PRISMA MEDIA is part of the digital advertising ecosystem and is a member of the [*Interactive Advertising Bureau*](https://www.iabfrance.com/article/nos-missions) (IAB), an organisation that proposes international standards and norms to be respected within this ecosystem. The IAB created the GDPR's [Transparency and Consent Framework](https://www.iabfrance.com/article/transparency-consent-framework) (hereafter TCF) to manage consent between publishers, advertisers and technology providers.

The TCF allows actors of the digital advertising ecosystem to manage consent in a standardised way according to the end goals that were established in the policies applicable to the

IAB members. These end goals aim to describe the objectives pursued for all of the data processing that is susceptible to be carried out by the publisher and the publishing editors.

Therefore, in order to comply with the IAB’s policies and to work with

advertisers and technology providers who are members of the IAB, PRISMA MEDIA uses cookies, trackers and allows their partners to use them for the end goals defined during collection in the CMP.

**4.6 Cookie lifetime and duration of consent**

If Cookies are accepted, your consent will be saved for a period of 6 months.

If you refuse Cookies by purchasing a subscription, your refusal will be saved for 1 month.

If you refuse Cookies using the “Continue without accepting” button on certain websites, your refusal will be saved for 6 months.

**4.7 – Mobile Applications**

1. **Access to Prisma Media Applications**

The PRISMA MEDIA digital business model relies on targeted advertising using the user’s profile. When the [CNIL's guidelines on gathering consent to install cookies and other trackers from 17 September 2020](https://www.cnil.fr/sites/default/files/atoms/files/lignes_directrices_de_la_cnil_sur_les_cookies_et_autres_traceurs.pdf) detailing the abandonment of scrolling as a method of collecting user consent, **the PRISMA MEDIA Group adapted its welcome strategy on its Applications,** and now offers Internet users the following welcome scenarios:

On the Télé Loisirs application:

* **Accepting all of the trackers allows the user to access all of the Application's contents for free**

When the internet user chooses to access the contents on the application for free by accepting the installation of trackers, they consent to PRISMA MEDIA Group and their partners collecting and processing browser and behaviour data (IP address, pages visited, or the dates and times the pages were consulted) to improve browsing and make it more interesting, and to”

* Store and/or access device information;
* Select a standard advertisement;
* Create a targeted advertisement for the profile;
* Select targeted advertisements;
* Create personalised content for the profile;
* Select personalised content;
* Measure the performance of an advertisement;
* Measure the performance of content;
* Perform market research to generate traffic;
* Develop and improve the product.

If Cookies are accepted, your consent will be saved for a period of 6 months.

* **If the user refuses the installation of cookies, a paid subscription offer will be proposed** ensuring targeted advertisement-free access to the Télé Loisirs Application for a subscription of 0.99 euros per month or 4.49 euros per year.

=> The user can browse without the installation cookies or trackers for targeted advertising.

=> PRISMA MEDIA will only deposit or use cookies which are strictly necessary to the proper functioning of the service, for statistics and for security purposes which fulfil the conditions for exemption of consent.

=> At the end of the one-month subscription without tacit renewal, the choice between two offers (free or paid) to access content will again be proposed to the user.

* **If neither of the two offers is suitable to the internet user,** they will not be able to access content on the Application.

On other Prisma Media Group applications:

Internet users can click on *“Settings”, “Accept”* (i.e., Cookies)or *“continue without accepting”* (i.e., cookies). When they choose *“continue without accepting”*, no cookies for which prior consent is necessary for installation will be deposited on the terminal or processed.

**II.** It is specified that the acceptance of the exploitation of advertising identifiers on PRISMA MEDIA's mobile Applications will be done Application by Application. You can at any time access the consent settings interface on the Applications which will allow you to:

* set your preferences purpose by purpose. You can selectively refuse or accept to install behavioural analysis trackers, geolocation trackers, trackers that measure the audience or the installation of trackers by PRISMA MEDIA partners;
* access the list of partners who are authorised to place trackers on our Applications, as well as a link to their confidentiality policy.

Certain Prisma Media mobile Applications allow for the collection of your geolocation data with your permission. When you are connected to the Application and you have activated this option, we collect information relevant to your location to offer advertisements and services in relation to your geographic position.

If background geolocation is activated, we collect this information as well when the Application is closed and not being used.

Your geolocation data collected on the mobile Applications can, with your permission, be shared with our direct and indirect geomarketing partners Adotmob and Single Spot so that personalised advertisements will be shown when you use the mobile Applications. For more information on the data processing carried out by these partners, you can consult our confidentiality policy:

* for Adotmob: [https://we-are-adot.com/privacy-policy](https://we-are-adot.com/privacy-policy/)
* for Single Spot :<https://www.singlespot.com/fr/privacy_policy>

If you don’t want your location data to be used as such, you can deactivate the background geolocation data or, more broadly, object to the use of your geolocation data on the consent settings interface as well as deactivating the geolocation function in your device’s settings.

**4.8 Data Management Platform - DMP**

PRISMA MEDIA has implemented a Data Management Platform (DMP) which uses several collection sources to link them in accordance with the objectives laid out in paragraph 4.3 and detailed in the consent settings interface of the CMP, with your explicit and valid consent gathered in the CMP.

Each user is given a PRISMA ID (User ID) in the DMP allowing them to reconcile several technical and identified traces with the source data brought forth by Prisma in the DMP. This data can be combined with the Browsing Data and Relevant Data in possession of PRISMA MEDIA and attached to a user profile to improve services, and to personalise and recommend targeted content and advertisements.

This reconciliation data operations can be carried out either by Prisma Media, or their partners (adding cookies to email, enrichment, cookie matching).

The PRISMA MEDIA Group’s advertising network can segment the audience and communicate these audience segments, i.e. the division of a population of user in homogenous sub-categories according to different criteria in the DMP, such as socio-demographic data, needs, purchasing behaviour, etc., to their advertisement partners (advertisers, agencies, SSPs, etc.).

These segmentation operations activate campaigns for users on PRISMA MEDIA Websites or Applications, or users on third-party websites or applications. This tool is a key element for PRISMA MEDIA's online advertising activity both in terms of the relevance of the Inventory given to the advertisers and in terms of the reconciliation operations of User data.

The main end goals attached to the exploitation of the data management platform by PRISMA MEDIA:

* Carry out targeted advertising using the user profile and standard profile to the audience.
* Propose personalised content through the user profile to the audience.

**TAB 5: PARTNERS AND THIRD-PARTY RELATIONS**

Data processed by the PRISMA MEDIA Group will also be processed by PRISMA MEDIA Group's service providers and partners in various situations. The PRISMA MEDIA Group commits to working with these partners within a contractual framework compliant with the demands of the current regulations and according to state-of-the-art security rules.

For contractors located outside of the European Union, any data transfer will be done in compliance with the current regulation.

**5.1 Partners, licensed trademark owners**

The PRISMA MEDIA Group uses brands as a Licensee on behalf of brand owners and publishes Media under the licensed brand. The PRISMA MEDIA Group and their partners act as independent Controllers.

As of 1 January 2023, these licensed brands are:

|  |  |  |
| --- | --- | --- |
| **Brands** | **Brand owner** | **Geographic location of the PRISMA MEDIA contractor** |
| *National Geographic* | National Geographic Partners LLC | United States |
| *Dr Good!* | Le Club Santé Débat SAS | France |
| *Dr Good c’est bon* | Le Club Santé Débat SAS | France |
| *Harvard Business Review* | Harvard Business School Publishing Corporation | United States |
| *Harper’s Bazaar* | Hearst Magazine Media, Inc | United States |
| *Flow* | DPG Media Magazines B.V | Netherlands |

Some data relative to users and subscribers to the Media of these brands will be shared in compliance with the applicable law and according to the contractual provisions defined between the PRISMA MEDIA Group and their Partner.

The end goals pursued will be presented to the users during collection within the framework of the present Guidelines.

**5.2 Acquisition and enrichment partners**

“**Partner(s)**” means every company, other than a Subcontractor, selected by one of the PRISMA MEDIA Group companies with which the provision and protection of Personal Data is regulated by contract. To know the Partners authorised to communicate the Data of consenting Users to the PRISMA MEDIA Group to receive personalised offers from them and/or to personalise advertisements, you can consult sections 5.2 to 5.5.

The PRISMA MEDIA Group works with partners specialising in acquiring data from physical persons through different methods like competitions, to transfer them to the PRISMA MEDIA Group.

The relationships with these partners are regulated by contracts detailing in particular each person's role, the responsibilities associated with them, and the defined methods to ensure that collection is compliant with the current regulation (appropriate information for individuals, purposes, exercising of rights, compliance monitoring, etc.).

The purposes associated with this collection are as follows:

* direct sales canvassing according to the directives in article L34-5 of the French Post and Telecommunications Code for advertising purposes through the user profile;
* Subscription to Newsletters of the Prisma Media Group;
* Creation of a Prisma Media Connect (PMC) account for the purposes defined in Tab 2 §2.2 end goals and lawful bases;
* Enrichment of the user profile via partner databases.

*List of partners who transfer data to the PRISMA MEDIA Group (as of 1/02/2023)*

|  |  |  |  |
| --- | --- | --- | --- |
| **Partner** | **acquisition** | **enrichment** | **Confidentiality policy** |
| **6 degrés Agency** | x |  | https://club-conso.fr/site/clubconso/pages/ppdcp.html |
| **Cooper Advertising** | x |  | https://cooper-advertising.com/fr/protection-des-doonees/ |
| **eGentic Gmbh** | x |  | https://www.egentic.com/data-protection/ |
| **Elixis Digital** | x |  | https://tool.elxtool.com/legal/politique\_protection\_donnees.pdf |
| **Webrivage** | x |  | https://webrivage.com/fr/policy |
| **GA Media** | x |  | https://ga-media.fr/politique-de-confidentialite/ |
| **Advertise me** | x |  | https://www.advertise-me.fr/politique-de-confidentialite/ |
| **Agence deux** | x |  |  |
| **EMB** |  | x | https://www.emb-europe.com/themes/emb/html/popup-rgpd-v8.html |

**5.3** at the present date, the PRISMA MEDIA Group Partners authorised to receive and use the Personal Data of users who have consented to receive personalised offers from the PRISMA MEDIA Group, from Partners or within the framework of personalised advertising are:

**5.3.1 Monetization partners - rental of personal data files**

The PRISMA MEDIA Group works with monetization partners to rent personal data files. According to the requirements of the regulation, the PRISMA MEDIA Group informs the data subjects in advance or gathers their consent, particularly when:

* Renting postal address files for sales canvassing, via PRISMA MEDIA Group's partners, subject to the information of the data subjects during collection.
* Renting electronic address files for sales canvassing via PRISMA MEDIA Group’s partners subject to the consent of the data subjects as required by article L34-5 of the French Post and Telecommunications Code.

Partner relationships are regulated by contracts detailing each party’s role, the associated responsibilities and the methods defined to ensure the compliance of the processing of the data regarding the current regulation, for example the exercising of a person’s rights.

*List of partners receiving data from the PRISMA MEDIA Group (as of 1/02/2023)*

The list of partners receiving **postal information** or **electronic contact information** from the PRISMA MEDIA Group is detailed below:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Partner** | **Sales canvassing through the post** | **Sales canvassing through email** | **Enrichment** | **Confidentiality policy** |
| **Adress Company** | X |  |  | https://www.adress-company.fr/cookies |
| **Cartégie** | X | X | X | https://www.cartegie.com/donnees-personnelles |
| **Cloudmedia** |  | X |  | <https://www.cloudmedia.fr/vie-privee>  [Deactivate targeted advertisements](https://er.cloud-media.fr/optout) |
| **Conexance** | X |  |  | https://www.conexancemd.com/fr/vie-privee.html |
| **Data Company** | X |  |  | https://www.datacompany.fr/rgpd |
| **Data Project** | X |  |  | https://leportailbtob.com/rgpd/rgpd.html |
| **Edgwhere** | X | X | X | https://www.edgewhere.fr/politique-de-confidentialite/ |
| **H-Consultants (HSK)** | X | X | X | https://h-consultants.rgpd-st.info/ |
| **Riviera Web** |  | X |  | http://rivieraweb-rw.fr/protectiondonnees.html |
| **Squadata** |  | X |  | https://www.squadata.net/private-policy/ |
| **Webrivage** |  | X |  | https://webrivage.com/fr/policy |
| **Wellpack** |  |  | X | https://wellpack.fr/politique-de-confidentialite/ |

To exercise the methods of withdrawing consent and objection, using can refer to **TAB 6 ERASURE, OBJECTION, WITHDRAWAL OF CONSENT.**

**5.3.2 Monetization partners - advertising in Newsletters**

|  |  |  |
| --- | --- | --- |
| **Partner** | **Advertising performance measures in Newsletters** | **Confidentiality policy** |
| Powerspace | Three types of targeting are used by our partner Powerspace to measure the performance of the proposed advertisements in our Newsletters:   * Demographic: gender, age using the data provided by the Prisma Media Group to the partner via tags * Geolocation: when the internet user opens the newsletter published by the Prisma Media Group, the browser and/or the email of the internet user pings the Powerspace server * Device: communicated to Powerspace when pinged by the browser. | * <https://powerspace.com/fr/privacy/> * [Deactivate targeted advertisements](https://powerspace.com/fr/privacy/#optout) |
| Ividence | Ividence uses cookies and similar technology (advertisement tags) to attribute to the user an anonymous browser ID when the email is opened. Only the browsing data associated with these cookies are used to strengthen the relevance of the emails that you receive. | <https://ividence.com/politique-de-confidentialite/> |

**5.3.3 Performance measurement and statistical partners**

Advertisers and intermediaries on the advertising value chain aim to measure the performance of advertisements on PRISMA MEDIA Group's websites:

As such, the PRISMA MEDIA Group can use and authorise the use of *independent third-party measuring solutions* to count the number of views of an advertisement on our websites within the statistics calculations. These anonymised or aggregated results on our audience measurements are shared with them.

*List of Performance measurement partners used by the PRISMA MEDIA Group*

|  |  |  |  |
| --- | --- | --- | --- |
| **Name of Partner** | **Confidentiality Policy** | **Details of the data usage** | **Lawful basis** |
| **Performance measurements of advertisements** | | |  |
| **SaleCycle** | <https://www.salecycle.com/service-privacy-notice/> | SaleCycle uses browser data to measure visit on the [www.prismashop.fr](http://www.prismashop.fr/) Website to know the products and services that interest you and to collect personal data, in particular the names, email addresses, telephone numbers of users and users’ unique device ID. This information helps the user during each step during the purchasing process by occasionally contacting them (through email or SMS). | Consent |
| **Mediametrie** | <https://www.mediametrie.fr/fr/gestion-des-cookies> | The eStat’Streaming technology from Médiamétrie enables the analysis of all content consumed via streaming (audio, video, live, deferred) available on Internet sites and mobile applications for audience measurement purposes.  This is a site-centric measure based on an eStat Streaming marker with the following scope:  – 3 screens (computer, mobile, tablet), connected TV, game consoles, internet box  – Worldwide  – Websites & apps: Websites & apps: Live and replay, audio and video, with user actions taken into account on the player | Legitimate interest |
| **Médiamétrie / Nielsen (DAR)** | <https://www.nielsen.com/fr/legal/privacy-principles/digital-measurement-privacy-statement/> | The Prisma Media Group transmits personal user profile data (email, gender, age, postal code) for analysis of the performance of the advertisements displayed on these advertising spaces according to the audience segments used for this purpose. This allows for the creation of research overviews, reports and analyses on consumer behaviour, including the composition of the audience that viewed certain content or on the effectiveness of an advertising campaign. | Consent |
| **Audience measurement and statistics** | | |  |
| **ID.fr (Wysistat)** | To deactivate trackers, click here: <https://www.wysistat.com/opt-out/verification.html> | Wysistat's trackers allow us to measure the audience of our sites (performance measurement, detection of navigation problems, optimization of technical performance or ergonomics, analysis of consulted content) and to produce anonymous statistical data without transmitting private data (unique ID/session, email, name, etc.).  Compliant with the CNIL's conditions and recommendations on the subject (<https://www.cnil.fr/fr/cookies-et-autres-traceurs/regles/cookies-solutions-pour-les-outils-de-mesure-daudience>) these trackers are exempt from consent. | Legitimate interest |
| **Google Analytics and Sirdata** |  | Google Analytics trackers allow the PRISMA MEDIA Group to pursue the following end goals:   * Improve publishing performance and the evolution of digital products; * Monitor internet sites and applications.   The systematic use of the proxy Sirdata according to the [CNIL’s recommendations from 7 June 2022](https://www.cnil.fr/fr/cookies-et-autres-traceurs/regles/google-analytics-et-transferts-de-donnees-comment-mettre-son-outil-de-mesure-daudience-en-conformite) by the Prisma Media Group avoids any direct contact between the Internet user’s terminal and the Google Analytics measuring tool. This proxyfication ensures no re-identification of the person by Google Analytics via all the proxyfied information transmitted by the Prisma Media Group to Google. |  |

**5.4 Subcontractors and/or other service providers involved in service provisions**

Data related to users will be transmitted to service providers tasked by the PRISMA MEDIA Group within the framework of its activities and to ensure the provision of its services.

The services that the PRISMA MEDIA Group subscribes to varies and evolves with time and include: hosting sites and services, data analysis and processing (for example providing an analysis software to measure advertisement relevance), customer relations services, communications with you (for example email or push notification systems).

The services to which the PRISMA MEDIA Group subscribes varies and evolves with time and include:

* hosting of sites and services,
* payment solutions,
* Data analysis and processing,
* subscription management services and single-issue purchases,
* customer relations services and quality control,
* communication with users (chat, etc.)
* etc.

When it is required for the provision of services, the PRISMA MEDIA Group shares certain data with service providers. As such, these service providers may act as subcontractors and/or data controllers and must comply with strict confidentiality obligations in a manner consistent with this Guidelines and the agreements that the PRISMA MEDIA Group concludes with these service providers.

**5.5 Adtech providers and advertisers**

Within the framework of its advertising activity, the PRISMA MEDIA Group works with numerous players in the digital advertising industry: technological partners, intermediaries, advertisers, etc., in particular within the framework of the TCF or within agreements negotiated by the PRISMA MEDIA Group. The objective is to offer to the Data Subjects who have consented, personalised advertising and services using the monitoring of their browsing made possible by cookies and other trackers deposited on their terminals.

The PRISMA MEDIA Group's advertising activity is based on the collection of personal data such as email address (encrypted and pseudonymised), IP address, and/or information about one's browser, etc., by the PRISMA MEDIA Group itself or by its Partners for the purposes explicitly stated at the time of collection and detailed in the privacy policies of the partners accessible on their sites and whose link is reproduced below or in the PRISMA MEDIA Group's CMP.

This personal data collected by the PRISMA MEDIA Group can be shared to various actors in the advertising chain, aiming to activate targeted advertising to offer personalised advertisements based on their internet browsing history. This sharing is provided for by the CMP and the list of partners concerned is made available either in the CMP or in these Guidelines.

|  |  |  |
| --- | --- | --- |
| **Advertising partners** | | |
| **PRISMA ID by the FIRST-ID company** | Consult the [FIRST-ID confidentiality policy](https://www.first-id.fr/politique-de-confidentialite).  You can withdraw your consent to the processing of your personal data by refusing at any moment by clicking the link available at the bottom of each web page on our site “manage your cookies” then “refuse and subscribe” in the CMP.  Consult "[whatismyfirstID](https://whatismy.first-id.fr/)" to know your ID and withdraw your consent. | The PRISMA MEDIA Group is a member of the FIRST-ID publishers network. When browsing our sites, subject to the consent of the internet users, the PRISMA MEDIA Group can use a personalised PRISMA ID based on FIRST-ID’s technology in order to improve the browsing experience on the Websites and to personalise content and targeted advertisements. This unique identifier is stored in a cookie that may or may not be deposited on the user's device depending on the consent given on the sites of a network of publishers that are members of the First-ID solution.  This identifier does not allow us to identify you directly, but it does allow us to track your browsing on the network sites in order to get to know you better. |
| **ID5 by the ID5 company** | Consult the [confidentiality policy](https://id5.io/platform-privacy-policy): <https://id5.io/platform-privacy-policy>  You can withdraw your consent to the processing of your personal data by refusing at any moment by clicking the link available at the bottom of each web page on our site “manage your cookies” then “refuse and subscribe” in the CMP. | When you visit one of the PRISMA MEDIA Group’s websites, ID5 can share personal data or collected data such as your email address (in this case it will be encrypted and pseudonymised), your IP address and/or your browser information.  ID5 can use this information as a data controller to create an ID to identify you on different devices. This ID does not contain any information that can identify you. This identifier can be placed in a first cookie belonging to Prisma Media or in an ID5 cookie.  This identifier can be shared by ID5 or by the Prisma Media Group with advertising partners in order to activate an interest based on consent and/or personalised advertisements based on their internet experience. |
| **Core ID by the Epsilon company** | Consult the [confidentiality policy](https://legal.epsilon.com/eu/privacy-poliicy-services-fr): <https://legal.epsilon.com/eu/privacy-poliicy-services-fr>.  You can withdraw your consent to the processing of your personal data by refusing at any moment by clicking the link available at the bottom of each web page on our site “manage your cookies” then “refuse and subscribe” in the CMP. | When you visit one of the PRISMA MEDIA Group sites, Epsilon may share personal data or information collected such as your e-mail address (in which case it would be encrypted and pseudonymised), your IP address, and/or information about your browser.  Epsilon may use this information as a controller to create an identifier for the purpose of identifying you on your various devices. This identifier does not contain any information that would allow you to be identified. This identifier may be placed in a first cookie, belonging to the Prisma Media Group, or in a Core ID cookie. This ID does not contain any information that can identify you. This identifier can be placed in a first cookie belonging to the Prisma Media Group or in a Core ID cookie.  This identifier can be shared by Core ID or by the Prisma Media Group with advertising partners in order to activate an interest based on consent and/or personalised advertisements based on their internet experience. |
| **RAMP ID by the LIVERAMP company** | Consult the [confidentiality policy](https://liveramp.fr/retirer-votre-consentement): <https://liveramp.fr/retirer-votre-consentement>.  You can withdraw your consent to the processing of your personal data by refusing at any moment by clicking the link available at the bottom of each web page on our site “manage your cookies” then “refuse and subscribe” in the CMP. | When you visit one of the sites of the PRISMA MEDIA Group, Liveramp has the possibility of sharing personal data or information collected like your email address (in this case it would be encrypted and pseudonymized), your IP address, and/or information about your browser.  LiveRamp uses this information to create an online identification code to recognise you on your devices without directly identifying you. LiveRamp may place this code in its cookie or in a PRISMA MEDIA Group cookie and allow it to be shared with our advertising partners and other third-party companies around the world to enable them to tailor content and advertisements to you based on your interests throughout your online experience (web, email, mobile apps, connected objects, etc). These companies may in turn use this code to associate demographic or interest information that you have provided during your interactions with them. |
| **ID+ by the Zeotap company** | Consult the [confidentiality policy](https://zeotap.com/privacy_policy):  <https://zeotap.com/privacy_policy>  You can withdraw your consent to the processing of your personal data by refusing at any moment by clicking the link available at the bottom of each web page on our site “manage your cookies” then “refuse and subscribe” in the CMP. | The Zeotap technology allows advertisers to show you relevant offers on the mobile applications and/or websites that you visit based on the consumption habits of the Data Subjects and for analysis purposes.  To function, these services rely on the deposit of cookies on the browser or when an email is opened. The reception of your irreversibly encrypted email allows for the creation of an ID+ identifier.  By depositing our cookies, certain information can be automatically collected (IP address, operating system, or browser type). |
| **Mediarithmics Tag** | Consult the [confidentiality policy](https://www.mediarithmics.io/legal/fr-data-policy): <https://www.mediarithmics.io/legal/fr-data-policy>  You can withdraw your consent to the processing of your personal data by refusing at any moment by clicking the link available at the bottom of each web page on our site “manage your cookies” then “refuse and subscribe” in the CMP. | Mediarithmics is a service provider that manages data and digital media for advertisers and agencies.  The Mediarithmics platform activates data, automates operations and optimises interactions across addressable media, all while providing greater performance, transparency and control for merchants and a better experience for consumers. |
| **Alliance Gravity Tag** | You can opt out of receiving personalized ads served through Gravity by clicking on the link below:  h[ttps://www.alliancegravity.com/politiquedeprotectiondesdonneespersonnelles/#opt-out](https://www.alliancegravity.com/politiquedeprotectiondesdonneespersonnelles/#opt-out)  Please note that this deactivation 1/ does not affect advertisements being shown by other partners and 2/ does not affect the interests that you expressly communicated to the Prisma Media Group.  You can withdraw your consent to the processing of your personal data by refusing at any moment by clicking the link available at the bottom of each web page on our site “manage your cookies” then “refuse and subscribe” in the CMP. | For targeted advertising purposes, Gravity collects, reconciles, and analyses pseudonymous information from the browsing of Internet users on websites (online activities, visits, page views, links) or on the mobile applications of its members and/or partners, using a line of code inserted in the pages you visit.  The Gravity tag and other identifiers placed in the cookies used by Gravity and its members are associated between them for each terminal on which the user browses. This data does not contain any data that Gravity can use to directly identify you. This data is crossed with browser data and other collected information when you enter into contact with the Members of the Gravity network and pseudonymized before Gravity uses them, such as your age range or your gender in order to draw up your user profile and associate your interests with those of Gravity's advertising partners. |
| **EUID by The TradeDesk** | Consult the confidentiality policy: <https://www.transparentadvertising.eu/#/privacynotice>  You can withdraw your consent to the processing of your personal data by refusing at any moment by clicking the link available at the bottom of each web page on our site “manage your cookies” then “refuse and subscribe” in the CMP. | When you visit one of PRISMA MEDIA Group’s websites, TradeDesk may share personal data or information collected like your email address (in this case it is encrypted and pseudonymized), your IP address and/or information regarding your browser.  TradeDesk may use this information as a data controller to create an identifier whose goal is to identify you on different devices. This ID does not contain any information that can identify you. This identifier can be placed in a first cookie belonging to the Prisma Media Group or in an EUID cookie.  This identifier can be shared by EUID or by the Prisma Media Group with advertising partners in order to activate an interest based on consent and/or personalised advertisements based on their internet experience. |
| **ID Criteo by Criteo** | Consult the confidentiality policy: <https://cookiepedia.co.uk/giving-consent-to-cookies>  You can withdraw your consent to the processing of your personal data by refusing at any moment by clicking the link available at the bottom of each web page on our site “manage your cookies” then “refuse and subscribe” in the CMP. | When you visit one of the PRISMA MEDIA Group’s websites, CRITEO may share personal data or information collected such as your e-mail address (in this case it would be encrypted and pseudonymized), your IP address, and/or information about your browser.  CRITEO may use this information as a data controller to create an identifier for the purpose of identifying you on your various devices. This ID does not contain any information that can identify you. This identifier can be placed in a first cookie belonging to the PRISMA MEDIA Group or in an CRITEO cookie.  This identifier can be shared by CRITEO or by the PRISMA MEDIA Group with advertising partners in order to activate an interest based on consent and/or personalised advertisements based on their internet experience. |
| **Invibes** | Consult the [confidentiality policy: https://www.invibes.com/cookie-list.html](https://www.invibes.com/cookie-list.html)  You can withdraw your consent to the processing of your personal data by refusing at any moment by clicking the link available at the bottom of each web page on our site “manage your cookies” then “refuse and subscribe” in the CMP. | When you visit one of PRISMA MEDIA Group’s websites, INVIBES may share personal data or information collected like your email address (in this case it is encrypted and pseudonymized), your IP address and/or information regarding your browser.  INVIBES may use this information as a data controller to create an identifier for the purpose of identifying you on your various devices. This ID does not contain any information that can identify you. This identifier can be placed in a first cookie belonging to the Prisma Media Group or in an INVIBES cookie.  This identifier can be shared by INVIBES or by the Prisma Media Group with advertising partners in order to activate an interest based on consent and/or personalised advertisements based on their internet experience. |
| **Notify** | [Consult the confidentiality policy:](https://notify-group.com/mentions-legales/)  <https://notify-group.com/mentions-legales/>  You can withdraw your consent to the processing of your personal data by refusing at any moment by clicking the link available at the bottom of each web page on our site “manage your cookies” then “refuse and subscribe” in the CMP. | Notify Brand Technology is a solution that aims to (i) measure the audience on the website and (ii) propose personalised advertisements and services using cookies deposited by our partners. This data will then allow them to adapt their communication to you across all electronic (email, applications, SMS, etc.) or traditional media (mail or telephone calls) subject to your free and express consent that your personal data be communicated to the partners of the group to which you first gave your consent. |
| **R-Target by the CCM PERFORMANCE company of the Le Figaro Group** | [Consult the confidentiality policy:](https://www.ccmperformance.com/privacy/?from=ccmperformance)  <https://www.ccmperformance.com/privacy/?from=ccmperformance>  You can withdraw your consent to the processing of your personal data by refusing at any moment by clicking the link available at the bottom of each web page on our site “manage your cookies” then “refuse and subscribe” in the CMP. | Within the framework of improving the Prisma Media Group’s offers to you, the CCM Performance company, with its R-TARGET solution, will deposit cookies on your terminal to offer targeted advertisements. R-Target recognises internet users using cookies. |
| **Squadata by the Digital Squad company** | [Consult the confidentiality policy:](https://www.squadata.net/private-policy/)  https://www.squadata.net/private-policy/  You can withdraw your consent to the processing of your personal data by refusing at any moment by clicking the link available at the bottom of each web page on our site “manage your cookies” then “refuse and subscribe” in the CMP. | The Digital Squad services aim to propose personalised advertisements showing products or services based on the recent behaviour of internet users on websites, newsletters, and applications of Digital Squad partners. Digital Squad recognises internet users using cookies. |
| **RemailMe** | [Consult the confidentiality policy:](https://remailme.fr/politique-confidentialite/)  <https://remailme.fr/politique-confidentialite/>  You can withdraw your consent to the processing of your personal data by refusing at any moment by clicking the link available at the bottom of each web page on our site “manage your cookies” then “refuse and subscribe” in the CMP. | RemailMe is a service offering targeted advertisements by email according to the user’s browsing habits. As such, the RemailMe company can deposit cookies on the internet user’s browser. |
| **Google Ad Manager** | Consult the [confidentiality policy](https://policies.google.com/privacy?hl=fr) | Google Ad Manager is an online advertising solution that allows the Prisma Media Group to promote products and services while customising budgets, audiences, and the delivery of these advertisements. |
| **Transparent Ad Marketplace by Amazon** | Consult the [confidentiality policy](https://www.amazon.com/gp/help/customer/display.html/ref=footer_privacy?ie=UTF8&nodeId=468496%23GUID-8966E75F-9B92-4A2B-BFD5-967D57513A40__SECTION_467C686A137847768F44B619694D3F7C) | Transparent Ad Marketplace is a server-side header bidding solution hosted in the Amazon cloud that monetises advertising space while improving the user experience through faster page load times. |
| **Mediarithmics** | | |
| **service providers** | Consult [the confidentiality policy](https://www.mediarithmics.io/legal/fr-data-policy): <https://www.mediarithmics.io/legal/fr-data-policy> | Mediarithmics is a service provider that manages data and digital media for advertisers and agencies through providing and managing a Data Management Platform.  The Mediarithmics platform activates data, automates operations and optimises interactions across addressable media, all while providing greater performance, transparency and control for merchants and a better experience for consumers. |
| **BeoP** | Consult the confidentiality policy:  <https://beop.io/fr/privacy-policy/>  You can withdraw your consent to the processing of your personal data by refusing at any moment by clicking the link available at the bottom of each web page on our site “manage your cookies” then “refuse and subscribe” in the CMP. | BeoP is a digital content provider, particularly in online survey services. The Prisma Media Group uses BeoP to create content to collect the opinions of their audience, carry out surveys, organise games, subject or not to regulations, and to test their knowledge by creating quizzes. BeoP allows the Prisma Media Group to monetise their spaces by activating the advertising lever allowing the distribution of content from partner advertisers. During this service, BeoP may deposit third-party cookies. |
| **Geolocation partners** | | |
| **Single Spot** | Consult the confidentiality policy: <https://www.singlespot.com/fr/privacy_policy>  You can withdraw your consent to the processing of your personal data by refusing at any moment by clicking the link available at the bottom of each web page on our site “manage your cookies” then “refuse and subscribe” in the CMP. | SINGLESPOT provides geolocation data and advertising identifiers (IDFA or GAID) to the Prisma Media Group, which are collected by SINGLESPOT on the Prisma Media Group's mobile applications using Singlespot's software (Software Development Kit). |
| **Adotmob** | Consult the confidentiality policy: <https://we-are-adot.com/privacy-policy/>  You can withdraw your consent to the processing of your personal data by refusing at any moment by clicking the link available at the bottom of each web page on our site “manage your cookies” then “refuse and subscribe” in the CMP. | ADOTMOB provides the Prisma Media Group with geolocation data and advertising identifiers (IDFA or GAID) which are collected by ADOTMOB on the Prisma Media Group's mobile applications using the Adotmob software. |
| **Advertisers** | | |
| **Havas** | Consult the confidentiality policy: **https://www.havasgroup.fr/politique-de-protection-des-donnees-personnelles/** | Havas is an advertiser that buys advertising space on the various digital media of the Prisma Media Group. The Prisma Media Group may transmit to this advertiser audience segments, i.e. groups of the Audience categorized according to various criteria (age, interests, city, etc.) and generated using information collected by Cookies or advertising identifiers, if any, associated with data from the Prisma Media database, in order to enrich Havas' customer knowledge for advertising purposes. |
| **L’Oréal** | Consult the confidentiality policy: https://www.loreal.com/en/group/global-privacy-policy/ | L’Oréal is an advertiser that buys advertising space on Prisma Media Group’s various digital media. The Prisma Media Group may transmit to this advertiser audience segments, i.e. groups of the Audience categorized according to various criteria (age, interests, city, etc.) and generated using information collected by Cookies or advertising identifiers, if any, associated with data from the Prisma Media database, in order to enrich l’Oréal’s customer knowledge for advertising purposes. |
| **Disneyland Paris** | Consult the confidentiality policy: https://www.disneylandparis.com/fr-fr/legal/charte-relative-aux-cookies/ | DisneyLand Paris is an advertiser that buys advertising space on Prisma Media Group’s various digital media. The Prisma Media Group may transmit to this advertiser audience segments, i.e. groups of the Audience categorized according to various criteria (age, interests, city, etc.) and generated using information collected by Cookies or advertising identifiers, if any, associated with data from the Prisma Media database, in order to enrich DisneyLand Paris’ customer knowledge for advertising purposes. |
| **Nestlé** | Consult the confidentiality policy: <https://www.nestle.fr/info/yourdata> | Nestlé is an advertiser that buys advertising space on Prisma Media Group’s various digital media. The Prisma Media Group may transmit to this advertiser audience segments, i.e. groups of the Audience categorized according to various criteria (age, interests, city, etc.) and generated using information collected by Cookies or advertising identifiers, if any, associated with data from the Prisma Media database, in order to enrich Nestlé's customer knowledge for advertising purposes. |
| **Intermarché** | Consult the confidentiality policy: https://www.intermarche.com/informations-legales/donnees-personnelles-et-cookies | Intermarché is an advertiser that buys advertising space on Prisma Media Group’s various digital media. The Prisma Media Group may transmit to this advertiser audience segments, i.e. groups of the Audience categorized according to various criteria (age, interests, city, etc.) and generated using information collected by Cookies or advertising identifiers, if any, associated with data from the Prisma Media database, in order to enrich Intermarché’s customer knowledge for advertising purposes. |

**5.6 Third-party connection services (i.e., social networks)**

Internet users can log in to their user account through the accounts they have on certain social networks such as Facebook, Twitter, Google or Apple.

For more information, certain platforms have made available specific information regarding this connection service:

see [Google](https://support.google.com/accounts/answer/10130420#apps-with-access)

see [Apple](https://support.apple.com/fr-fr/HT204053#:~:text=Utiliser%20le%20service%20Connexion%20avec%20Apple%20dans%20des%20apps%20et,un%20compte%20et%20vous%20connecter.)

see [Facebook](https://fr-fr.facebook.com/help/218345114850283/?helpref=uf_share)

see [Twitter](https://help.twitter.com/fr/managing-your-account/connect-or-revoke-access-to-third-party-apps)

see [Tiktok](https://support.tiktok.com/fr/safety-hc/account-and-user-safety/connect-to-third-party-apps)

As such, the PRISMA MEDIA Group may need to access certain information transmitted to these social networks, mainly the user’s email address. An authorisation to access this profile data and to share the activities with these social networks will be requested from the user, who will be informed of the data used and how it is used and shared.

**5.7 Data transfers outside of the EU**

The PRISMA MEDIA Group is based in France but within the framework of its activities, it is susceptible to work with partners and/or subcontractors located outside of the European Union.

In case of transfer of Data outside the European Union, PRISMA MEDIA will inform you of the said transfers and will take the necessary measures to supervise them in accordance with the regulations in force (by signing the European Commission's Standard Contractual Clauses) and to ensure the confidentiality and security of your Data.

**TAB 6: ERASURE, OBJECTION, WITHDRAWAL OF CONSENT: ALL ABOUT HOW TO EXERCISE YOUR RIGHTS**

In this tab we have gathered all of the ways you can exercise your rights with the PRISMA MEDIA Group:

**6.1 TO UNSUBSCRIBE FROM EMAILS SENT BY THE PRISMA MEDIA GROUP (Newsletters, sales solicitations for PRISMA MEDIA Group products and services, etc.)**

**=> directly in the emails (including for PRISMASHOP)**

You can click on the **unsubscribe link** in the emails you receive (accept in the “transactional” emails that handle account management, order summary, etc.). Your request will be taken into account automatically but may take several days.

Please note: Regarding newsletters, explanations are in the FAQ to help users:

on Prismashop: [How to unsubscribe from Prismashop newsletters.](https://www.prismashop.fr/service-clients.html?question=comment-desabonner-e-mails-prismashop)

on PMC: [emails received](https://www.prismaconnect.fr/faq#my-emails-received)

If you have any problems unsubscribing, contact us at [dpo@prismamedia.com](mailto:dpo@prismamedia.com).

**=> in the preferences centre of the PRISMA MEDIA Group (outside of Prismashop)** accessible through:

* The unsubscribe link in the emails: in addition to the ability to unsubscribe from the message concerned, you can access a preference centre containing all your subscriptions to PRISMA MEDIA Group services and manage them either individually or in a group.
* The PMC account: in the profile settings of your PMC account, you can also access all of your subscriptions and unsubscribe if you wish.

**Please note: Unsubscribing from Prismashop messages is not possible in the settings.**

**6.2 TO OBJECT OR WITHDRAW CONSENT TO OUR EMAILS AND EMAILS FROM OUR PARTNERS**

**Emails:**

You can click on the **unsubscribe link** in the emails received. Your request will be taken into account automatically but may take several days.

You can also use:

* the unsubscribe link included in the emails: in addition to the ability to unsubscribe from the message concerned, the user can access a preference centre including all of their subscriptions to the PRISMA MEDIA Group services and manage them either individually or in a grouped manner.
* The PMC account (if the user has a PMC account): in the profile settings of your PMC account, you can also access all of your subscriptions and unsubscribe if you wish.

**Canvassing through the post:**

If you do not wish to receive commercial offers from our partners by post, **if you did not indicate your opposition at the time of your subscription,** you can exercise your right of opposition at any time during your subscription:

* contact customer service by telephone at +33 (0) 808 809 063 (French toll-free number) which will take your request into account;
* connect to your PrismaShop customer account and go to “my personal information” and choose your preference using the On/Off button;
* contact the Data Protection Officer of the PRISMA MEDIA Group at the following email address: [dpo@prismamedia.com](mailto:dpo@prismamedia.com) or at the mailing address: Groupe PRISMA MEDIA, Data Protections Officer, 13 rue Henri Barbusse, 92230 Gennevilliers.

**Telephone canvassing**

If you do not wish to receive sales solicitations by telephone and/or SMS for products and services of the PRISMA MEDIA Group, **if you did not object at the time you subscribed**, you can exercise your right to object at any time during your subscription:

* contact customer service by telephone at +33 (0) 808 809 063 (French toll-free number) which will take your request into account;
* connect to your PrismaShop customer account and go to “my personal information” and choose your preference using the On/Off button;
* contact the Data Protection Officer of the PRISMA MEDIA Group at the following email address: [dpo@prismamedia.com](mailto:dpo@prismamedia.com) or at the mailing address: Groupe PRISMA MEDIA, Data Protections Officer, 13 rue Henri Barbusse, 92230 Gennevilliers.

**6.3 REFUSING TO INSTALL COOKIES ON YOUR TERMINAL:**

**Via the CMP:**

**For cookies requiring prior consent** => as soon as you arrive on one of the Group’s Websites or Applications, you will be invited to make your choice in the Consent Management Platform (CMP) deployed on all Websites and Applications of the PRISMA MEDIA Group.

Then, you can change your choice at any moment by accessing the CMP:

* by clicking here or
* via your *PRISMA CONNECT Account*
* or directly through the *Websites and Applications (link in footer)*

**Via the link from our partner Wysistat:**

**For exempted cookies** => you can deactivate them directly using the following link and on TAB 5, paragraph 5.3.2 of this Confidentiality Page: https://www.wysistat.com/opt-out/verification.html.

**Via your browser’s configuration**

You can also configure your browsing software to accept or refuse Cookies that are proposed to you occasionally, before a Cookie is likely to be stored in your terminal.

To manage Cookies, each browser’s configuration is different. This is detailed in the browser’s help menu, which will allow you to know how to modify your cookie preferences:

- For Internet Explorer™: click [here](https://support.microsoft.com/fr-fr/help/17442/windows-internet-explorer-delete-manage-cookies)

- For Safari™: click [here](https://support.apple.com/fr-fr/guide/safari/sfri11471/mac)

- For Chrome™: click [here](https://support.google.com/chrome/answer/95647?hl=fr&hlrm=en)

- For Firefox™: click [here](https://support.mozilla.org/fr/kb/effacer-cookies-donnees-site-firefox)

- For Opera™: click [here](https://www.accepterlescookies.com/comment-accepter-les-cookies-sur-opera.html)

**Via third party sites**

*YOURONLINECHOICES*

You can connect to the website [Youronlinechoices](http://www.youronlinechoices.com/fr/controler-ses-cookies/), proposed by digital advertising professional who are members of the European Digital Advertising Alliance (EDAA) and managed in France by the [Interactive Advertising Bureau France](https://www.iabfrance.com/) (IAB). You can find out which companies are registered with this platform and which offer the possibility of refusing or accepting the cookies used by these companies to adapt the advertisements likely to be displayed on the user's terminal according to the user's browsing information by clicking [here](https://www.youronlinechoices.com/fr/controler-ses-cookies/).

*ABOUTADS*

This website can also help you express your online choice by clicking [here](https://optout.aboutads.info/?c=3&lang=fr).

If you notice that your request has not been processed or is not fully taken into account, contact us at dpo@prismamedia.com

**6.4 MANAGING AND ERASING YOUR USER ACCOUNT**

**=> the PMC Account**

As a PRISMA MEDIA CONNECT account holder, you have a personal space where you can directly exercise certain rights:

* the right to access and rectify your personal account information,
* the right to delete the account independently by clicking on "delete my account" accessible directly via the "manage my rights" tab,
* registering for and unsubscribing from certain products and services offered by the PRISMA MEDIA Group

A contact form is also available on the FAQ page for PRISMA MEDIA CONNECT ([here](https://www.prismaconnect.fr/faq#my-personal-data)) to write directly to the Data Protection Officer.

**=> The PRISMASHOP account**

As a PRISMASHOP account holder, you have a personal space where you can directly exercise certain rights:

* the right to access your personal account information and to modify your personal data,
* the right to object to canvassing by post.

There is no automatic account deletion feature that you can activate on your own. To delete your account, you must send an email to [dpo@prismamedia.com](mailto:dpo@prismamedia.com) with the subject line “Prismashop account deletion”. To help the user, this question is available on the FAQ page: [How do I delete my account?](https://www.prismashop.fr/service-clients.html?question=comment-supprimer-compte-prismashop).

**In general, you can contact the PRISMA MEDIA Group for any questions regarding the protection of your personal data or if there is any malfunction with the features listed above.**

**6.5 MANAGING PUSH NOTIFICATIONS FOR YOUR BROWSER**

Receiving push notifications is set and can be managed directly in your browser. The PRISMA MEDIA Group is not able to unsubscribe you, therefore you must take the following steps:

To no longer receive push notifications on your computer:

- Go to the PRISMA MEDIA Group website from which you receive the push notifications;

- Click on the lock in the address bar;

- Then modify the status of the Notifications (Block/Always ask/Authorise).

**6.6 DIRECT CONTACT OR CONTACT WITH THE CNIL**

Contact details

* by email: [dpo@prismamedia.com](mailto:dpo@prismamedia.com)
* by mail: Groupe PRISMA MEDIA, Data Protection Officer, 13 rue Henri Barbusse, 92230 Gennevilliers.

Your request must include a return address. In certain situations, the PRISMA MEDIA Group will carry out identity checks (i.e., asking for a photocopy of an ID).

In accordance with current regulations, the PRISMA MEDIA Group has 1 (one) month to respond following the receipt of the request. This response period can extended to two months when taking into account the complexity and the number of requests sent to the PRISMA MEDIA Group. In this case, the PRISMA MEDIA Group informs the person of this extension and the relevant justifications.

**Contact details of the French Information Commissioner’s Office (*Commission Nationale de l’Informatique et des Libertés - CNIL*)**

You can contact the French data protection regulator directly via the following link and contact details:

* [Contact the CNIL: switchboard and telephone hotlines](https://www.cnil.fr/fr/vous-souhaitez-contacter-la-cnil)
* Commission Nationale de l’Informatique et des Libertés, 3 Place de Fontenoy, 75007 Paris.