

Privacy Policy

This privacy policy sets out how we, Judge Food SAS JUDGE-FOOD obtain, store and use your personal information. The effective date of this privacy policy is October 2, 2017.

By using our website <http://www.judgefood.com> , and/or any of the applications or Services provided on or through the website or by Judge Food (collectively the “Services”), you agree to the use and treatment of your personal information in accordance with this privacy policy.

In accordance with the provisions of the law n ° 78-17 of 6 January 1978 relating to data processing, files and freedoms, our website has been declared to the CNIL (Commission Nationale Informatique et Libertés - French Data Protection Authority) under the number 2052234 v 0 .

Please read this privacy policy carefully. We recommend that you print off a copy of this privacy policy and any future versions in force from time to time for your records.

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Our details

The data controller in respect of our website is SAS JUDGE-FOOD (SIRET 823 151) . You can contact the data controller by writing to :

SAS JUDGE-FOOD
Chez Centre d'affaire de Mayotte
97600 Mamoudzou
Mayotte

or sending an email to conseil@judgefood.com .

The data protection officer for the data controller is Edson MONGINY or can contact the data protection officer by writing **SAS JUDGE-FOOD**
Chez Centre d'affaire de Mayotte
97600 Mamoudzou
Mayotte

or sending an email to conseil@judgefood.com .¹

If you have any questions about this privacy policy, please contact the data controller.

How we collect personal information about you

We collect personal information about you when you provide it to us, such as through your use of our website and its features, when you contact us directly by email, phone, in writing, social media, when you order Services, when you use any of our other websites or applications or any other means by which you provide it. We may also receive information about you from third parties such as affiliates, business partners, credit and fraud check agencies, as well as third parties with whom we have had no prior contact. We also collect information about your use of our website through cookies and similar technologies.

Personal information we collect or obtain about you

The type of information we collect about you may include information such as your:

- name,
- email address,
- address,
- date of birth
- Kind (Male/Female)
- phone number,
- payment information,
- information about your computer (e.g. your IP address and browser type),
- information about how you use our website (e.g. what pages you have viewed, the time when you viewed them and what you have clicked on),

¹ This paragraph should only be included if you have appointed a data protection officer. Certain organisations will need to appoint a data protection officer and, if so, provide the contact details of the data protection officer in this notice. You will be required to appoint a data protection officer if the data controller's core activities consist of: (i) processing operations which require regular and systematic monitoring of data subjects on a large scale; or (ii) processing sensitive personal information and personal information relating to criminal convictions and offences on a large scale; or (iii) if required by European Union or national EU member state law.

- information about your mobile device (such as your geographical location),

Information we receive from third parties will generally be your name and contact details, but may include any additional information they provide to us, including (but not limited to) any of the types of information set out above.

We may also obtain personal information from the following publicly accessible sources, including the electoral register, online customer databases, business directories, media publications, social media and other publicly accessible sources.²

Please note that we may not be required to provide you with certain information in this privacy policy if you already have that information.

In addition, where we receive personal information about you from a source other than yourself, we are not required to provide you with that information if:

- you already have the information,
- providing you with the information would prove impossible or would involve disproportionate effort,
- we are under an EU or EU member state obligation to obtain or disclose the information, or
- we are obliged or keep the information confidential as a result of an obligation of professional secrecy regulated by EU law or EU member state national law.

Where we obtain personal information about you from a source other than yourself, and are required to provide you with that information, we will provide you with the information contained in this privacy policy:

- within a reasonable period after obtaining your personal information (and in any event within month at the latest), taking into account the specific circumstances in which we use your personal information,
- if we intend to use your personal information to communicate with you, at the point when we first communicate with you, and
- if we envisage that we will disclose your personal information to a third party, when we disclose your personal information to that third party (at the latest).

How we use your personal information³

We may use your personal information for one or more of the following purposes in our legitimate interests or in the legitimate interests of third parties:

- **Providing you information about Businesses, Locations, Events and Brands.** One of the key purposes of the Services is to help users learn about businesses, locations, events and

² Add any other public sources of personal information that you use to this list.

³ This list of purposes for which personal information may be used sets out the most common uses of personal information by a business. You should delete or add to this list as appropriate. However, in general, you may only process personal information for a limited number of purposes, and the most commonly used purposes are: (i) in order to perform a contract with the individual; (ii) for your legitimate interests as a business; or (iii) for compliance with a legal obligation. If you cannot process the personal data in question on one of these grounds, you will require the individual's explicit consent, and such a purpose should be included in the following section beginning "We may process your personal information for the following purposes where we have your consent to do so".

brands (for example, a TV show, a TV personality, newspaper or a consumer good that manages a page on the Service) that are relevant to them, and for these entities to provide information about themselves, their locations and events to users. When you visit a particular location your visits may be shared with that location in order for that location to better provide Services to you. Additionally, brands may have access to aggregated and anonymous/or anonymous data, such as de-identified data about places that its followers visit (that is, not tied to individual users).

- **Providing Publicly Available Information.** When you use the Services, certain information is public, such as your public user profile information, tips, likes, saves, public photos, lists that you create and save, and lists of friends and/or followers (as applicable to a particular Service), and may be searchable by search engines and be shared with or disclosed to third parties to a wide range of users and Services. We may also share or disclose aggregated and/or anonymous data (that does not identify an individual user), to third parties, including users you may follow, users of our API and our customers, for analytical or other purposes.
- **Administering, running and improving our website and business, including personalising our website experience for you.** This is necessary for our legitimate interest of better understanding our other customers' and potential customers' preferences and tailoring our website, products and Services to their needs and preferences.
- **Communicating directly with you in relation to your purchase(s) of our Services, and in response to your enquiries we receive from you.** This will be necessary either to perform a contract which we have entered into with you (or to take steps, at your request, to enter into a contract with you) or for our legitimate interest of satisfying and confirming your requirements in order to provide you with our products or Services or to answer questions we receive from you.
- **Protecting our business and our business interests, including for the purposes of credit and background checks, fraud prevention and debt recovery.** This is necessary for our legitimate interests of preventing criminal activity such as fraud or money laundering, for ensuring that our website and Services are not misused and protecting our business.
- **Displaying advertisements to you and analysing the information we receive in relation to those advertisements.** This is necessary for our and third parties' legitimate interests of direct marketing and advertising products and Services.
- **Providing you with offers relating to our Services which relate to Services you purchased from us or were in negotiations to purchase from us (provided that you did not opt-out from receiving such communications either at the time or subsequently).** This is necessary for our legitimate interest of direct marketing and advertising our products and Services.
- **Communicating with our business advisors and legal representatives.** This is necessary for our legitimate interests of obtaining legal or professional business advice, and we will only share your personal information where it is necessary to do so, to the minimum extent necessary and on an anonymised basis as far as possible.

- **Passing your personal information on to third parties, such as payment Service providers, including credit card and/or PayPal , in order to process your payments for our Services.** This will either be necessary for us to perform a contract we have entered into with you (or to take steps, at your request, to enter into a contract with you) and for our and that third party's legitimate interest in processing payment for products sold and Services rendered.
- **Enforcing our legal rights.** This is necessary for our legitimate interest of protecting our business and enforcing our contractual rights or other legal rights.
- **Ensuring physical, network and information security and integrity.** This is necessary for our legitimate interest of ensuring that our IT systems and networks are secure and uncompromised, including, for example, preventing malware, viruses, bugs or other harmful code, preventing unauthorised access to our systems, and any form of attack on, or damage to, our systems and networks.
- **In connection with disclosure requests and in the case of a business or share sale or sale or purchase of a business and/or assets, whether actual or potential.** This is necessary for our legitimate interests of selling and/or ensuring and promoting the success of our business.
- **Providing statistical information to third parties such as Google Analytics ,.** This is necessary for our and third parties' legitimate interests of processing personal information for research purposes, including market research, better understanding our respective customers, and tailoring our respective products and Services to their needs.
- **Indicating possible criminal acts or threats to public security to a competent authority.** This is necessary for our legitimate interest of promoting the success of our business, preventing crime, for compliance with a legal obligation to which we are subject, in the general public interest or for the legitimate interests of governmental bodies and competent authorities preventing crime.
- **In connection with any legal or potential legal dispute or proceedings.** This is necessary for our legitimate interest of promoting and ensuring the success of our business, the resolution of disputes and making such disclosures which are required by law or which we consider, acting reasonably, are required by law.

We may process your personal information for the following purposes where we have obtained your consent to do so:

- **To provide you with offers relating to Services we offer from time to time and those of selected third parties**
- **Selling or passing on your personal information to third parties (including to third parties within our corporate group from time to time) for marketing purposes such as our business partners, affiliates, associates, suppliers, independent contractors, list providers and joint venture partners.**⁴

Where we process your personal information on the basis of your consent, you can withdraw your consent to such processing at any time by emailing us at conseil@judgefood.com or writing to us at

Société JUDGE-FOOD (adresse Postale)
Chez Centre d'affaire de Mayotte
97600 Mamoudzou
Mayotte

We may also collect or process your personal information where it is necessary to do so for the following other purposes:

- **Complying with laws, regulations and other legal requirements.** Processing of your personal information may be necessary for compliance with legal obligations to which we are subject. For example, we may require your personal information pursuant to a statutory obligation to conduct anti-money laundering checks or to disclose your information to a court following receipt of a court order or subpoena.

How long we store your personal information

We will store your information for no longer than necessary, taking into account the following:

- the purposes for which we are processing your personal information, such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or for our legitimate interests,
- whether we have any legal obligation to continue to process your information, such as any record keeping obligations imposed by applicable law, and
- whether we have any legal basis to continue to process your personal information, such as your consent.

How we secure your personal information

We take appropriate technical and organisational measures to secure your personal information and to protect it against unauthorised or unlawful processing and against the accidental loss or destruction of, or damage to, your personal information, including:

- only sharing and providing access to your personal information to the minimum extent necessary,

⁴ This provision only needs to be included if you intend to sell on personal information to third parties. Most businesses will not intend to sell on the personal information of their customers and if you do intend to sell on the information, you must consider very carefully the requirement to obtain consent to do so. The fact that you intend to sell on the information to third parties must be brought to the customer's attention at the time their personal information is collected and the third parties must be clearly identified either individually or by specific category. Unless your customers opt-in (i.e. expressly consent) to have their details sold or passed on to such third parties, you must not sell or pass them on.

- using secure servers to store your personal information,
- requiring proof of identity from an individual before we provide personal information to that individual, and
- using Secure Sockets Layer (SSL) software to the encrypt any payment transactions you make on or via our website.⁵

Transmission of information (including person information) over the internet is not entirely secure and if you submit any information to us over the internet (whether by email, via our website or any other means) you do so entirely at your own risk. We cannot be responsible for any costs, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your transmission of information to us over the internet.

Cookies and similar technologies

Cookies are data files which are sent from a website to a browser to record information about users of a website.

We use cookies and similar technologies on or via our website.

You can reject some or all of the cookies we use on or via our website by changing your browser settings but doing so may impair your ability to use our website or some or all of its features. For further information about cookies, including how to change your browser settings, please visit www.allaboutcookies.org.

We use Google Analytics on our website to understand how you engage and interact with it. For information on how Google Analytics collects and processes data using cookies, please visit www.google.com/policies/privacy/partners/. You can opt out from Google Analytics tracking by visiting: <http://tools.google.com/dlpage/gaoptout>.⁶

Transfer of your personal information to other countries and safeguards

We may transfer your personal information outside of the country in which we collected or otherwise obtained it, including outside the European Economic Area or to an international organisation. Where we transfer your personal information outside the European Economic Area, the country to which it is transferred will either be subject to an adequacy decision by the European Commission or if not (or if we transfer your personal information to an international organisation) we will ensure that the transfer takes place on the basis of one or more of the following safeguards:⁷

⁵ Include this provision if you accept payment for goods and services online from your website.

⁶ This provision should be included if you use Google Analytics on your website.

⁷ If you transfer any personal information outside of the European Economic Area using specific safeguards, you should delete any safeguards you do not use. If you have not yet transferred any personal information outside of the European Economic Area, you should retain the full list of safeguards to give you flexibility as to which safeguards you can use if you do choose to transfer any personal information outside of the European Economic Area.

- data protection policies adhered to by the data controller and other companies and entities within our corporate group from time to time, which comply with applicable laws, known as “binding corporates rules” or “BCRs”,
- standard data protection clauses adopted by the European Commission or adopted by the Information Commissioner’s Office and approved by the European Commission in accordance with applicable law,
- a code or codes of conduction produced by an association or other body approved by the Information Commissioner’s Office,
- an approved certification mechanism (such as the EU-US Privacy Shield), or
- where authorised by the Information Commissioner’s Office, contractual clauses between the data controller or processor and the data controller, processor or recipient of the personal information in the third country or international organisation.

Your rights in relation to your personal information

You have the following rights in relation to your personal information, which you can exercise by writing to the following address:

Société JUDGE-FOOD
Chez Centre d'affaire de Mayotte
97600 Mamoudzou
Mayotte

or sending an email to conseil@judgefood.com :

- to request access to your personal information and information related to our processing of your personal information,
- to request the correction or deletion of personal information,
- to request that we restrict our use of your personal information,
- to object to us processing your personal information where we process it order to carry out a task in the public interest or in the exercise of official authority, for our legitimate interests or for direct marketing purposes. You can exercise your right to stop receiving direct marketing by clicking unsubscribe at the bottom of any marketing email, by following the instructions in any text you have received from us or by sending an email to conseil@judgefood.com, asking that we stop sending you marketing communications or including the words “OPT-OUT”,
- to receive personal information which you have provided to us in a structured, commonly used and machine-readable format (e.g. an Excel spreadsheet) and the right to have that personal information transferred to another data controller (including a third party data controller), and
- to withdraw your consent to our use of your personal information at any time where we rely on your consent to process the data. If you withdraw your consent, this will not affect the lawfulness of our use of your personal information on the basis of your consent before the point in time when you withdraw your consent.

You also have the right to lodge a complaint with a supervisory authority, which, for the purposes of the France, is the CNIL, the contact details of which are available here: <https://www.cnil.fr/>

Where you request access to personal information we are required by law to verify your identity before doing so. In order for us to verify your identity we require you to provide us with an original or certified copy of a document from each of the following two categories of documents:

- **Category One:** a full current signed French or overseas passport, a full current French or EU photocard driving licence or a national identity card.
- **Category Two:** a copy of your bank statement, utility bill (gas, electric, water, landline phone), TV licence renewal statement or council tax bill with your address, dated no earlier than three months before the date when you request access to your personal information.

Where you provide a certified copy of these documents, these must be certified by an appropriate professional such as a lawyer, accountant, an official at a bank or building society or a regulated financial adviser.

We will not be able to provide you with access to your personal information until you provide us with your proof of identity set out above and we have been able to successfully verify your identity.

Consequences of not providing personal information

Where you wish to purchase or utilize our Services, we may require your personal information in order to enter into a contract with you. We may also require your personal information pursuant to a statutory obligation (in order to be able to send you an invoice for products and Services you wish to order from us, for example).

If you do not provide your personal information, we will not be able to enter into a contract with you or to provide you with those Services.

Changes to our privacy policy

We may change our privacy policy from time to time without providing prior notice to you. Changes to our privacy policy will be indicated to you by us posting an updated version of our privacy policy on our website with a new effective date stated at the beginning of it. By continuing to access our website on or after that effective date, you agree to be bound by that privacy policy.

Where we intend to use your personal information for a new purpose other than the purpose(s) for which we originally collected it, we will provide you with information about that purpose and any other relevant information before we use your personal information for that new purpose.

Changes to your information

Please inform us of any changes to the personal information we have provided so we can keep the personal information we hold about you accurate and up-to-date.

Passwords

Where we have provided you with a password to access our website or any part of it or any goods or Services offered by us or anyone else, that password is confidential. You must keep that password confidential and not pass it on to anyone else.

We cannot be responsible for any loss or damage suffered by you as a result of your disclosure of your password to any third party and we disclaim any and all liability to you in respect thereof.

Links

Our website and any other websites owned or operated by us or our corporate group from time to time may contain links to other websites and applications which are owned or operated by third parties.

Such third parties will have their own policies and procedures governing their use and storage of your personal information and you should check their privacy policies before using their websites and applications.

We cannot be responsible for the policies and procedures of such third-party websites or applications and we disclaim any and all liability to you in respect thereof.

Our website and children

Our website and our products and Services are not intended for use by individuals under the age of 13.

IF YOU ARE UNDER THE AGE OF 13, YOU MUST NOT USE OUR WEBSITE, PURCHASE OR ATTEMPT TO PURCHASE ANY OF OUR PRODUCTS OR SERVICES, OR SUBMIT ANY PERSONAL INFORMATION TO US.

We do not knowingly or intentionally process the personal information of any individual under the age of 18.