

# Data protection policy

*Last updated 22.11.2021*

Capitalised terms are defined in the [Terms of Service](#) of the Platform.

When you browse the ManoMano Platform and use the online sales Services offered there, personal data about you is collected and processed by our departments.

The purpose of this data protection policy is to inform you about:

- how we collect and process your personal data;
- the cookies we place on your browsing device.

## I. YOUR PERSONAL DATA

### 1. Who is the data controller?

The data controller is the person who determines the purposes and means of processing, namely the objective and how we achieve it.

**Colibri SAS - ManoMano: data controller for the use of the Platform and the Services offered there**

Colibri SAS - ManoMano, registered on Paris Trade and Companies Register under number 752 979 930, represented by Mr Christian Raison as Chief Executive Officer, having its registered office at 52 Rue Bayen 75017 Paris, publishes the Platform.

In this context, we collect and process your personal data as a data controller during your browsing on the Platform and use the Services offered there.

**Colibri SAS - ManoMano & Sellers: joint data controllers for the management of your Orders**

Your personal data collected for the fulfilment of your Orders placed on the ManoMano Platform is jointly processed by the company Colibri SAS - ManoMano, the company that operates the Platform, and by each Seller with which you place an Order.

## 2. Why do we process your personal data and on what legal basis?

Purpose	Legal Basis
Access and browsing on the Platform	execution of the contract
Management of your Orders placed via the Platform (connection with Sellers, delivery, customer service, after-sales service, etc.)	performance of sales contracts
Payment in one or more instalments	execution of the contract
Detecting, preventing and combating fraudulent and illegal activities on the Platform	ManoMano's legitimate interest
Recording exchanges between the User and the customer service, the Seller or the Experts by email, chat or telephone to improve our Services, train our teams and manage the customer and prospective relationship	ManoMano's legitimate interest
Customer relationship management via social networks	ManoMano's legitimate interest
Analysing your browsing on the Platform to improve our services	ManoMano's legitimate interest
Carrying out statistical studies on the use of our Platform and Services	ManoMano's legitimate interest
Collecting and managing reviews on Products, Services and customer service performance	ManoMano's legitimate interest
Conducting surveys and questionnaires to improve our Platform and Services	obtaining consent
Organising contests	obtaining consent
Sales prospecting by email and/or SMS	ManoMano's legitimate interest for a customer on a similar product or service or obtaining consent

Personalised advertising based on your browsing, your profile and information you have provided to us	obtaining consent
Displaying the contents of the Personalised Platform based on your browsing, your profile, information you have provided	obtaining consent
Management of requests for right of access, rectification and objection	legal obligation

### 3. What personal data do we process about you?

We collect and process:

- personal data you have entered on our Platform, in particular when creating your Personal Account or Guest Account (email, surname, first name, address, telephone number, password, etc.);
- information relating to the Orders you place on the Platform (product purchased, transaction number, delivery address, etc.);
- information about your means of payment (credit card number, credit card expiry date, visual cryptogram). Only our secure payment service provider has access to the visual cryptogram;
- information you provide to us when you contact customer service, Experts or the Seller via the Platform (content of exchanges, nature of the complaint, etc.);
- your login and browsing data on the Platform (IP address, value in euros and basket contents, products and pages you have viewed or searched for, URL of the landing page and previous URL of the website from which you arrived);
- data on emails we send to you for statistical purposes and sales prospecting;
- information you provide when you leave a review;
- information about our advertisements you view;
- information you provide when participating in promotional operations, surveys and questionnaires, contests or events we organise.

As part of the ManoManoPro Platform, we collect and process personal data you have entered and/or transmitted to register on the ManoManoPro Platform and benefit from the specific services reserved for Building Professionals.

### 4. How long do we keep your personal data?

As a first step, we keep your personal data in our **active database** (i.e. the data is accessible by the ManoMano departments in charge of processing current matters) for the following periods:

- if you have never placed an Order on our Website: we retain your personal data for sales purposes for **three years from your last contact with ManoMano** (i.e. from the last time you clicked on a hyperlink contained in an email);
- if you have placed an Order on our Website: we retain your personal data for **three years from the end of your sales relationship with ManoMano**. The

end of your sales relationship corresponds to your last Order on the Platform or, if this date is later, your last contact with ManoMano (namely, your last connection to your Personal Account/Guest Account or your last telephone call/email/chat with ManoMano);

- we keep your data relating to your requests for access, rectification, erasure, portability, limitation and opposition for **three years from the exercise of your right**;
- we keep the data collected via the audience measurement trackers exempt from consent for 25 months after placing the tracker on the connection device;
- your reviews of Products are posted on the Platform until you ask for them to be removed.

At the end of these periods, we archive your personal data for an additional period in our **intermediate archiving database** (meaning data can only be consulted on an ad hoc and justified basis by specifically authorised ManoMano departments), (i) as evidence in the event of a dispute (five years) and (ii) to comply with our legal and tax archiving obligations in force (ten years).

At the end of this additional period, **your personal data is anonymised or permanently deleted from our databases.**

## **5. Who is the recipient of transmitted personal data?**

### **5.1 Our service providers**

Your personal data is transmitted to the service providers we use to subcontract all or part of the processing we carry out with your data, including for the purpose of:

- operating the Platform and its Services (sending emails and SMS, telephone calls, etc.): your data is transmitted to specialised technical service providers;
- paying for your Orders: your data is transmitted to service providers specialised in banking transactions (such as banks, payment service providers);
- paying for your Orders in instalments: your data is transmitted to our partner Oney;
- storing Products shipped by ManoFulfilment: your data is transmitted to specialised logistics providers;
- managing customer service: your data is transmitted to our partners and our technical service providers;
- our instant messaging system on our Platform: your data is transmitted to the Experts and our technical service provider;
- managing reviews: we transmit your data to service providers specialised in processing customer reviews;
- managing sales prospecting: we transmit your data to service providers specialising in sales prospecting.

The subcontractors we use offer the guarantees required by the applicable personal data protection regulations. They only have access to the personal data required for the performance of their services and are not authorised to process your personal data for other purposes. We have also signed agreements with each of them to guarantee the

security and integrity of your personal data and their processing in compliance with applicable regulations.

## **5.2 Platform Sellers and their carriers**

The data necessary to manage your Orders is transmitted to Sellers from whom you purchased a Product via the Platform.

Your personal data to ensure the delivery of your Order is also transmitted to the carrier you have selected or proposed to you when placing your Order.

## **5.3 Authorities**

Your personal data may be disclosed to the authorities pursuant to a law, a regulation or a decision of a competent regulatory or judicial authority.

In general, we undertake to comply with all legal rules that may prevent, restrict or regulate the disclosure of information or data and in particular to comply with applicable data protection regulations.

## **5.4 In case of acquisition, merger, business transfer**

In the event where the company Colibri SAS - ManoMano or part of its activities are acquired by a third party company or merge, we will inform you in advance regarding the transfer of your personal data and your right to oppose this transfer.

## **5.5 Users**

When you post a review on the Platform, your Public Username and review are available to Users.

# **6. What are your rights over your personal data and how do you exercise them?**

## **6.1 What are your rights?**

You have the right to obtain from us:

- confirmation that your personal data is or is not being processed and, where applicable, have access to this data;
- update and rectification of your personal data that is inaccurate or incomplete;
- erasure of your personal data under certain conditions. It should be noted that data shared with other users (such as the publication of reviews) will remain visible to the public on the Platform, even after deletion of your Personal Account or Guest Account;
- restriction of the processing of your personal data under certain conditions;
- portability of your personal data;
- organising what happens to your personal data in the event of death (storage, erasure, or communication to a designated person).

You also have the right to object to the processing of your personal data under certain conditions.

You can also at any time:

- withdraw your consent to the processing of your data carried out by our departments for the purposes of behavioural advertising, browsing analysis and audience measurements by setting your cookies;
- object to the processing of your data for sales prospecting purposes:
  - by email, by clicking on the unsubscribe link in our promotional emails and in our newsletter;
  - by SMS, by sending "STOP" to the number indicated in the SMS received;

We also remind you that you have the right to lodge a complaint with the Data Protection Authorities [ICO] if you consider that your rights have not been respected.

Further information on your rights with regard to your data can be found on the Data Protection Authorities [ICO] website: <https://ico.org.uk/>.

## 6.2 How can you exercise your rights?

For any request relating to exercising your rights, you can make your request:

- through this form: <https://faq.manomano.com/hc/en-gb/requests/new>
- by post (with copy of your ID) sent to the following address:

ManoMano  
A l'attention du délégué à la protection des données (DPO)  
52 rue Bayen  
75017 PARIS

Our departments will reply to you as soon as possible and at the latest within one month after receipt of your request.

## 7. Is your personal data transferred outside the European Union?

Some processing operations that we entrust to our subcontractors are carried out outside the European Union. Agreements have been signed with each of these service providers to ensure that transfers of your personal data are carried out safely and in compliance with applicable data protection regulations in force.

## 8. Contact the Personal Data Protection Officer:

If you have any questions about the processing of your personal data or to exercise your rights over your data, you can contact the Data Protection Officer (DPO), appointed by Colibri SAS - ManoMano:

- through this form: <https://faq.manomano.com/hc/fr/requests/new>
- by post to the following address:

COLIBRI SAS  
Délégué à la Protection des Données  
52 rue Bayen  
75017 PARIS

## II. OUR COOKIES

We describe below the trackers and/or cookies (hereinafter “Cookies”) that may be placed and/or read on your device when you use the Platform and the means available to you to accept or refuse such Cookies at any time.

### 1. What is a cookie?

A cookie is a small computer file that is stored and/or read, for example, when visiting a website or mobile application, regardless of the type of device you use (computer, smartphone, tablet, etc.).

There are several types of Cookies such as HTTP cookies, flash cookies, fingerprinting, identifiers generated by software or an operating system (serial number, MAC address, identifier for vendors (IDFV), etc.).

### 2. Which cookies do we use on the Platform?

An information banner is displayed when you connect to the Platform in order to inform you prior to the placing of these Cookies, (1) of their presence and (2) allow you to choose your settings. We inform you that 4 categories of cookies may be installed when you browse our Platform:

#### 2.1. Necessary cookies

These Cookies are required for the proper functioning of the Platform.

Within our Platform, we use:

- Cookies to store your choices on the placing of Cookies (which cookies you authorise);
- cookies that enable you to use the main features on the Platform, including:
  - identifying yourself and logging into your account;
  - chatting with online advisors when you need them;
  - displaying Products you have already viewed on the Platform;
- cookies that enable us to remember the content of your shopping basket on our Platform;
- cookies that enable you to pay for your Orders on the Platform;
- Cookies that enable balancing of equipment load;
- audience measurement cookies which are strictly necessary to provide our services.

These Cookies do not require your consent. However, you can set your browser to block them. If you block these trackers, the Platform may not function properly.

## 2.2. Preference Cookies

These cookies allow us to optimise your browsing on our Platform and improve the content that we offer you.

By way of example, we have:

- Cookies to show you YouTube videos;
- Cookies to analyse your browsing and propose surveys and questionnaires to help us understand how you use the Platform and improve our Services.

You must accept these Cookies to benefit from them.

## 2.3. Statistics Cookies

These Cookies allow us to measure the audience on our Platform (number of visitors, duration of browsing, etc.) in order to improve its operation and the services offered.

These Cookies tell us:

- the value in euros and basket contents, even if the transaction is not finalised;
- the content of your searches on the Platform;
- your time stamp;
- your location (geolocation based on your IP address to the nearest city);
- the URL of the landing page and the URL of the website from which you arrived;
- your IP Address;
- the name, version, language and size of your browser and operating system window as transmitted by your browser.

We use "Google Analytics" to measure our audience. The use of Google Analytics results in the transfer of personal data to the United States. Please read the terms of service of Google Analytics: [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

If you want to disable Google Analytics on your browser, you can install an add-on in your browser developed by Google: <https://tools.google.com/dlpage/gaoptout?hl=en>

## 2.4. Marketing cookies

These Cookies enable us to analyse your browsing to identify your interests and show you advertisements that are most likely to interest you when you browse the internet.

In this context, two types of Cookies can be placed on the Platform:

- "internal" Cookies placed and used by ManoMano;
- so-called "third party" cookies placed, used and managed directly by our partner companies. We are joint data controllers for these Cookies with our partners.

The partner companies that place and use Cookies on our Platforms on their behalf are:

- Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, "Google") : <https://www.google.com/privacy/ads>. You can disable the use of



Google Ads Personalisation Cookies by clicking on the link below, downloading and installing the plug-in provided: <https://support.google.com/ads/answer/7395996?hl=fr> ;

- Facebook (1601 S. California Ave, Palo Alto, CA 94304, USA, "Facebook") : <https://www.facebook.com/about/privacy> ;
- Criteo : <https://www.criteo.com/fr/privacy> ;
- Microsoft: <https://about.ads.microsoft.com/en-gb/resources/policies/privacy-and-data-protection-policies>.

We invite you to consult their data protection policies (link above) to find out more about the processing carried out by our partners and, if you so wish, to object to their services.

These cookies enable you to:

- analyse User browsing on the Platform (for example, the number of pages viewed, Products viewed, searches you have carried out);
- create performance statistics, including the total number of Users who clicked on the advertisements;
- show you the advertisements that are most relevant to you based on your browsing and profile when you visit another website on the partner network;
- limit the number of times the same advertisement is displayed to you;
- target advertisements to Users who have already visited or interacted with our Platform;
- ensure security, prevent fraud and debug;
- develop and improve the services provided.

You must accept these Cookies to benefit from them.

### **3. How long is my consent valid for?**

Your consent is valid for a period of 12 months. You may at any time change your consent under "Set my cookies".

### **4. How long do Cookies last?**

The duration of each Cookie is shown in the "Settings" section of our Cookie Management Tool.

### **5. How can you configure Cookies?**

At any time, you can choose to indicate and change your Cookie preferences, as described below.

#### **5.1. Cookie management platform used by the Provider**

We use a tool that allows you to manage the placing of Cookies when you connect to the Platform. You can set the Cookies placed on the Platform at any time by clicking on "Set my cookies" at the bottom of the website.

## **5.2. With your browser**

In principle, your browser allows you to view, manage, delete and block Cookies on a website. You can configure your browser in such a way that:

- Cookies are stored on your device or, on the contrary, they are rejected, either systematically or according to their issuer.
- acceptance or rejection of Cookies is offered to you on an ad hoc basis, before a Cookie is likely to be stored on your device.

You are informed that if you delete all Cookies, you will lose all your choices. Any settings you change could affect your Internet browsing and your conditions of access to certain services requiring the use of Cookies. Your attention is drawn to the fact that a number of features necessary for browsing the Platform may be degraded due to the settings you have changed (difficulties with saving or viewing, etc.).

You can configure your browser software in such a way that cookies are stored on your device or, on the contrary, that they are rejected, either systematically or according to their issuer.

The configuration of each browser is different. It is described in your browser's help menu, which will let you know how to change your cookie preferences.

- For Internet Explorer™: <https://support.microsoft.com/fr-fr/topic/supprimer-et-g%C3%A9rer-les-cookies-168dab11-0753-043d-7c16-ed5947fc64d>
- For Safari™: <https://support.apple.com/kb/PH5042>
- For Chrome™: <https://support.google.com/chrome/bin/answer.py?hl=fr&hlrm=en&answer=95647>
- For Firefox™:

## **5.3. With your smartphone's operating system**

You can manage the placing of Cookies in the rules of your smartphone's operating system.

## **5.4. Youronlinechoices.com website**

You can object to the placing of cookies linked to personalised advertising via the website dedicated to interest-based advertising on the Internet: <https://www.youronlinechoices.com/en/controler-ses-cookies/>