

MARKETPLACE PRIVACY POLICY

For us, Cdiscount, it is essential to ensure the confidentiality and respect of your Personal Data.

We protect your privacy by ensuring the protection, confidentiality, non-alteration, availability and security of the Personal Data you entrust to us through all our communication channels.

We make every effort to (i) provide you with clear and transparent information about how your Personal Data will be processed, (ii) apply the technical and organisational measures necessary to protect your Personal Data in accordance with applicable personal data protection law, (iii) retain your Personal Data only for the time necessary for the purposes of the processing determined.

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GLOSSARY

For a proper understanding of this privacy policy, here are some key concepts:

Cookies : A cookie is a small text file placed on the user's hard drive by the server of the visited site or by a third party server, it contains information about the navigation performed on this site.

Personal data : Any information that directly or indirectly identifies a natural person (for example, your name, e-mail address, billing information, telephone number, date of birth).

Right of access : You have the right to ask us to confirm whether or not personal data concerning you are being processed and, if so, to access such data and:

- the reasons why we hold your personal data;
- the categories of data we hold;
- our use of your personal data;
- who has access to your personal data (and their location);
- where your personal data may be transferred;
- the length of time we keep your personal data;
- if you have not provided us with your personal data directly, how we obtained it;
- your rights under applicable laws and the possibility of limiting processing;
- the possibility of lodging a complaint with the competent supervisory authority; if we use your personal data for any automatic decision-making and how we proceed.

Right to erase : You have the right to ask us to delete any personal data concerning you.

Right to Limitation : You have the right to ask an organization to temporarily freeze the use of some of your Data, particularly during the examination of your request to exercise another right.

Right of objection : You may at any time object to the use of some of your Data by an organization by stating reasons related to your particular situation.

Right to portability : You may request the communication of part of the Data you have provided us in a machine-readable format but also the transmission of this Data to a third party of your choice.

Right of rectification : You may request the rectification of inaccurate or incomplete information about yourself (e.g. an incorrect address).

Purpose : The purpose refers to the main purpose pursued when processing your Personal Data. Your Personal Data is used for specific, explicit and legitimate purposes.

Group Cdiscount : refers to the company Cdiscount and all the companies controlled directly or indirectly by Cdiscount, within the meaning of article L. 233-3 of the french commercial Code.

Basis of the treatment : To process your Personal Data Cdiscount has the following legal bases :

- **Contract performance** : we process your Personal Data when it is necessary for the performance of the contract concluded with you or for the performance of pre-contractual measures taken at your request. For example, to make the payment, you will be asked for your bank details.
- **Compliance with a legal obligation** : the processing of your Data may be imposed on us by the legislator. For example, the fight against terrorism
- **Our legitimate interest** : the processing of your Data may be necessary to pursue our legitimate interest, including ensuring that the sales experience is improved and that our business prospers.

Marketplace : The marketplace is an online platform that connects independent sellers and buyers.

Person concerned : This privacy policy applies to you if you are :

- Cdiscount Seller, i.e. the person who has created an account on the Platform and sells his products on cdiscount.com,
- prospect Seller of Cdiscount i.e. not having created an account on the Platform.

Data controller : this is the natural or legal person, public authority, department or other body which, alone or jointly with others, determines the purposes and means of the processing. Cdiscount is for the most part responsible for most of these processing operations.

Processing : any operation or set of operations performed or not performed using automated processes and applied to Personal Data, such as collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, matching or interconnection, limitation, deletion or destruction.

Transfer of Personal Data : Any communication, copy or movement of Personal Data intended for processing in a third country

1. DATA CONTROLLER AND HIS DPO

Cdiscount is a public limited company with a share capital of €6,403,294.38, registered in the Bordeaux Trade and Companies Register under number B424059822, represented by Mr Emmanuel Grenier, in his capacity as Chairman and Chief Executive Officer and whose registered office is located at 120-126, Quai de Bacalan - 33067 BORDEAUX Cedex.

Cdiscount publishes the MarketPlace and, as such, processes your Personal Data in various ways as Data Controller.

The Cdiscount DPO ensures the conformity of the processing of personal data carried out by Cdiscount. You can contact him:

- or by email sent to informatique-et-libertes@cdiscount.com
- or by post addressed to Cdiscount, Personal Data Protection Officer, 120-126 quai de Bacalan 33000 BORDEAUX.

2. WHAT DATA ABOUT YOU IS COLLECTED ?

The information collected by Cdiscount includes :

- **Identity information** - this is the information we use to ensure that you are who you say you are. This includes: first name, last name, e-mail address, telephone number, etc.
- **Contact information** - this is the information we use for commercial prospecting purposes. This includes for example: telephone number, postal address, e-mail address, etc.
- **Device information** - this is the information we use to secure our network and improve our services and performance. This includes, for example: the IP address, the date and time of the visit, the duration of the visit on our Platform.
- **Profile/Behavioural Information** - this is the information we use to ensure that we only provide information that is relevant to you. This includes for example: your sales offers, your performance on the marketplace, etc.
- **Financial information** - this is the information necessary to pay for our services on our Platform. This includes for example: your bank details (credit card, Paypal account, RIB,...), your payment institution, etc.

3. WHY DO WE PROCESS YOUR DATA ?

Your Personal Data are processing for the following processing operations :

N° / REF	Principal purpose	Legal basis	Recipient
Data processing n°1	Management of products offered by Sellers	Performance of the contract	<u>Intern Recipient :</u> - Direction MarketPlace <u>Extern Recipient :</u> - Service providers specialising in product integration
Data processing n°2	Seller Quality Control	Performance of the contract / Legitimate interest	<u>Intern Recipient :</u> - Direction MarketPlace - Customer Relationship Management Service - Administrative and Financial Department - Legal Department <u>Extern Recipient :</u> - Service providers specialized in the management of Sellers' accounts
Data processing n°3	Anti-fraud management	Legitimate interest	<u>Intern Recipient :</u> - Direction MarketPlace
Data processing n°4	Management of the "Fulfillment" service	Performance of the contract	<u>Intern Recipient :</u> - Direction MarketPlace - Customer Relationship Management Service - Administrative and Financial Department - Legal Department

			<u>Extern Recipient :</u> - Service providers specialising in the transport and management of warehouses
Data processing n°5	Administrative and accounting management of MKP vendor accounts	Performance of the contract	<u>Intern Recipient :</u> - Administrative and Financial Department - Legal Department - Quality service
Data processing n°6	Seller request management	Performance of the contract	<u>Intern Recipient :</u> - Direction MarketPlace - Customer Relationship Management Service - Legal Department - Quality service
Data processing n°7	Management of exchanges with Sellers	Performance of the contract / compliance with a legal obligation	<u>Intern Recipient :</u> - Direction MarketPlace - Administrative and Financial Department <u>Externes Recipient :</u> Service providers specialising in customer relationship management
Data processing n°8	Management of the relationship with prospective Sellers	Legitimate interest	<u>Intern Recipient :</u> - Direction MarketPlace <u>Extern Recipient :</u> - Service providers specialized in the management of Sellers' accounts - Service providers specialized in software publishing for collecting customer orders and printing transport labels - Service providers specialising in currency management - Service providers specialising in market analysis
Data processing n°9	Management of prospecting of Sellers and/or prospective Sellers by the Group Cdiscount	Legitimate interest	<u>Intern Recipient :</u> - Direction MarketPlace <u>Extern Recipient :</u> - Service providers specialized in marketing campaign management
Data processing n°10	Write reports on the activity of the Sellers	Performance of the contract	<u>Intern Recipient :</u> - Direction MarketPlace
Data processing n°11	Marketing the advertising space of the Sellershop	Performance of the contract	<u>Intern Recipient :</u> - Direction MarketPlace
Data processing n°12	Sponsorship Management	Legitimate interest	

4. HOW LONG DO WE KEEP YOUR DATA ?

We keep your Personal Data to allow you to use the Cdiscount MarketPlace on a continuous basis, for as long as necessary to carry out the processing operations referred to in paragraph 3 above and to comply with legal requirements.

The length of time that Cdiscount keeps your Personal Data varies depending on the purpose of the processing and Cdiscount deletes your Personal Data in accordance with applicable law.

5. HOW TO EXERCISE YOUR RIGHTS ?

For requests that reach the Data Protection Officer by email or post, please indicate the email address attached to your seller account (or use it in the case of an email) as well as your full name. In the event that you are unable to find the e-mail address attached to your seller account or in the event of serious doubts about your identity, additional information relating to your identity may be requested from you in accordance with Article 12 of the DGPS.

We will send you a reply within a maximum of one (1) month following the date of receipt of your request. This period may be extended by two (2) additional months depending on the complexity and number of requests.

For the sake of transparency and simplicity, you will find below a table summarizing your rights according to the different processing operations.

A glossary of key terms is available at the beginning of the document.

Your rights	Conditions	Data processing concerned
Right of access	-	All processing of personal data
Right to rectification	It is important to note that this right only applies if: <ul style="list-style-type: none">- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;- you wish to object to the processing and there are no legitimate compelling reasons for the processing or if it is a processing operation carried out for the purpose of commercial prospecting;- the personal data have been unlawfully processed.	All processing of personal data
Right to restriction of processing	It is important to note that this right only applies if: <ul style="list-style-type: none">- you dispute the accuracy of your Data for the duration of time allowing us to verify the accuracy of the same,	Processing operations based

	<ul style="list-style-type: none"> - you consider that we are processing your Data unlawfully and that you require that their use be limited rather than deleted, - we no longer need your Data for the purposes referred to in paragraph 3 but that they are still necessary for the establishment, exercise or defense of your legal rights, - in the event that you exercise your right to object during the period of verification as to whether the legitimate grounds we are pursuing prevail over yours. 	<p>on the performance of the contract, your consent or our legitimate interest.</p>
Right to erasure	<p>In the event of a request to delete your Data, Cdiscount may nevertheless keep it in the form of an intermediate archive, for the time necessary to satisfy its legal, accounting and tax obligations.</p>	<p>Processing operations based on the performance of the contract, your consent or our legitimate interest.</p>
Right to object	-	<p>Processing operations based on our legitimate interest.</p>
Right to data portability	-	<p>Processing operations based on your consent or the execution of the contract.</p>
The right to formulate post-mortem guidelines	<p>You have the right to formulate specific and general post-mortem guidelines regarding the storage, deletion and communication of your Data.</p> <p>In the absence of any instructions, your heirs may contact Cdiscount to</p> <ul style="list-style-type: none"> - to access Data processing allowing "the organisation and settlement of the deceased's succession". - and/or to have your Account on the Platform closed and/or to oppose the further processing of your Data. <p>In any case, you have the possibility to inform us, at any time, that you do not wish, in the event of death, that your Data be communicated to a third party.</p>	<p>All processing of personal data</p>

The right of complaint	You can, at any time, file a complaint with the competent supervisory authority.	All processing of personal data
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6. COOKIE MANAGEMENT

This section is dedicated to our cookie management policy on our Platform.

It allows you to learn more about the origin and use of the navigation information processed during your consultation of our Platform and your rights.

6.1 What is a cookie ?

When consulting its Platform, Cdiscount may, subject to your choices, deposit a text file on your terminal (computer, smartphone, tablet) using your browser.

This text file is a cookie. It will allow Cdiscount, during the validity or registration of the cookie, to identify your device during your next visits.

Only the issuer of a cookie may read or modify the information contained in the cookie.

Below you will find information about cookies that may be placed on your device while you are on the Platform, either by Cdiscount or by third parties, and how you can delete/reject the registration of these cookies on your device.

6.2 What are cookies used for on www.cdiscount.com ?

6.2.1 "Essential" cookies

These cookies are essential for navigation on the MarketPlace. These cookies are also necessary for tracking Cdiscount's activity. These cookies may be installed on your device by Cdiscount or its service providers.

6.2.2 Cookies " Analytics and Personalization " cookies

These cookies are not essential for browsing our site but may allow, for example :

- for you: to benefit from complete information, to optimize your experience on the site;
- for us: to better identify you, to improve our offer, or to optimize the functioning of our site.

6.3 Manage cookies placed on your device

You can set a cookie on your device only if you want to.

Thanks to the Evidon tool available on our website or the settings of your browser software, you can, at any time, simply and free of charge, choose whether or not to accept the registration of cookies on your device.

6.3.1 The choices available with the Evidon tool

With the Evidon tool, you can choose the cookies that can be placed on your website, with the exception of essential cookies, which are strictly necessary for the navigation and operation of the Cdiscount website and for managing Cdiscount's activity.

6.3.2 The choices available to you through your browser software

You can configure your browser software as you wish, so that cookies are (i) accepted and stored on your device or, on the contrary, (ii) rejected.

If your browser software is set to accept cookies on your device, cookies embedded in the pages and content you have viewed will always be saved on your device.

You can configure your browser software in such a way that (i) you are offered the option of accepting or rejecting cookies from time to time, before a cookie is likely to be saved, (ii) you systematically refuse to save cookies in your device.

Warning : Any settings you may make on your browser software regarding the acceptance or rejection of cookies may affect your Internet experience and your access to certain services that require the use of these same cookies.

For example, by refusing certain essential cookies, you may no longer be able to use the Platform.

If you choose to refuse to store cookies on your device or delete cookies stored on your device, we do not accept any responsibility for the consequences of the degraded operation of our services resulting from the inability of us to store or view the cookies necessary for their operation and that you have refused or deleted them.

7. TRANSFERS OUTSIDE THE EUROPEAN UNION

As a general rule, we store your Data within the European Union.

However, since some of our service providers and Marketplaces are located in countries outside the European Union ("Third Countries"), we transfer some of your Data to Third Countries.

This may be the case in particular for Third Countries for which the European Commission has not assessed the level of compliance such as the United States of America.

In such a case, we ensure that this transfer is carried out in accordance with the applicable regulations and guarantees an adequate level of protection of your privacy and fundamental rights (in particular by using standard contractual clauses of the European Commission, the model of which you can find by clicking on this link <https://www.cnil.fr/fr/les-clauses-contractuelles-types-de-la-commision-europeenne>).

Upon simple request to our Data Protection Officer, we can provide you with more information about these transfers.

8. SECURITY MEASURES

We undertake to implement appropriate technical and organisational measures to guarantee a level of security appropriate to the risk to the rights and freedoms of natural persons in the context of the processing operations referred to above.

These measures shall be defined taking into account the state of knowledge, the costs of implementation and the nature, scope, context and purposes of the processing operation as well as the risks identified.

In addition, we inform you that we comply with the security standard of the PCI DSS payment card industry, which is a guarantee of our expertise in terms of security.

9. REVIEW AND UPDATE OF THE POLICY

This policy will be updated as necessary to meet the requirements of applicable data protection regulations. It shall be reviewed at least every three (3) years.

Le **29/06/2020**

Validated by the Cdiscount DPO