

Cookie policy
ANKORSTORE Platform

Last updated on May the 4th 2020

1. Preamble

ANKORSTORE is concerned with the privacy of the ANKORSTORE platform (the "**Platform**") users, and uses its best efforts to protect it. In particular, ANKORSTORE undertakes to ensure a level of protection of personal data that is in accordance with the General Data Protection Regulation ("**GDPR**"), including any French laws and regulations implementing, complementing or replacing the GDPR, where appropriate.

By means of cookies and other tracers, ANKORSTORE collects and processes personal data relating to the Users and the Members. "Users" refer to any person, whether a Member or not, who accesses the Platform. "Members" designates the users, who have registered with the Platform, and which registration was approved by ANKORSTORE. The Users and the Members shall be collectively referred to as the "**Data Subjects**".

This cookie policy (the "**Cookie Policy**") describes how the personal data of Data Subjects will be collected, by means of cookies and other tracers, and how these data will be processed.

The personal data shall be processed by ANKORSTORE SAS, a *société par actions simplifiée* subject to French law, with a share capital of 1,000 euros, registered with the Register of Companies in Paris as company No. 852 870 658, and which registered office is at 101 rue de Sèvres, 75006 Paris, France (hereinafter "**ANKORSTORE**").

2. What is a cookie?

A cookie is small text file that is placed by the Platform servers or under the supervision of ANKORSTORE and that is stored locally by the browser in a dedicated area of the hard drive or device of the Data Subject (computer, tablet, mobile phone or any other device connected to an electronic communications network), when consulting a content published on the Platform or an online advertisement.

The file may only be read by its issuer, i.e. ANKORSTORE. The file, during its duration of validity, enables its issuer to recognise the device used, every time this device is used to access content that includes cookies placed by that issuer.

Cookies enable ANKORSTORE to store information on how the Data Subject browses the Platform and how it navigates through the Platform.

In accordance with applicable laws, and save for exceptions, ANKORSTORE will ask the Data Subject for its consent before placing these cookies.

3. What cookies does ANKORSTORE use?

- **Purely technical Cookies**

Certain functionalities of the Platform may not work if ANKORSTORE does not use certain cookies (i.e. technical or functional cookies). These cookies are essential for Data Subjects to browse the Platform and use its functionalities. In such a case, ANKORSTORE is not required by law to obtain the Data Subject's consent before placing these cookies.

They are notably "session ID" cookies or "session identifier" cookies, which purpose is to enable the Member to remain logged in for the duration of the Member's browsing of the Platform, without having to enter its login and password again, and to store the content of its shopping basket. These cookies also enable the Member to log in to the Platform again without having to re-type its login and password.

They are also persistent cookies used to customise the user interface (e.g. remembering the layout that was chosen).

- **Other cookies**

Apart from the purely technical cookies, which are necessary to the provision of the service through the Platform, ANKORSTORE uses performance cookies and audience measurement cookies, targeting or advertising cookies, and conversion tracking cookies, as further detailed in article 4, after obtaining the prior consent of the Data Subjects to the use of such cookies.

- **Third-party cookies**

The Platform may contain links to other websites. ANKORSTORE does not know which cookies are used by these third party websites. For further information, please refer to the information given by these third party websites about their own cookies.

4. Which data are collected by means of cookies?

Through the use of cookies, ANKORSTORE indirectly collects information about the Data Subject's navigation, such as:

- the Data Subject's IP address;
- device ID;
- webpages visited; and
- the products that were searched and/or viewed.

The collected data will not be used by ANKORSTORE in combination with any other processing of data.

5. For which purposes is ANKORSTORE placing cookies?

ANKORSTORE collects personal data through the use of cookies and other tracers, so as to understand how Users and Members navigate through the Platform, and to obtain data on the basis of which ANKORSTORE may improve the browsing experience in the future, send customised offers to Users and Members, identify the Member when he/she accesses his/her account, store items in the shopping basket after leaving the site, measure the Platform audience and performance, measure the conversion rate and the impact of any social medial advertising campaigns, and run targeted advertising campaigns.

The purposes, lawful bases, and the durations of validity are described below:

Purposes	Type of cookie	Lawful bases	Duration of validity of the consent
To enable the Member to register on the Platform, be identified when he/she visits the Platform, and store the content of his/her shopping basket ("session identifier" cookie)	Cookie that is strictly necessary for the provision of the service	Legitimate interest	No consent required
To customise the user interface for a Member	Cookie that is strictly necessary for the provision of the service	Legitimate interest	No consent required

	Requested by the Member		
Analysis of the Data Subject's navigation so as to understand how he/she navigates through the site, draw up statistics to measure the audience of the Platform, assess the performance of the service and improve the content of the Platform, on the basis of navigation statistics, and improve the content of the Platform, on the basis of anonymised navigation statistics	Google Analytics Inspectlet performance and audience measurement cookie	Consent required	13 months
Conversion tracking analysis so as to analyse the link between any ANKORSTORE advertisements published on social media and the specific actions taken by the Data Subject on the Platform	Performance and audience measurement cookie (conversion tracking) Facebook, LinkedIn and Pinterest	Consent required	13 months
Targeted advertising and targeted emailing (including retargeting on social media), so as to improve the service supplied to the Member and his/her experience on the Platform	Performance and audience measurement cookie	Consent required	13 months

ANKORSTORE does not allow third parties to place cookies on the devices of the Users.

6. Who are the recipients of the data collected through the cookies?

The data collected through the cookies that are strictly necessary to supply the service at the Member's request, will not be disclosed to third parties, except to the Platform hosting service provider which stores all of the data.

The data relating to performance, to audience measurement, and to conversion tracking, may be used by ANKORSTORE or by a third party. The recipients of the data collected by means of the cookies are: Google, Inspectlet, Facebook, LinkedIn, and Pinterest, each recipient receiving the data that concern it.

The data collected through the cookies may also be disclosed:

- to individuals authorised by ANKORSTORE to process these data, and who have first signed a non-disclosure agreement, including to ANKORSTORE employees;
- to ANKORSTORE's external counsels and advisors: lawyers, accountants, statutory auditors, etc., which are bound by an obligation of secrecy;
- to authorities: in accordance with the law, further to an order from a court and/or further to a court ruling;

- to any third party, in the event of a merger by way of acquisition, the assignment of all or part of assets, a direct or indirect change of control, or any other form of restructuring implemented by ANKORSTORE.

7. What can a Data Subject do in relation to cookies?

As soon as the Data Subject accepts that cookies be placed, the Data Subject's web browser automatically discloses information to ANKORSTORE, such as the IP (Internet Protocol) address, the browser version of the device the Data Subject uses, and the Data Subject's navigation through the Platform (notably the pages viewed).

A Data Subject may configure his/her browser at any time, so as to be notified every time a cookie is placed on the device, or he/she may object to the use of cookies.

Even though most web browsers have default settings according to which all cookies are accepted by default, a Data Subject may, if he so wishes, choose to allow all cookies, systematically block all cookies, or choose the cookies he/she accepts according to the purposes defined, by adjusting certain settings. ANKORSTORE would like to draw the Data Subject's attention to the fact that, if he/she refuses the placing of certain cookies, his/her user experience may be affected.

ANKORSTORE informs the Data Subject that he/she may change his/her mind as to his/her consent at any time, by modifying these settings.

In relation to the management of cookies and of the choices made by the Data Subject, the configuration of each web browser is different. The configuration is described in the Help menu of the browser, where the Data Subject will find information on how to modify his/her choices in relation to cookies:

- For Internet Explorer 7 and 8:
<http://windows.microsoft.com/fr-FR/windows-vista/Block-or-allow-cookies> ;
- For Internet Explorer 9:
<http://windows.microsoft.com/fr-fr/windows7/how-to-manage-cookies-in-internet-explorer-9> ;
- For Safari: <http://support.apple.com/kb/PH5042> ;
- For Chrome version 30 and higher:
<http://support.google.com/chrome/bin/answer.py?hl=fr&hlrm=en&answer=95647> ;
- For Firefox: version 24 and higher <http://support.mozilla.org/fr/kb/activer-desactiver-cookies>.

Besides, disabling advertising cookies does not mean that the Data Subject will receive no advertising. It simply means that this advertising will no longer be customised according to the Data Subject's interests.

8. The rights of the Data Subjects

The Data Subjects shall have a right of access, a right to rectification, a right to erasure, and a right to the portability of their personal data, as well as a right to object to the processing of their personal data and a right to restriction of processing, in the conditions set out by applicable regulations.

ANKORSTORE may be led to request to the Data Subjects that they give their explicit consent to the processing of their personal data, as described in article 5. In such a case, a Data Subject may at any time withdraw his/her consent to the processing of his/her data by ANKORSTORE for targeted advertising, behavioural advertising, audience measurement and conversion tracking purposes, as explained in article 7.

A Data Subject's withdrawal of his/her consent will have no impact on the experience offered on the Platform outside the scope of the processing concerned.

The Data Subjects may send their request to ANKORSTORE:

- in writing, to the following address: ANKORSTORE SAS, 101 rue de Sèvres, 75006 Paris, France;
- by e-mail, to: info@ankorstore.com.

If a Data Subject considers that his/her rights are infringed, this Data Subject has the right to lodge a complaint with the French data protection authority i.e. *Commission nationale informatique et libertés* (CNIL), or with any other competent authority.

9. Data retention period

ANKORSTORE shall store the data collected through the use of cookies only for the duration that is strictly necessary for the purposes listed in article 5, i.e. for 13 months.

The data of the Data Subjects shall then be archived, with restricted access, for an additional duration so that ANKORSTORE can comply with its legal and/or regulatory obligations in relation to the archiving and retention of data. On the expiry of this additional duration, the data shall be permanently deleted from ANKOSTORE's databases.

10. Transfers of personal data outside the European Union

The data of the Data Subjects will be transferred outside the European Union, notably to service providers that are located in the United States and provide audience measurement, conversion tracking, and targeted advertising services to ANKORSTORE. ANKORSTORE has enforced suitable safeguards to secure these transfers of data outside the European Union, notably through the Privacy Shield mechanism, the signature of standard contractual clauses, or through an adequacy decision made by the European Commission. A copy of the documentation of suitable safeguards for the transfer of your data may be obtained by sending an e-mail to ANKORSTORE at info@ankorstore.com.

11. Change to this Cookie Policy

ANKORSTORE reserves the right to amend and/or update this Cookie Policy. The revised Cookie Policy shall be published on the Platform with an indication of the date it was last updated on.