

Website

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Privacy and cookies policy




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The website available at <https://www.boondmanager.com/> (hereinafter referred to as the "**Site**") is published by Wish SAS (hereinafter referred to as "**BoondManager**"), which, as the company responsible for processing personal data, attaches great importance to the protection and respect of privacy.

The purpose of this privacy policy is to inform, when browsing the Site, any person using the Site (hereinafter referred to as "**Users**" or "**you**") of BoondManager's practices regarding the conditions of collection, use and sharing of information that Users may provide, as well as their rights.

The Site complies with French and European standards relating to the protection of privacy and personal data and in particular with Law No. 78-17 known as "Informatique et Libertés" of January 6, 1978 relating to information technology, files and freedoms, amended by Law 2004-801 of August 6, 2004 and Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 known as the "**GDPR**" relating to the protection of individuals with regard to the processing of personal data and to the free movement of such data.

A. Definition

"Controller" means any natural or legal person, public authority, department or other body which, alone or jointly with others, determines the purposes (the "why?") and means (the "how?") of processing.

"Data subject": means any natural person who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier, or to one or more factors specific to his physical, physiological, genetic, mental, economic, cultural or social identity.

"Personal data": means any information relating to an identified or identifiable natural person. This person is called the "data subject".

"Processing of Personal data": means any operation or set of operations which may or may not be performed using automated processes and applied to personal data or sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, communication by transmission, dissemination or otherwise making available, alignment or combination, limitation, erasure or destruction.

"Processor": means any natural or legal person, public authority, department or other body that processes Personal data on behalf of the Controller.

IMPORTANT: NOTE TO USERS

BROWSING THE SITE AFTER PUBLICATION OF THIS PRIVACY POLICY IMPLIES UNRESERVED ACCEPTANCE THEREOF.

If the User wishes to withdraw his consent to the processing of his data, he simply needs to make a request in accordance with the procedure indicated in article *J. How can you exercise your rights to your data* of the present policy.

In addition, where required by law and/or in certain circumstances, the User's consent will be obtained or an opt-out facility will be provided prior to any transmission of data.

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B. Who is responsible for processing the personal data collected?

The data Controller is BoondManager.

C. What data do we collect and how do we use it?

All data processed by BoondManager complies with regulatory requirements in terms of purposes, retention periods, recipients and data security. BoondManager specifically informs you about the processing of your data prior to its implementation, for example via legal clauses inserted into our tools and websites. Nevertheless, you will find below some general information on our data processing operations.

Candidates

Would you like to join our team? You're right!

When you send us your application or when we contact you, we essentially process these categories of data about you:

- Identification data (such as surname, first name, postal address, e-mail address, telephone number, etc.);
- Data relating to professional situation (such as C.V., covering letter, etc.) ;
- Data from interviews and tests
- Connection data (such as IP address, web pages visited on the site and browsing data such as cookies).

The recipient of the Personal data collected on the Site is first and foremost BoondManager and in particular our HR team, our Management.

Personal data will not be disclosed to third parties, with the exception of any subcontractors we may use to provide services to the Site (e.g. if we use a third party to conduct impartial technical tests).

Candidates' Personal data will not be kept beyond the time required to fulfill BoondManager's obligations.

Clients

Have you put your trust in us and become one of our happy clients? You've done the right thing!

When you work with us and our tools, we essentially process these categories of data about you:

- Identification data (such as surname, first name, email address, telephone number, etc.)
- Job-related data (e.g. job title, BoondManager authorizations, etc.)
- Billing data
- Client service data and exchanges
- Connection data (such as IP address, web pages visited on the site and browsing data such as cookies).

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The primary recipient of the data is BoondManager and in particular our technical and sales teams.

Personal data will not be disclosed to third parties, with the exception of any subcontractors we may use (e.g. when we provide assistance via our ticketing tool).

As a Client, your data will not be retained beyond the time necessary to fulfill BoondManager's obligations, except for data that BoondManager would need to retain as evidence, for legal or administrative purposes or in accordance with applicable legislation. For further information, please refer to the "Data processing agreement" appendices to our General Terms and Conditions.

Prospects

Have you expressed an interest in our products and services? We look forward to welcoming you as one of our clients!

When we exchange information with a view to future collaboration, we essentially process these categories of data about you:

- Identification data (such as surname, first name, postal address, e-mail address, telephone number, etc.);
- Data relating to the company, professional situation and business needs ;
- Data relating to commercial actions and exchanges (such as the follow-up of commercial exchanges and proposals, the management of demonstrations, etc.);
- Connection data (such as IP address, web pages visited on the site and browsing data such as cookies).

The recipient of Personal data collected on the Site is first and foremost BoondManager and in particular our sales teams.

Personal data will not be disclosed to any third parties, with the exception of any subcontractors performing services for the Site - subject to supervision where applicable - (for example, if we organize a remote demonstration using a videoconferencing tool).

Prospects' Personal data will not be retained beyond the time necessary to fulfill BoondManager's obligations.

Visitors

As we have not yet had the pleasure of getting to know you, we do not process any data about you, with the exception of browsing data, in particular cookies.

D. What is the purpose and legal basis for collecting Personal Data?

Purpose of the Personal Data collected

Personal data collected on the Site is used solely for and during the performance of services for the following purposes:

- recruitment management for candidate data ;
- commercial relationship management for client data ;
- management of pre-contractual relations for prospect data ;

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- collection of information through cookies and other trackers ;
- smooth operation and continuous improvement of the Site and its functionalities: general administration, performance monitoring and general management of Site security.

In addition, BoondManager may use data to meet its legal and/or regulatory obligations.

Legal basis for the processing of personal data

The Processing and collection of Personal data are authorized on the basis of the following legal basis:

- performance of contractual or pre-contractual obligations for recruitment management, commercial relationship management and pre-contractual relationship management;
- BoondManager's legitimate interest in guaranteeing the highest level of operation and quality of the Site for the proper functioning and continuous improvement of the Site;
- User's consent to the deposit of cookies and other trackers.

Aggregation with non-personal data

BoondManager reserves the right to publish, disclose and use aggregate information (information about Users or specific groups or categories of Users combined in such a way that an individual User can no longer be identified or referred to) and non-personal information for industry and market analysis, demographic profiling, promotional and advertising purposes, and other commercial purposes.

E. What are our canvassing practices?

Under no circumstances do we use Candidate data for commercial prospecting purposes. With regard to our Clients and Prospects, we adhere strictly to the regulations in force, whatever the channel (postal mail, e-mail, SMS/MMS, automatic call machines, etc.). Furthermore, once you have given us your trust and consent to the transmission of relevant information on our products and services, in line with your needs, you retain the right to reverse your decision at any time. Otherwise, your data will be kept for up to three (3) years from the last contact you made with us.

F. When is data collected?

The data collected by BoondManager is freely communicated by Users when registering for an account for candidates, clients and prospects.

They may also be collected automatically during use of the Site, in particular when the User browses the Site's pages.

This automatically collected data does not reveal the identity of the User, but concerns the use of services. This collection is necessary for the maintenance and operation of BoondManager's services, as well as for its internal analyses and reports.

This information includes :

- information on how the services are used (frequency, traffic data, how the User reached the Site);

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- information concerning the device used to access the services (device name, country, location, IP address, browser and device characteristics, operating system, language preferences, reference URL).

In any case, the Personal Data collected :

- will be obtained and processed fairly and lawfully;
- will be recorded for specific and legitimate purposes;
- will be used in accordance with these purposes;
- are adequate, relevant and not excessive in relation to these purposes; and
- will take precautions to ensure the security and confidentiality of data to prevent it from being damaged, modified, destroyed or communicated to unauthorized third parties.

G. Do we use cookies and other trackers ?

A cookie is a text file that may be stored in a dedicated space on the hard disk of the User's computer when he/she visits an online service via his browser.

In practice, cookies are small text files that are placed on the User's computer by the websites the User visits. They are used to operate the websites and improve their usability.

The cookie is transmitted by a website server to the User's browser. Each cookie is assigned an anonymous identifier. A cookie cannot be traced back to an individual.

Only the sender of a cookie can read or modify the information contained in it.

When consulting the Site, Users are informed that cookies or other means of recording navigation data are used by the Site or by third parties, service providers for the Site and deposited on the User's terminal (computer, mobile or tablet).

In accordance with the recommendations of the French Data Protection Authority (CNIL), the User is expressly asked to accept the Site's cookies when connecting to the Site for the first time.

To see exactly which cookies we use in real time, we invite you to download "Ghostery", a free browser extension.

Purpose of cookies

The cookies used by BoondManager or its partners make it possible to identify Users, to recognize their browser when they connect to the Site, to record their access frequencies (traffic measurement) and the display preferences of the User's terminal, to adapt and/or personalize the presentation of the Site to improve the User's experience and to optimize the Site with the sole aim of providing the services requested by the User.

The different types of cookies that may be used on our websites are as follows:

Mandatory cookies

These cookies are necessary for the proper functioning of the site and cannot be deactivated. They are used to provide you with a secure connection and to ensure the minimum availability of our Site.

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Functionality cookies

These cookies enable us to analyze site usage so that we can measure and improve performance. For example, they enable us to store your connection information and display the various modules of our site more consistently. They also enable us to activate certain Site functions, such as chat support.

Social and advertising targeting cookies

These cookies are used by advertising agencies and social networks, and in particular allow you to share pages on social networks, post comments and display advertising (on or off our site) tailored to your interests.

User's right to refuse cookies

When browsing the Site for the first time, a banner explaining the use of cookies appears. It enables the User to activate or deactivate certain cookies. It disappears only when the User has accepted, or not, the use of cookies to continue browsing.

The registration of a cookie is subject to the User's consent. In accordance with legal and regulatory provisions, BoondManager obtains prior consent for the deposit of cookies.

With regard to advertising cookies placed by third parties, you can also visit the Youronlinechoices site, proposed by digital advertising professionals belonging to the European Digital Advertising Alliance (EDAA). You can then refuse or accept cookies used by member advertising professionals.

It is also possible to object to certain third-party cookies directly with the publishers:

- For analytical and performance cookies: the means of deactivation are Realitycs and Google Analytics.
- For targeting or advertising cookies: the means of deactivation is Mediarithmics.

Users also have the option of configuring their browsing software in such a way as to oppose, totally or partially (in particular depending on the sender), the recording of cookies. The configuration also offers the possibility of accepting or refusing cookies on a one-off basis, before they are stored on the User's terminal.

Users who wish to prevent cookies from being saved can follow the procedure specific to each browser and described in the browser's help menu.

- Chrome
- Internet Explorer
- Edge
- Safari
- Firefox
- Opera

However, in the event of opposition to the recording of cookies or the uninstallation of a cookie, Users are informed that certain services may no longer function correctly.

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H. Where do we host your Personal Data ?

As far as possible, BoondManager will only process your data within the European Union and will not transfer this data outside the European Union.

However, in the case of international transfers outside the European Union, a distinction must be made between :

- countries which have been the subject of an adequacy decision by the European Commission: in this case, data is transferred to a country ensuring a level of protection deemed sufficient and adequate to the provisions of European data protection regulations; and
- countries whose level of data protection has not been recognized as adequate: in this case, to guarantee a transfer in compliance with European regulations, and in particular to ensure data security, BoondManager will base its transfer on protection mechanisms adapted to each service provider and subcontractor, such as the conclusion of standard contractual clauses approved by the European Commission, the application of binding corporate rules or under an approved certification mechanism.

I. How do we protect your Personal Data ?

BoondManager is committed to protecting your data and your privacy.

BoondManager undertakes to implement appropriate and reasonably necessary measures with regard to the regulations applicable to the protection of personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, in order to guarantee a level of security appropriate to the risks incurred for the rights and freedoms of natural persons in connection with the processing referred to in this privacy policy.

BoondManager takes care to protect and secure your data in order to ensure its confidentiality and prevent it from being distorted, damaged, destroyed or disclosed to unauthorized third parties. BoondManager takes the necessary precautions, in view of the state of knowledge, the nature of your data, the needs, the risks, the costs of implementation and the nature, scope, context and purposes of the processing, to preserve the security of the data and in particular implements the following measures:

- Organizational: authorizations, data processing procedures to ensure that only those people who need your data in the course of their duties have access to it (these people being subject to an obligation of confidentiality), etc. ;
- Physical/material: protection of our premises, encryption of our work tools, choice of reliable hosting providers whose security is widely recognized;
- Logical: implementation of security tools (antivirus, firewall, anti-intrusion systems, etc.), securing of computer workstations and network peripherals, etc. In addition, we regularly have security audits carried out by specialized third parties, and are committed to correcting any detected vulnerabilities as quickly as possible.

When Personal data is transferred to third parties for processing, BoondManager ensures that these third parties implement all appropriate technical and organizational measures to ensure the protection of personal data in accordance with applicable laws.

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Finally, in the event of a violation of rights concerning personal data likely to give rise to a high risk for the User's rights and freedoms, BoondManager undertakes to inform the User of this violation within a maximum period of seventy-two (72) hours.

J. How can you exercise your rights to your data ?

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 known as the "**GDPR**" on the protection of individuals with regard to the processing of personal data and on the free movement of such data and with Law No. 78-17 known as "**Informatique et Libertés**" of 6 January 1978, as amended by Law 2004-801 of 6 August 2004 on information technology, files and freedoms, the User has:

- a right of access to personal data;
- a right to rectify personal data;
- a right to delete and erase his personal data;
- a right to object to the processing of personal data;
- a right to limit the processing of his data;
- a right to data portability, when data is processed automatically on the basis of consent or contract;
- a right to withdraw consent at any time; and
- a right to define what happens to his data after his death.

Users wishing to assert one of their rights may send their request by e-mail or by post to the following addresses:

- **Postal mail:** BoondManager - 6 rue de Porstrein - 29200 Brest - FRANCE
- **E-mail:** gdpr.compliance@boondmanager.com

In the event of exercising one of these rights, the User must provide BoondManager with the necessary information for identification: surname, first name, e-mail address and, if applicable, postal address.

Furthermore, in accordance with current regulations, the User's request must be clear and specify in detail the right he wishes to exercise, as well as the address to which he wishes to receive a reply in the event of the exercise of one of the rights listed above. BoondManager may ask the User to provide a photocopy of an identity document bearing his signature in order to verify his identity.

BoondManager undertakes to respond within a maximum of one (1) month following receipt of the User's complete request.

Due to the complexity of the request and/or the number of requests, this period may be extended by two (2) months on condition that BoondManager informs the User of the reasons for the postponement within one (1) month of receipt of the request.

BoondManager informs Users of their right to lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (hereinafter referred to as the "**CNIL**") in one of the ways indicated below:

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- **Via the CNIL website:** www.cnil.fr/fr/plaintes or www.cnil.fr
- **By post:** Commission Nationale de l'Informatique et des Libertés - CNIL
3 Place de Fontenoy TSA 80715 - 75334 PARIS CEDEX 07

K. Changes to the data protection policy

The present data protection and confidentiality policy may change at any time as a result of legal, regulatory, jurisprudential and doctrinal developments (especially CNIL doctrine). We will publish any changes on this page and, in the event of significant modifications, on other pages of this Site via dedicated inserts or information banners. Any changes that must be expressly brought to the attention of data subjects will be communicated by e-mail, for example.

The prevailing version is that which is accessible online on the day the Site is consulted.

Any consultation of the Site after publication of the modified confidentiality policy implies unreserved acceptance by the latter of the new confidentiality policy.

L. Contacts

For any inquiries or to find out more about the processing of their personal data, including the exercise of their rights indicated above, the User may contact BoondManager by e-mail or post at the following address:

- **Postal mail:** BoondManager - 6 rue de Porstrein - 29200 Brest - FRANCE
- **E-mail:** gdpr.compliance@boondmanager.com

For any complaint or dissatisfaction in connection with the use of his personal data by BoondManager, the User may contact BoondManager by e-mail or post at the following address:

- **Postal mail:** BoondManager - 6 rue de Porstrein - 29200 Brest - FRANCE
- **E-mail:** gdpr.compliance@boondmanager.com

When the User contacts BoondManager, he will be asked to identify himself.

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