

Privacy Policy of IN CONCRETO's website

Updated on 1 September 2020.

The protection of personal data is considered by the **LAW FIRM IN CONCRETO**, which wishes to explain in a clear and transparent manner, how and why it collects, processes, stores and uses users' personal data.

This Privacy Policy also sets out the rights and control tools available to Users regarding the processing of their personal data.

1. Introduction

The present privacy policy (hereinafter the "Privacy Policy") is proposed by the law firm IN CONCRETO, SARL, with a share capital of 15,000 Euros, registered with the Paris Trade and Companies Registry, under the number 533 262 739. Its registered office is located at the following address: 9 rue de l'Isly, 75008 Paris (hereinafter the "LAW FIRM IN CONCRETO").

The law firm IN CONCRETO can be contacted by email at the following address: info@in-concreto.fr or by phone at the following number: +33 (0) 1 44 69 31 50.

The law firm IN CONCRETO makes the website available to users (hereinafter the "User(s)"): (hereinafter the "Site").

2. What information does the LAW FIRM IN CONCRETO collect from their users?

To allow Users to connect to its User space, the latter, acting as data controller, must collect nominative data relating to Users, in particular the following personal data:

- username and password

The User is informed that if he does not wish to provide the personal data requested, he will not be able to connect to his User account.

3. How and why are the personal data of Users used?

The law firm IN CONCRETO uses the Users' personal data for the following purposes:

Purpose	Legal basis of the processing operation
Connection to the customer area	The treatment is based on the consent of the User/contract concluded with the User.

4. With which third parties does the law firm IN CONCRETO share the personal data of its Users?

Users' personal data are processed by the law firm IN CONCRETO and by the subcontractors that support its activity.

5. What are the rights of the Users?

Users benefit from several rights summarised below:

- **Right of access:** the right to be informed and to request access to the personal data processed by IN CONCRETO;
- **Right of rectification:** the right to ask IN CONCRETO to modify or update personal data when they are inaccurate or incomplete.
- **Right of deletion:** the right to ask IN CONCRETO Law Firm to definitively delete personal data;
- **Right of limitation:** the right to ask IN CONCRETO to temporarily stop the processing of all or part of the personal data;
- **Right of opposition:**
 - the right to refuse at any time the processing of personal data;
 - the right to refuse the processing of personal data for marketing purposes.
- **Right to withdraw consent:** the right to withdraw consent to the processing of personal data at any time, by means of a simple procedure equivalent to that used to obtain the User's consent;
- **Right to data portability:** the right to request a copy of personal data in electronic format and the right to request the transmission of such personal data for use by a third party service;
- **Right to give post-mortem instructions:** the User may give IN CONCRETO Law Firm instructions relating to the storage, deletion and communication of his personal data after his death. In the absence of such directives, IN CONCRETO Law Firm will grant the requests of the heirs as restrictively set out in article 40-1, III of the French Data Protection Act (Loi Informatique et Libertés).

6. How can the User exercise his/her rights?

To exercise the rights stated above and for any questions relating to the processing of personal data, the User may contact the Data Protection Officer of the law firm IN CONCRETO at the following email address: rgpd@in-concreto.fr or by mail at the address of the registered office of the law firm IN CONCRETO.

In order for the law firm IN CONCRETO to process the request as quickly as possible, the User must indicate in his request its purpose and the context in which his personal data have been collected by the law firm IN CONCRETO. He will also have to provide a copy of both sides of his identity card.

7. How does the law firm IN CONCRETO secure the personal data of Users?

The law firm IN CONCRETO ensures the security of Users' personal data by implementing the appropriate technical and organisational measures in order to guarantee a level of security adapted to the risk, such as pseudonymisation and encryption of Users' personal data, any means to guarantee the constant confidentiality, integrity, availability and resilience of the processing systems and services, any means to restore the availability and access to Users' personal data, as well as a procedure to regularly test, analyse and evaluate the effectiveness of the technical and organisational measures implemented.

8. How long do we keep the Users' personal data?

Users' personal data are kept only for the time necessary to achieve the purpose for which the law firm IN CONCRETO holds such data, to meet the needs of Users or to fulfil its legal obligations.

In order to establish the length of time personal data is kept, the law firm IN CONCRETO applies the following criteria:

- if the User makes a request to IN CONCRETO, the personal data will be kept for the time necessary to process the request;
- The law firm IN CONCRETO may keep Users' data for a period of three years for commercial prospecting purposes.
- The data relating to the processing of an application is kept for two years after receipt of the candidate's file in the case of non-selection or until the final closure of the file in the case of collaboration.

At the end of the periods mentioned above, the personal data will be deleted or IN CONCRETO will proceed to their anonymisation.

9. Links on the law firm IN CONCRETO's website to third party sites

In order to improve the quality of the website, the law firm IN CONCRETO may include on the website links to third party websites. These websites have a different and independent privacy policy from that of the law firm IN CONCRETO. The User is invited to consult the privacy policy of the third party websites he visits.

10. The User's right to make a claim to the CNIL (French Data Protection Authority)

In the event of a complaint, Users may contact the CNIL, which is the competent authority for the protection of personal data, whose contact details are as follows: 3 Place de Fontenoy, 75007 Paris, telephone: 01 53 73 22 22.

11. What are the cookies/tracers used by the law firm IN CONCRETO on the Website and how to oppose them?

"Cookies" are small data files generally consisting of letters and numbers sent from the website's server to the cookie file of the browser on the hard disk of the visitor's computer. This operation enables the website to recognise a visitor's devices as soon as a connection is established between the server and the browser. The main purpose of a cookie is to enable the law firm IN CONCRETO's server to adapt the content of the web pages to the personal preferences of visitors, in order to personalise their visit to the website.

In accordance with the Decision of the Council of State rendered on 19 June 2020 and Deliberation No. 2019-093 of 4 July 2019 adopting guidelines relating to the application of Article 82 of the Law of 6 January 1978 as amended to reading and writing operations in a user's terminal (in particular cookies and other tracers), IN CONCRETO informs Users that Google Analytics tracers are used. **Cookies are stored for a maximum period of 13 months.**

At the first connection/at each connection to the website, an alert message informs the User of the use of the trackers and invites him/her to accept the use of these trackers.

The alert message includes:

- the identity of the RGPD controller(s);
- the precise purposes of the tracers used;
- the possibility of withdrawing consent at any time.

To guarantee the free, informed and unequivocal consent of the User, the banner will not disappear as long as he or she has not continued browsing.

Unless the User's prior consent is obtained, the deposit and reading of tracers will not be carried out:

- if he goes to the website (home page or directly to another page of the website) and does not continue his navigation: a simple absence of action cannot be considered as a manifestation of will;
- or if he clicks on the link in the banner allowing him to set the cookies and, if necessary, refuses to accept cookies.

The User can choose to deactivate the trackers at any time. His browser can be set up to notify him of the trackers that are deposited in his terminal and ask him to accept them or not.

The configuration of each browser is different. It is described in its browser's help menu, which will allow the User to find out how to modify his or her cookie preferences.

» Firefox: <https://support.mozilla.org/fr/kb/cookies-informations-sites-enregistrent>

- ✓ *Click on the menu button and select "Options".*
- ✓ *Select the "Privacy" panel.*
- ✓ *Set the "Retention rules" menu to "Use custom settings for history".*
- ✓ *Uncheck the "Accept cookies" box.*
- ✓ *Any changes you have made will be automatically saved.*

» Internet Explorer : <https://support.microsoft.com/en-us/products/windows?os=windows-7>

- ✓ *Click on the Tools button, then click on "Internet Options".*
- ✓ *Click on the "Privacy" tab, then under "Settings", move the slider up to block all cookies or down to allow all cookies, then click OK*

» Google Chrome: <https://support.google.com/chrome/answer/95647?hl=fr>

- ✓ *Select the icon in the Chrome menu.*
- ✓ *Select "Settings".*
- ✓ *At the bottom of the page, select "Display advanced settings".*
- ✓ *In the "Privacy" section, select "Content Settings".*
- ✓ *Select "Prohibit all sites from storing data".*
- ✓ *Select OK.*

» Safari: <https://www.apple.com/legal/privacy/fr-ww/cookies/>

- ✓ *Click on "Settings" > "Safari" > "Privacy" > "Cookies and website data".*

12. Changes to our Privacy Policy

This Privacy Policy is subject to change. The law firm IN CONCRETO therefore advises its Users to regularly consult this page of the website. In the event of a significant change in the Privacy Policy, the law firm IN CONCRETO will notify Users of such changes by any means.