

# PERSONAL DATA PROTECTION POLICY

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The purpose of this document is to inform all users of the website [www.needhelp.com](http://www.needhelp.com) (hereinafter the '**Website**') about the personal data protection measures implemented by NEEDHELP in order to guarantee that the nominative information entrusted to us within the context of the service that we provide remains confidential and secure.

Use of the Website is indeed likely to entail the collection and processing of personal data within the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on personal data protection (hereinafter the '**GDPR**') and the French Data Processing and Civil Liberties Act no. 78/17 of January 6, 1978 in its current version (known as 'Loi Informatique & Libertés' in French, hereinafter the '**Data Processing and Civil Liberties Act**').

Therefore, this personal data protection policy (hereinafter the '**Policy**') has been drawn up to help the Website's users (hereinafter '**You**' or a '**User**') understand which data are collected, for which purposes, and what their rights are in this regard. This Policy supplements the Website's general terms and conditions of use ('**Terms and Conditions**').

This Policy may be modified from time to time. Any modification will be implemented after You have been informed of such, for example, by means of a banner stating so on the Website and/or by any other means available to NEEDHELP (for example, by writing to the email address provided on your user page).

Any new version of the Policy is only applicable when using the Website after said version comes into effect.

## 1 — Identity of the data controller

The personal data controller applied to the Website is the company We Share Trust, a simplified joint-stock company (*société par actions simplifiée*, SAS) with a capital of 101,890 euro, identified in the Commercial and Companies Register of Paris under number 799 782 859, whose head office is situated at 5 Villa Victor Hugo, 75116 Paris (hereinafter '**NEEDHELP**' or '**Us**').

## 2 — What is personal data?

The term '*personal data*' refers to all information relating to a natural person that may directly or indirectly identify them, for example your surname, first name or even your email address. Similarly, the IP address of the computer connected to the Internet may also be personal data. An IP address is assigned to each peripheral device connected to the Internet so that it may send and receive data.

### **3 — At what point are personal data collected and processed by NEEDHELP?**

The Website connects people who have expressed a requirement for certain tasks to be performed (DIY, small jobs, etc.) with people who declare themselves to have the appropriate skills to meet such a requirement. Everyone who uses the Website, whether to declare a requirement or to declare their skills and availability, are considered **Users** within the meaning of this Policy.

Therefore, when You use the Website, in particular when You create an account on the Website (which is necessary for ordering services or advertising your services), We collect the information that You yourself provide, including information concerning your identity, your requirements and/or your skills. When You declare a requirement through the Website, we collect and process all of the information relating to this requirement (the type of service, the place where the service is to be provided etc.).

In addition, when You visit our Website, We automatically collect certain information about your use of the Website and about the IT equipment used.

### **4 — What personal data are collected and processed by NEEDHELP?**

In light of the above, generally the personal data that We collect and process with regard to Website Users are:

- **data relating to your identity**, such as your surname, first name, postal address, email address, as well as any data relating to changes to this information;
- **data relating to lifestyle habits**, in particular those pertaining to the requirements declared by Users;
- **data relating to the qualifications or, more generally, the skills** of the Users who offer services to other Users who have declared a requirement; if You are a professional, We collect information regarding your employment status (a company or self-employed worker), your current employer, your experience, your skills (including whether You own a driving license and have your own transport), and even your right to work in French territories. We are likely to request a sworn statement that confirms a clean police record, your bank account details, languages spoken, information about your potential geographical working area and your methods of communication;
- **financial data**, in particular data relating to transactions made through the Website (estimates and invoices, etc.), and the preferred payment method;
- **data relating to the services provided**: if You make use of the opportunity to evaluate the services rendered, NEEDHELP will process the information that You provide for the purposes of presenting these opinions and evaluations on the Website;

- **data relating to criminal sentences or violations (only in the United Kingdom); and**
- **technical data**, which are data relating to use of the Website: browser type/version, operating system used, the page visited, the page visited prior (referrer URL), IP address, logs, the *user agent*, date and time of the server request and the HTTP status code.

## **5 — On what lawful basis are personal data collected and processed by NEEDHELP?**

We collect and process Users' personal data in strict compliance with the data protection regulations, in particular the GDPR, the Data Processing and Civil Liberties Act and other potentially applicable texts, as well as the directives of the applicable personal data protection authority (i.e. the CNIL in France).

All data that are collected and processed by NEEDHELP are collected and processed by virtue of a duly identified lawful basis, in accordance with Article 6 of the GDPR:

- **your consent:** most data conferred to Us are conferred on the basis of the User's consent, who agrees to provide Us with these data for processing purposes;
- **fulfillment of the contract** entered into between the Users through the Website which allowed such connection. This processing is indeed necessary in order to comply with the contract (for issuing an estimate, placing an order, performing the services provided, invoicing, etc.);
- **NEEDHELP's legitimate interest:** We automatically collect certain data (including Website navigation data) for the purposes of determining statistics or even to help us identify and correct potential errors in how the Website functions. These collection and processing actions are never likely to damage your interests or your basic rights.

## **6 — For what purposes are personal data collected and processed by NEEDHELP?**

All personal data collection and processing actions carried out on the Website adhere to a well-defined and legitimate purpose. The data entrusted to Us are never re-used for other purposes than:

- **To create a User account on the Website**, which allows You to declare your requirements or even to offer Your services to other Users;
- **To help carry out the services requested through the Website;**

- **To allow NEEDHELP to correspond with You**, for example within the context of exchanging messages with our customer service department;
- **To allow NEEDHELP to manage the Website**, in particular through analyzing connection data; certain data that allow NEEDHELP to **keep the Website secure**, in particular to limit the risk of bank card fraud;
- **To allow NEEDHELP to send You targeted advertising**: if You have expressed your consent to receive targeted advertising, We will process and use your User profile data, your booking data and any additional information, as well as the time you spent accessing your User profile, in order to better understand your habits and potentially send you information about additional services that are likely to interest You. You can revoke your consent to your data being used for advertising purposes at any time by sending an email to the following address: [privacy@needhelp.com](mailto:privacy@needhelp.com).

## 7 — How long does NEEDHELP keep the collected and processed data?

We store the collected personal data of Website Users only for the time period necessary to fulfill the determined purpose or meet our contractual and legal obligations.

Data are kept for the following periods of time:

- **Data relating to the User account**: these data are kept while the User account remains active, with the understanding that you can close this at any time. After the inactivity period of 2 (two) years, We will send you an electronic letter to inform you that your User account will close, unless you log into the account again. We will keep the data relating to your User account for up to 2 (two) years after the account is closed. Despite the above, the data belonging to a User who has been subject to a penalty due to violation of the NEEDHELP Terms and Conditions and/or endangering third parties, for example in the event of expulsion from the Website, will be kept for 10 (ten) years;
- **Data relating to the requests for services made through the Website**: these data are kept for a period of 10 (ten) years from when the invoice has been drawn up, in accordance with our accounting and fiscal obligations;
- **Data relating to use of the Website**: these data are kept for 13 (thirteen) months;
- **Data relating to complaints**: these data are kept for 5 (five) years.

## 8 — Who is the collected data communicated to?

Data are processed on servers belonging to the technical service providers that We have commissioned for this purpose. These service providers process the data only after explicit instruction and are contractually obliged to ensure sufficient technical and organizational data protection measures.

In addition, the data that You communicate to us are transmitted to other Users of the Website for the purposes of placing service orders:

- If You are a User who wishes to benefit from a service, We will communicate to the Users who provide such services within the area concerned all relevant information in relation to the requirement that You have described (type of service, location, etc.); We will also process your User profile data in order to manage, execute, process, invoice and monitor the service and contracts, and to perform other related services such as managing potential complaints and/or cancellations. In addition, we will use your User profile data, including your telephone number, to send you SMS notifications;
- If You are a User who offers your services on the Website, We will communicate to the Users who require such services the information that We have available concerning your skills, experience and your location, for example.

Finally, depending on the chosen payment method, We may pass on your credit card information (card number, expiration date, security code) or your bank details (hereinafter known as the '**Payment Information**') to our payment services provider Mangopay — MANGOPAY SA, based at 10 Boulevard Royal, L-2449 Luxembourg, who will collect, process and use the Payment Information for the purposes of processing payments or collecting funds from your account. NEEDHELP does not collect or keep this Payment Information.

## **9 — How are personal data protected by NEEDHELP?**

In their capacity as data controller, NEEDHELP agrees to implement and maintain, at their own expense, the appropriate technical and organizational measures pertaining to data processing and security matters in accordance with Articles 32 to 34 of the GDPR.

NEEDHELP will also ensure that these technical and organizational measures are at all times adapted to the particular risks associated with their processing activities, in terms of the nature of the information collected, in particular in order to protect the data against destruction, loss, modification, unauthorized disclosure or access, whether accidentally or illicitly.

Therefore, with regard to the **technical measures** implemented by NEEDHELP:

- all data are kept and saved on remote servers that are protected against third-party attacks (*Google Cloud Platform, Google Drive*);
- our databases are secured with complex passwords; and

- the management software used is only accessible with login details and passwords.

With regard to **organizational measures**, only certain members of NEEDHELP management or the people who need to know the data in order to effectively fulfill the contract concerned are authorized to have access to such data.

NEEDHELP also agrees to maintain, update and keep complete and accurate the registers concerning the data processing activities that they implement. These registers detail their processing activities.

## **10 — What are your rights with regard to your personal data?**

NEEDHELP will respect the rights granted to You by the GDPR and the Data Processing and Civil Liberties Act.

To this end, You have the right to request access to your personal data that are kept by NEEDHELP, as well as the right to the rectification or erasure of these data, the right to restrict the processing of Your personal data, and the right to object to the processing.

However, in the event that you restrict or object to data processing, NEEDHELP may no longer be in a position to allow You to access your User account or to use the Website. Nonetheless, NEEDHELP hereby notifies You that they may, in spite of everything, keep certain information in order to meet their legal obligations and within the context of observing, exercising or defending legal rights, in particular following violation of the NEEDHELP Terms and Conditions.

You may also define the instructions as to how Your data is kept, erased and communicated after your death. In the absence of such instructions, Your personal data will be kept in accordance with the paragraphs above, unless Your descendants request that the data be erased more quickly.

To exercise these rights, You can send an email to the following address: [privacy@needhelp.com](mailto:privacy@needhelp.com)

Finally, You have the right to file a complaint at any time with the relevant data protection authority. To do so, You may contact the relevant data protection authority in the region where You live or, in any event, the French CNIL: [www.cnil.fr](http://www.cnil.fr).

## **11 — Do international data transfers occur?**

The data collected and processed by NEEDHELP are kept on *Google Drive*, which may entail a data transfer outside of the European Union. The guidelines for this transfer are contained in a contract that provides for all of the security measures in place to protect the data against any unauthorized disclosure or access.

Certain data may also be transferred to countries that are situated outside of the European Union but that have an adequate level of protection according to the European Commission (for example, Switzerland).

## **12 — For more information**

For any further information about the way in which NEEDHELP collects and processes Your personal data, please send an email to the following address: [privacy@needhelp.com](mailto:privacy@needhelp.com).

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