

PRIVACY POLICY AND PROTECTION OF PERSONAL DATA

Last modification : 06/08/2021

Customer Service contact information : contact@flyingrhino.io

The company Flying Rhino, (hereinafter the "Company"), represented by Nathalie Dumas as Founder and Director, collects and processes personal data about the users (hereinafter the "Users" or "User") of the website www.flyingrhino.io (hereinafter the "Website") and the services (hereinafter the "Services") of the Company.

The Company is concerned about the protection of privacy and personal data. Thus, it ensures that it adopts and complies with a personal data processing policy that complies with the regulations in force and especially with the General Data Protection Regulation No. 2016/679 of April 27, 2016 (the "GDPR") and the French Data Protection Act of 1978 as amended.

Thus, the purpose of this privacy and personal data protection policy (the "Policy") is to set out the terms and conditions under which the Company processes personal data concerning Users.

The cookie management policy and this Policy form a binding contract between the User and the Company (hereinafter the "Contract").

The Company reserves the right to modify the Policy at any time and undertakes to inform Users of such changes via this document which Users should consult regularly.

1. The data controller

The Company is the controller of the personal data collected and processed under the terms of this Policy applicable to Users of the Services.

You may contact the Company at the contact information provided in Section 9 "Contact" of this Policy.

For more information

The data controller is the person, in this case the Company, who determines the manner and purpose of the processing of personal data. As its name indicates, it is responsible for the processing of personal data that it implements and is the main contact for the User to assert his rights under the processing.

2. Sources and categories of personal data

2.1. Source and collection of personal data

The Company collects personal data from Users in the course of using the Services. In particular, the Company collects and processes the personal data of the Users when :

- filling in the contact form by the Users on the Website

- the registration to the newsletter (via the Website or other)
- surveys, polls and prospection via online or printed questionnaires
- the visit of Users to the Website (refer to the cookies policy)

The Company also collects all personal data communicated spontaneously and voluntarily, especially when you contact us.

2.2. Categories of personal data

The Company collects and processes the following categories of personal data:

- Information necessary for the registration to the newsletter
Personal data: first name and e-mail address
- Information filled in the contact form by the Users on the Website
Personal data: name and e-mail address
- Information that you provide to us when you contact us, respond to our surveys, polls and prospection via online or printed questionnaires:
Personal Data: last name, first name, e-mail address and any other personal data you choose to share with us.
- When you visit the website: Information about the type of device used, IP address, browser type and language.
- The information collected by the cookies installed on our Website, such as the pages viewed, is detailed in the Company's cookie policy available here [: insert link].

2.3. The mandatory nature of data provision

Some information may be mandatory for the implementation of the Services (e.g. the email address for the subscription to the newsletter). Mandatory data are indicated on our forms by an asterisk or by the explicit mention "Mandatory information". If you do not provide the mandatory data, we will not be able to provide the Services concerned.

2.4. Data accuracy

The Company makes every effort to keep personal data accurate and complete. To ensure that we have the most current information, you may notify us of any changes in your contact information or any other data by contacting the Company at the contact information listed in Section 9 "Contact" below, or by regularly updating your Profile.

2.5. Location of personal data

The personal data collected and for which the Company is responsible are hosted in France and Canada on Planet Hoster's servers for the Website and on Google Drive & Microsoft servers for the other Services.

More details concerning the guarantees taken for data transfers outside the European Economic Area are indicated in article 6.

3. Purposes and legal bases of the processing

Personal data is processed by the Company for the following purposes:

Within the execution of the Contract for the provision of Services:

- Implementation of the Services to the Users, as defined in the event of a Contract signed by both the User and the Company.
- Manage the relationship with the Users
 - Management of the acceptance of this Policy and the Cookie Management Policy;
 - Communications with the Users; and
 - Management of possible complaints.

As part of our legitimate interest in respecting your rights:

- To compile statistics on the use of the Services and the Website and on the behavior of Users;
- To offer the Company's Services; and
- Provision, maintenance and improvement of our Services and Website.

For the above processing, the Company's legitimate interest is to define the type of customers for its products and services, to develop its business and to improve its commercial and marketing strategy.

In addition, the collection also allows to:

- Manage the recovery;
- Detect, investigate, prevent or take action regarding illegal activities, abuse, suspected fraud or situations involving potential threats to the safety or rights of an individual or entity and to use as evidence in litigation;
- Investigate, prevent and deter violations of this Policy; and
- Protect and defend our rights and interests, including intellectual property rights, before courts or administrative tribunals.

For the above purposes, the Company's legitimate interest is to enforce its rights and prevent fraud and any prohibited or illegal activity.

The Company also seeks to enable the training of its employees and the conduct of compliance and security audits.

Thus, the Company's legitimate interest is to maintain the level of competence and enrich the knowledge of its teams.

Finally, data is collected to meet legal obligations:

- To meet legal and regulatory obligations to which the Company is subject, such as tax reporting of transactions,
- To train our staff, as part of the legal obligations to which the Company is subject as an employer,
- To manage the requests of the Users in respect of their rights in terms of personal data.

4. Communication of personal data

The personal data, collected and processed, may be transmitted:

- To authorized persons in the relevant departments within the Company;
- To service providers or subcontractors used by the Company to fulfill the purposes set forth in Section 3 of this Policy.
- In the event of a claim, theft or other breach of the law, personal data may be transmitted to our insurance company, which is obliged to keep the transmitted data confidential, and, if necessary, to the police and judicial authorities.
- To administrative and judicial authorities and more generally to public bodies in order to comply with our legal obligations or to enable us to defend our rights and interests,
- If necessary, to our legal advisers and lawyers,
- If we sell or transfer our business or part of it and your personal data relates to that sold or transferred part, or if we merge with another company, we will share your personal data with the new owner of the company or our merger partner, respectively.

5. Security of personal data

The Company implements organizational, technical, software and physical security measures to protect personal data from loss, unauthorized access, disclosure or alteration.

6. Transfer of data outside the European Economic Area

Your personal data may be transferred to countries outside the European Economic Area (hereinafter "EEA"), especially to our Russian partner Rocketmind (<https://rocketmind.ru/>).

7. Data conservation

The Company retains your personal data for the time necessary to achieve the purposes for which it was collected, plus any statutory periods for archiving, retention of certain data and prescription. At the end of the processing, the personal data will be either deleted or anonymized by the Company.

The retention period depends on the type of personal data and the purpose. In particular, the retention period is determined according to the following criteria:

- The regularity of your use of our Services;
- The existence of legal or contractual obligations requiring us to retain data;
- The existence of a retention period specifically defined by the applicable regulation; and
- The type of personal data and in particular its sensitivity (e.g. your banking information).

In this context, the Company uses the following retention periods:

- Data relating to the use of any of our Services on the Website (contact form, newsletter, information request) will be retained, at the latest, after three years following the last use.
- Your data will then be deleted or anonymized by the Company, unless such data is required to be retained for accounting, dispute resolution, collection or fraud

- prevention purposes.
- When your personal data is used for marketing purposes, the retention period for that data is three years from the date of your last activity.

For more information about how long we keep your personal data, please contact us at the address and phone number listed in Section 9 "Contact" below.

8. User rights

Users are informed that, under the conditions of the RGPD and the laws applicable in France, they have the right of access, rectification, deletion, and portability of their personal data, as well as the right to limit and oppose the processing of such data.

Users also have the right to organize the fate of their personal data in the event of their death, as well as the right to lodge a complaint with the CNIL, whose website is accessible at <http://www.cnil.fr> and whose headquarters are located at 3 Place de Fontenoy, 75007 Paris.

For processing based on his consent, the User may withdraw it at any time, without prejudice to the lawfulness of the processing prior to this withdrawal.

The User may exercise his rights, free of charge, with the Company at the address indicated in Article 9 "Contact" below.

Further information

In addition to the information below, the Company invites the User to consult the CNIL website:

- **Right of access:** the User has the right to obtain from the Company confirmation as to whether or not his/her personal data are being processed and, where they are, access to said data as well as information on the purposes of the processing (art. 15 of Regulation 2016/679 on the protection of personal data ("RGPD")). Requests that are manifestly unfounded, excessive or repeated may not be answered.
- **Right of rectification:** the User has the right to obtain from the Company, as soon as possible, the rectification of his/her personal data that he/she considers inaccurate (art. 16 of the RGPD).
- **Right of deletion:** the User has the right to obtain from the Company the erasure of his/her personal data, under the conditions provided for in Article 17 of the GDPR.
- **Right of portability:** the User has the right to receive the personal data concerning him/her that he/she has provided to the Company, in a structured, commonly used and machine-readable format (art. 20 of the GDPR). This right applies only to the data that provided, when the processing is based on consent or on a contract and is carried out using automated processes.
- **Right to limitation of processing:** the User may obtain from the Company the limitation of the processing of his/her personal data under the conditions of Article 18 of the GDPR.
- **Right to withdraw consent:** Users have the right to withdraw their consent to the processing of your data if such processing is based on consent. Withdrawal of consent does not affect the lawfulness of processing based on consent carried out prior to the withdrawal of consent.
- **Right to object:** the User has the right to object at any time, for reasons relating to his or her particular situation, to the processing of his or her personal data, where such

processing is based on legitimate interest and under the conditions of Article 21 of the GDPR.

- **Right to organize the fate of his/her personal data in case of death:** the User may define general or specific directives relating to the conservation, deletion and communication of his/her personal data after his/her death (law 78-17 of January 6, 1978 modified, art. 40, II).
- **Right to lodge a complaint with a supervisory authority:** without prejudice to any other administrative or judicial remedy, the User has the right to lodge a complaint with a supervisory authority if he/she considers that the processing of personal data concerning him/her constitutes a breach of the regulations applicable to personal data (art. 77 of the RGPD).

9. Contact

For more information on the processing of your personal data or to exercise your rights, you can contact us at the following address

Email : admin@flyingrhino.fr

Address : 8 Rue des Alouettes, 13820 Ensues-la-Redonne, France