

## **MYVINCHA PRIVACY POLICY**

INSD PROGRAMME is the editor and publisher of the website [www.myvincha.com](http://www.myvincha.com) (hereinafter "the Website"), the 1:1 Meditation/Coaching session (hereinafter "1:1 Meditation/Coaching") and of the mobile application entitled MYVINCHA (hereinafter "MYVINCHA App" or "the Application" or "the App").

In this framework INSD PROGRAMME implements personal data processing in accordance with the applicable legal provisions and in particular the EU Regulation 2016/679, known as "GDPR".

GDPR defines "personal data" as any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one 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 the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (hereinafter "PD").

The Processing Manager is the company INSD PROGRAMME S.A.S whose head office is located at 59 rue Saint-Denis - 75001 PARIS.

For any question related to your PD and/or to exercise your rights related thereto, please contact INSD PROGRAMME's Data Protection Officer: Mr Dusan Gruicity  
Phone: +33 (0) 788793119  
Email: [office@myvincha.com](mailto:office@myvincha.com) (hereinafter "DPO").

This Privacy Policy (hereinafter "the Privacy Policy") states how INSD PROGRAMME collects and processes all PD you provide directly or indirectly while using the Website, 1:1 Meditation/Coaching and/or MYVINCHA App.

### **1. TYPE OF PERSONAL DATA USED**

The PD used by INSD PROGRAMME are essentially those of its employees, commercial partners, Website, 1:1 Meditation/Coaching and/or MYVINCHA App users or prospects users.

When using the Website, 1:1 Meditation/Coaching and /or MYVINCHA App, INSD PROGRAMME collects your identification and contact data (name, email, addresses, IP, etc.) as well as data relating to your personal and / or professional life (marital status, occupation, etc.).

INSD PROGRAMME does not collect or process your banking data in any way on the Website and/or MYVINCHA App. Only marketplaces (Apple Store, Android Store etc.) have access to this data during your purchases.

When you log in to the Website and/or MYVINCHA App via another website or application such as Facebook INSD PROGRAMME is also recipient of PD collected and held by that website/application according to the terms and conditions of the website/application.

We invite you to consult the personal data protection policies of these websites so that you are precisely aware of the information which is collected by these sites and applications as well as the purposes of use of your data, in particular for advertising purposes.

## **2. PD USE**

INSD PROGRAMME uses your PD primarily to operate and manage the Website, 1:1 Meditation/Coaching and MYVINCHA App in order to execute its contractual obligations and fulfill its legal obligations.

Only if you have explicitly checked the box allowing so, INSD PROGRAMME will also use your PD for business development and direct marketing.

Please note that failure to provide required PD on MYVINCHA App or the Website may prevent INSD PROGRAMME from fulfilling its services.

## **3. LEGAL BASIS FOR PROCESSING & RETENTION DURATIONS**

A) When you provide INSD PROGRAMME with your PD on the page "Contact us" of the Website:

Your PD are processed by INSD PROGRAMME with your express consent on the legal basis of GDPR provision 6 §1 a).

The purpose of this processing is to answer your questions and/or requests submitted on this page.

The PD will be retained for the time needed to respond to your questions and/or requests submitted on this page.

Your PD may be retained longer if they are necessary:

- to ensure compliance with legal, accounting and tax retention requirements, i.e. 10 years;
- for the retention of evidence during the applicable prescription periods, i.e. 5 years;
- for commercial prospecting purposes, i.e. 3 years from the end of our business relationship with you or from our last contact with you.

B) When on the Website or on MYVINCHA App you check the box "I agree to receive newsletters and direct marketing related to MYVINCHA and INSD PROGRAMME"

Your PD are processed by INSD PROGRAMME with your express consent on the legal basis of GDPR provision 6 §1 a).

The purpose of this processing is to provide you with updates and information on services and products relevant to you.

The PD will be retained for commercial prospecting purposes, i.e. 3 years from the end of our business relationship with you or from our last contact with you.

Your PD may be retained longer if they are necessary:

- to ensure compliance with legal, accounting and tax retention requirements, i.e. 10 years;
- for the retention of evidence during the applicable prescription periods, i.e. 5 years.

C) When you create a user account and /or subscribe to a MYVINCHA service on the App and/or on the Website

Your PD are processed by INSD PROGRAMME on the legal basis of GDPR provision 6 §1 b) & c).

The purpose of this processing is to provide you with the services associated to your user account and/or subscriptions.

The PD will be retained for the duration of your account and/or of your subscription and/or of your use of the services you requested.

Your PD may be retained longer if they are necessary:

- to ensure compliance with legal, accounting and tax retention requirements, i.e. 10 years;
- for the retention of evidence during the applicable prescription periods, i.e. 5 years;
- for commercial prospecting purposes, i.e. 3 years from the end of our business relationship with you or from our last contact with you.

Please note that the failure to provide the PD required for these services may prevent INSD from fulfilling the corresponding services.

#### **4. YOUR RIGHTS**

You hold the right to ask INSD PROGRAMME for access, rectification, erasure, limitation, portability of your PD in accordance with the terms and conditions set by the applicable legal provisions and in particular by the GDPR.

You are informed that the right to the portability of personal data concerns the PD that you have directly and yourself provided to INSD PROGRAMME via the Website and/or the App.

In addition, You can at any time oppose to this use and/or withdraw your consent to the processing.

You also have the right to give instructions regarding the retention, deletion and communication of your PD after your death.

To exercise one or more of these rights, you should contact the data controller in writing at the contact details listed above. The contact person is Mr. Dusan Gruicity Tel: +33 (0) 788793119, Email: office@myvincha.com

You also have the right to introduce, if necessary, a claim with a supervisory authority, such as the CNIL.

## **5. SECURING & STORING YOUR PD**

The collected PD are protected by physical and technological measures to guarantee their security, confidentiality, integrity and availability, in accordance with legal requirements.

## **6. DISCLOSURE TO THIRD PARTIES OF YOUR PD**

The recipients of your PD are its possible professional partners necessary for the achievement of the aforementioned purposes.

These recipients guarantee the same degree of protection for PD as INSD PROGRAMME.

In addition, in order to comply with its legal obligations, INSD PROGRAMME may be obliged to disclose your PD to any competent judicial authority by reasoned decision.

INSD PROGRAMME also uses the services of Google's Analytics and Firebase Realtime Database, which implies that some PD may be transferred to partners located in the United States. This transfer takes place within the framework of the "Privacy Shield" convention.

## **7. USE OF COOKIES**

The Website may use cookies to ensure relevance and efficiency of the uses and services and to provide Users with personalized services and offers.

### 7.1 What is a cookie?

A cookie is a piece of information added on to your terminal as you use the Website. It contains several data: the name of the server, an identifier in the form of a unique number, an expiry date, etc.

This information is sometimes stored on your login device in a simple text file that a server access to read and save information.

### 7.2 The role of cookies

Their main objective is to improve your experience the Website.

Some cookies can store preferences and information about your Website browsing (pages viewed, frequency, etc).

Cookies also allow to better adapt and personalize the offers INSD PROGRAMME can provide you.

The Website can use several types of cookies, including those which:

- allow you to identify yourself and therefore access your user account
- memorize the elements which open on the Website in the form of windows (or other) and already viewed during a previous visit
- allow to adapt the presentation of the Website to the display preferences of the terminal
- allow to establish usage statistics
- allow to evaluate the general use that you make of the Website - allow to adjust offers related to your interests.

### **7.3 Retention duration of the cookies**

Our cookies will not be retained for more than 13 months as from the day you consented to their use.

INSD PROGRAMME declines any responsibility for the consequences related to the deteriorated functioning of its services, because of the impossibility for its services to record or to consult cookies you will have declined.

## **8. HYPERTEXT LINKS TO SITES / THIRD APPLICATIONS**

MYVINCHA App and/or Website may contain hypertext links to websites or third-party applications.

INSD PROGRAMME is not responsible for the operation and content of these sites or third party applications with which it claims no legal link.

You are therefore informed that INSD PROGRAMME is not responsible for the followup given to the redirection to these sites or applications.

## **9. MODIFICATION OF THE PRIVACY POLICY**

Given the possible evolution of MYVINCHA App, 1:1 Meditation/Coaching and/or the Website and regulations, INSD PROGRAMME reserves the right to modify at any time this Privacy Policy.

The new policy will, if necessary, be brought to your attention by changing the dedicated page of MYVINCHA App and/or Website. You will need to expressly consent to the new policy to continue using the MYVINCHA App and/or Website.