

Privacy Policy WhatsApp Groups

Your privacy is important to us. Wojo is committed to protecting your privacy, whether it's when you visit our , use our application or come to work in our facilities.

The purpose of this Privacy Policy (the **"Policy"**) is to explain to you how we collect, use and share your personal data during and as a result of your visits to the Wojo General WhatsApp Group or Local Wojo WhatsApp Groups administered by Wojo (hereinafter collectively **"WhatsApp Groups"**) and the rights you have in relation thereto.

Where this Policy mentions "we" or "us", it refers to the Wojo Group, headquartered at 92, avenue Charles-de-Gaulle (Neuilly-sur-Seine), which determines why and how your personal data is processed. We are the "controller" of your personal data.

We process your personal data in accordance with the applicable regulations, in particular Regulation (EU) 2016/679 (General Data Protection Regulation known as "**RGPD**") and the amended "Informatique et libertés" Law n°78-17.

Personal data we collect and process

We collect information about you, as listed below, directly from you, or indirectly through your company.

The types of information we collect and process may include:

- Identification and contact data (surname, first name, business and/or personal telephone number) and professional data (company, job title, position).
- Communications processed via our WhatsApp Groups (for example: your opinions, recommendations, questions/comments, publications, messages, survey responses).
- Computer data (connection identifiers) or information on your consent to this Policy (for example: technical data on the identifiers of your device or computer such IP address, geographical area, pages consulted by the user, date and time of consultation, origin of the connection).

Data collection is limited to the information required for the purposes described below. Mandatory data is indicated as such on the collection forms.



Purposes of processing and legal basis

We process your personal data for the purposes and on the grounds described below:

- Communication of general information from Wojo, in particular commercial information such as service updates, newsletters, new offers, news, etc. You have given your prior consent to this processing and your consent has been obtained in compliance with data protection regulations.
- Putting you in contact with other members of the Wojo community by creating a discussion open to members of a site and allowing the distribution of publications for the purposes of commercial prospecting, promotion of members' services, organization of events, etc. You have given your prior consent to this processing and your consent has been obtained in compliance with data protection regulations.
- This is necessary in order to comply with our **legal or regulatory obligations.** (e.g. managing exercise of your rights).

You may withdraw your consent at any time by leaving the WhatsApp Groups. Such withdrawal will not affect the lawfulness of the processing carried out prior to your departure. We will endeavour to keep the personal data in our possession up to date. However, you are responsible informing us promptly of any changes to your personal data.

Communications to third parties

In order to achieve the purposes described above, we may communicate your personal data, in compliance with data protection regulations, to the following recipients:

- All this data is used by **our internal** sales, marketing, finance and IT **departments**, as well as our **operations departments**, which include the Wojo area concerned by your reservation.
- Our subcontractors, partners, service providers, professional advisors: we may engage or call upon other companies to perform certain functions on our behalf or to provide you with certain services. They are subject to contractual and legal obligations in order to preserve your privacy and the confidentiality of your data (for example: Meta Group to enable you to use WhatsApp Groups via WhatsApp messaging). For more information, please consult their privacy or data protection policies.
- Finally, to legal and regulatory obligations, we may also share personal data with **public organizations**, judicial or administrative authorities and supervisory **bodies**.



Data retention period

Your personal data is kept for the **time necessary to achieve the purposes for which it was collected**.

To determine the appropriate retention period for your personal data, we consider **the amount**, **nature** and **sensitivity** of the personal data, the potential risk arising from unauthorized use or disclosure of the personal data, the purposes for which we process your personal data and our legal obligations. Beyond that, **your personal data will be deleted or archived in accordance with legal and regulatory requirements**.

- Technical and organizational safety measures

WhatsApp uses end-to-end encryption to secure communications. For more information, please consult their privacy or data protection policy.

We remind you that the visibility of your personal data within this group may nevertheless entail certain risks. We encourage you not to share sensitive information.

Your rights

You have the following rights:

- 1. Right of access: you may request access to the personal data we hold about you and certain information about how it is processed. In certain cases, and on your request, we may provide you with an electronic copy of your data;
- Right of correction: you can ask us to rectify any inaccurate or incomplete data concerning you. You must then demonstrate how such information is incorrect.
 ;
- 3. Right to restrict processing: in certain circumstances, it may be possible to restrict processing. You can make this request at any time, and we will decide what action to take;
- Right to object: you may object to any processing based on our legitimate interests, for reasons relating to your particular situation and, in any event, when we send you marketing communications (newsletter, quotations, etc.);
- 5. Right deletion: in certain circumstances, you may request the deletion of your personal data. Once we have determined, in accordance with the law, that your request is admissible, we will delete your personal data as soon as possible;
- 6. Right to portability: in certain circumstances, you can ask us to send you your personal data in a commonly used and readable format.



If technically possible, you may also request that we pass on your data to another data controller;

- 7. Right to withdraw your consent: insofar as the processing of your personal data is based on your consent, you may withdraw it at any time;
- 8. The right to formulate directives concerning the conservation, deletion and communication of your personal data after your death.

Some of these rights will only apply in certain circumstances. You can exercise these rights by contacting Wojo by :

 the <u>rights exercise request form</u> available at <u>https://www.wojo.com/landing/charte-rgpd/?ref=reborn_footer;</u>

For all other inquiries, please contact WOJO :

- by contacting**rgpd@wojo.com**; or
- by post (we recommend registered mail): WOJO, Service Juridique, 92, avenue Charles-de-Gaulle, 92200 Neuilly-sur-Seine.

When you contact us to exercise your rights, we may ask you to identify yourself before processing your request.

You also have the right to lodge a complaint concerning the processing of your personal data with the competent data protection authority: the Commission Nationale de l'Informatique et des Libertés (CNIL).

To find out more about Wojo's handling of personal data, you can consult our <u>Personal Data</u> <u>Protection Charter</u> and, if you are a customer, the **information notice on the protection of personal data** sent by Wojo or by your employer, available on our website or on request.

Modification s

This Policy may be amended from time to time. **Any material changes to this Policy will be communicated to you** by any method we choose and as permitted by applicable law.

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