



Privacy policy

Personal data – Website management

Activities relating to the www.paraboot.com website involve the processing of personal data.

What does the personal data use policy cover?

This policy informs you of the nature of this processing and of your rights concerning your personal data.

This privacy policy is drawn up pursuant to Law no. 78-17 of 6 January 1978 (known as the “Loi informatique et libertés” or “LIL”) and the General Personal Data Protection Regulation (“GDPR”) no. 2016/679.

Who are the managers of this policy?

The processing co-managers are:

ETABLISSEMENTS RICHARD PONTVERT ET COMPAGNIE, SA [Equiv. Public Limited Company] with a capital of €823,834, whose registered office is at 65 rue des Tuiliers 38430 Saint-Jean-de-Moirans, registered under number 060 500 147.

CAPUCE, SA [Equiv. Public Limited Company] with a capital of €1,552,000, whose registered office is at 65 rue des Tuiliers 38430 Saint-Jean-de-Moirans, registered under number 349 869 594.

Whose legal representative is Mr Eric Forestier, CEO

The contact details of the processing co-managers are as follows:

65 rue des Tuiliers 38430 Jean-de-Moirans

Tel: +33 4 76 93 88 00.

Email: contact@paraboot.com

Who does this policy concern?

This policy concerns the website users.

More specifically it concerns:

- persons who subscribe to the newsletter
- applicants who submit their applications via the website (online recruitment)
- customers of our online store
- persons who reserve products online to collect in-store
- persons to whom we have entrusted technical services (hosting service, maintenance, website security)
- persons with access to the website's back office for its administration
- persons who contact us via the website's contact form
- persons browsing the website (internet users)

Purpose (what the data collected is used for)

The purpose of the processing is the management of the website.

This processing is for various purposes determined, depending on the case, either by ETABLISSEMENTS RICHARD PONVERT ET COMPAGNIE or by CAPUCE SA.

ETABLISSEMENTS RICHARD PONVERT ET COMPAGNIE determines the following purposes:

- the management of online applications (online recruitment)
- the technical management of the website (maintenance, hosting and website security)
- website administration
- the management of requests for information via the contact form
- the management of website cookies

CAPUCE SA determines the following purpose:

- the management of customer orders via the online store

The following purposes are co-managed:

- the management of newsletter subscriptions
- the management of product reservations
- the management of after-sales service and product returns

Legal basis for processing: what gives us the right to process data

The legal basis for processing is as follows:

- for the management of newsletter subscriptions, the legal basis is the subscriber's consent
- for the management of online applications (online recruitment), the legal basis is the applicants' consent
- for the management of orders via the online shop, the legal basis is the order placed by these customers (the contract)

- for the management of after-sales service and product returns, the legal basis is the order placed by these customers (the contract)
- for the technical management of the website (maintenance, hosting and website security), the legal basis is the legitimate interest and the contracts entered into with the service providers
- for website administration, the legal basis is the legitimate interest
- for the management of online reservations, the legal basis is consent
- for the management of requests for information via the contact form, the legal basis is the legitimate interest (to enable online communication)
- for the management of cookies on the website, the legal basis is the consent of the persons concerned when this consent is compulsory

Data retention period

Data subject to processing are retained for a period not exceeding that necessary for the purposes for which they are recorded (processing minimisation principle).

The maximum retention periods are as follows:

- for the management of newsletter subscriptions: the email address is retained until the person concerned unsubscribes
- for the management of online applications (online recruitment): 2 years for unsuccessful applications
- for the management of orders via the online store: 10 years from the end of the order. Bank details are retained for 30 days
- for the management of after-sales service and product returns: 10 years from the order
- for the technical management of the website (maintenance, hosting and website security): 13 months maximum for IP addresses and connection logs
- for website administration: for as long as the persons concerned administer the website
- for the management of online reservations: the time needed for the reservation
- for the management of requests for information via the contact form: 3 years from the request
- for the management of website cookies: 13 months maximum

Data processed

The processing manager processes the following categories of data:

- Identification data (surname, given name, address, email address, telephone, etc.)
- Data concerning the product(s) ordered, returns and withdrawals, etc.
- Connection data (IP addresses, device type, browser, logs, usernames)
- Location data – post code and address (for online reservations and finding a point of sale on the “Boutiques” page)
- Financial information (bank details for orders)

Compulsory or optional nature of data collection

The data collected are compulsory in order to achieve the processing purposes, except in the following cases:

- Location data
- Certain connection data (collected by trackers)

Data sources

Data are transferred directly by the person concerned either to ETABLISSEMENTS RICHARD PONVERT ET COMPAGNIE or to CAPUCE SA (for online orders).

Data recipients

Depending on their respective needs, the following are recipients of all or part of the data:

- the processing co-manager
- persons in charge of technical services (hosting service, maintenance, website security)
- Dalenys (payment platform)
- online payment service providers (PayPal, American Express, Sofort and Bancontact, etc.)
- the logistics coordinator
- carriers

What security measures are in place?

The processing manager implements appropriate technical and organisational measures in order to ensure a level of security appropriate to the risk.

The processing manager takes measures to ensure that any natural person acting under the authority of the processing manager or under that of the subcontractor, who has access to personal data, does not process them except upon instruction from the processing manager, unless obliged to do so.

The existence or not of data transfers to countries outside the European Union and associated guarantees

The processing manager makes no transfers of personal data outside the European Union.

Automated decision making

The processing does not provide for fully automated decision making.

Geolocation

If you use the online reservation system from a computer and you allow access to your location, your browser gathers information concerning nearby wireless access points and your computer's IP address and sends them to the geolocation service provider by default.

For Firefox, this provider is *Google Location Services*. This transfer is used to obtain an estimate of your location. This location estimate is then shared with ETABLISSEMENTS RICHARD PONVERT ET COMPAGNIE.

By default, Firefox determines your location by sending:

- your computer's IP address,
- information concerning nearby wireless access points and
- a random customer ID, assigned by Google, which expires after two weeks.

For more information: <https://support.mozilla.org/fr/kb/firefox-partage-t-il-ma-position-avec-sites-web?redirectslug=does-firefox-share-my-location-web-sites&redirectlocale=en-US>

Google Location Services then returns a geolocation estimate. For a full description of the information collected and used by Google, please refer to [Google's geolocation privacy policy \(in English\)](#).

Information is exchanged over an encrypted connection to protect your privacy. Once Firefox has your location information, it transfers it to ETABLISSEMENTS RICHARD PONVERT ET COMPAGNIE, which requested it. At no time are the name, website address or cookies shared with *Google Location Services*.

For a full description of the information collected and used by Firefox, please refer to your browser's privacy policy.

If you use our services from a mobile device, this device will send us data concerning your geographical location according to the settings you have chosen on your phone. We will ask for your consent before using the GPS or other tools enabling your exact location to be identified.

Cookies and other trackers used on the website

A cookie is a tracker. When an internet user browses on a website, it enables personal data concerning the user to be collected.

When using the internet on your computer, cookies are managed by your internet browser (Internet Explorer, Firefox, Safari or Google Chrome).

Some cookies are internal to the website, others are third-party cookies placed on the website by third-party companies.

The third-party trackers we use on the website are as follows:

· **Google**

Analytics (cf https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage#gtags_and_analyticsjs_-_cookie_usage)

=> Statistics cookies: _ga; _gat; _gid; collect

These cookies generate data enabling us to compile general statistics concerning the way in which visitors use our website. We use the services of Google Analytics of Google Inc.

· **Addthis** (cf <https://www.oracle.com/legal/privacy/addthis-privacy-policy.html#publisher-visitors>)

=> Statistics cookies: __atuvc; __atuv; loc; uvc

These cookies generate data enabling us to compile specific statistics concerning the sharing of our website content with social networks. We use the services of Addthis.

· **Youtube**

=> Preference cookies: yt-player-bandwidth

These cookies enable a website to analyse in a general manner information that changes the way in which the website behaves or appears. The one that we use is used to determine optimal video quality depending on a visitor's device and network settings.

=> Marketing cookies: GPS; IDE; NID; PREF; r/collect; rc::a; rc::b; test_cookie; VISITOR_INFO1_LIVE; YSC; yt.innertube::nextId; yt.innertube::requests; yt-player-headers-readable; yt-player-two-stage-token; yt-remote-cast-installed; yt-remote-connected-devices; yt-remote-devices-id; yt-remote-fast-check-period; yt-remote-session-app; yt-remote-session-name.

These cookies are mostly used to store statistics concerning:

- The way in which a visitor uses videos on YouTube via our website
- User bandwidth on pages with integrated YouTube videos
- The user's video playback preferences for YouTube videos embedded on the website

Further information:

For more information concerning [Analytics cookies and privacy](#)

Google: <https://www.google.com/policies/technologies/cookies/>
<https://policies.google.com/privacy?hl=fr&gl=fr>

We use cookies requiring the internet user's consent.

Consent is obtained when a Cookie banner appears on the website.
Unless internet users have been informed and given their express consent, cookies are not stored or read on their devices.
Consent is requested for each type of cookie (by purpose).
The list of third-party cookies is given when consent is requested.
Users can postpone their choice and decide later. Unless their consent is given, no cookies are stored.
Users have the right to reject the storage of these cookies.
They have the right to withdraw their consent at any time, just as easily as they gave it.
Cookies stored have a maximum lifespan of 13 months. At the end of this period, consent is requested again.

Internet users are informed that they may also disable cookies by configuring their internet browser:
If internet users wish to delete the cookies stored on their device and configure their browser not to accept cookies, they may do so via their internet browser preferences.
These browsing options concerning cookies are usually found in the “Options”, “Preferences” or “Tools” menus in their browser.

For more information concerning the rules applicable to cookies, internet users may refer to the following links:

<https://www.cnil.fr/fr/cookies-et-autres-traceurs-la-cnil-publie-de-nouvelles-lignes-directrices>
<https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000038783337>

What happens to personal data after death - Right of access, to the rectification, erasure and portability of data

Data subjects may set instructions concerning the retention, deletion and disclosure of their personal data after their death. These instructions may be general or specific.

Data subjects also have the right of access, to the restriction of processing, to rectification, erasure and, under certain conditions, to the portability of their personal data. Data subjects have the right to withdraw their consent at any time if consent constitutes the legal basis for processing.

Requests must indicate the surname and given name, email or postal address of the person concerned, and must be signed and accompanied by valid proof of identity.

These rights may be exercised by contacting:

Mr Pierre Colin - Marketing Manager
65 rue des Tuilliers 38430 Jean-de-Moirans
Tel: +33 4 76 93 88 00.
Email: contact@paraboot.com

Complaints

Data subjects have the right to lodge complaints with the supervisory authority (CNIL):
<https://www.cnil.fr/fr/webform/adresser-une-plainte>