

PRIVACY POLICY

www.greenhomeimmobilier.fr

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Article 1. INTRODUCTION

GREEN HOME, in the capacity of data controller, attaches great importance to protecting and respecting the privacy of its Users, and, in particular, to the protection, confidentiality and security of the Personal Data that it collects, in compliance with the General Data Protection Regulation 2016/679 (**GDPR**) and the French Data Protection Act n°78-17 (**DPA**).

This policy aims informs Data Subjects of how GREEN HOME uses information that it collects i.e. what it does with the data collected and processed under its responsibility; and/or the information that Data Subjects must provide, including through the website www.greenhomeimmobilier.fr (**Website**), by email (contact@greenhomeimmobilier.fr) or in relation to the Services.

To this end, Users are invited to read this document carefully.

It is possible to visit the Website anonymously and without having to provide personal information

When using the Website, Users may however be required to provide their Personal Data when:

- ✓ Sending a message via the "Contact" form;
- ✓ Requesting a valuation of their property via the "Valuation" form;
- ✓ Asking to be contacted via the "Contact" form on each Listing;
- ✓ Setting up an alert to receive Listings by email;
- ✓ Sending a message via the "Franchise" form;
- ✓ Getting in touch by email;
- ✓ Or even via

The Privacy Policy is accessible i) by a hyperlink in each of these Website forms, ii) from each page of the Website, iii) and also by sending an email request to contact@greenhomeimmobilier.fr

Article 2. DEFINITIONS

In this document, the following terms shall have the following meanings:

- **Client:** an adult person acting as a private individual, under a contract with GREEN HOME for the provision of services in the context of property transactions;
- **Data:** the personal data of Data Subjects, collected and processed when managing contact requests received via the Website or email, or via the company's Facebook, Instagram, LinkedIn or Pinterest accounts for which plugins can be found i) on the first page of the Website and ii) in the top right-hand corner of the Website.
- **Data Subjects:** all persons whose data are processed by GREEN HOME
- **Website:** means the website www.greenhomeimmobilier.fr published by GREEN HOME.
- **User:** means any person of legal age who uses the Website on a private individual basis;

- **Cookies:** means the practice of storing and/or reading information on digital terminals (computer, smartphone, tablet etc.). A cookie is a small text file stored on your computer or device by our website when you use certain parts of the Website and/or certain features of the website. Details of the cookies used by our website are set out below;
- **Services:** means all services offered by GREEN HOME related to the sale of property, as described in the Terms of Use available at the following address: <https://www.greenhomeimmobilier.fr/conditions-generales-d-utilisation.pdf>

Article 3. PURPOSE

The purpose of the Privacy Policy is to define the commitments of GREEN HOME as a Data Controller, with regard to Data that is collected and processed when Data Subjects use the Website and/or within the framework of Green Home's business.

Article 4. DATA

Some data is collected automatically by our website (**for more details, please see section 11 on our use of cookies**). Other data are only collected if voluntarily submitted by the User, or in the course of performing the Services, for the purposes set out in Section 5, for example when requesting a valuation.

Depending on your use of our website, we may collect some or all of the following data:

i Identification data

In order to i) send a contact request, ii) request a property valuation, iii) send a contact request about a listing, iv) set up an email alert, or v) join the network of GREEN HOME franchisees, GREEN HOME requires identification data, and in particular:

- Full name
- Email address
- Telephone number
- Postal address
- Source of the contact

If the information is incorrect, the request cannot be processed.

ii. Client Personal Data

In order to process requests for i) property valuations or ii) email alerts, GREEN HOME is likely to require information, including:

- Description of the property to be valued
- Client preferences for the creation of an email alert (type of property wanted, location, size)
- The Client's budget / financial situation

If this information is not provided or is inaccurate, GREEN HOME will not be able to provide a suitable response to the Client.

III. Computer data

- Browsing history
- IP address

Article 5. DATA SUBJECTS AND TYPES OF PROCESSING

In the capacity of Data Controller, GREEN HOME collects and processes Data relating to the following categories of persons and on the following grounds:

DATA SUBJECTS	PURPOSE OF THE PROCESSING	LEGAL GROUND	DATA STORAGE PERIOD
User of the website	To receive, manage and process contact requests, valuation requests, requests to set up an alert, requests relating to the network of franchisees, received via the forms on the Website, by email or via social networks	To execute pre-contractual measures at the request of the User	3 years from the last contact with the User
	To execute pre-contractual measures at the request of the User	Legitimate interest of GREEN HOME, namely the improvement of its services	See the article "Cookies"
Clients (Private individuals)	To manage buyer and vendor contracts	To perform the contract,	Duration strictly necessary for managing the commercial relationship
	To manage client accounts	To comply with accounting and tax obligations	10 years for accounting documents
	To manage information requests	Legitimate interests of GREEN HOME, namely the promotion of its business and the execution of contracts with Clients	
	Social Network Management		
Prospective clients	Prospecting	Legitimate interest of GREEN HOME if the prospect is a Client i.e. the promotion of its business; or consent, for prospects who are not Clients	Three years from the date the data are collected or the last contact with the prospect

At the end of the storage period, the Data will be archived in a secure manner for the necessary storage and/or limitation periods in accordance with law or regulations.

At the end of these periods, the data will be deleted or anonymised, in accordance with the regulations in force.

Article 6. DATA RECIPIENTS

In accordance with the purposes listed in Article 5, the Data are strictly intended for:

- GREEN HOME (and any internal staff specifically authorised for the purpose, in strict compliance with their roles)
- Independent Property Advisers
- Notaries
- State authorities (Land Registry, URSSAF, Public Treasury, pension funds, etc.) ;
- liability insurance;
- the following suppliers/subcontractors:
 - **OVH**: Website hosting;
 - **AC3 ImmoFacile**: Real estate Customer Management Services, for managing clients, sales mandates and property listings published on the website / Used by all
 - **Mandates register** using the AC3 ImmoFacile software
 - **Dashboard**: Customised web application for monitoring the activity of sales teams / Used by all
 - **Maxime RIPAUD**: Freelance web developer
 - **Google Analytics**: Website audience analysis;
 - **Google Drive**: Management of mandates & storage of company files
 - **Communication tools** used by all employees (email and instant messaging)

When GREEN HOME sends data to its subcontractors, they are required to respect the confidentiality, integrity and security of the data and to use the data only to execute the service required of them.

In particular circumstances, GREEN HOME may be required to disclose Data if required by judicial and administrative authorities, subject to justification.

Article 7. ACCESS TO SOCIAL NETWORKS

The Website can be used to access to Social Network pages by clicking on certain plugins on the Website.

When Users click on these links, their Data is automatically transferred to the Social Networks. These external websites then carry out their own data processing, to which GREEN HOME is a third party. Consequently, GREEN HOME invites Users to read their respective privacy policies, as specified in the article "Cookies" below, in order to understand the terms and conditions and if necessary to exercise their rights.

Furthermore, when browsing the GREEN HOME Facebook and Instagram pages, data are processed for statistical purposes under the joint responsibility of GREEN HOME and Facebook Ireland Limited, the latter being primarily responsible for such processing in accordance with an addendum available at the following address: <https://www.facebook.com/policy.php>

Article 9. USER RIGHTS

Users have the following rights:

- a **right of access**, i.e. to obtain from the Data Controller confirmation as to whether or not their Data are being processed and, if so, to access the Data and various other information including the purposes of the processing, the category of Data held, the recipient(s) of the Data etc.
- a **right to rectify**, as soon as possible, any Data that are inaccurate, incomplete, outdated or ambiguous, or whose collection and processing are prohibited;
- a **right to object** to the processing of the Data by the Controller or to the transfer of the Data, unless there are compelling legitimate grounds which override the interests of the User;
- a **right to the deletion of their Data for the following reasons:**
 - a. The Data are no longer necessary for the purposes for which they were collected or processed;
 - b. The consent on which the processing was based has been withdrawn, and there is no other lawful ground for processing your Data;
 - c. An objection has been raised to the processing of the Data and there is no overriding interest in carrying out the processing;
 - d. The Data have been processed illegally;
 - e. The Data must be deleted in order to comply with a legal obligation of GREEN HOME;
 - f. The Data was collected when the data subject was a minor.
- a **right to decide in advance and during their lifetime** the conditions under which the User wishes the Data that the Company has collected and processed to be kept and communicated **after their death**;
- a **right to Data portability** and retrieval allowing the User to receive their Data in a structured, commonly used and machine-readable format, and to transmit it to another Data Controller; the Company which initially collected the Data may not object to this process.

If a User wishes to exercise any of these rights, they may send a request by email to contact@greenhomeimmobilier.fr, or by post to the following address: Green Home Immobilier - 1 rue Fondère 13004 Marseille, France.

As soon as an email request is received at the above address, the data controller will notify the Data Subjects by email of the time required to process the request, which may take a maximum of one month.

Data Subjects may also make any other claim to the Commission Nationale de l'Informatique et des Libertés (CNIL) in the event that the response from GREEN HOME is deemed unsatisfactory or incomplete.

Article 10. COOKIES

a. Strictly necessary cookies ("technical cookies")

Some cookies are exclusively intended to enable or facilitate electronic communication or are strictly necessary for the provision of online communication services at the express request of the User.

In accordance with Article 82 of the DPA and the CNIL Resolutions No. 2020-091 and No. 2020-092 of September 17, 2020, the User's **consent** is not sought for the use of these cookies since the processing of Data is necessary to pursue a legitimate interest of GREEN HOME, namely the proper technical management of its Website.

These are mainly session cookies allowing authentication and connection to the Website as well as the recording of navigation data during a session (for example to ensure User authentication by remembering the means of authentication used during a session or choice of default language, etc.)

b. Cookies that are not strictly necessary ("non-technical cookies")

GREEN HOME uses cookies that store information on the Users' preferences and browsing history, allowing us to analyse navigation habits and determine the Users' interests, optimise the website and to adapt the content to their interests.

For these cookies, whose sole purpose is not for easier navigation or which are not strictly necessary to benefit from the Services, an information banner is displayed when the User first connects to or visits the Website, before these cookies are placed, to (i) inform the User of their presence and their precise purpose and (ii) enable the User to accept, block or, where applicable, to configure the use of cookies on their terminal. This choice may be changed at any time by the User

Cookie preferences (consent or refusal) will be saved for a maximum of six (6) months from when the cookie is first stored on the User's terminal.

These cookies include, in particular, third-party cookies that may be stored on the User's terminal when they browse the Website. The purpose of these cookies is to share social network content and to analyse your browsing. GREEN HOME does not manage the storage and reading of cookies by social networks through the plugins on the Website, which are issued by the social networks. Users should consult the privacy policies of these social networks in order to learn the purposes for which they may use the browsing information they collect through these plugins:

- Facebook <https://www.facebook.com/help/cookies>
- Pinterest <https://policy.pinterest.com/fr/privacy-policy>
- Instagram <https://help.instagram.com/519522125107875>
- LinkedIn <https://www.linkedin.com/legal/privacy-policy>

Users may configure their browser to allow all non-technical cookies, be notified when a cookie is sent, or block all such cookies.

Audience measurement cookies will not be stored for longer than two (2) years, in accordance with CNIL Resolution no. 2020-091 and recommendation no. 2020-092 of 17/09/20 no. 2019-093. The information collected through trackers will be kept for a maximum of twenty-five months.

Article 11. CHANGES TO THE PRIVACY POLICY

The Company reserves the right to change the Privacy Policy.

In the event of substantial modification, Users will be informed by means of a special notice displayed on the Website.

If the User does not agree with the new terms, they must cease to use the Website.

Article 12. APPLICABLE LAW

The privacy policy is written in French and is governed by French law. Any dispute shall be brought before the competent French courts.