

# DECATHLON PARAGLIDING

Version1. 29 July 2019

## Privacy Policy - Personal Data

### 1. General information

Decathlon Sports Switzerland SA, as the responsible entity for data processing, attaches great importance to the protection of and respect for your private life. The purpose of this policy is to inform you of our practices regarding the collection, use and sharing of the information that you provide to us through our platform (the "Platform") accessible from the website [www.decathlonparapente.com](http://www.decathlonparapente.com) or via our mobile applications. Decathlon Paragliding and/or Decathlon SA will be referred to from this point as "**Decathlon**", "We", "Us" or "Our".

This policy, as well as our General Conditions of Use and Our [Charter on Cookies](#) (see section "Managing cookies"), presents the way in which We process the personal data that We collect and that You provide to Us. We invite You to read this document carefully to know and understand Our practices with respect to the processing of Your personal data that We carry out.

### 2. The information that We collect

We may collect and process the following data:

#### 2.1. Information that You send to Us directly

By using Our platform, You send Us information, some of which could be used to identify You ("Personal Data"). This is particularly the case when You complete forms (for example, the Decathlon registration form), when You register for Your first flight or tandem flight.

This information includes the following data:

- Data required to register for the service that We provide on Our platform or for access to any other service provided by Us. This data includes Your name and surname, email address, date of birth, gender, telephone number and password. This information is mandatory. Without this, Decathlon will not be able to provide You with the services offered by Our platform and You will not be allowed to create an account on Our platform;

- A postal address;
- A copy of all the exchanges between You and Decathlon;
- A copy of all reservations or publications made on Our platform;
- Details of financial or accounting operations made on Our platform or by any other means, including information relating to Your payment card, Your banking data and information relating to flights reserved;
- Details of Your visits to Our platform and the content You have accessed;
- If applicable, Your responses to Our surveys and questionnaires and any reviews You have made to evaluate a service performed with a partner school. Such information is particularly likely to be used for research and analysis of user behaviour;
- Data that We may ask You to provide when You report a problem relating to Our platform or to Our services, for example the subject of Your request for assistance;
- Data related to Your location when You agreed that We collect and process this data;
- Data that We may ask You to provide when You subscribe to a service offered by Our partners (first paragliding flight, paragliding course), for example the weight of the passenger wishing to undertake the flight. This is to allow the proper preparation of equipment necessary for the delivery of the service.
- Where applicable, the registration of Your equipment (canopy, seat, safety harness or any other equipment).

## 2.2. Data that We collect automatically

In situations where You connect to Our services by using social network features available to You, Decathlon will have access to some of Your account data (including Your first name, surname, photograph, email address, number of Facebook friends, number of Instagram followers) on said social network in accordance with the general conditions of use of the social network concerned. We may also collect some of Your Personal Data when You interact with some social network features, such as the “Like” feature.

During each of Your visits, We may collect, where appropriate and in accordance with the applicable legislation and with Your agreement, information relating to the devices which You use Our services or the networks from which You access Our services, such as: Your IP addresses, data connection, types and versions of internet browsers used, types and versions of browser plugins, systems and

operating platforms, data concerning Your navigation on Our Platform, including Your navigation of the different pages of Our Platform, the content You access or visit, search terms used, loading errors, the duration of visit to certain pages, the advertising ID on Your device, interactions with the page, and any phone number used to contact Us. Among the technologies used to collect this information, We particularly use cookies. (To learn more about this subject, please refer to Our [Charter on Cookies](#), under "Managing cookies").

We also collect information about Your use of Our Platform which may be displayed on Your public profile.

## 2.3. Duration of storage of Your data

**2.3.1.** With the exception of the Personal Data categories referred to in Articles 2.3.2. and 2.3.3. below, Your Personal Data is archived at the end of the following periods:

- 5 years after Your last use of Our platform, if You have not closed Your account;
- 1 year after the closure of Your account, except if You have received a negative assessment or a report, in which case Your data is kept for 2 years following the last negative assessment or report received if this duration is longer.

**2.3.2.** The following Personal Data categories may be retained for various periods of time:

- Financial data (for example payments, refunds, etc.) is kept for the duration required by the applicable tax and accounting laws;
- Content created by You on Our Platform (such as the comments, opinions and ratings) is rendered anonymous after the time limits referred to in 2.3.1 but remain visible on Our Platform.

**2.3.3.** In the event that Your account has been suspended or blocked, We retain Your data for a period ranging from 2 to 10 years from the date of the suspension in order to avoid any circumvention by You of the rules in force on Our Platform.

## 3. How do We use the data that We collect?

We use the data We collect to:

PURPOSE	LEGAL BASIS
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<p><b>3.1</b> Fulfil the contracts agreed between You and Us or between Us and Our business partners (for example the schools) and provide You with the information and services requested;</p>	<p>This processing is necessary for the execution of Our respective contractual obligations.</p>
<p><b>3.2</b> Send You information about Our services (for example, reservation confirmations) by email, SMS, or any other means of communication;</p>	<p>This processing is necessary for the execution of our respective contractual obligations and/or done with Your consent.</p>
<p><b>3.3</b> Collect Your payments</p>	<p>This processing is necessary for the execution of our respective contractual obligations.</p>
<p><b>3.4</b> Allow You to customise Your profile on Our Platform;</p>	<p>This processing is done on the basis of Your consent.</p>
<p><b>3.5</b> Allow You to communicate and exchange with the other members of Our community or schools authorised to publish on the Platform.</p>	<p>This processing is necessary for the execution of our respective contractual obligations and/or done with Your consent.</p>
<p><b>3.6</b> Give You access and enable You to communicate with Our member services;</p>	<p>This processing is (i) necessary for the execution of our respective contractual obligations, (ii) done with Your consent, and/or (iii) necessary for the establishment, exercise or defence of legal claims.</p>
<p><b>3.7</b> Ensure the respect of (i) the applicable legislation, (ii) Our General Conditions of Use, and (iii) Our privacy policy. In the case of violations on Your part, We may suspend Your account on Our Platform;</p>	<p>This processing is (i) necessary for the execution of our respective contractual obligations, (ii) done with Your consent and/or (iii) necessary for the establishment, exercise or defence of legal claims.</p>
<p><b>3.8</b> Send You, in accordance with the applicable legal provisions and with Your agreement when legislation requires, marketing messages, advertising and promotional materials, and information relating to the use of Our services,</p>	<p>This processing is based on Your consent and/or Our legitimate interest (to provide You with relevant information).</p>

<p>reservation terms and conditions, or to suggest and advise You of goods or services that may be of interest to You. We may also use Your data to send You advertising messages that may be of interest to You via social network platforms or third-party sites. If You would like more information on this subject, We invite You to refer to these platforms' contractual documents;</p>	
<p><b>3.9</b> Inform You of changes to Our services;</p>	<p>This processing is necessary for (i) the execution of our respective contractual obligations, (ii) Our legal obligations, and/or (iii) the establishment, exercise or defence of legal claims.</p>
<p><b>3.10</b> Verify the information contained in Your passport, identity card or any other identity document that We may have collected during Your registration or Your use of Our platform;</p>	<p>This processing is (i) done with Your consent, (ii) necessary for the execution of Our respective contractual obligations, and/or (iii) necessary for the establishment, exercise or defence of legal claims.</p>
<p><b>3.11</b> Manage Our Platform and perform internal technical operations for the resolution of problems, data analysis, testing, research, analysis, studies and surveys;</p>	<p>This processing is based on Our legitimate interest (to ensure the security of Our Platform and improve its functionality).</p>
<p><b>3.12</b> Improve and optimise Our platform, in particular to ensure that the display of Our content is adapted to Your device;</p>	<p>This processing is based on Our legitimate interest (to provide You with relevant information).</p>
<p><b>3.13</b> Allow You to use the interactive features of Our services if You wish;</p>	<p>This processing is necessary for the execution of our respective contractual obligations and/or done with Your consent.</p>

<p><b>3.14</b> Assist Us in the preservation of a healthy, secure environment on Our Platform;</p>	<p>This processing is (i) based on Our legitimate interest (to ensure the security of Our platform), (ii) necessary for the execution of Our contractual obligations and/or (iii) necessary for the establishment, exercise or defence of legal claims.</p>
<p><b>3.15</b> Evaluate the effectiveness of advertising messages that We send and adapt them to Our members.</p>	<p>This processing is (i) based on Our legitimate interest (to measure and optimise the effectiveness of Our campaigns) and/or (ii) done with Your consent.</p>

#### 4. Who are the recipients of the information that We collect and why do We pass on this information?

**4.1.** When You use Our services, some of Your information is transmitted to other members of Our community or schools authorised to publish on Our platform, through Your public profile or within the reservation process (for example We communicate Your phone number to the people with whom You will fly).

**4.2.** We may also share information about You, including Personal Data, with other entities in the Decathlon Group within the framework provided by this policy.

**4.3.** We also work in close collaboration with third party companies that may have access to Your Personal Data, and in particular with:

- the social media platforms that may offer You features to allow You to integrate information from Your account on their platform into Your Decathlon profile;
- Our trading partners who promote their services on Our platform and to which You can choose to subscribe;
- Our trading partners on whose internet site We may advertise Our services;
- the subcontractors We use in the fields of technical services, payment services and identity verification, and suppliers of analytical solutions.

**4.4.** We only share Your data with the third parties mentioned in 4.3. above in the following cases:

- When We make a request to a service provider for the execution of any contract agreed between You and Us or to provide or improve Our services (for example for payments made via Our platform);
- Within the framework of the reservation process, We may, in order to provide the requested services, display on Our Platform or pass on to another Member some of Your Personal Data such as Your name, photograph, mobile phone number or email address;
- We publish the comments that You have written on Our rating system on Our platform. These notices, which contain Your first name and the first letter of Your surname as well as Your photograph are visible to all visitors to Our Platform;
- When We make a request to search engine and analytical solution suppliers to improve and optimise Our Platform;
- When You make the express request (for example when You use authentication provided by social networks), or subscribe to a service provided by one of Our partners, or ask to benefit from an offer or a deal from one of Our partners);
- When We distribute, on Our trading partners' internet sites, certain parts of Our Platform (whose paragliding flights You have made) particularly through APIs. In this case, certain information from Your public profile may also be displayed on these sites;
- When We have the legal obligation to do so or if We believe in good faith that this is necessary: (i) to respond to any claim against the Decathlon, (ii) to comply with any judicial request, (iii) to execute any contract agreed with Our members, such as the General Conditions of Use and this Privacy Policy, (iv) in the event of an emergency involving public health or the physical integrity of a person, (v) for investigations and scrutiny, or (vi) in order to guarantee the rights, property and safety of Decathlon, its members and more generally any third parties;
- In the situation where We may sell or acquire a business or assets, in which case We reserve the possibility to share Your Personal Data with the potential seller or buyer of such a business or assets;
- If Decathlon or all or part of its assets are acquired by a third party, the data in Our possession will be, where appropriate, transferred to the new owner.

In accordance with the applicable legislation and with Your consent when it is required, We may aggregate data which relates to You and that We receive or send to Our trading partners, including all or part of Your Personal Data and information

collected through cookies. This aggregate information will only be used for the purposes described above.

We draw Your attention on the fact that if You decide to give Us access to some of Your information, including Your Personal Data, by the intermediary of connection services made available by Our trading partners, their confidentiality policies are also valid. We have no control over the collection or processing of Your data carried out by Our trading partners on their own platform.

## **5. How do We use and moderate Your messages?**

We may view the messages You exchange with other members of Our community via Our Platform for the purposes of fraud prevention, improvement of Our services, user support, verification of compliance by Our members with contracts agreed with Us and in particular with Our General Conditions of Use. For example, in order to prevent a member from bypassing Our online reservation system, We are permitted to browse and analyse messages exchanged on Our platform to ensure that they do not contain any details or references to other internet sites.

We never view Your communications with other members of Our community for promotional purposes or for targeted advertising. Wherever possible, We use automated systems to manage the moderation of messages transmitted between members via Our Platform, so that no individual decision may be taken.

## **6. Targeted advertising, emails and SMS messages that We send to You**

In accordance with the applicable legislation and with Your consent as required, We may use the data that You provide to Us on Our Platform for commercial prospecting (for example to (i) send You Our newsletters, (ii) send You invitations to Our events or any other communication that may be of interest to You, and (iii) display targeted advertisements on social media platforms or third party sites).

As regards promotional emails: You may withdraw Your consent at any time by (i) unchecking the relevant box in Your account, (ii) clicking on the unsubscribe link provided in each of Our communications, or (iii) contacting Us in the manner described in Article 13 below.

As regards targeted advertising:

- On social network platforms (for example Instagram, Facebook, Twitter): You may deny this processing at any time by configuring the parameters relating to advertising in Your account;

- On third-party sites: You can refer to Our [Charter on Cookies](#) (under "Managing cookies") to see how to withdraw Your consent.

## 7. How and where is Your data transferred?

As a general rule, We keep Your Personal Data within the European Union. However, insofar as, for example, some of Our service providers are located in countries outside the European Union ("Third Countries"), We transfer some of Your Personal Data to Third Countries. In particular, this may be the case for Third Countries for which the Swiss Federal Data Protection Officer has not indicated as giving "adequate protection". In such a case, We ensure that this transfer is carried out in accordance with the applicable regulations and guarantee a sufficient level of protection for the privacy and fundamental rights of individuals.

We can provide You with more information about these transfers if you send a simple request to Our Data Protection Officer (Parapente@decathlon.com).

## 8. What are Your rights to Your Personal Data?

You have the right to receive a copy of Your Personal Data in Our possession (right of access).

You may also request the deletion of Your Personal Data as well as the correction of incorrect or obsolete Personal Data (right to erasure and right to rectification). Please note that We may retain certain information about You as the law requires it or when We have a legitimate reason to do so. For example, if We believe that You have committed fraud or violated Our General Conditions of Use and that We wish to prevent You from circumventing the rules applicable to Our community.

You also have the right at any time to refuse the processing of Your Personal Data for direct marketing purposes or processing carried out on the basis of Our legitimate interest (right to object).

You have the right to limit the processing performed on Your Personal Data (right to restrict processing). Please note that this right applies only if (i) You dispute the accuracy of Your Personal Data for the period allowed to us to check the accuracy of this data, (ii) in the case of unlawful processing on Our part, You request a limitation of its use rather than a deletion, (iii) We no longer need the Personal Data for the purposes of processing but which You still require for the establishment, exercise or defence of legal claims; (iv) You choose to exercise Your right to object during the verification period of whether the legitimate grounds that We are pursuing prevail.

You have the right to make a complaint to the relevant control authority or to obtain redress from the applicable courts if You consider We have not respected Your rights.

You also have the right to portability of Your data, namely the right to receive the Personal Data that You have provided to Us in a format that is structured, commonly used and readable by machine, and the right to transmit this data to another controller (right to portability).

You also have the right at any time to define instructions related to the use of Your Personal Data after Your death.

To exercise these rights, You can contact Our Data Protection Officer according to the methods defined in article 13 below.

## **9. Cookies and similar technologies**

For more information, see Our [Charter on Cookies](#) (under "Managing cookies").

## **10. Confidentiality of Your password**

You are responsible for the confidentiality of the password that You have chosen to access Your account on Our platform.

You agree to keep this password secret and not to communicate it to anyone.

## **11. Links to other internet sites and social networks**

Our Platform may occasionally contain links to internet sites belonging to Our partners or third-party companies. Please note that these internet sites have their own privacy policies and that We decline any responsibility for the use made by these sites of information collected when You click on these links. We invite You to familiarise Yourself with these sites' privacy policies before transmitting Your Personal Data to them.

## **12. Changes to Our privacy policy**

We may modify this privacy policy. When this is necessary, We will inform You and/or will seek Your agreement. We advise You to consult this page regularly to be aware of any changes or updates to Our privacy policy.

## 13. Contact information

For questions relating to this privacy policy or requests relating to Your Personal Data, You can contact Us by:

- sending an email to Our Data Protection Officer at [parapente@decathlon.com](mailto:parapente@decathlon.com)
- or by sending Us a letter to the following address: DECATHLON Sports Switzerland SA - Rue de Lausanne 20 bis - 1201 Geneva - Switzerland