

PRIVACY POLICY HERO COACH AI APPLICATION

The purpose of this personal data protection policy ('Policy') is to inform you of the type of data collected, how it is used and your rights regarding the processing carried out in the context of:

- Your browsing on our website/application;
- And/or as part of our commercial relations;
- And/or as part of our relations with you if you are or represent a third party (prospect, partner, supplier, member of an administrative or judicial authority, journalist, etc.).

If you are required to make our company the recipient of information concerning persons other than yourself (for example other persons working for the company that you represent, prospective customers, etc.), you guarantee that you have ensured that:

- To only send us information that is strictly necessary for the purposes for which you are sending it to us;
- To ensure that these people are well informed and have not objected or, where consent is required by law, to guarantee that you have obtained such consent;
- And to send them a copy of this Policy, in which the use of the term 'you' applies both to you and to the persons in question.

This Policy may be amended, supplemented or updated to comply with any legislative, regulatory, case law or technical developments.

I. Data controller and recipients of your personal data

We hereby inform you that your personal data is processed by White Matter, whose registered office is located at 20bis Rue de Chartres, 92200, Neuilly sur Seine, France..

Your personal data may be made accessible to our technical service providers ('processors' within the meaning of the regulations) for the strict purposes of their mission.

Some of your personal data may also be transmitted to third parties who may use it for their own purposes (for example, agents for the purposes of managing a dispute (lawyers, bailiffs, etc.) or, in the event that our company or all or part of its assets are acquired by a third party, your personal data may be made accessible to any person involved in the preparation and completion of the transaction and included in the assets transferred.

Your data may also be made accessible to our processors located in the United States, a country recognised by the authorities as providing an adequate level of data protection under the Data Privacy Framework. For more information on the guarantees governing this transfer, please write to 20bis Rue de Chartres, 92200, Neuilly sur Seine, France.

II. Personal data processed and means of collection

Your personal data is collected either directly from you (for example when you enter it on our application) or indirectly because your employer, the company or the administration you represent has communicated it to us.

Other personal data may also be collected directly from you (by telephone or email, for example). When this personal data is essential for us to respond to you, perform a contract or meet a regulatory obligation, we will inform you of this at the time of collection.

This data, which is necessary for the purposes described below, relates in particular to:

- When you browse our website/application: browsing data (IP address, time and duration of your visit, operating system, browser and pages viewed);
- If you use our services: data relating to your identity, your contact details and payments made and sums due, identifiers for access to our services, your language preferences, your history of use of our services;
- If you are or represent a third party: any data communicated to us during our exchanges, *i.e.* generally your identity, information relating to the purpose of our exchanges and, where applicable, your contact details.

III. Purposes, legal basis for processing your personal data and retention period

The conditions of use of your personal data depend on your situation. They are summarised in the table below, but not all purposes will necessarily apply to your situation.

At the end of the retention periods specified in the table below, your personal data will, if necessary, be archived for a period not exceeding the statutory limitation periods or applicable archiving obligations or the duration of proceedings in the event of litigation. Once these periods have expired, the data will be destroyed.

Purposes	Legal basis(s)	Duration of use
Follow-up and management of your requests for information or contacts	Execution of pre-contractual measures taken at your request (request for information about our services, etc.) or, if your requests are made on behalf of a company, our legitimate commercial interest in responding to the requests.	3 years after the end of our commercial relationship, if applicable, or 3 years after our last contact
To compile statistics and improve our knowledge and services	Our legitimate business interest in developing our activities	

Improving our knowledge of our customers and their needs		
Management of our relationship in the context of the provision of our services (performance and monitoring of our services, invoicing, assistance, management of outstanding payments)	Our legitimate interest in performing a contract to which you are a party For health data used for fitness monitoring and personalisation of services, for service optimisation and user experience: your consent, which may be withdrawn at any time without calling into question the initial lawfulness of the use of your data.	1 year after the end of our commercial relationship
Creation of a profile for the purposes of personalising your programme in our application. Without this information, we will not be able to carry out the services provided by our application	Your consent, which may be withdrawn at any time without calling into question the initial lawfulness of the use of your data.	
Management of our relations with our suppliers and service providers, invoicing, management of unpaid invoices	Our legitimate commercial interest	1 year after the end of our commercial relationship
Management of prospects	Our legitimate commercial interest	3 years after our last contact
Management of our relations with third parties (administration, journalists, etc.)	Our legitimate interest in carrying out our activities and maintaining relations with third parties	1 year after our last contact
Management of accounting and finance	Our legal obligations and our legitimate interest in good management	1 year after the end of the financial year
Management of pre-litigation and litigation	Legitimate interest of our company (establishing, exercising or defending legal rights)	For the duration of the proceedings (until the expiry of legal remedies)
Management of your rights relating to the protection of your privacy and your personal data	Compliance with our company's legal obligations	6 months after the last contact

IV. Your rights regarding your personal data

You may, at any time, exercise the various rights provided for by the regulations in force: right of access, right to rectify any erroneous data concerning you and, in the cases and within the limits provided for by the regulations, right of opposition, right to delete some of your personal data, to have its use restricted or to request its portability with a view to its transmission to a third party.

To exercise your rights, simply write to 20bis Rue de Chartres, 92200, Neuilly sur Seine, France and enclose, where appropriate, any document proving your identity and the validity of your request.

You are reminded that, in accordance with the regulations, we may refuse to comply with certain requests concerning some of these rights (in particular the right of deletion), for legitimate reasons such as the need to defend legal claims or the requirements of a legal obligation to retain certain data.

In the event of unresolved difficulties, you may refer the matter to the appropriate supervisory authority.