

PERSONAL DATA CHARTER AND COOKIES

Last update 19 November 2018

The present personal data and cookies charter (hereinafter the “**Charter**”) is intended for users of the website <http://www.elleboutique.com/> (hereinafter the “**Site**”).

When we employ the terms “You” or “Your”, we are referring to you as a Site user.

The purpose of this Charter is to inform you of the reasons and terms for processing:

- on the one hand, your personal data on the Site, which constitutes information enabling your direct or indirect identification (hereinafter “**Personal Data**”),
- on the other hand, information relative to your browsing of the Site, likely to be recorded in files called “cookies” or similar tools (hereinafter “**Cookies**”). Certain information from Cookies does not allow for your direct or indirect identification and does not therefore constitute Personal Data. Other information can enable your indirect identification and legally constitutes Personal Data (hereinafter “**Data from Cookies**”). For further information on Cookies and similar technologies and the processing of Data from Cookies, you may directly consult the “Cookies” section by clicking on the following link, [II. COOKIES](#)

In order to simplify matters, information from Cookies and Personal Data shall both be referred to hereinafter under the unique term “**Data**”.

This Site is published by the company Hachette Filipacchi Presse (HFP), a limited company with capital of €201,478,432, the head office of which is located at 149, rue Anatole France – Levallois-Perret (92534), registered in the Nanterre Trade and Companies Register under the number 582 101 424 (hereinafter the “**Publisher**” or “**We**”).

We may alter the Charter at any time in order to comply with any regulatory, jurisprudential, editorial or technical developments. Before browsing, we suggest that you refer to the latest version of the Charter. You can find out if there has been any alteration since your last consultation by checking the date on the top of the page.

The Charter is an integral part of the Site’s General Terms of Use.

The processing of your data is carried out in accordance with applicable regulations, and in particular the European Regulation “GDPR” (no. 2016-679 relative to the protection of physical persons with regards to the processing of data of a personal nature and the free flow of this data) and the “Information and Freedom” law, (law no.78-17 of 6th January 1978 relative to IT, files and freedom, amended, and any regulation that completes or substitutes these regulations (hereinafter “**Rules on Information and Freedom**”).

The Publisher is responsible for the processing of most of the Data processed on the Site, as specified below. Processing implies the use of a piece of Data (e.g., consultation, collection, etc.) However, the

Publisher is not responsible for all the processing of your Data. Service Providers, Publisher clients or third-parties, may be solely responsible for some processes as specified below.

I. Data Protection

A. Processing for which the Publisher is responsible

When the user browses the Site, Data is likely to be collected and processed in order to enable access to certain Site services (Hereinafter the “**Services**”) for the purposes of administration and business management.

1) What Personal Data do you directly declare?

This pertains to Personal Data that you directly communicate for precise purposes (meaning objectives) in completing forms on our Sites.

Personal Data collected from forms:

The type of Personal Data collected by these forms is specific in itself and different according to the Services and the purpose of the processing. It may pertain to Personal contact Data (e-mail, postal address, telephone number, etc.).

Upon collection, you are indeed informed:

- of the objectives of the Data collection (purpose);
- whether or not certain information is obligatory or if it is optional, and where relevant, the implications of not providing obligatory information;
- of those responsible for processing (usually the Publisher, but it could involve a partner/partners in which case you will be informed at the time of collection);
- of your rights and the manner in which you may exercise them with those responsible for processing;
- of the legal basis justifying the lawfulness of processing (e.g., whether the processing is based on your consent, or on the necessity to comply with a legal obligation or to carry out a contract between us, on the legitimate interest of the Publisher or of a third-party, etc.);
- of the type of individual who is authorised access to your Data (meaning the recipients of your Data);
- that should we intend to transfer your Data outside the European Union, we shall implement guarantees and inform you of these guarantees, ensuring the compliance of these transfers with the Rules on Information and Freedom;
- of the period of conservation, or when this is not possible, of the criteria used to determine this period;
- and generally speaking, of all the indications imposed by the Rules on Information and Freedom.

The present Charter again communicates this information and additional information to you.

2) Which Data is indirectly collected on the Site?

Generally speaking, it concerns Data from Cookies or other similar technologies. For further information on Cookies and their settings, click directly on the [section II. COOKIES](#)

This may concern:

- **Data relative to browsing:** meaning Data collected during your browsing of the Site on behalf of the Publisher. The Publisher collects two types of browsing data:
 - **Connection Data** such as the date, the time of connection and/or browsing, the type of browser, the browser language, the IP address.
 - **Geo-tracking Data** referring to the data collected upon activation of geo-tracking systems when you connect to the Site. This geo-tracking service uses Data, such as GPS signals, device sensors, WiFi access points and cell tower identifiers, to calculate or estimate your precise position.
- **Data collected via social networks or any other third-party:** If you have an account on a social network site and you access the Site without first subscribing to Services, we are able to receive information from these social networks in order to facilitate the creation of an account on the Site. When you use a Service via a social network, you allow us to access certain information that you have already provided to the social network site, such as in particular your username, your surname and first name, your profile photo and your data relative to the use of the Service. By accessing a Service via a social network, you authorise us to collect, store and use all the information that you have authorised the social network site to provide us with.

3) Why do we collect some of your Data?

The reason(s) for which Data is collected on the forms are specified upon collection.

The purpose of Data and information from Cookies, whose storing to your device is subject to authorisation, are indicated in the information banner present upon first connection and described in greater detail in the present Charter under the section Cookies, which you can consult by clicking here [II. COOKIES](#)

Generally speaking, purposes differ according to Services. The purposes may be the following, it being specified that only the Data required for each of these purposes is collected. The purposes sought by the Publisher are:

- The sending of Newsletters, canvassing and promotional messages if you have specifically authorised it when consent is the required legal basis.
- Establishment of statistics and web traffic measurements of Services.
- By confirming the information banner upon connection to the Site, you accept (i) the detection of advertising blockers, (ii) the storing of Cookies and similar technologies to your device, third-party or not, (iii) the cross-referencing of Personal Data and behavioural Data from Cookies, in order to reinforce knowledge of your preferences with the aim of improving your experience vis-à-vis Services and promotional messages sent to you, (iv) the fact that the Data from Cookies or similar technologies may be used for the purposes of (a) improving the pertinence of advertising content displayed on Services, (b) proposing offers tailored to your centres of interest, such as they emerge from your browsing, in particular in cross-reference with your Personal Data, (c) carrying out studies intended to optimise the presentation of offers by the Publisher.

Data may be collected for other purposes for some special or temporary services. Wherever necessary, information on said processing will be specified in a special document upon collection of this Data.

4) Who are the recipients of the Data collected?

The Database created upon subscription to Services is strictly confidential. We undertake to take all the necessary precautions, organisational measures and use all the appropriate techniques to preserve the security, integrity and confidentiality of Data and in particular, prevent it from being deformed, damaged or accessed by unauthorised third-parties.

- **Recipients of Personal Data for the purposes sought by the Publisher**

In order to achieve the purposes of processing that they pursue, the Publisher needs accredited persons to be able to process the Data. As such the accredited services of the Publisher and its sub-contracted service providers are recipients bound to confidentiality, and authorised to access the Data collected within the framework of use of the Service.

- **Personal Data transferred to third-parties**

In addition, Personal Data may be transferred to third-party recipients, such as commercial partners, for purposes that will be specified to you, and determined by them, upon obtaining consent. As a rule, such transfers are not carried out without your prior consent, unless another legal basis exists which is more suitable. In this case, the third-party recipient will normally be responsible for the processing of this additional purpose.

- **Data transferred to authorities and / or public bodies**

Finally, pursuant to the regulations in effect, Data can be transferred to the competent authorities upon request and in particular to public bodies, exclusively in response to legal obligations, court officers, ministerial officers and organisms assigned to carry out debt recovery, as well as within the context of searches for perpetrators of offenses committed over the Internet.

5) Protected transfers outside the European Union

Some recipients are located outside the European Union. Pursuant to the Rules on Information and Freedom, guarantees have been taken to ensure a sufficient degree of protection for your Personal Data.

This concerns the following recipients: The LAE (Lagardère Active Enterprises) companies of Shanghai, New York, Hong Kong, Bangkok, Seoul and Tokyo.

These recipients will receive the following data: e-mail address.

The aim of transmitting this data to recipients located outside the European Union is the sending of Newsletters.

The following guarantees have been taken to ensure a sufficient degree of protection for Personal Data: signing of the European Commission's standard contractual clauses or of *Binding Corporate Rules*.

To enable the encrypted transmission of Data, the Publisher may be required to use a storage and file sharing service published by an American service provider who hosts data in the United States. This implies the transfer of Personal Data to the United States, but this transfer is guaranteed by the membership of these sub-contractors to a programme called *Privacy Shield*, which has been recognised by the European Commission as offering an adequate level of protection for data of a personal nature transferred by a European entity to companies established in the United States.

Information from Cookies and similar technologies may be transferred outside the European Union with a view to its hosting and processing within the context of advertising purposes or of audience measurement. You can find further information on this point and the guarantees in place to ensure compliance of these transfers with the Rules on Information and Freedom for each partner concerned in the section [II. COOKIES](#)

You can procure a copy of these protection guarantees by contacting the processing manager at contact.laeparis@lagardere-active.com or from our data protection representative at DelegueProtectionDonnees@lagardere-active.com.

6) What are your rights and how to exercise them?

Pursuant to the Rules on Information and Freedom and within its limits, you have a right of access, rectification, deletion and in particular, a right to request the deletion of Data if it was collected when you were a minor, of opposition, limitation and portability of Data that concerns you.

When the processing of Data is carried out on the basis of your consent, you may withdraw that consent at any time.

When the processing is based on the legitimate benefit of the Publisher or of a third-party, you may oppose processing at any time, for reasons relating to your specific situation.

However, when the aim of processing is prospecting, you may oppose such processing without motive, including for profiling purposes in as much as it is related to such prospecting.

You have the opportunity to define instructions relative to the use of your Personal Data after your death.

The exercise of these rights may take place at any time with the Publisher when they are responsible for the processing at contact.laeparis@lagardere-active.com. You can also contact the personal data protection representative at DelegueProtectionDonnees@lagardere-active.com.

Personal Data that will be communicated within the context of your exercising your right of access and of portability, will be done privately and confidentially. In view of this, in order that your request for access and portability be taken into account, we ask that you provide the necessary elements for your identification, those are: a sworn written statement in which you attest to being the subject of the Personal Data in question as well as a photocopy of your identity document bearing a signature.

Finally, in the event of dispute, you may submit a claim to the CNIL (French National Commission on Informatics and Liberty)

7) Conservation period and archiving of Data

Your Data will not be conserved by the Publisher beyond the period strictly necessary for the purposes pursued, as stated herein and this, pursuant to the Rules on Information and Freedom and the applicable laws.

In this regard, the Data used for the purposes of prospecting may be conserved for a maximum period of 3 years from the end of business relations, for example the date of last contact that you had with the Publisher.

Upon expiry of the conservation periods for the principal purpose of processing, Data may be archived and conserved for the period of legal provision in order to defend our rights or for the period of conservation imposed by law.

Your Data will be deleted or definitively rendered anonymous when the conservation periods expire. However, it may be archived beyond the intended periods for the needs of research, observation and for the pursuit of criminal offenses, with the sole aim of enabling, wherever necessary, the provision of this Data to the judicial authority.

8) Security

We take the appropriate measures in technical and organisational terms to prohibit unauthorised access to, or divulging of, your Data to unauthorised persons.

In the event of a request for deletion, the Publisher will respond within the legal period in order to proceed with the deletion of Data but shall not be held responsible for any residual traces that may potentially be found over the Internet.

B. Processing for which the Publisher is not responsible

Some of your Personal Data collected via the Site may be used on behalf of third-party associates. In addition, these third-party associates can process information from Cookies on their own behalf. They are therefore responsible for the processing carried out and your rights shall be exercised with them.

Usually, such a transfer to third-parties is not carried out without your prior consent, unless another legal basis is more suitable.

When these third-parties are responsible for the processing of your Data, this information will be specified in the notices or special contractual documents (collection forms, game-contest rules, third-party associate's or client's privacy policy, etc., Cookie section of the present Charter).

II. COOKIES

1) What is a Cookie?

A Cookie or any similar tracker is a tracker likely to be saved to your device (computer, tablet or smartphone) and / or when you consult a Service with browsing software, via the Site.

A Cookie allows its issuer, during its period of validity, to recognise the device in question each time the device accesses digital content bearing Cookies from the same issuer, and depending on the type

of Cookie, to collect additional, indirectly identifying information, on your behaviour within the Services.

In the event that the computer is used by several individuals, for example in the same family with the same browser, the Cookie is assigned to the browsing information of all the individuals having used the device, without distinction.

2) Who uses Cookies?

Cookies can be placed by the Publisher, not by its technical service providers or its partners or third-parties.

Only the Cookie operator, that is to say the person on behalf of whom it is issued, whether they be the issuer or not, is responsible for its use and the Data collected by it.

3) Why are Cookies placed on the Publisher's Site?

The Cookies enable the Site to operate properly and to register your preferences, to provide the Publisher and its partners with information for statistical or advertising purposes. Below you will find the main purposes of Cookies issued on behalf of the Publisher and, in the partner's privacy policies below, further information on the processing of the Cookies that they place.

- **COOKIES AND OTHER SIMILAR TECHNOLOGIES FOR THE PURPOSES OF BROWSING:**

These Cookies are necessary for the correct browsing of the Site, they serve in particular to:

- adjust the presentation of the Site to the display preferences of your device (language used, display resolution, OS used, etc.);
- memorise information relative to your username;
- provide you with access to your account or any other reserved space thanks to your username;
- implement security measures, for example when you are asked to reconnect to Content or a Service after a certain lapse of time.

- **STATISTICAL COOKIES FOR AUDIENCE MEASUREMENT:**

Cookies for audience measurement help to establish statistics and volumes of traffic and use for the different elements that make up the Site (sections and content visited, itinerary), which in turn enable the Publisher to improve the interest and ergonomics of its Services.

- **ADVERTISING COOKIES:**

Cookies are required for the proper functioning of advertising, even untargeted, which allows you to consult quality editorial content on the Site without financial disbursement.

Advertising Cookies enable, notably, (i) to avoid the repeated display of the same advert, even if the advert is not linked to your preferences, (ii) to audit, measure the advertising inventories and monitor the effectiveness of adverts for the purposes of marketing of advertising space, (iii) to determine in real time which adverts to display depending on your centres of interest in view of your

recent browsing of the Site and other sites, in order (iv) to contribute to improving your browsing experience and make it more interesting as well as to improve the pertinence of messages that are likely to be addressed to you, once you have granted prior approval of this possibility, (v) to carry out studies intended to optimise the presentation of the offers from the Publisher.

- **COOKIES FOR TARGETED ADVERTISING:**

As with other publishers of free sites funded by advertising, we implement means enabling the improved pertinence of advertisements. To this end, we and our partners collect, compare and analyse information, often aliases, from your browsing on the Site (online activities, visits, pages viewed, links) with the help of a line of code inserted in the pages that you visit.

We participate in and call upon exchange services based on the marketing username aliases contained in the Cookies (*cookie matching*) with third-parties, advertising networks or analytical services. These Cookie exchanges therefore enable clients of partners who propose these cookie exchange services to enhance user profiles using data that we possess for targeted advertising purposes.

These processes do not allow for your direct identification. However, only adverts concerning news, products or services likely to interest you, and of which you would not necessarily have been otherwise aware, will be displayed on the pages visited.

If you refuse the targeted advertising cookies, you will continue to receive adverts but they will be standard adverts, not related to your supposed preferences and therefore less likely to interest you.

In the event that we should consider obtaining from a third-party, information on your browsing in order to associate it to the Data with which you provide us, we shall first solicit your explicit approval before going ahead with such an association and addressing you with targeted adverts or canvassing.

- **SOCIAL NETWORK SHARING COOKIES:**

The Publisher offers you the possibility of features that enable the sharing of editorial content, or any other type of content published on the Site, via social network sites. Social network Cookies are managed by the publisher of the social network site. You will find further information on the policy for the management of social network Cookies on the sites concerned.

- **“FLASH”© COOKIES FROM “ADOBE FLASH PLAYER”™:**

“Adobe Flash Player”™ is software that enables the rapid development of dynamic content using the computer language “Flash”. Flash (and similar software apps) memorises the settings, preferences and use of content with the help of technology similar to that of Cookies. However, “Adobe Flash Player”™ manages this information and the User choices via a different interface to that which is provided by the User’s browsing software.

4) HOW TO MANAGE THEM?

In continuing your browsing of the Site, you accept that the Publisher's Cookies and those of third-parties be stored to your device, for the purposes specified in the information banner and the Charter herein.

You can nevertheless express your choice with the Publisher's partners and at any time configure your browser preferences in such a way that Cookies are stored to your device or, on the contrary, that they are rejected, either systematically or according to their issuer. You can also configure your browser preferences so that the option to accept or reject cookies is offered to you every time you visit a website, before a Cookie is likely to be stored to your device.

Please note: the recognition of your preferences concerning advertising Cookies relies on a Cookie. If you delete all the Cookies stored in your device's browser, we will no-longer know what consent you have given and this would then result in its being reset. Your consent, as a result, will be requested once again upon your next visit or when moving to another page of the Site.

- **CONSENT ON COOKIES**

It is presumed that you have given your consent:

- by clicking on the icon "I understand" which features on the information banner visible upon first connection to the Site;
- in continuing your browsing, that is to say when you have clicked on a Site component (image, link etc.) or you consult another page of the Site.

If you accept via your browser software the saving of Cookies to your device, Cookies included in the pages and content that you have viewed may be temporarily stored in an especially dedicated space on your device. They will be read only by their issuer.

Consent granted by you is valid for only thirteen (13) months from the first storing of the Cookie in your device, following the expression of your consent.

- **EXERCISING YOUR CHOICES**

Certain Cookies are stored on our Site by the Publisher or its technical service providers and operated by the Publisher for its own needs, the Publisher is therefore responsible for them.

Other Cookies are issued and operated by third-party associates of the Publisher for purposes determined by these third-parties, the latter are therefore responsible for their processing.

Only the Cookie operator, whether they be the issuer or not, is responsible for its use and the Data collected by it.

Further information on the purposes of Cookies stored by third-parties can be found by reading the privacy policies of these partners that you will find via a link in the section "Exercise your choices for Cookies stored by third-parties" below.

- **EXERCISE YOUR CHOICES FOR COOKIES STORED BY THIRD-PARTIES:**

- **FOR ADOBE - BROWSING COOKIES**

In as much as your device is capable of visualising content developed with the language Flash, you can access its management tool for Flash Cookies, directly via <https://www.adobe.com/uk/>

○ **FOR GOOGLE ANALYTICS – STATISTICAL COOKIES FOR AUDIENCE MEASUREMENT**

<u>Link for description and privacy policy</u>	<u>Additional information</u>
https://tools.google.com/dlpage/gaoptout?hl=en-GB	The use of Google Analytics implies a transfer of collected Data from Google Analytics' Cookies outside the European Union to the United States. Google is a member of the programme called <i>Privacy Shield</i> , which has been recognised by the European Commission as offering an adequate level of protection to data of a personal nature transferred by a European entity to businesses in the United States.

○ **FOR YOUTUBE - BEHAVIOURAL AND ADVERTISING COOKIES**

In the event of refusal to use Cookies for the purposes of targeted advertising, adverts will continue to be displayed on the internet pages that you visit, but will not be adapted to your centres of interest.

<u>Link for description and privacy policy</u>	<u>Additional information</u>
https://www.youtube.com/in-tl/uk-GB/yt/about/policies/#staying-safe	YouTube is located in the United States and hosts Data in different countries outside the European Union. YouTube is a member of the programme called <i>Privacy Shield</i> , which has been recognised by the European Commission as offering an adequate level of protection to data of a personal nature transferred by a European entity to businesses in the United States.

○ **FOR FACEBOOK – SOCIAL NETWORK SHARING COOKIES**

Facebook: <https://en-gb.facebook.com/about/privacy/cookies>

○ **FOR TWITTER - SOCIAL NETWORK SHARING COOKIES**

Twitter: <https://twitter.com/privacy?lang=uk>

○ **FOR PINTEREST - SOCIAL NETWORK SHARING COOKIES**

Pinterest: <https://policy.pinterest.com/en/privacy-policy>

• **Exercising your choices on Cookies issued by, or on behalf of, the Publisher:**

<http://www.elleboutique.com/mentions-legales>

• **Other means of exercising your choices:**

VIA YOUR ONLINE CHOICES :

You can connect to the site [youronlinechoices](http://www.youronlinechoices.com), proposed by digital advertising professionals grouped together in the European association EDAA (European Digital Advertising Alliance) and managed in France by the Interactive Advertising Bureau France. You will be able to discover the companies involved in this platform and who offer the possibility to refuse or accept Cookies used by these companies to adjust to the User's browser information, adverts likely to be displayed on their devices: <http://www.youronlinechoices.com/uk/your-ad-choices/>

VIA ABOUT ADS:

This site, published in English, also enables you to express your choice online via the following link:
<http://www.aboutads.info/choices/>.

VIA THE BROWSER SETTINGS

For Cookie preferences, the settings for each browser are different. They are described in your browser's help menu, which will tell you how to edit your cookie preferences.

For Internet Explorer™: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

For Safari™: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

For Chrome™: <https://support.google.com/chrome/answer/95647?hl=en-GB&hlrm=en>

For Firefox™: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

For Opera™: <https://www.opera.com/help/tutorials/security/privacy/>

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