

Privacy Policy

This Privacy Policy explains how we use and process your personal data (your "Information"):

- When you are a user of our application (see our "Policy applicable to all Users")

This Privacy Policy informs you about the cookies we use on the Application and their purposes (see our "Cookie Policy").

This Privacy Policy came into effect on [01/09/2023].

We may change this Privacy Policy at any time if we modify the way we handle your Information. We will inform you by the most appropriate means based on our relationship with you (sending an email, displaying a notification on our Application).

A. BASIC INFORMATION

1. Definitions

When we use capitalized terms in this Policy, we refer to the definitions below:

- **"Application"** refers to the "SeeU" application that we publish and on which you can benefit from our services.
- **"Account"** refers to the personal account of a User on the Application, allowing them to access and use the services and features.
- **"SEEU"** or **"we"** refers to our company as identified in the section "Who are we?".

- **"Information"** refers to the personal data that concerns you, whether this information identifies you directly or indirectly.
- **"Privacy Policy"** refers to this entire document.
- **"Policy"** refers to one of the policies applicable to a specific category of individuals within our Privacy Policy.
- **"User"** refers to you as long as you have an Account on the Application.

2. Who are we?

We are MV Agency, an EURL company with its headquarters located at 67 boulevard Carnot, 06400 Cannes, registered with the Cannes Trade and Companies Register under number 894 760 867 (hereinafter "SEEU").

3. How can you contact us?

For any questions regarding the protection of your personal data, you can contact us by one of the following means:

- By email: [hello@seeuapp.io]
- By mail: MV Agency, 67 boulevard Carnot, 06400 Cannes
- By contact form: [<https://seeuapp.fr/contact>]

B. POLICY APPLICABLE TO ALL USERS

This Policy explains how we process your Information when you are a User of the Application.

1. What information do we collect about you?

When you are a User, we may use different categories of Information about you, which you can provide to us directly or which we may collect indirectly.

Information Category	Information Collected
Identity	Name, surname, title, postal code, email address, date of birth, client code assigned internally.
Account	Username, password, and email associated with the account.
Relationship Tracking	Requests for documentation, trials, information on our services, correspondence with you, exchanges between you and our customer service, your feedback on our services, potential complaints, and technical support requests.
Connection Data	IP address, visited page and referring page, dates and times of connection, etc.
Usage Metadata	Actions performed on our Application, such as the most frequently used features, your interactions with us, etc
Geolocation	Location data obtained via your smartphone's geolocation feature (your GPS position).

Device Configuration Information	The operating system of your smartphone, smartphone model, screen resolution.
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2. Why do we use your Information and for how long?

We use your Information for various reasons:

- We may need it to deliver the Products you order (Execution of a contract);
- We may need it to comply with a legal obligation (Compliance with the law);
- We may have a legitimate interest in processing your Information (Legitimate Interest);
- We do it because you have given us your consent (Consent).

Below you will find the reasons why we process your Information (the purposes of our processing) and the retention periods for your Information:

3. Purpose, Legal Basis, and Retention Period

Purpose	Legal Basis	Retention Period
Management of the Application and provision of associated services	Execution of a contract	For the duration of the contractual relationship

User localization to display nearby Partners on the Application	Execution of a contract	For the duration of your use of the Application while you are connected
Management of our legal, accounting, and tax obligations	Compliance with the law	Retained in archive form for the legal retention period required (e.g., up to 10 years for accounting obligations)
Management of complaints and disputes	Legitimate interest of MV Agency to establish proof of a right or proper execution of contractual obligations	For the duration of the applicable prescription period for our commercial relationship (e.g., up to 5 years for civil prescription)
Retention of connection data	Legal obligation	12 months
Application security (prevention and detection of cyberattacks)	Legitimate interest of MV Agency to detect malicious behavior to ensure the security of the site, and the availability, integrity, and confidentiality of the data it contains (including personal data)	6 months
User account management	Execution of a contract	For the duration of the contractual relationship
List of Users excluded from the Application	Legitimate interest of MV Agency to ensure that excluded Users cannot re-register within a certain period	3 years from the date of exclusion decision

Anonymized statistics of User activity on the Application	Legitimate interest of MV Agency to study statistics related to Application use	Last 3 years
Conducting satisfaction surveys or requesting feedback	Legitimate interest of MV Agency to conduct satisfaction surveys to gather User impressions	For 5 years
Sending newsletters, white papers	Consent	For 3 years from our last contact with you or until you withdraw your consent
Prospecting related to products or services similar to those already provided by MV Agency	Legitimate interest of MV Agency	Up to 3 years from our last contact with you. You have the right to object to receiving our commercial prospecting
Prospecting by email or SMS for products or services distinct from those already provided by MV Agency	Consent	For 3 years from our last contact with you or until you withdraw your consent
Prospecting by phone for distinct services	Legitimate interest of MV Agency to send commercial offers to Users likely to be interested	For 3 years from our first prospecting or our last exchange with you. You can object to our prospecting operations by phone
Management of an opposition list	Legitimate interest of MV Agency to no longer send prospecting to Users who have objected	For 3 years from the exercise of your right to object

Management of GDPR requests	Legal obligation	For 5 years from the request to exercise the right
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*When "Consent" is indicated in the "Legal Basis" column of the table, it means that we can only process your Information for the concerned purpose if you consent, notably by checking a box inviting you to do so on the Application. You can withdraw your consent at any time by contacting us.

D. INFORMATION COMMON TO ALL OUR POLICIES

1. To whom do we communicate your Information?

➤ To our teams

Your Information may be communicated to all our teams who need it to perform their duties within the commercial management of our Application. Example: our sales team to contract with you, our support/service team to handle your questions or complaints, etc.

➤ To our subcontractors

We use various technical service providers for different reasons:

Subcontractor Identity	Reasons for Subcontracting
GooglePlay – AppleStore – AppCenter	Hosting of the Application
Firebase	Data storage
Sendinblue	Management of mailing and marketing campaigns

Hubspot	Customer relationship management
Firebase – GooglePlay – AppleStore	Analysis of Application traffic statistics
Stripe	Payment management

➤ **To administrative or judicial authorities**

We may be required to communicate some of your information to administrative or judicial authorities when we receive a judicial requisition.

➤ **To our partner merchants**

We may communicate your email address to our partner merchants so that they can inform you exclusively about their offers via email. We only transmit your data if you have expressly consented to it by checking a dedicated box on the Application. You can object to this transmission at any time by contacting us at the contact details provided in this Privacy Policy.

We make the list of partner merchants available to you at the following link: <https://seeuapp.io>

2. Where do we store your Information?

We ensure that your data is hosted as often as possible within the European Union. However, some of your Information may be hosted outside the European Union. When this is the case, we ensure in advance that they take adequate safeguards in accordance with the General Data Protection Regulation (GDPR).

Below you will find the list of data transfers outside the European Union that may be carried out and the adequate safeguards we take:

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Recipient involved in the transfer outside the EU	Adequate safeguards	Countries concerned by the transfer
Hubspot	European Commission Standard Contractual Clauses	United States and other third countries
Stripe	European Commission Standard Contractual Clauses	United States
Firebase	European Commission Standard Contractual Clauses	United States and other third countries
Google	European Commission Standard Contractual Clauses	United States and other third countries

Apple	European Commission Standard Contractual Clauses	United States and other third countries
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3. What are your rights?

The regulations regarding personal data protection grant you several rights:

Right	Description
Right of access	You can ask us to access all the Information we have about you.
Right of rectification	You can ask us to correct your Information if it is inaccurate.
Right of opposition	You can ask us to stop using your Information when we do so based on a legitimate interest. You can also ask us to stop receiving commercial prospecting.
Right to withdraw your consent	When one of our processing activities is based on your prior consent, you can withdraw your consent at any time. We will then stop using your Information for this processing.

Right to erasure	You can ask us to delete your Information and to stop using it.
Right to restriction	You can ask us to temporarily stop using your Information while requiring us to temporarily retain it.
Right to data portability	You can ask us to provide you with an export of your Information in a reusable format and, where possible, ask us to transmit it to another organization that can reuse it.
Right not to be subject to automated decisions	You have the right not to be subject to a decision based solely on automated processing that produces legal effects concerning you or significantly affects you.
Right to define guidelines concerning your data in case of death	You have the right to define, update, or revoke guidelines regarding the retention, deletion, or communication of your Information after your death.
Right to lodge a complaint	You can lodge a complaint with the authority responsible for protecting personal data (in France, the CNIL,

	www.cnil.fr) if you believe that your rights have not been respected.
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4 How can I exercise my rights?

To exercise your rights, please contact us using the contact details provided in the "**How can you contact us?**" section.

We will do our best to respond to your request within one month. The rights you can exercise are defined by the GDPR and depend on the legal basis of our data processing activities. Therefore, it may happen that a request to exercise rights cannot be processed because the invoked right cannot be exercised. If this is the case, we will inform you.

We may also ask you for proof of identity to ensure that it is indeed you exercising your rights, especially when we have no other means to verify it. You should only send us proof of identity if we request it. Please note that we can only respond to requests to exercise rights that concern the processing of personal data that we carry out and that are identified in this Privacy Policy.