



Privacy Policy

<https://thefoodassembly.com/>



THE FOOD ASSEMBLY

PRIVACY POLICY

At EQUANUM, protecting your personal data is a priority.

When you use the website and/or platform <https://thefoodassembly.com> (the "Website" or "Platform") and/or the Food Assembly application (the "Application"), and in the context of managing our contractual relationships with our customers, we may collect personal data about you.

The purpose of this policy is to inform you of how we process such data in compliance with Regulation (EU) 2016/679 of April 27, 2016, concerning the protection of natural persons with regard to the processing of personal data and the free movement of such data (the "GDPR").

1. Who is the data controller?

The data controller is EQUANUM, a simplified joint-stock company registered with the Paris Trade and Companies Register under No. 528 203 755, with its registered office at Deskopolitan, 226 Boulevard Voltaire, 75011 Paris, France ("We").

According to our Specific Terms of Use, as we define certain purposes for processing personal data within the Platform jointly with the Hive Managers, we may act as co-controllers and should be considered joint controllers of the processing. This is without prejudice to the fact that we

alone determine the essential means of the processing, such as, without limitation, the categories of data to be processed, data recipients, or data retention periods.

As owners and managers of the Platform, we assume the vast majority of the commitments made to ensure respect for and protection of your privacy. Therefore, we are your primary contact for any requests regarding your personal data. You can find the distribution of our various obligations in the "Collection and Processing of Personal Data" section of our Specific Terms of Use.

2. What data do we collect?

Personal data is information that identifies an individual directly or through cross-referencing with other data.

Mandatory data fields are indicated when you provide us with your information. These fields are marked by all necessary means.

An "User" can be a Member, Producer, or Hive Manager.

a. Members and Producers

- **Members:** Consumers within the geographic area of the Hive they joined to access Producers' Offers.
- **Producers:** Suppliers offering products within a specific geographic area for direct sale to Hive Members.

We collect personal data in the following categories:

- Identification data (name, first name, date of birth, ID photo, nationality, email, mailing address, phone number);
- Data related to your orders;
- Connection data (login logs, encrypted passwords);
- Navigation data (IP address, pages visited, date and time of connection, browser used, operating system, user ID, IFA);
- Location data (mobile app users only);
- Economic and financial data (bank account details, credit card information);
- Any information you choose to share with us through contact requests.

b. Hive Manager

The Hive Manager creates and manages a Hive, organizes sales, and coordinates product delivery by Producers to Members.

We collect personal data in the following categories:

- Identification data (name, first name, email, mailing address, phone number);
- Lifestyle data;
- Professional data (work experience, current employment status, skills, projects, personal constraints);
- Connection data (login logs, encrypted passwords);
- Navigation data (IP address, pages visited, date and time of connection, browser used, operating system, user ID, IFA);
- Location data (mobile app users only);
- Economic and financial data (bank account details);
- Any information you choose to share with us through contact requests.

c. Venue Owners

We collect personal data in the following categories:

- Identification data (name, first name, email, mailing address);
- Any information you choose to share with us through contact requests.

d. Gift Card Providers

For individuals, we collect:

- Identification data (name, first name, email);
- Professional data (company name);
- Data related to orders;
- Navigation data (IP address, pages visited, date and time of connection, browser used, operating system, user ID, IFA);
- Economic and financial data (credit card details).

For professionals, we collect:

- Identification data (title, name, first name, email, mailing address, phone number);
- Professional data (company name);
- Data related to orders;
- Navigation data (IP address, pages visited, date and time of connection, browser used, operating system, user ID, IFA);
- Economic and financial data (credit card details).

e. Job Applicants

We collect personal data in the following categories:

- Identification data (name, first name, ID photo, email, mailing address, phone number);
- Professional data (company name, CV, job title/role, LinkedIn URL);
- Navigation data (IP address, pages visited, date and time of connection, browser used, operating system, user ID, IFA).

3. On what legal bases, for what purposes, and for how long do we retain your personal data?

Purpose	Legal Basis	Retention Period
Providing our services via your account	Execution of pre-contractual measures or contract performance	Data is retained for the account's duration. Inactive accounts are deleted after three years if there is no response to our reactivation email. Logs are kept for 6-12 months. Certain data may be archived for five years for legal purposes.
Processing your order and contract management	Contract performance	Data is retained for the duration of the contract. Financial data (excluding CVV) is retained until withdrawal rights expire. Cryptogram data is not stored.
Improving services (internal problem-solving, analysis)	Legitimate interest	Data is retained for three years.
Constituting a user and prospect file	Legitimate interest for users, consent for prospects	For users: data is retained for the contract's duration. For prospects: data is retained for three years following the last contact.
Compliance with legal obligations	Legal obligations	Transaction data is retained for five years, and invoices for 10 years.

Purpose	Legal Basis	Retention Period
Sending newsletters, promotions	B2C: legitimate interest for users, consent for prospects. B2B: legitimate interest	Data is retained for three years from the last contact or until consent is withdrawn.
Responding to information requests	Legitimate interest	Data is retained only as long as necessary to process the request.
Managing recruitment applications	Execution of pre-contractual measures	Data is retained during the application process and for up to two years if consent for retention is given.
Organizing contests, lotteries, and promotional operations (excluding online gambling subject to ARJEL approval)	Legitimate interest in retaining customer loyalty and offering gifts	Data is retained for the duration of the contests or promotional operations and may be archived for 5 years for legal purposes.
Generating statistics (e.g., site navigation, audience metrics) and improving site functionality through analytics cookies	Your consent	Data is retained for 3 years.
Displaying personalized advertisements via advertising cookies	Your consent	Data is retained for 3 years.
Managing requests to exercise your rights	Legitimate interest in responding to your requests and keeping a record of them	<p>If an identity document is requested, it is retained only for the time necessary to verify identity and is deleted once verification is complete.</p> <p>If you exercise your right to object to receiving marketing communications, this information is retained for 3 years.</p>

4. Who are the recipients of your data?

Your personal data may be accessed by:

- a. **Our staff and entities within the La Ruche qui dit Oui! group.**
- b. **Our subcontractors**, including:
 - Technical service providers,
 - Transport and delivery providers,
 - Hosting providers,
 - Newsletter and email service providers,
 - Audience measurement and analytics providers,
 - Secure payment providers,
 - Billing systems,
 - Cookie management tools,
 - Debt collection agencies and credit organizations,
 - Identity verification providers.
- c. **Other platform users:**
 - For example, in the event of a Hive closure, Member data may be transferred to another nearby Hive Manager. Similarly, Producer data may be accessible to different Hive Managers. Producers may also access Member data but are not considered joint data controllers.
- d. **Public and private authorities**, when required to comply with legal obligations.

5. How do we use and moderate your messages?

We may review messages exchanged with Hive Managers on our Platform for purposes such as:

- Fraud prevention,
- Service improvement,
- User assistance,
- Ensuring compliance with our Terms of Use.

For instance, to prevent Producers from using our services to sell products outside the Platform, we may scan and analyze messages exchanged to ensure they do not contain prohibited content, such as references to external websites.

We never review your communications for promotional or advertising purposes.

6. Are your data transferred outside the European Union?

Your data is stored on servers located within the European Union (Ireland and Germany), managed by AWS. However, some tools we use may involve data transfers outside the EU. These transfers are secured using the following mechanisms:

- a. Transfers to countries deemed adequate by the European Commission under Article 45 of the GDPR.
- b. Transfers to countries without an adequacy decision are secured via:
 - o Standard contractual clauses approved by the European Commission,
 - o Binding corporate rules, or
 - o Approved certification mechanisms.
- c. Transfers based on appropriate safeguards as outlined in Chapter V of the GDPR.

7. What are your rights regarding your data?

You have the following rights concerning your personal data:

- o **Right to information:** This policy is designed to inform you about how we process your data.
- o **Right of access:** You can access all your personal data at any time.
- o **Right to rectification:** You can correct inaccurate or incomplete data.
- o **Right to restriction:** You can request limited processing of your data under certain circumstances.
- o **Right to erasure:** You can request the deletion of your personal data.
- o **Right to lodge a complaint:** You can file a complaint with the competent authority (e.g., CNIL in France) if you believe your data rights are violated.
- o **Right to set post-mortem instructions:** You can specify how your data should be managed after your death.
- o **Right to withdraw consent:** For processing based on consent, you can withdraw it at any time.
- o **Right to data portability:** You can request your data in a machine-readable format for transfer to another provider.
- o **Right to object:** You can object to data processing, though we may continue processing if we have legitimate reasons.

To exercise these rights, contact us using the information provided below. We may request additional information to verify your identity.

8. What cookies do we use?

For detailed information on cookie management, please refer to our cookie policy.

9. Contact point for exercising your rights

- **Email:** privacy@lrqdo.fr
- **Address:** EQUANUM SAS – Privacy Queries – Deskopolitan, 226 Boulevard Voltaire, 75011 Paris, France.

10. Modifications

This policy may be updated to reflect regulatory, judicial, editorial, or technical changes. Changes take effect upon publication. You are encouraged to review this policy regularly. Significant updates will be communicated to you.

Effective date: October 16, 2023.