



Privacy Policy

This "Privacy Policy" is updated regularly, the last update dates from May 29th, 2023: we invite you to consult it as often as possible to be informed of any latest changes.

In case of disagreement with the new wording of the "Privacy Policy", you retain the possibility to request the deletion of all Personal Data concerning you in accordance with the modalities of exercise presented to you in the part "5: Rights relating to Personal Data and their management".

I: Scope of Skeepers' "Privacy Policy"

Skeepers, SAS with a capital of €11,470,723, registered with the Marseille Trade and Companies Register under number 879 038 990, and whose registered office is located at 18-20 Avenue Robert Schuman, CS 40494, 13002 Marseille, is the owner of the <https://www.avis-verifies.com/fr/> website. It is composed of Solutions Ratings & Reviews (Verified Reviews), Feedback Management, Customer Data Activation, Influencer Marketing, Live Shopping and Consumer Videos.

Skeepers is particularly concerned about issues related to confidentiality, as well as the protection of Personal Data of Users of its website and/or services, as well as those relating to its Customers. It takes this into account from the design of any new solution it offers to its customers to improve their Customer Engagement and, in general, for any new data processing project it initiates internally.

It thus guarantees the best possible level of protection of Personal Data, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (known as the "General Data Protection Regulation", hereinafter "GDPR"), French law (Data Protection Act of 1978, known as "LiL") and, even more, with all international and national regulations applicable to it regarding the protection of such Personal Data.

This "Privacy Policy" describes in detail the policy and practices of Skeepers (or "the Skeepers Group") regarding the collection, use and disclosure of Personal Data that it processes on its behalf or on behalf of its Customers.

For specific processing related to the publication of Verified Reviews, Skeepers acts as a trusted third party to, on the one hand, collect and disseminate Customer Reviews related to a consumer experience, and on the other hand, ensure the compliance of the content collected with French law and the AFNOR NF Z 74-501 standard that Skeepers undertakes to respect in order to preserve the reliability of the Customer Reviews published.

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1: Definitions

In the body of this "Privacy Policy", each of the following terms shall have the meaning given by its definition.

"**Verified Review Attestation**", a web page indexed by Google and/or other Search Engines, specific to each Customer, on which all Customer Reviews concerning him are displayed. This page is accessible by clicking on the Widget or by clicking on the URL of said web page referenced by the Search Engine;

"**Supervisory authority**" means an independent public authority established by a Member State pursuant to Article 51 of the GDPR, and to which any data subject may lodge a complaint concerning the protection of his or her personal data, i.e. the Commission Nationale de l'Informatique et des Libertés (CNIL) in France;

"**Customer Review**", general designation grouping "Product Reviews" as well as "Brand Reviews";

"**Product Review**", rating, evaluation or comment given by a Consumer on the quality of a Product;

"**Site Review**", rating, rating or comment given by a Consumer on the overall quality of his experience;

"**Consumer Database**" means all Personal Data relating to Consumers, transmitted by Customer to Skeepers, in connection with the use of the Rating & Reviews Solution (Verified Reviews);

"**Adwords campaign**", advertising system of the Google search engine, which displays ads or advertising banners, targeted according to the keywords typed by the Internet user or according to his browsing behavior;

"**Customer**" or "**Merchant Partner**" means a natural or legal person who uses Skeepers to obtain Customer Reviews resulting from a purchased product, user experience, or other action that may result in a request for a Customer Review;

"**Order or Purchase**", order, purchase or use of a Product made by a Consumer within a Customer's store or on its website;

"**Terms of Use or Terms of Use**", conditions applicable to any person connecting to the Skeepers website <https://www.avis-verifies.com/fr/> and/or using Skeepers' services;

"**GTC or General Terms and Conditions of Services**", conditions applicable to any person subscribing to a Skeepers offer;

"**Consent**" of the data subject, i.e. any freely given, specific, informed and unambiguous indication of his or her wishes by which the data subject consents, by a statement or by a clear affirmative action, to the processing of personal data relating to him or her;

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"**Consumer**", a natural person who acts for purposes that do not fall within the scope of his commercial, industrial, craft or liberal activity;

"**Personal data**" or "**Data**" means **any information relating to an identified or identifiable natural person (hereinafter referred to as 'data subject')**; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to its physical, physiological, genetic, mental, economic, cultural or social identity.

More simply, "personal data" **is to be understood as any information concerning natural persons (Users / Consumers)**;

"**Form**", a web page on which the Consumer can access by clicking on the hypertext link sent to him by email or SMS after each Order or Purchase, and which the Consumer can fill in in order to submit a Customer Review;

"**Internet**", a set of interconnected computer and telecommunications networks, of global dimension, allowing access to content by Consumers, via servers;

"**Internet user**", a person using the Internet to access various content made available publicly;

"**Search engine**", a website used to find resources associated with any words on the Internet;

"**Product**", product or service sold or offered free of charge by a Customer to the Consumer on its website or in store;

"**Data Controller / Controller**" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing; where the purposes and means of such processing are determined by Union or Member State law, the controller may be designated or the specific criteria for his or her appointment may be provided for by the law of the processing or the specific criteria for his or her appointment may be provided for by the law of the processing or processing system. the Union or by the law of a Member State;

"**Service**" means the service provided by the Skeepers Group (herein Ratings & Reviews) subscribed to by the Customer;

"**Site**" or "**Platform**", website from which the Skeepers Group offers its Ratings & Reviews solution accessible from the following domain name: <https://www.avis-verifies.com/fr/>;

"**Processor**" means the natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller;

"**Processing**" means any operation or set of operations whether or not performed by automated means and applied to personal data or on sets of personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

More simply, "**Data Processing**" is any form of use of your data;

"**User**", person browsing the <https://www.avis-verifies.com/fr/> website ;

"**Personal data breach**" means a breach of security resulting in, accidentally or unlawfully, the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

"**Widgets**", drawings created by Skeepers displaying the average score obtained from Brand Reviews or Product Reviews.



2: Processing of Personal Data by the Skeepers Group

A) The processing of Personal Data carried out by Skeepers (Data Controller) on its website

1. The contact form

For any contact request made via the form available on the page <https://www.avis-verifies.com/fr/contact/> the User gives his consent to Skeepers, via a checkbox, to process the following Personal Data:

- Surname and first name;
- Email address;
- Phone number;
- Company name.

They must be filled in in order to be able to contact you again to respond to your request, but also to send you personalized communications and offer you our additional solutions, which may be of interest to you given your Feedback Management, Customer Data Activation, Influencer Marketing, Live Shopping and Consumer Videos needs. Otherwise, it will be impossible to send the contact form.

Skeepers will also be able to process any other personal data that the User has chosen to communicate to it deliberately, during their exchanges.

Your information will be kept for three years from the last contact, before deletion.

2. Demo request

For any demo request made via the form available on the page <https://www.avis-verifies.com/fr/request-a-demo/> the User gives his consent to Skeepers, via a checkbox, to process the following Personal Data:

- Name (optional)
- Address mail
- Company Name
- URL of your website
- Phone number (optional)
- Country

They must be filled in in order to be able to contact you again to respond to your request, but also to send you personalized communications and offer you our ancillary solutions, which would be likely to interest you given your needs Feedback Management, Customer Data Activation, Influencer Marketing, Live Shopping and Consumer Videos). Otherwise, it will be impossible to send the contact form.

Skeepers will also be able to process any other personal data that the User has chosen to communicate to it deliberately, during their exchanges.

Your information will be kept for three years from the last contact, before deletion.

3. Application for registration

For any registration request made via the form available on the https://www.avis-verifies.com/fr/inscription/?_hstc=69704527.a0ee1443ba8b20ff539e59855c553948.1654678141730.1669385315388.1669388970846.82&_hssc=69704527.38.1669284950386&_hsfp=3764043876 page to try our product, the User gives his consent to Skeepers, via a checkbox, to process the following Personal Data:

- Email address
- (First name) optional
- (Name) optional
- Phone number
- Company Name
- URL of your website



They must be filled in in order to be able to contact you again to respond to your request, but also to send you personalized communications and offer you our additional solutions, which may be of interest to you given your needs (Feedback Management, Customer Data Activation, Influencer Marketing, Live Shopping and Consumer Videos). Otherwise, it will be impossible to send the contact form.

Skeepers will also be able to process any other personal data that the User has chosen to communicate to it deliberately, during their exchanges.

Your information will be kept for three years from the last contact, before deletion.

4. Download the e-book

For any download of the e-book via the link <https://get.avis-verifies.com/fr/ebk/avis-clients-strategie-gagnante> the User gives his consent to Skeepers, via a checkbox, to process the following Personal Data:

- Surname and first name;
- Email address;
- Company name.

They must be filled in in order to be able to contact you again to respond to your request, but also to send you personalized communications and offer you our ancillary solutions, Feedback Management, Customer Data Activation, Influencer Marketing, Live Shopping and Consumer Videos. Otherwise, it will be impossible to send the contact form.

Skeepers will also be able to process any other personal data that the User has chosen to communicate to it deliberately, during their exchanges.

Your information will be kept for three years from the last contact, before deletion.

5. Cookies and other tracers

Access to and navigation on the Site <https://www.avis-verifies.com/fr/> triggers the processing of data collected through cookies, pixels and other similar technologies, tracers (collectively referred to as "Cookies" in this "Privacy Policy") necessary for the Site to function, in order to make your visit to the Site as simple, reliable and useful as possible.

Non-essential cookies are subject to the prior consent of the User before they are deposited.

For more information, please see our [Cookie Policy](#).

6. Management of applications and interviews (constitution of a library)

Any application received for a job offered within the Skeepers Group, or spontaneously, will be treated with the utmost care and attention.

If, unfortunately, your profile has not been retained, we will keep your information (CV and cover letter) for 2 years, before deleting it, unless you exercise your right to object or delete them before the end of the deadline.

Their processing is justified by the legitimate interest of the Skeepers Group to recruit and to build a library. When the candidate has been selected to join the Skeepers Group, the pre-contractual basis justifies the processing and storage of his or her data.

You have various rights over your information, including those of access, updating, opposition and deletion, the modalities of exercise of which are presented to you in the section "5: Rights relating to Personal Data and their management".



B) The processing of Personal Data carried out by Skeepers (Processor) under its Ratings & Reviews solution

Skeepers may process Personal Data for its Ratings & Reviews, Feedback Management, Influencer Marketing, Customer Data Activation and Live Shopping solutions as a Processor on behalf of its Customers.

The Ratings & Reviews Solution makes it possible to collect Customer Reviews resulting from an Order placed by a Consumer on the website or in the store of one of its Customers.

Thus, when a Consumer places an Order with one of Skeepers' Partner Merchants, the Personal Data listed below will be collected.

After each Order or Purchase from one of the Partner Merchants, the Consumer is invited, by email or SMS, to submit a Customer Review on his consumer experience, to which is attached a hypertext link that refers to a Customer Review Form.

This invitation, valid for three months, is only sent when a Consumer has placed an Order or purchase from one of the Partner Merchants. **No prior consent is required from Consumers, because emails and SMS sent under the Rating & Reviews solution (Verified Reviews) are not advertisements, marketing emails/SMS but surveys on the customer experience, lived by Consumers on products and/or services they have purchased or from which they have benefited from Skeepers Partner Merchants, who do so on the basis of their legitimate interest (Article 6. f) of the General Data Protection Regulation).**

Some Customers may wish to obtain the prior consent of their consumers/end customers: the lawfulness of their collection depends solely on them, and Skeepers is in no way responsible for consent that has not been obtained in a free, specific, informed and unambiguous manner within the meaning of Articles 4 and 7 of the General Data Protection Regulation (GDPR).

Consumers are not required to create a personal space on the Skeepers Site to post Customer Reviews.

The services of collection, moderation and publication of online customer reviews carried out by Skeepers are certified NF Service since March 28, 2014. As such, Skeepers undertakes to comply with the NF Z 74-501 standard and the NF 522 certification standard, which requires it to publish all customer reviews, both positive and negative, subject to a moderation process defined in the General Terms and Conditions of Use of Verified Reviews.

Thus, Skeepers is committed not to make any selection, so that any Consumer who has had a consumer experience with one of Skeepers' Customers will be surveyed, and will therefore receive a request for Customer Reviews that he can file, without any compensation, within three months from the date of receipt of the invitation.

Skeepers Customers, as Data Controllers, ensure compliance with the Principles for the Processing of Personal Data (Article 5 of the GDPR), i.e. the lawfulness, fairness and transparency of the Personal Data collected from Data Subjects, which they subsequently transmit to the Skeepers Group.

The Skeepers Group requires its Customers to comply with the GDPR and to inform, prior to any collection of their data and in accordance with Articles 12 et seq. of the Regulation, their Consumers, in order to avoid any confusion when processing their Personal Data by the SKEEPERS Group.

The Personal Data that is communicated to the Skeepers Group must be accurate, adequate, relevant and limited to what is necessary for explicit and legitimate purposes determined by the Data Controllers. Skeepers, under its Ratings & Reviews, Feedback Management, Influencer Marketing, Customer Data Activation and Live Shopping solutions, keeps them securely for a period not exceeding that necessary for the purposes for which they are processed.

Skeepers Group Customers remain solely responsible to the data subjects for any lack of information, inaccuracy, error or omission relating to their Data.



The Skeepers Group therefore declines any responsibility in the event of violation of these fundamental principles by its Customers, and invites Data Subjects who believe that their rights have been violated, to contact the company directly.

In the course of its business, Skeepers collects and processes Personal Data in a variety of ways.

The table below details the data processing implemented by Skeepers under its Ratings & Reviews solution (Verified Reviews) on behalf of its Clients:

<p>Nature of the operations carried out on personal data</p>	<ul style="list-style-type: none"> ■ Reception ■ Collection ■ Registration ■ Conservation ■ Modification ■ Consultation/Access ■ Use ■ Erasure ■ Organization ■ Extraction ■ Communication ■ Dissemination ■ Provision ■ Destruction
<p>Purposes of personal data processing operations carried out by Skeepers on behalf of its Customers</p>	<ul style="list-style-type: none"> • Collection, management, publication and dissemination of Consumer Reviews on the Customer's website, as well as on partner commercial sites and search engines; • Receipt of Customer data; • Sending email/SMS campaigns; • Receipt and management of Customer Consumer Reviews; • Extraction and analysis of verbatims, keywords and the polarity of verbatim; • Allow the Data Controller to respond to the questions / needs of its customers in case of dissatisfaction related to said purchase; • Publication of consumer reviews on the Customer's website and on search engines.
<p>Purposes of personal data processing operations carried out by Skeepers specific to Consumers on behalf of its Customers</p>	<ul style="list-style-type: none"> • Access to and Use of the Rating & Reviews Solution and Skeepers Services; • Collection and publication of your Customer Review on the Partner Merchant's website and on Search Engines, including Google; • Verifying the authenticity of your Customer Review; • Compliance of customer review collection services with the AFNOR NF Z 74-501 standard relating to online customer reviews, the collection process and moderation and restitution; • Implementation of the moderation process in accordance with the AFNOR NF Z 74-501 standard and the Skeepers GTCU and in particular: <ul style="list-style-type: none"> - To contact you in the event that your Customer Review is reported by other users and, if necessary, to ask you to provide the necessary documents to verify your Customer Review; - To communicate with you during the moderation process and thus communicate the follow-up of your Customer Review, from the moderation, until the rejection of your Customer Review or its publication; - To communicate to you the possible response of the Partner Merchant to your Customer Review and allow you to exchange with him; • Provision of a support service; • Personalization of the Services in particular by: <ul style="list-style-type: none"> - The possibility of sharing your Customer Review on social networks;

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	- The ability to display members of your Social Networks who have submitted Customer Reviews through Skeepers in order to increase trust in Customer Reviews and create a better experience for users on the Skeepers Website.
Categories of personal data processed	<ul style="list-style-type: none"> • Name of the Consumer; • First name of the Consumer; • First name and first letter of the Consumer's surname on published Reviews; • Consumer's email; • Phone number (if sending SMS); • Order number / reference; • Order date; • Address IP ; • Verified Reviews widget cookies; • The date of publication of the Customer Review; • The Product purchased; • The place of purchase (in case of purchase in store). • The ratings assigned by the Consumer to his consumer experience; • His comments and observations on his consumption experience; • The date and time of filing of the Notice; • The Consumer's response(s) to the Customer's comment(s) in relation to a Review; • The Consumers' answer(s) to questions asked by Internet users on the Customer's website. <p>No sensitive data will be accepted/processed.</p>
Categories of data subjects (hereinafter "Data Subjects")	<ul style="list-style-type: none"> ■ Customer's employees ■ Customer's customers
Retention period(s)	<p>Personal data is kept for 18 months from the sending of the VERIFIED REVIEWS email, if no review is filed, or 3 months from the filing of the Review, when a consumer has filed a Review.</p> <p>The personal data attached to each Review is deleted by automated anonymization.</p> <p>Opinions thus anonymized are kept for a period of 5 years, from the date of their publication, only for statistical purposes.</p> <p>They are deleted from the database and backups at the end of 5 years from collection. The data deletion process takes place over one (1) rolling month.</p>

Special treatments:

a) Where a consumer wishes to file a Customer Review directly, they have the option to do so by contacting Skeepers in three different ways:

- via the contact form;
- via the abuse filing platform accessible from the Customer's Verified Reviews Certificate;
- via his email address.

On this occasion, Skeepers necessarily collects the following Personal Data:

- Surname;
- Forename;
- Email address;
- Date and reference of the Order;
- Date and place of purchase in case of Purchase in one of the stores of Skeepers Customers.

In order to comply with the obligations resulting from the AFNOR NF Z 74-501 standard, Skeepers also asks the consumer to justify his consumption experience by means of proof of purchase (invoice, proof of payment, purchase order, etc.).

As part of this verification process, Skeepers may collect the following additional Personal Data:

- Postal address;



- Phone number;
- Amount spent when ordering;
- Payment method used.

This Personal Data is only used to verify the reality of a consumer experience and to comply with the AFNOR NF Z 74-501 standard. They are therefore not kept by Verified Reviews and are only processed for verification before being deleted.

b) At the strict request of the Client, one or more additional questions on specific topics may be attached to the Form. Skeepers collects responses to these surveys. By completing this Form, consumers will have the opportunity to provide additional information such as:

- Age ;
- Sex;
- Consumption habits;
- Photos or videos.

The transmission of this information is not mandatory and does not condition the filing of a Review, consumers may choose not to inform them.

c) Following the submission of a Review, Skeepers sometimes intervenes on a moderation phase of the Customer Review.

Moderation is a process prior to the publication of a Review that aims to ensure the compliance of the collected content with French law and the AFNOR NF Z74-501 standard that Skeepers undertakes to respect in order to preserve the reliability of the Customer Reviews published.

All content relating to the identity of the Consumer, the Reviews collected and which are intended to be published are subject to moderation.

Through this moderation process, Skeepers ensures full transparency with respect to both Merchant Partners and Consumers. Indeed, in accordance with the AFNOR NF Z 74-501 standard, Skeepers undertakes to transmit and publish notes, comments, and additional information strictly identical to those collected, with the exception of any mention or declaration of an illicit or inappropriate nature, or contrary to the General Conditions of Use.

Thus, Skeepers returns the Customer Reviews in their entirety whether positive or negative, without being able to modify or correct them, as soon as they have not been rejected during the moderation process defined in Article 5.2 of the Skeepers Terms of Use.

Thus, as part of the moderation process, Skeepers is required to collect Personal Data corresponding to the Consumer's response(s) to the Partner Merchant's comments in relation to a Customer Review.

It is recalled that Skeepers only acts as an intermediary and does not interfere in the existing relationship between the Partner Merchant and the Consumer.

d) Personal data collected after clicking on "useful notice"

This type of Review is used to indicate whether the Review that is read by an Internet user has been useful to him. It is therefore not necessary to write a Review to click on "useful notice yes" or "useful notice no". Any Internet user, reader of the Customer Reviews collected by Skeepers can specify, if he wishes, if the Review he has read seems useful in his search for information.

Thus, in order to ensure the relevance of this feature, Skeepers retrieves the IP address of the Internet user clicking on "useful notice" so that a Consumer can vote only once.



e) Personal data collected during the operation of the "Questions / Answers" module

The "Questions / Answers" module allows an Internet user to ask a question about a product. Consumers who have already ordered this product are solicited by email to respond to the Internet user interested in this product.

Skeepers necessarily collects the following Data it receives from all Merchant Partners:

- Surname;
- Forename;
- Email address;
- Date and reference of the Order;
- Date and place of purchase if it is made in one of the Customers' stores;
- Name and internal and international references (GTIN / ISDNF) of the Product ordered.

In addition, Skeepers may also collect other Data that may be submitted by Merchant Partners such as:

- Date of birth of the Consumer;
- Sex;
- Phone number;
- Consumer habits (type of products purchased, frequency of purchase);
- Name and reference of the seller.

In addition, when a Partner Merchant has subscribed to the "Questions / Answers" module, Skeepers will be required to collect the Consumer(s) of this product to the question asked by said Internet user on the site of the Partner Merchant.

D) The processing of Personal Data by Skeepers (Data Controller) with regard to its Customers

As part of the subscription to one or more Skeepers Group solutions, and subsequently as part of this collaboration, Skeepers processes the Personal Data of its Customers.

The table below details the data processing implemented by the Skeepers Group in connection with its relations with its Customers:

Nature of the operations carried out on personal data	<ul style="list-style-type: none">■ Reception■ Collection■ Registration■ Conservation■ Modification■ Consultation/Access■ Use■ Erasure■ Extraction■ Communication■ Dissemination■ Provision■ Interconnection■ Destruction
Purposes of the personal data processing operations carried out by Skeepers in connection with its relations with its Customers	<ul style="list-style-type: none">• Listening and recording of telephone and video conversations in the context of incoming and outgoing calls with prospects/customers in order to improve the quality of the service provided;• Manage the contractual / commercial relationship;• Create and manage the Client's Back Office;

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	<ul style="list-style-type: none"> • Allow access to and use of the Platform and its services; • Perform all operations related to the Services, • Communicate with the Customer in the context of the performance of the Services or for information purposes in the event of changes to the General Conditions; • Provide support service; • Perform marketing and statistical analyses; • Conduct customer review surveys; • Analyze data, audience types and usage trends; • Produce statistics in order to improve the operation and optimize the Platform; • Analyze Data, Audit, and identify usage trends • Maintain the Platform in its proper functioning and in a secure environment; • Resolve any technical incidents encountered; • Sending commercial information in connection with the Services subscribed; • Request payment for the Services subscribed; • Manage unpaid, litigation and litigation; • Detection, prevention and fight against fraud and cybercrime; • Keeping of general and auxiliary accounts; • Responses to official requests from public or judicial authorities empowered for this purpose; • Acquisition audit by potential buyers.
Categories of personal data processed	<ul style="list-style-type: none"> • Surname; • Forename; • Business email address; • Business phone number; • Image (if video interview); • Voice (if video/audio interview); • Identifier; • Password; • Connection logs; • Cookies and other Tracers; • Bank details.
Categories of data subjects (hereinafter "Data Subjects")	<ul style="list-style-type: none"> • Employees, assimilated or external hired by the Customer
Legal bases (depending on purpose)	<ul style="list-style-type: none"> • Pre-contractual / contractual • Legitimate interest of Skeepers • Consent (prior to recording of video/audio interview) • Legal obligation
Retention period(s)	<p>Five (5) years from the end of the contractual relationship between the Skeepers Group and the Customer (prescription of common law in civil and commercial matters).</p> <p>Three (3) years from the last contact in the context of a commercial prospection.</p> <p>Retention for a maximum of 6 months from the date of recording of the audio or video interview. Data from analysis documents (reports and analysis grids) are retained for one (1) year from their collection.</p> <p>Retention for the duration of the dispute, deletion of data once all remedies have been exhausted and the</p>



	decision has become enforceable or prescription of the legal action. In case of amicable settlement of the dispute, deletion as soon as the settlement is settled. Retention during the current accounting year, increased by ten (10) years from closing.
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Personal data is processed in the Skeepers Group only by the competent services, which have to know information for the proper performance of their tasks. They are subject to a Confidentiality Agreement.

3: Sharing of Personal Data collected

A) Publication of Customer Reviews

By completing and returning the Customer Review Form, consumers are informed that their Customer Reviews will be made available to the public, by publishing and disseminating them on the Customer's website, as well as on partner commercial sites and Search Engines, including Google or Bing.

These Customer Reviews will be available to all visitors to these websites.

Each Customer Review published will mention at least the following information about its editors:

- Forename;
- First letter of the Name;
- Notes and comments;
- The date of publication of the Customer Review;
- The date of the Order or Purchase;
- The Product purchased;
- The place of purchase (in case of purchase in store).

Such Customer Review may also include:

- The right of reply of the Partner Merchant and all exchanges of the consumer with the latter, unless the Partner Merchant has disabled this feature.

- Any additional non-mandatory personal information that the consumer has chosen to provide, such as:

- o Age;
- o Sex;
- o His consumption habits;
- o Photos or videos.

Thus, each Customer Review is displayed only with the first name and the initial of the Consumer's name.

However, pseudonymization is possible at the time of filing a Review from the thank you page, where there is a checkbox mentioning the option not to display the "first name + first letter of the name". A first and last name will then be randomly generated next to the Notice filed.

If the Review has already been published and the Consumer wishes it to be pseudonymized, he has the possibility to make the request directly by contacting Verified Reviews at the following address: moderation@avis-verifies.com . A first and last name will then be randomly generated next to the published Notice.



B: Sharing with third parties

At Skeepers, Personal Data is not and will never be sold to third parties.

However, Skeepers may share Personal Data with third parties for the following purposes:

- Maintain the technical functioning of its Platform and services;
- Perform certain services on its behalf.

These Processors and partners may have limited access to certain Personal Data, strictly in the context of the performance of their services. They have a contractual obligation to use them in accordance with the provisions and regulations applicable to the protection of Personal Data.

The Skeepers Group undertakes to verify that all its Processors and partners scrupulously comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR) and to conclude contracts with them including a Data Processing Agreement and a Non-Disclosure Agreement.

In this context, all Processors and partners of the Skeepers Group are required to provide sufficient guarantees demonstrating that the technical and organisational security measures applicable to the protection of Personal Data have been taken (Article 32 of the GDPR).

If you wish to know the complete and up-to-date list of Processors and service providers, you can contact the Skeepers Data Protection Officer by email at: privacy@skeepers.io.

The Skeepers Group may also share your information if it believes disclosure is necessary:

- To pursue claims against the Skeepers Group and comply with administrative and judicial procedures (e.g. judicial authorities);
- To comply with a legal obligation (e.g. public bodies such as URSSAF);
- Due to a merger, acquisition, sale of assets or receivership proceedings.

Finally, in order to create a better experience and increase trust in published Customer Reviews, Skeepers offers Consumers the opportunity, when submitting a Customer Review, to link it to their profile on social networks such as Facebook.

This feature allows users of Skeepers services who are connected on social networks, to view the members of their network who have submitted a Customer Review.

On the occasion of this connection, Skeepers may collect certain Data that Consumers have previously transmitted to said social networks, such as:

- Username;
- Address e-mail ;
- Sex;
- Date of birth;
- Profile picture;
- Geographical location;
- Network of friends.

In any case, the Internet user who links his Customer Review to a social network is informed in advance of the Personal Data that Skeepers receives.

You have the right to object, at any time, to the transfer of your data to Third Parties, who are not Service Providers that Skeepers uses for the proper performance of the Services offered. We will then no longer transmit your data to these Third Parties, unless we can justify to you that we have legitimate and compelling reasons for the transfer/processing of your data that override your interests and your rights and freedoms, or for the establishment, exercise or defence of our legal claims.



Objecting to the transfer of your data to the Providers that Skeepers uses for the proper performance of its Services will result in the deletion of your Personal Data at Skeepers, as it is not possible for Skeepers to perform its Services without its Providers.

Skeepers is committed to ensuring that your data is hosted within the European Union and the European Economic Area. With the express written consent of its Clients, who wish to benefit from certain specific services of Skeepers operated outside the territory of the European Union and the European Economic Area, within the framework of the Rating&Reviews Solution, the moderation service, a limited amount of your Personal Data may be shared with providers in countries outside the European Union and not considered to offer adequate data protection under the GDPR.

In this case, Skeepers ensures that Standard Contractual Clauses, in their latest version in force, are signed with said third-country service providers, and that additional technical measures are implemented in order to be able to provide a sufficient level of protection within the meaning of the supervisory authorities, including the European Data Protection Board in its "[Recommendations 01/2020 on measures that supplement transfer tools to ensure compliance with the EU level of protection of personal data](#)".

4: Retention, security and confidentiality of Personal Data

The Skeepers Group only retains and stores your Personal Data for the time strictly necessary for the purposes defined in section "B) The processing of Personal Data carried out by Skeepers (Processor) under its Ratings & Reviews solution", in accordance with the recommendations of the CNIL, in compliance with its contractual obligations, legal, accounting and tax, **and to enable it to scrupulously comply with the AFNOR NF Z 74-501 standard and its legal obligations.**

In any case, the Skeepers Group ensures the strict confidentiality of the Personal Data collected and processed. To this end, Skeepers has implemented organizational, technical, software and physical measures, described in its Information Systems Security Policy (ISSP) and its Secure Assurance Plan (PAS): they aim to protect your Data against alteration, destruction and unauthorized access in accordance with Article 32 of the GDPR.

Specifically, these measures include:

- Data anonymization and pseudonymization techniques to increase security;
- A regular backup of Personal Data with regularly validated restoration processes, in technically and physically separate backups;
- Limited and controlled access to data (authentication and authorization control) subject to confidentiality;
- Secure hosting (ISO 27001 certified host for technical measures, ISO 27017 for cloud security, ISO 27018 for cloud privacy, SOC 1, SOC 2 and SOC 3, PCI DSS level 1, BSI Common Cloud Computing Controls Catalogue (C5), ENS High.);
- Data encryption (KMS encrypt) in transit and at rest;
- An in-depth security analysis to assess its level. It should be noted that if the required level is not reached, a new design phase is opened in order to reach the level required by the Skeepers Group.

In addition, Skeepers' information system is monitored by internal software to monitor its proper functioning and ensure that no vulnerabilities are present.

The Skeepers information system includes centralized and protected logging devices of the use of the services to detect any intrusion or fraudulent use, to try to identify the causes and origins and to avoid any contamination of other sites by rebound and finally to put the system back in place.

The security level of Skeepers Group's information systems is tested every 6 months to ensure that no inherent security vulnerabilities are accessible.

In accordance with Article 33 of the GDPR, the Skeepers Group undertakes to notify the CNIL, as soon as possible, which may not exceed 72 hours, of any Data breach likely to generate a risk for the rights and freedoms of Users. The Skeepers Group undertakes to notify Data Subjects, as soon as possible, of any Data breach that may result in a high risk to their rights and freedoms.



6: Rights relating to Personal Data and their implementation

In accordance with the regulations applicable to the Skeepers Group regarding the protection of Personal Data, you have, at any time and for any reason, various rights with regard to the processing of Data for which you are the data subject.

These are the right of access, rectification, erasure and opposition, the right to restriction of processing, the right to data portability, the right not to be subject to automated individual decision-making (including profiling), the right to define guidelines for the storage, erasure and communication of your Personal Data after your death.

For a better understanding of these rights and their usefulness: <https://www.cnil.fr/fr/les-droits-pour-maitriser-vos-donnees-personnelles>

The Skeepers Group guarantees to any person visiting its Site and / or using its Solutions and services, the exercise of these rights in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (RGPD) and the Data Protection Act (LiL).

For the processing of personal data based on your consent, you have the right to withdraw it at any time, without this affecting the lawfulness of the processing, previously based on consent before withdrawal thereof.

The exercise of these rights is free of charge, insofar as these requests are neither unfounded nor excessive, in which case the User will assume the costs of processing the request.

Skeepers does not knowingly collect Personal Data from minors under the age of 13, for U.S. citizens, 16 years of age, for European citizens, 15 years old, for French citizens, for whom access to its services is prohibited. Nevertheless, if you are a minor, or a parent or legal guardian of that minor, and you believe that we hold your Personal Data/Personal Data about that minor, you may obtain the deletion of your/her Personal Data after proving your identity and, if applicable, your legal authority over the minor.

For any request to exercise a right, you must, in your message:

1) State the type of right exercised (right of access, rectification, erasure, opposition, right to restriction of processing, right to data portability, right not to be subject to automated individual decision-making (including profiling), right to define guidelines for the storage, erasure and communication of your Personal Data after your death);

2) Specify the address (email or postal) **on which you wish to obtain a response from Skeepers** (otherwise we will choose the same channel as the one you used to contact us);

3) Include a means to identify you (order number, customer ID, etc. if the means communicated does not seem sufficient to prove your identity, a copy of your identity document may be required);

4) Explain, if possible:

- **the context in which your data was collected,**
- **as well as the Solution concerned** (here Ratings & Reviews - Verified Reviews).

This information is valuable so that the Data Protection Officer / Data Protection Officer can answer you as soon as possible.

You can then write to the Data Protection Officer of the Skeepers Group, at the following email address: privacy@Skeepers.io **(for the right of deletion only: datadeletion@skeepers.io) or by post, at the address indicated below:**

SKEEPERS
Legal Department - Data Protection Officer
18-20 Avenue Robert Schuman
CS 40494
13002 Marseille

Skeepers informs you that no requests will be processed by phone.

SKEEPERS SAS with a capital of 11 470 723 €
18/20 Avenue Robert Schuman - CS 40494 - 13002 Marseille
RCS Marseille 879 038 990 – NII FR01879038990 – Siret: 879 038 990 00 21
<http://www.skeepers.io>



A response will be sent to you as soon as possible, which may not exceed one (1) month from the date of receipt of your request.

An extension of two (2) months is possible, in case of complex request, or if a large number of applications have been received.

Your request, as well as any data useful for processing your request, will be kept for a period of three years (five years for the right to object) from receipt of your request.

If a supporting document has been requested from you, or if you have sent it spontaneously, it will be kept for a period of one year.

If you consider, after contacting the Data Protection Officer, and a period of one month has elapsed, that your GDPR rights are not respected, send a complaint to the CNIL.