

PRIVACY POLICY PERSONAL DATA AND COOKIES

By ordering on the website "www. FIBDT SOUSSE - International Festival BD Francophone and Arabic in Tunisia - Sousse.com", and ticking the box "sign up", which you click when ordering a Pass Festival International BD in Tunisia in Sousse or an entrance ticket, you confirm your acceptance of this Privacy Policy and agree to be bound by it.

The general conditions are also fully applicable to all orders placed with the U.F.E. SOUSSE, so any order will be exclusively governed by these general conditions, in full knowledge of the facts by the customer.

The prices displayed on this Site are those in effect at the time of the consultation by the Customer and at the time of his firm order.

They may be modified without notice, depending on the latest programming news or recent changes beyond our control.

1 - INTRODUCTION

As part of its cultural, artistic and educational activities and all its spin-off activities, the U.F.E. SOUSSE is required to process information about you. For example, by browsing our websites or our mobile and digital applications, by filling out a subscription form to a newsletter, by clicking on an advertising link that we present to you, you send us information some of which are likely to identify you (" personal data ").

This Privacy Policy informs you of how we collect and process your personal information. We invite you to read it carefully.

IMPORTANT

We only use your personal data in the cases provided by the regulations in force:

- The execution of a contract that we have concluded with you and / or
- compliance with a legal obligation, and / or
- Your consent to the use of your data, and / or
- The existence of a legitimate interest in using your data. The legitimate interest is a set of business or business reasons that justifies the use of your data by U.F.E. Sousse

If you have any questions about this document, you can contact the U.F.E Data Protection Officer. SOUSSE (festivalbdtunisie.sousse@gmail.com)

2 - Who is responsible for the treatments mentioned in this document?

The controller of the treatments mentioned in this document is the U.F.E. SOUSSE, association governed by the law N ° 2011-88 of 24 September 2011, N ° 151 of 19 December 2017, whose registered office is at: BP N ° 771 - Rue el Fourat - Cité Jawhara 4000 SOUSSE, including Mrs. Roselyne CORDIN, President, is the legal representative.

The Data Protection Officer of the U.F.E. SOUSSE is Monsieur Yannick CORDIN.

3- What data do we collect about you and under what circumstances do we collect it?

3.1 The data that you send us directly

On the occasion of the various contacts that we have with you, you can be brought to communicate us information which concerns you. They are collected especially when subscribing to a newsletter, the creation of an account on our sites and applications or to access any other offer or any other service.

These data include your e-mail address and any other information you wish to bring to our attention.

3.2 Data We Collect During Our Business Relationship

The data we collect during our business relationship with you include the following:

- Your participation in promotional offers, contests or events:
- The requests you made to our Association, or the incidents that you have reported to us, for example regarding the performance of our services;

3.3 The data we automatically collect

During each of your visits to our sites and applications, we collect information about your connection and your navigation. Different technologies can be implemented to collect this data. The main one is the cookie.

Data collected through cookies

A cookie is a text file posted when you visit an online site, application or advertisement and stored in a specific area on your computer or mobile device's hard drive. Cookies are managed by your Internet browser and only the sender of a cookie can decide to read or modify the information contained therein.

A cookie has a limited validity period. Its deposit and storage on your terminal are done in compliance with the applicable legislation and subject to the choices you have expressed and that you can change at any time, under the conditions specified in Article 9 below.

A cookie does not identify you personally. It allows its transmitter to recognize your terminal and collect a certain amount of information relating to the navigation carried out from this terminal.

Cookies have several functions, such as allowing you to navigate efficiently on a site or an application, remembering your choices, goods and services you want to buy, offer you relevant advertising content according to your interests expressed during your navigation. You will find more information about cookies on the following websites:

www.cnil.fr

www.allaboutcookies.org

www.aboutcookies.org

www.youronlinechoices.eu

The cookies deposited by U.F.E. SOUSSE subject to your choices give us access to the following information:

- Identifiers of the equipment you use (IP address of your computer, Android ID, Apple ID, etc.)
- Type of operating system used by your device (Microsoft Windows, Apple OS, Linux, BeOs, etc.)
- Type and version of the browser software used by your device (Microsoft Internet Explorer, Apple Safari, Mozilla Firefox, Google Chrome, etc.)

- Dates and times of connection to our services,
- Address of the Internet page of origin ("referrer"),
- Navigation data on our services, content viewed.

Data collected by standard Internet technologies

We are also likely to use standard Internet technologies, such as scripts, pixels, and redirects. Scripts (sometimes called tags), written in javascript language, are programs that run in your browser and perform various actions, for example sending information to our servers. Scripts are also able to create pixels. Pixels (sometimes called transparent GIFs, clear GIFs, or Web-bugs) are lines of code that allow you to display a graphic image (usually invisible) on a web page or in an e-mail. Redirects make it possible to make a web page available under several page addresses (URLs). When a browser opens a redirect URL, a page with a different URL is opened.

The purpose of these technologies is to improve your experience on our sites and applications, including personalized content according to your interests. For example, when a user clicks an article sharing button, a script creates a pixel that counts the share. Thus, we are able to know the total number of shares of an article, and we can establish the ranking of the most shared articles.

These technologies give us access to the following information:

- Information about your use of our sites and applications;
- Information about the presence of cookies on your device, the time and date of consultation of a page, and a description of the page where the web beacon is put;
- Information about the reading or not of the emails we send you, about the clicks you make on the links contained in these emails.

Our sites and applications may also include scripts, pixels and third-party redirects. These technologies allow third-party service providers to collect certain information such as your browser type, and the web page that has redirected you to our websites. These third-party service providers process the information they collect on our websites. These third-party service providers process the information they collect for auditing, research, and reporting purposes on our sites and apps and the advertisements they view. We do not share your credentials with these third parties as part of their use of these technologies.

3.4 Data on minors

In principle, our products and services are aimed at adults who are able to subscribe to contractual obligations.

The minor user must obtain the consent of his legal guardian before the communication of his personal data.

For registration on our site and some of our online services (newsletter for example), the age of 16 is accepted.

A user under the age of 18 at the time of publication or subscription to the newsletter has a specific right to erase data concerning him. For further information, please contact the U.F.E Association Data Protection Officer. SOUSSE: festivalbdtunisie.sousse@gmail.com)

3.5 Data on a third party

Before offering a third party subscription or any other product or service that we market, you must ensure that the data subject agrees that his personal data, including his postal address, are communicated to us.

3.6 Exclusion of any sensitive data

The U.F.E. SOUSSE does not collect any sensitive data about you. Sensitive data includes: racial or ethnic origin, political opinions, religious or philosophical beliefs, union membership, health data or sexual orientation. If such information was in any way communicated to us, it will be deleted.

4. For what purposes do we use your data?

This article tells you the main purposes for which we use the data mentioned in Article 3.

4.1 - Operations necessary to supply products or services

Management of subscriptions to our newsletters and / or e-mail alerts;

Customer relationship: provision of a community manager accessible by e-mail for any question or complaint;

Conducting satisfaction surveys

Sending information about the modification or evolution of our services;

Management of the exercise of your rights over your personal data, under the conditions provided for in article 9;

Verification of the respect of the applicable legislation, of our contracts and general conditions of use.

4.2 - Marketing and commercial prospecting operations relating to the publications, products and services of the U.F.E. Sousse

Update to the postal standards, update, enrichment and deduplication of your personal information in a dedicated database of the Association U.F.E. SOUSSE;

Sending information about our press group, its publications and its activity;

Sending of marketing, advertising and promotional offers relating to our products and services by postal mail, asilage, e-mail, mobile notifications, on social networks or any other support;

Customized loyalty or business prospecting actions;

Setting up of competitions or other promotional activities;

Collection of customer reviews;

Development of trade statistics.

4.3 - Transactions Related to Business Partnerships

Sharing, exchanging or renting files with business partners in compliance with applicable regulations and security requirements;

Sending marketing, advertising and promotional messages relating to partners' products and services by post, asilage, e-mails, mobile notifications, on social networks or any other medium;

Establishment of contests or other promotional or event operations with commercial partners.

4.4 - Purposes associated with the deposit of cookies on your browser

1. Operation and optimization of navigation on our sites and applications

- Adaptation of the presentation of our sites and applications to the display preferences of your terminal (language used, display resolution, operating system, etc.) during your visits, according to the hardware and software of visualization or reading that your terminal has;
- Memorization of information relating to a form that you have completed on our site (registration or access to your account) or products, services or information that you have chosen on our site (service subscribed, content consulted, purchase made, etc ...);
- Automatic connection to the reserved or personal areas of our site, such as your account, thanks to identifiers or data that you have previously entrusted to us;
- Provision of sharing tools on social networks;
- Management of our platforms and realization of internal technical operations in the context of problem solving, data analysis, tests, researches, analyzes, studies and surveys;
- Implementation of security measures;
- Quality measures to ensure that the display of our content is adapted to your device.

2. Attendance and audience measurement

- Establishment of statistics and volumes of use and use of the various elements of our site (headings and contents visited, routes) to improve the interest and ergonomics of our services;
- Accounting of total number of advertisements posted by us on our advertising space, classification and statistics;
- Analysis of audiences based on the results of advertising campaigns;
- Determination of interests and behaviors;
- Improved customer / user knowledge for personalization purposes.

5. How long do we keep your data?

Your personal data are kept for a period of time in accordance with the legal provisions or proportional to the purposes for which they were recorded. Some retention periods are in the legitimate interest of the U.F.E. SOUSSE as specified in the introduction.

The retention periods vary depending on whether we have a current contractual relationship (you are an active customer), that we had with you in the past a contractual relationship (you are an inactive customer) or that we never have had with such relationship (you are then a prospect). The data related to your browsing on our online services collected by the cookies you have authorized have a specific shelf life.

The table below lists the main retention periods for your data.

In any case, we regularly review the information we hold.

When their retention is no longer justified by legal, commercial or customer management requirements, or if you have made use of a modification or erasure right, we will delete them securely.

CATEGORIES OF DATA FINALITIES DURATION OF CONSERVATION

Data about a prospect

Data set Constitution and management of a prospect file 3 years after the data collection or last contact from the prospect

Data about an active customer

Data set Customer account management For the duration of the contractual relationship

Data about an inactive client

Identification and contact data - Registered newsletters Sending information about the evolution of our publications

and our offers 3 years maximum from the unsubscription or the last contact from the customer

Data generated by cookies

Data related to your browsing on our online services Operation and optimization of services

Attendance measures

Customization of content and advertisements 13 months maximum

Assumed data

Information on your intended uses and interests Sending information and offers that are supposed to correspond to your interests and uses Annual update

6. Who is likely to have access to the data we collect?

6.1. Access to data within U.F.E. Sousse

Are likely to have access to some of your data:

- The members of our Steering Committee of the International Comics Festival in Tunisia in Sousse, the members of the Board of Directors of the U.F.E. SOUSSE, the members of the U.F.E. Sousse
- Official partners and partners contributing to the organization, logistics and development of our International Comics Festival in Tunisia in Sousse and partners of the U.F.E. Sousse
- The partners and marketing partners of the International Comic Strip Festival in Tunisia in Sousse, and the U.F.E. Sousse

Access to your data is based on individual and limited access permissions. The staff of the Festival and the U.F.E. SOUSSE who can access the personal data are subject to an obligation of confidentiality (by a nominal commitment and personal confidentiality).

6.2. Transmission of data

Relations with the U.F.E. Sousse

In order to enable you to use our sites and applications, the U.F.E. SOUSSE may transfer some of your personal data to U.F.E. WORLD. It is the Paris headquarters gathering 170 independent representations around the world, with its own website in which mini-sites of 170 representatives allow internal and independent communication to that of the Head Office. It provides analytical services to U.F.E. SOUSSE, which means that it processes the data we collect to enable you to use our sites and applications. We invite you, for more information on this use of your data, to consult the privacy policy of U.F.E. World, as responsible for processing your data in this context.

Also likely to have access to some of your data:

The subcontractors

They provide services on our behalf, including:

- Managing telephone calls, sending postal or digital mail
- Personalization of the content of sites and mobile applications
- Realization of maintenance operations and technical developments
- Collection of customer reviews
- Providing analytics solutions or audience measurement statistics

The access of our subcontractors to your data is done on the basis of signed contracts mentioning the obligations incumbent on them with regard to the protection of the security and the confidentiality of the data.

Social media platforms

The use of social networks to interact with our sites and applications (including buttons "share" Facebook, Twitter, Google+) is indeed likely to lead to data exchange between the U.F.E. SOUSSE and these social networks. For example, if you are connected to the social network Facebook and you visit a page of the site "www. FIBDT SOUSSE - BD International Festival Tunisia - Sousse", Facebook is likely to collect this information. Similarly, if you see an article on the site "www.fibdt.fr - Comics International Festival Tunisia - Sousse" and you click on the "tweeter" button, Twitter will collect this information. We invite you to consult the personal data management policies of the various social networks to learn about the collection and processing they perform on your data.

Our business partners

They promote products or services for themselves or advertisers. We draw your attention to the fact that if you decide to subscribe to the products or services of our business partners and allow them to access some of your information, including by connecting to their sites or applications, their privacy policies and their cookies are opposable to you. We have no control over the collection or processing of your data by our trading partners on their own platform.

Police authorities, judicial or administrative authorities

When we have a legal obligation to do so or to guarantee the rights, property and safety of the U.F.E. Sousse.

7. Is your data being transferred outside of Africa, and from the European Union?

We store your personal data in Africa, the European Union and the United States. In all cases, we ensure that the processing is carried out in accordance with this privacy policy and that it is framed by the standard contractual clauses of the European Commission, which ensure a sufficient level of protection of life. privacy and fundamental rights of individuals.

8. How is your data protected?

As a data controller, we implement appropriate technical and organizational measures in accordance with the applicable legal provisions, to protect your personal data against tampering, accidental or unlawful loss, use, disclosure or unauthorized access. authorized, and in particular:

The appointment of a Data Protection Officer;

The establishment of a unit dedicated to the security of information systems;

Awareness of the confidentiality requirements of our employees brought to access your personal data;

Securing access to our premises and our computer platforms;

The implementation of a general IT security policy of the company;

Securing access, sharing and transfer of data;

High degree of data protection requirements when selecting our subcontractors and partners.

9. What are your rights?

9.1. Your rights regarding access to your personal data

You have the right to access your personal data and request that it be rectified, completed or updated. You can also request the deletion of your data or oppose their treatment, provided you justify a legitimate reason.

You can ask to exercise your right to the portability of your data, that is to say the right to receive the personal data that you have provided us in a structured format, commonly used and the right to transmit these data to another responsible for treatments.

Finally, you can formulate guidelines for the retention, erasure and communication of your personal data after your death.

You can exercise your rights with the U.F.E. SOUSSE at the following address: BP no. 771 - Rue El Fourat - Cité Jawhara - 4000 SOUSSE - TUNISIE or by e-mail: festivalbdtunisie.sousse@gmail.com

Before responding to your request, we may verify your identity and / or ask you to provide us with more information to respond to your request. We will endeavor to comply with your request within a reasonable time and, in any case, within the deadlines set by law.

In the event of an unsatisfactory response, you can lodge a complaint with the National Commission for Informatics and Liberties (CNIL).

9.2. Your rights to oppose commercial solicitations

We may use your contact information in connection with commercial solicitations, in accordance with applicable law and the terms of this Privacy Policy. You can at any time oppose these solicitations, according to modalities that depend on the communication channel that we will use to send them to you.

Commercial solicitations electronically (e-mail):

We respect the rules of the post and electronic communications codes in force, providing for the preliminary and express collection of your consent for the sending of commercial prospecting by electronic means (e-mail, push notifications or SMS).

However, your express and prior consent is not required when you are already a U.F.E. SOUSSE and the International Comics Festival in Tunisia in Sousse and that the object

our solicitation is to offer you products or services similar to those you already provide us.

In any case, you always have the possibility to oppose the receipt of these solicitations by clicking on the unsubscribe link provided in each e-mail.

9.3. Your rights in accepting and managing cookies

The registration of a cookie on your navigation terminal is subject to your wishes. You can at any time modify your choices regarding the acceptance or rejection of cookies stored on your device, either on your browser or online with different operators.

In order to manage the cookies as close as possible to your wishes, we invite you to set your browser according to the purpose of the cookies.

How to exercise your choices?

1 - Make your choices on your browser

You can set your browser software so that the acceptance or rejection of cookies are offered to you punctually, before a cookie is likely to be registered, or to accept or systematically refuse the registration of cookies in your terminal.

We alert you to the fact that any setting on your browser software regarding the refusal of technical cookies and features will likely alter your browsing comfort on our websites, or even prevent the use of some of our services requiring the use of these same cookies.

If necessary, we disclaim all liability for the consequences of the poor functioning of our website and our services resulting from the impossibility to register or to consult the cookies necessary for their operation and that you have refused or deleted.

For the management of cookies and your choices, the configuration of each browser is different. It is described in the help menu of your browser, which will allow you to know how to change your wishes for cookies:

Microsoft Internet Explorer

<http://windows.microsoft.com/fr-FR/windows-vista/Block-or-allow-cookies>

Microsoft Edge

<https://privacy.microsoft.com/fr-fr/windows-10-microsoft-edge-and-privacy>

Apple Safari

<http://docs.info.apple.com/article.html?path=Safari/3.0/fr/9277.html>

Google Chrome

<http://support.google.com/chrome/bin/answer.py?hl=fr&hlrm=en&answer=95647>

Mozilla Firefox

<http://support.mozilla.org/fr/kb/Activer%20et%20d%C3%A9sactiver%20les%20cookies>

Opera

<http://help.opera.com/Windows/10.20/fr/cookies.html>

- Adobe Flash Player Flash Cookies

Adobe Flash Player is a computer application that allows the rapid development of dynamic content using Flash computer language. Flash (and similar apps) remembers the settings, preferences, and usage of this content through technology similar to cookies. However, Adobe Flash Player manages this information and your choices by an interface different from that provided by your browser.

Since your device might be able to view content developed with Flash, we invite you to access your Flash cookie management tools, directly from the site <http://www.adobe.com/en>

- "Do not track"

You can also set your browser so that it sends a code indicating the websites that we do not want to be followed ("Do not track" option).

Microsoft Internet Explorer

<http://windows.microsoft.com/fr-fr/internet-explorer/use-tracking-protection#ie=ie-11>

Microsoft Edge

<https://privacy.microsoft.com/fr-fr/windows-10-microsoft-edge-and-privacy>

Apple Safari

<http://support.apple.com/kb/PH11952>

Google Chrome

<https://support.google.com/chrome/answer/114836?>

Mozilla Firefox

<https://support.mozilla.org/fr/kb/comment-activer-option-ne-pas-pister>

Opera

<http://help.opera.com/Windows/12.10/fr/notrack.html>

2 – Faire vos choix en ligne

Pour les cookies de mesure d'audience et les cookies analytiques

Les cookies analytiques nous permettent d'obtenir des statistiques anonymes de fréquentation de notre site afin de l'optimiser et de détecter d'éventuels dysfonctionnements. Ils sont déposés sur nos sites et applications par les sociétés Google Analytics, ATInternet (Xiti), Parse.ly, Weborama, ACPM.

Si vous ne souhaitez pas que nos sites et nos services enregistrent des cookies dans votre navigateur à des fins de mesures d'audience, vous pouvez cliquer sur les liens suivants où vous trouverez des informations supplémentaires :

 Cookies Google Analytics : <https://tools.google.com/dlpage/gaoptout>

 Cookies ATInternet :

<https://www.atinternet.com/societe/protection-des-donnees/mettre-a-jour-mes-preferences/>

 Cookies Parse.ly : <https://www.parse.ly/privacy-policy/>

 Cookie Weborama : <https://weborama.com/fr/respect-de-la-vie-privee/>

 Cookie ACPM : (en attente du lien médiamétrie)

Pour les cookies "Réseaux sociaux"

Nous utilisons les boutons de partage Facebook, Twitter, Pinterest, Google+ et LinkedIn.

 Pour gérer vos données sur Facebook : <https://www.facebook.com/help/cookies/>

 Pour gérer vos données sur Twitter : <https://support.twitter.com/articles/20170518-utilisation-des-cookies-et-des-technologies-similaires-par-twitter>

 Pour gérer vos données sur Pinterest : <https://policy.pinterest.com/fr/cookies>

 Pour gérer vos données sur Google+ : <https://policies.google.com/privacy?hl=fr#infochoices>

 Pour gérer vos données sur LinkedIn : <https://www.linkedin.com/legal/cookie-policy>

Désactiver ces cookies empêche donc toute interaction avec les réseaux sociaux.