

**U-LABEL**  
**PRIVACY POLICY**

01/12/2021

This Privacy Policy sets out how and why U-LABEL SAS collects, stores, and processes your personal data when you use its website U-LABEL and services - as well as your rights with respect to your personal data. If you have any questions or feedback, please contact [contact@u-label.com](mailto:contact@u-label.com).

## 1. THE CONTROLLER

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The Controller that is responsible for collecting and processing your personal data when you use the Website is:

U-LABEL, Société par actions simplifiée  
7 ter Rue Colonel Oudot  
75012 Paris  
France  
Share Capital: 5.000 euros  
SIRET: 89853590100018  
TAV Intracommunautaire: FR25898535901  
Email address: [contact@u-label.com](mailto:contact@u-label.com);  
Website: <https://www.u-label.com>

## 2. DEFINITIONS

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“**Controller**” means U-LABEL, also referred to as “U-LABEL”, “we”, “us”, and “our”.

“**Processor**” means a natural or legal person that processes personal data on behalf of or pursuant to U-LABEL instructions.

“**Processing**” refers to the ways your personal data is (among other things) collected, stored, used, disclosed, and erased.

“**Personal Data**” means any information relating to an identified or identifiable natural person (a “Data Subject”). Examples of such personal data includes your name, email address, photograph, professional title, business phone number, and any other personal information you provide to us that is capable of identifying you.

“**Services**” includes the services that are created and made available through the Website.

“**Website**” includes <https://www.u-label.com>

### 3. COLLECTING PERSONAL DATA

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When you access to the Website, including the Services available on it, we collect Personal Data that enables us to provide secure Website access and our Services to you. When you interact with the Website (i.e. to register your details and/or login), your Personal Data is collected for registration and security purposes. Personal Data is collected as input by you and from third party processing services that collect personal data via our Website (such as event registrations).

Personal Data is only collected when necessary to provide secure Website access and/or Services to you, and is limited to the relevant types of Personal Data actually required.

### 4. PURPOSES OF PROCESSING & LEGAL BASIS

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#### **Website Use**

The Personal Data collected by U-LABEL via its Website allow us to provide secure access to our Website and to respond to your questions.

This type of Processing is done with your consent, which you may give when submitting your details via the electronic contact form, and otherwise for U-LABEL's legitimate interest of improving the Website, our Services and responding to your queries.

#### **Registration**

Our Website, and the Services it provides, may require users to register their Personal Data (for example name, email address, and password) and user consent is requested at the time of registration.

This type of Processing is done on the legal basis of your consent and otherwise, where consent is not legally required, for U-LABEL's legitimate interest of ensuring the security of our Services and the people that access and use them. Where a user has entered into a contract with U-LABEL (for example that relates to a service), then it may be necessary for us to process Personal Data in order to fulfil our obligations to perform the contract.

#### **Marketing & Organisation Communication**

Personal Data may be processed for the purpose of sending email communications about U-LABEL news and events. Personal Data is also processed, as our Services reasonably require, to communicate updates, troubleshoot issues with the service, and to respond to and resolve user queries about the service.

Processing Personal Data for marketing and organizational communication purposes is done on the legal basis of user consent and otherwise, for U-LABEL's legitimate interests of marketing its news and events to interested users. Processing Personal Data to communicate with users about services they use is done pursuant to U-LABEL's legitimate interest of providing ongoing services and related service support to its users.

#### **Services**

Personal Data is processed to operationally provide our Services to users and ensure that the Services are protected, to the extent possible, from unauthorized access and use. Such Processing also includes to: process business transactions; establish and maintain customer accounts; communicate with you about updates, maintenance, outages or other technical matters relating to the Services; provide training; notify you about changes to our policies and procedures; verify the accuracy of account and technical contact information; and respond to user inquiries.

The legal basis for such Processing is U-LABEL's legitimate interest of providing and maintaining the Services, and ensuring security of these systems.

### **Social Media Integration & Plugins**

U-LABEL integrates content from its Twitter and LinkedIn accounts ("social media platform(s)") to its Website. These social media platforms can, if buttons are included on our Website, automatically download information technology content. The pages viewed by a user can then automatically send data to these social media platforms. Through this technical process, the social media platform may receive personally identifiable information, such as an IP address and browsing habits, to optimize user-directed advertising. This information is stored by the social media platforms and may be shared with third parties where appropriate. If the user is logged in to a social media platform with their profile, the social media platform recognizes the user at each activity. Personal Data such as the IP address of the person concerned, clicks on pages, access time, access location, the frequency of visits, links of origin, follow-on links and data on the length of stay on the Website are sent. The social media platforms may, if buttons are included on our Website, monitor user activity.

The Website embed content and uses social plugins ("plugins") from social media platforms. If you visit a page of our Website that contains such plugin, your browser connects directly to the servers of the social media platform. The content of the plugin is transmitted by the social media platform directly to your browser and integrated into the webpage. By integrating the plugin, the social media provider receives the information that your browser has accessed the corresponding page of our Website. This also applies if you do not have a profile or are currently not logged in to the respective social media platform. This information (including your IP address) is transmitted by your browser directly to a server of the social media platform (possibly in the US) and stored at that location. If you are logged in to one of the social media platforms, the provider can directly allocate the visit to our Website to your profile in the respective social media platform. If you interact with the plugins (for example by clicking the "Like" or "Share" buttons), the corresponding information is also transmitted directly to a social media platform server and stored at that location. The information may also be posted on the social media platform and displayed to your contacts. This type of Processing is necessary for the optimal marketing of our Services, which is a legitimate interest of U-LABEL.

If you do not want social media platforms to assign the data collected via our Website directly to your profile in the corresponding social media platform, you must log out of the corresponding service before you visit our Website. You can prevent the plugins from being loaded, even with add-ons for your browser, using the script blocker "NoScript" (<http://noscript.net/>).

### **Legal Compliance**

U-LABEL must comply with its legal obligations (for example as directed by regulatory authorities or under a Court order) and in such circumstances, it may be necessary for us to process Personal Data for these reasons.

### **Cookies**

Cookies are small files stored on your computer when you access our Website. They have various functions including: allowing you to navigate smoothly between pages on the Website, remembering your preferences and improving the overall experience of the Website.

U-LABEL uses the following cookies on this Website:

- *Persistent cookies*: These allow us to improve how the Website collects information, enhancing your experience of the site over time; and
- *Session cookies*: These store information about your current browsing session, helping you to navigate between pages.

You can enable or disable cookies by modifying the settings in your browser. You can find out how to do this and obtain more information on cookies at: [www.allaboutcookies.org](http://www.allaboutcookies.org).

## 5. DATA STORAGE

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U-LABEL will store and process your Personal Data for the purposes stated in this Privacy Policy. U-LABEL retains your Personal Data for the period of time necessary to achieve the purposes described in this Privacy Policy, subject to extension as permitted by law, and will delete your personal data after such time that it is no longer required.

## 6. DATA TRANSFERS & RECIPIENTS

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### Disclosure to Third Parties

U-LABEL may disclose your Personal Data, as necessary, to third party Processors for the purpose of developing the Website and Services, and marketing and organisational communications on behalf of U-LABEL. When Personal Data is shared with third party recipients for such purposes, it is shared subject in accordance with this Privacy Policy and as authorised and instructed by U-LABEL.

If required by law, U-LABEL may disclose personal data upon request of a public authority and upon receipt of a Court order, or similar, to disclose personal data.

### Cross-Border Transfers

In some cases it may be necessary to transfer Personal Data to international businesses and/or organisations (that is, outside of the European Union). In such instances, Personal Data will be transferred subject to necessary safeguards including pursuant to adequacy decisions of the European Commission or a contractual agreement between U-LABEL and the international Processor.

## 7. PROTECTION OF PERSONAL DATA

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All information collected via the Website and Services are saved and stored in secure operating environments and is only accessible by authorised personnel. The Website is monitored regularly to ensure that it is secure and data is not being accessed or used improperly. The Website is protected by appropriate security measures to safeguard, prevent loss, unlawful use and unauthorised access to Personal Data to the maximum reasonable extent.

## 8. YOUR RIGHTS

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### Accessing your Personal Data

When you request access to your Personal Data, and such request is reasonable and proportionate, U-LABEL will provide such service free of charge, however if your request requires disproportionate technical or administrative effort U-LABEL may charge a fee.

If you request access to your Personal Data, U-LABEL may request verification of your identity to ensure to the fullest extent possible that Personal Data is not unlawfully disclosed – failure to adequately validate your identity may result in U-LABEL's refusal to allow access to requested Personal Data.

### Data Accuracy

You are responsible for maintaining the accuracy of your Personal Data by contacting U-LABEL to notify us of any changes to or errors in your personal data. You have the right to access your Personal Data stored by the Website and Services to update, amend and rectify your Personal Data record.

### **Erasure**

You have the right to have your Personal Data erased, noting that without the retention of your Personal Data, access to the Websites and Services may be limited.

### **Withdrawing Consent**

You also have the right to withdraw your consent to your data being processed at any time, without affecting the lawful Processing of your Personal Data before such withdrawal.

### **Objection**

You have the right to object, in whole or in part, to your personal data being collected and processed pursuant to U-LABEL's legitimate interests. In such case, we will no longer process Personal Data - except where the compelling legitimate grounds to continue the Processing override the interests, rights and freedoms of the user, or to establish, exercise or defend legal claims.

### **Restricted Processing**

Users have the right to restrict Processing of their Personal Data if (i) accuracy of the Personal Data is contested for the period of time in which U-LABEL can verify the accuracy of the Personal Data, (ii) Processing is unlawful and the data subject opposes erasure of the Personal Data and requests restricted Processing instead, (iii) U-LABEL no longer needs the Personal Data for the purpose of Processing but is required by the data subject to establish, exercise or defend legal claims, and (iv) the user objects to Processing pending verification whether U-LABEL's legitimate grounds prevail over those of the user. Where Processing has been restricted under the above bases, such Personal Data (save for storage) will only be processed with a user's consent or to establish, exercise or defend legal claims or to protect the rights or interests of another individual in the public interest.

### **Personal Data Portability**

Users have the right to request and receive their Personal Data in a structured way as well as the right to have their Personal Data transmitted to another Processor, where technically feasible and not adversely affecting the rights and freedoms of others.

## **9. COMPLAINTS**

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If you have a complaint about the way U-LABEL handles or processes your Personal Data, you may lodge a complaint with the relevant supervisory authority, which for U-LABEL is the [Data Protection Authority in France](#). At first instance, we recommend that you direct any concerns or complaints to [contact@u-label.com](mailto:contact@u-label.com).

## **10. CHANGES TO THIS PRIVACY POLICY**

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This Privacy Policy may change from time to time when reviewed and in compliance with applicable laws and regulations. Your rights under this Privacy Policy will not be reduced without your explicit consent. Where changes are significant, you will be notified by email and/or by notice via the Website.