

Privacy Policy

In this document, Squadeasy's services refer to the Squadeasy mobile and web application produced by LiveHappier as well as the web platforms accessible on <https://squadeasy.com/>.

We have the utmost respect for our users' confidentiality. Since we created Squadeasy's services, we have been offering our services while adhering to a strong set of privacy principles.

Squadeasy's services are marketed by the simplified joint-stock company LiveHappier registered in the Paris Trade and Companies Registry under number 808 330 388, which acts as the data controller for Squadeasy's services.

Our Data Protection Officer maintains the registry of processing operations for Squadeasy's services as provided for in Article 30 of the GDPR. Users may contact the officer at the following email address: barth@squadeasy.com.

You have the right to file a complaint for any breach of the protection of your data with the National Commission on Data Processing and Liberties, www.cnil.fr.

If you have questions or comments about this Privacy Policy, please send an email to boogie@squadeasy.com or a letter to the address below:

LiveHappier
Le Cargo
157 boulevard Macdonald
75019 Paris

1. Personal Data Collection

Squadeasy's services collect information about you - including personal data - if you choose to share it with Squadeasy's services, create an account, or use, complete or download activities using Squadeasy's services. Squadeasy's services also collect information about how you use the services. This personal data must include your full name, email address, and password and may include your title, country of residence, how you use the equipment, your activities, route tracking (including information about date, time, geographic location and your speed and rhythm), your IP address, profile picture, and other images you provide. If you do not enter the required personal data, you will be unable to use Squadeasy's services.

Squadeasy's services also collect the Personal Data you entered in the contact form which allows Squadeasy to contact you in order to respond to and follow up on any questions you may have.

In addition, using Squadeasy's services may result in any personal data you enter being collected, processed or taken from you using our services: choice of team, choice of missions, number of points accumulated, whether or not you are employed by a partner company where relevant, the answers to the quizzes you participate in, graphs summarizing your performance, the full name you provide when you join a team and when you allow your team to benefit from a "boost", the contacts you choose to invite via Squadeasy, and your interactions with other users via the private chat.

If you choose to use Squadeasy's geolocation-based services, we will collect the geographic location of your device. Squadeasy's services can also collect and download data such as speed and direction from your device. You can prevent us from using certain geolocation data on your device or browser settings by deactivating "Location services".

You can use Squadeasy's services to access your contacts' contact details in order to get in touch with them via Squadeasy's services.

THIRD-PARTY SERVICES

Squadeasy's services let you sign up for and connect to Squadeasy via accounts that you create from third-party products and services like Facebook or Google (collectively, "Third-Party Accounts"). These Third-Party Accounts may request your permission to share certain information with Squadeasy. We use this information to verify your identity and provide you with features of our products and services. This information may include your full name, email address, profile information, and preferences with the relevant Third-Party Account. This information is collected by the Third-Party Account provider and is provided to Squadeasy's services as part of its privacy policy. Normally, you can control the information we receive from these sources through the privacy settings in your Third-Party Account.

2. How Information Is Collected, Processed and Stored

We use relevant personal data we collect to help us operate, provide, improve, understand, personalize, support, and market our services.

We operate and provide our services, which includes providing user assistance and improving, correcting, and customizing our services. We understand how people use our services and analyze and use the information we collect to assess and improve our services, research, develop, test new services and features, and perform troubleshooting activities. We also use your information to respond to you when you contact us.

Squadeasy's services collect the information you provide to us. You can also upload activities such as a path or a route to Squadeasy's services based on your geographic location. You can join challenges and contests, and communicate with other members. You can also provide additional personal information.

Squadeasy's services also collect various kinds of technical information including location, device, and network information, as well as cookies, log files, and analysis services.

We use cookies to operate, provide, improve, understand, and personalize our services.

YOUR RIGHTS

You have the right to modify, access, delete, transfer, limit the processing of, and decide on what happens to your data should you die.

If requested, Squadeasy's services will send you confirmation about when your personal data is processed and how to access your personal data.

You have the right to receive personal data about you that you have consensually or contractually provided to a data controller in a structured, commonly used, and machine-readable format. You have the right to transmit this data to another data processor without us preventing it.

You can define what to do in terms of storing, deleting, and transferring your personal data in the event of your death.

When we process your personal data with your consent, you have the option to withdraw this consent at any time. Doing so will not affect the legality of any processing which has been done on your personal data beforehand.

Requests to exercise your rights are to be performed by sending an email to boogie@squadeasy.com.

TERMINATION

Users may cancel their account at any time by clicking on a button on the website or mobile application. Any personal data will be deleted.

DATA RETENTION PERIOD

Unless the law imposes a specific retention period, we shall keep your personal data for a duration that does not exceed what is necessary for the purposes for which it is collected and processed.

As such, we keep your personal data attached to your account until you have deleted it, or for as long as your company uses Squadeasy's services. If you do not use our services for one year, we will delete your account and personal data.

COOKIES

When you consult our services, cookies will be stored on your device. A banner on the <https://squadeasy.com/> websites will inform you that we are using cookies to improve your experience. Generally, cookies and similar items work by assigning a unique number to your computer that has no meaning outside of Squadeasy's services. Squadeasy service cookies do not contain any information which could identify you personally; Squadeasy's services use cookies to personalize your experience. Squadeasy's services may also use cookies to help provide content specific to your interests. In addition, after entering your member ID and password when consulting the services online, Squadeasy records this information so that you do not need to enter it again during your session. The "Configure" option which appears on the <https://squadeasy.com/> site allows you to choose which categories of cookies are active. You can also "refuse" to collect information through cookies or other tracking technologies in order to actively manage the settings on your browser or mobile device. You can consult your browser's technical information or your mobile device to find out how to delete or deactivate cookies and other tracking/recording tools. If you have any questions about how to refuse cookies or other tracking/recording tools, contact us at boogie@squadeasy.com. Refusing cookies may disable some of the services' features. Squadeasy's services may also use your IP address to identify you, administer services, and diagnose problems that may occur with Squadeasy's servers.

When you access third-party sites advertising Squadeasy's services or when you view these advertisements, cookies may be created by the companies which publish them. These third parties may use cookies as part of Squadeasy's services. These partners or other third parties who provide content or services available on Squadeasy's websites are responsible for the cookies they set and their cookie provisions apply. Squadeasy's services assume no responsibility for any use of cookies by these third parties. For more details, you are advised to consult the cookie policies directly on the websites of these advertisers or third parties.

PURPOSES OF PROCESSING AND LEGAL BASIS

The main purpose of collecting your personal data is to offer you a fun, social and connected physical activity experience that is safe, optimal, effective, and personalized. To this end, we use your personal data for the following purposes:

- Executing the contract:

- to provide our services (including “social” features such as the chat which you may choose to use) and to ensure that they operate properly, including checking your identities for this purpose
- Our legitimate interest in evaluating and improving our services:
 - customizing, evaluating and improving our services, content, and documentation
 - analyzing the volume and history of your use of our services
 - resolving any problems to improve how you use our site and services
 - preventing, detecting and investigating all activities which are potentially prohibited and illegal or contrary to good practice, and ensuring compliance with our general conditions of use and sending policy
- Your consent:
 - informing you about our services and our partner companies’ services if you have given authorization to receive our newsletter on Squadeasy or your company has expressly authorized us to do so on the Squadeasy corporate version
 - processing your geolocation data as part of how we monitor the physical activities you use Squadeasy’s services for
- complying with our legal and regulatory obligations

NEWSLETTER AND MARKETING EMAILS

Every newsletter and marketing email we send includes a link to unsubscribe from our services. Users who have specifically chosen to receive Squadeasy’s services newsletter can easily unsubscribe at any time by following the links to unsubscribe from our services in any of these emails.

ANALYSIS SERVICES

Squadeasy’s services use analytics providers such as Google Analytics to understand how our services are used and help us improve them. You can refuse to use Google Analytics cookies via the “Configure” option in the banner on our site <https://squadeasy.com/>.

3. How we protect your personal data

We take very strict measures to protect our data collection, transmission and storage. These measures depend on the sensitivity of the data that we collect, process and store. Squadeasy’s services use a company that is an industry leader in online security verification and services to enhance the security of our services. The services are registered with the site identification authorities so that your browser can confirm the identity of Squadeasy’s services before sending personal data. In addition, Squadeasy’s secure servers protect this information by using advanced firewall technology.

The effectiveness of these measures to prevent people from accessing your personal data without authorization relies on the security features your browser offers you. It is recommended that you use a browser with security features to submit your credit card data and other personal data to the

services, where applicable. Note that if you are not using an SSL compatible browser, your data may be intercepted.

Most browsers are able to notify you if you are switching from secure to unsecured communication, if you receive invalid credentials for the services you are communicating with, or if you are sending information over a non-secure connection. Squadeasy's services recommend that you activate these functions in your browser to ensure that your communications are secure. You can also monitor the URL of the services you visit (secure URLs start with https:// and not http://), as well as your browser's security symbol, to see if you are communicating with a secure server. You can also view the security certificate details of the services to which you are connected. Check the validity of any service which you connect to via secure communications.

DATA STORAGE LOCATION

Our servers are hosted by OVH, France.

The servers are spread over 2 sites in France: Roubaix and Gravelines

For more details about locations, please consult the site:

OVH website

SECURITY

As part of its services, Squadeasy attaches the utmost importance to the security and integrity of its customers' personal data.

As such, and in accordance with the GDPR, Squadeasy commits to taking useful precautions in order to preserve the security of the data and protect it against any accidental or illegal deletion, accidental loss, modification or unauthorized access, as well as against any other form of unlawful processing or communication to unauthorized parties.

For this reason, Squadeasy implements industry standard security measures to protect personal data from unauthorized disclosure.

In addition, Squadeasy has set up the appropriate electronic, physical and management procedures to safeguard and preserve the data it collects through its services to avoid any unauthorized access and ensure that the data is used correctly and accurately.

However, no one can consider themselves completely immune to a computer attack. This is why if a security breach does affect you, Squadeasy agrees to inform you as soon as possible and to do whatever it can to neutralize the intrusion and minimize its impacts. If you incur any damages due to a third party exploiting a security breach, Squadeasy commits to provide you with all the necessary assistance so that you can assert your rights.

Please bear in mind that any user, client or hacker that discovers a security breach and exploits it is liable to criminal prosecution and that Squadeasy will do everything in its power to protect the data and rights of its users and to limit the impact to the utmost, including filing a complaint and/or taking legal action.

Complying with the recommendations of the National Data Protection Commission about password security levels requires that your account password should contain at least 8 characters, 1 number and 1 special character.

4. How your personal data is shared

You provide us your information when you use our services and we share your information to operate, provide, improve, understand, personalize, help and market our services better.

THIRD-PARTY SERVICES

When you use the third-party services which are integrated into our services, these third parties may receive personal data that you provided. If you interact with a third-party service linked to our services and identified as such, you may provide information directly to that third party. Please note that when you use third-party services, their conditions and privacy policies govern how you use these services.

PERSONAL DATA RECIPIENT

Squadeasy's services may provide your personal information (including your email address and name) to the following third-party categories:

- Partners
- Customers

In addition, if you use Squadeasy's services with your company or as part of an event organized by a company, we will provide the following personal data to that party: team score, team ranking, and professional email address for the sole purpose of administering the event on the basis of their legitimate interest in organizing and administering such an event in the context of their charitable and commercial activities and, where appropriate, for marketing purposes if you have given specific consent.

INFORMATION SHARED BY YOU

If you link your Squadeasy's services account to other social networks and share your activities there, they will be visible outside of the services. If you choose to share or publish your location information via these third parties, malicious people may be able to access this information. You should be careful when sharing information via third parties and should carefully consider these third parties' privacy practices.

5. Updates to our privacy policy

We may modify or update our Privacy Policy. We will send you notice of any changes to this Privacy Policy and update the date it was last modified at the top of the page. By continuing to use our services, you confirm that you accept our modified Privacy Policy. If you do not agree with our updated Privacy Policy, you must stop using our services. Please consult our Privacy Policy on a regular basis.