

Archive Valley Privacy Policy

1. General

For the purposes herein, all capitalized terms shall have the meanings ascribed in the General Terms and Conditions.

This document (the “**Privacy Policy**”) is designed to inform Visitors and Users (hereinafter referred to as “**you,**” “**your**”) of the Website about the commitments ARCHIVE VALLEY (hereinafter referred to as “**ARCHIVE VALLEY,**” “**we,**” “**our,**” “**us**”) is taking in order to respect privacy and protect the personal data collected, stored and processed when using the Website and the Services or otherwise when interacting with us.

In this matter ARCHIVE VALLEY acts as data controller in compliance with the data protection rules and the regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 as from its entry into force, namely 25th May, 2018 (hereinafter referred to as the “**GDPR**”). Information of registered Users on the site will be saved in compliance with the Data Protection Act of the French law (Act n°78-17 of 6 January 1978) and in compliance with the GDPR.

The legal basis of our processing of your personal data is the following:

- (i) The legitimate interest resulting from your voluntary provision of your personal data when visiting the Website, as these data are aimed at enabling us to better answer to your information requests about our Services;
- (ii) Your consent to our display of your testimonial and your user stories, as set forth in section 2, as well as to our use of social network cookies and analytics cookies, as set forth in section 9;
- (iii) Processing is necessary for the performance of the contract to which you are party for purposes of using our Services on our Website.

At the time of registration as a User, you warrant the accuracy of all information

provided.

You are invited to read this Privacy Policy with attention. If you do not agree with this policy, you must not access or use our Website and Services or interact with any other aspect of our business.

2. **What information we collect about you**

We collect and process information about you when you provide it to us voluntarily by filling in the various forms available within the Website and when you use our Services, as further described below.

2.1. **Information you provide to us**

We collect information about you, including information that can identify you directly or indirectly as a natural person (“**Personal Data**“), when you input it into the Website and/or Services or otherwise provide it directly to us, when you correspond with us by phone, e-mail or otherwise, when you reply to survey or questionnaires.

The information you give us may include:

- Mandatory information in relation with the Website’s registration and contracting process, such as your first name, last name, username, password, email address, phone number, company name, professional and expertise information, city and country of residence. Archive Valley will collect, process and use those data for the purpose of providing you with our Services. We will not be able to provide you with the Services offered if the required information is not provided;
- Optional information required for the purpose of the use and performance of our Services and in particular for the creation of your Account and of your Profile, such as your photograph, languages spoken, mini-biography, job title, CV, IMDB link, basic professional information, daily rates, subscription preferences, and any other User Content;
- Your name, email and comments as submitted through our Website’s contact form;

- A record of any Request and Purchase of Archive Content you have placed through the Website;
- A record of any Assignment you have placed or received through the Website. Note that information related to the Assignments are not considered as Personal Data;
- A record of any correspondence, meeting, phone call between you and us;
- Payment and financial information such as details of accounting, billing or financial transactions including transactions carried out through our Website or otherwise, agreements made between Users, proof of payments and invoices. For purposes of the Services, this also may include information such as your payment card or bank account details, which are collected, processed and stored on our behalf through the services of our payment provider Stripe and in accordance with their Stripe's General Terms and Conditions. We do not have access to these data;
- Information about third-parties, such as the email and the name of a representative or entity when you act on his/her behalf during the Request and Purchase of Archive Content process, for example when you input the licensee's contact detail in the quote request form. By doing so, you acknowledge that you were given the consent and all the necessary authorization from such third-parties before giving us those Personal Data;
- Scan of a proof of identity and business-related documents when necessary, in accordance with applicable laws and in compliance with the Know Your Customer principle;
- Details of your visits to our Website and the resources that you access;
- Your comments, feedbacks and your replies to any surveys or questionnaires, which may be used for analytic and user understanding purposes;
- Information required when you want to report a problem with our Website or our Services or when you decide to engage with our team to ask for a specific support. This information provided through any of our support channels may include contact information and a summary of the problem you're experiencing;
- Your testimonial and your user stories in relation with the Website and your use of our Services, that we display with your permission, alongside with your name, through our Website and different communication channels, including our social media and our newsletters;

- Details of oral or written Interview about you that we publish with your permission, alongside with your name, on our blog, social media channels or newsletters.

2.2. Information we collect indirectly

- We inform you that we may process indirectly your email address from other users of our services, when these users request that we send you an invitation to register on the Website.

- **2.3. Information we collect automatically**

With regard to each of your visits to our Website we may collect, in accordance with applicable laws and where required with your consent, information relating to your activity on our Website, to the devices you use and the networks you are connected to when using our Services. This may include the following information: your IP address, log-in information, browser type and version, browser plug-in types and versions, operating system and platform, information about your visit including the URL clickstream to, through and from our Websites, features you viewed or searched for, download errors, length of visits to certain pages, page interaction. We collect this information through the use of various technologies including Django error reporting, Javascript and Python SDK, as well as cookies (see below section 9 for further information).

3. How we use information we collect

How we process the information we collect depends in part on which Services you use, how you use them, and any preferences you have communicated to us. If you are an individual in the European Economic Area (EEA), note that we collect and process information about you only where we have legal basis for doing so under applicable EU laws.

We use information for the following purposes :

3.1. To provide you with our Services and improve your experience

We use information about you to provide the Services to you, including to authenticate you when you log in, connect you with other Users, enable you to communicate and interact with other Users, identify you to other Users, personalize your Profile, process transactions with you, collect your payments, send you alerts via our Email Notification Service, provide customer support, operate, optimize and maintain the Services.

Processing your information for this use is necessary for the Performance of our mutual

contractual obligations and to satisfy our legitimate interests.

3.2. To administer our Website and Services and for internal operations

This use may include troubleshooting, data analysis, testing, research and development, analytic, statistical evaluation and survey purposes.

This processing is based on our legitimate interest, such as ensuring the security of our Website and Services and improving its features, contents and Services.

3.3. To communicate service-related information

We use your contact information, such as your email address, to send communications via email and within the Services, including sending you Email Notifications when you or other Users interact with you on Services, sending you messages in relation with the Personal Assistant Service, confirming your purchases including the Purchase of Archive Content, reminding you of subscription expirations, notifying you about changes of our Services or pricing, requesting transaction reportings in relation with the Services provided, responding to your comments, questions and requests, providing customer support, providing you tailored communications based on your activity and interactions with us, sending you technical notices, any pricing, feature, legal or Services updates, user guides, tooltips, security alerts, and administrative messages. Beside those electronic communications, we may use any other means to communicate you any service-related information, including your telephone number to call you.

This processing is necessary for the performance of our mutual obligations, meaning these communications are part of the Services and in most cases you cannot opt out of them. This processing is also necessary for compliance with our legal obligations and/or the establishment, exercise or defence of legal claims.

3.4. For customer support

We use your information to resolve technical issues you encounter, to respond to your questions and to your requests for assistance, to analyze crash information, and to repair and improve the Services.

Processing your information for this use is necessary for the performance of our mutual contractual obligations and may be necessary for the establishment, exercise or defence of legal claims.

3.5. To market, promote and drive engagement with the Services

We use your contact information and information about how you use the Services to send promotional communications that may be of specific interest to you, including by

email. These communications are aimed at driving engagement and maximizing what you get out of the Services, including information about new survey requests, blog articles, newsletters, offers, suggestions, and events we think may be of interest to you. Part of those communications requires your consent using the opt-in option in your Account settings, and at any time you can control whether you want to receive these communications or withdraw your consent using the opt-out option. We keep track of your subscription preferences.

In case you do not wish to receive these communications, you have the possibility to opt-out of receiving them when your data are collected or at any moment during your use of our Services, by logging into the Website and using settings available within the Services or your Account .

3.6. For safety and security

We use information about you and the Services to verify Accounts and activity, to monitor suspicious or fraudulent activity, to manage litigation, disputes and complaints, to identify violations of Services policies, to enforce our Terms and Conditions, to disable your Account.

This processing is necessary for the performance of our mutual contractual obligation and for compliance with our legal obligations and/or for the establishment, exercise or defence of legal claims.

3.7. For identity verification and company check

We may verify the information contained in your proof of identity and in your business documents, including transactional documents, that may be collected from you at the time of registration or at any other time during your use of our Website and Services. Since our Website and Services are only accessible to persons acting in a professional capacity, this processing is necessary for the performance of our mutual contractual obligations, carried out for the establishment, exercise or defence of legal claims and/or for compliance with our legal obligations.

3.8. To respect our legal and regulatory requirements, as well as to protect our legitimate business interests and legal rights:

Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with

legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

4. **How we share information we collect**

4.1. With our Users through our Website and Services

When you use our Services, some information about you is shared with other Users of Archive Valley on your public Profile, such as your first name, photograph, languages spoken, mini-biography, job title, IMDB link, professional and expertise information, city and country of residence. When reasonably necessary, we may disclose or anonymize such information to comply with legal proceedings and/or to enforce any agreement with our Users (such as our Terms and Conditions).

We do not share your email and telephone number with other Users, including Archive Vendors.

4.2. With our Users and Visitors in our blog and our communication

With your consent, we share information about you, such as testimonials, comments, interview alongside with your name, in our public blog which is accessible by any Visitor and User. We also share it with our Users through our newsletters, communication emails and text messages.

4.3. With third-parties

The only persons who have the right to access your personal data are:

- our personnel
- the services in charge of control (including external auditor)
- our subcontractors. We work with the following subcontractors: Amazon AWS, Stripe, Hubspot, Intercom, Mailchimp, Hotjar, Google Analytics, Google Ads, Google Drive, Gmail, Wordpress, Trello, Slack, Dropbox, Python SDK, Stripe ;
- partners with whom we may work for the performance of our activities, **with your consent**.

We seek guarantees from those service providers acting as data processors under the GDPR on their compliance with the rules set out in the GDPR. To this end, their processing of your personal data are governed by a Data Processing Agreement that sets out the subject-matter and duration of such processing, its nature and purpose, the type of personal data and categories of data subjects and their obligations.

We may also give access to your personal data to government agencies, for the sole purposes of meeting legal requirements, or to representatives of the law, ministerial officers and organizations responsible for the collection of debts.

4.4. We do not sell your Personal Data to any third-parties.

5. **How do we store, secure and transfer information we collect**

5.1. Servers and the storage of information

We use the data server and data hosting service provider Amazon Web Services, Inc., to host and store the information we collect and we use technical measures to secure your data. The data transfer between our Services and the server is [SSL] encrypted.

While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on Amazon Web Service' servers or otherwise in our care, is absolutely safe from intrusion by others.

5.2. Transfer outside the EU

We collect information internationally. Your information is stored in the US, in servers managed by Amazon Web Services, Inc. This company has joined the Privacy Shield which has been deemed adequate to enable data transfers under EU law by the European Commission on July 12, 2016 see [the adequacy determination](#)). To learn more about the guarantees that it provides, please visit [the Privacy Shield website](#).

We or our third-party service providers may transfer your information internationally wherever we or our third-party service providers operate for the purpose of providing you the Services.

We ensure that our third-party service providers either have joined the Privacy Shield or have entered into a contract with us which contains standard contractual clauses that have been approved by the European Union Commission.

5.3. Your password

The access to your Account and our Services is only possible after entering your personal password directly. Passwords are hashed in our system. Where you have chosen a password, you are responsible for keeping this password confidential and for not sharing it with anyone. You can reset your password at any time.

6. **How long do we keep information**

The information we collect about you will be stored for the duration of your relationship with us. We will then either put beyond use, delete or anonymize your Personal Data :

- 5 (five) years after your last use of our Website, if you did not close your Account and in case you decide to re-active the Services ;

- 3 (three) years after the closing of your Account.

While anonymizing such information, any information provided through the Request and Purchase of Archive Content process and through the Assignment process will remain and will be still displayed, including the messages you sent to other users.

Payment and financial data information is stored for the duration required by applicable tax and accounting laws.

We archive some of your information from closed Accounts as necessary to comply with our legal obligations, resolve disputes, enforce our terms and conditions, support business operations, troubleshoot problems, assist with any investigation, prevent fraud, collect any remaining fees that are due, continue to develop and improve our Website and Services, and take other actions otherwise permitted by law. Where we retain information for Website and Service improvement and development, we take steps to eliminate information that directly identifies you.

In the event that your Account is suspended or blocked, we will keep your information for a period of 5 (five) years in order to prevent you from circumventing the rules applying to our Website and Services.

7. **How to access and control information**

You may exercise the following rights attached to your Personal Data:

- Right to access to your personal data,

- Right to rectify your personal data,

- Right to limitation of treatment,

- Right to opt-out of communication, as stated in section 3.5, as well as to oppose to the processing of your data. We may however carry on with this processing if there are legitimate reasons for it that should prevail over your rights and freedoms or if it is required in order to establish, exercise or defend our rights before courts ;

- Right to oblivion, by requesting the deletion of your data and forbid any future collecting and processing;

- Right to data portability by obtaining a copy of Personal Data we hold about you in an electronic format,
- Right to deactivation of your Account,

You can exercise these rights by contacting us at the following addresses:

- Email address: hello@archivevalley.com,
- Postal address: ARTCHY, 176 avenue de Charles de Gaulles, 92522 Neuilly-sur-Seine, France ;

or by using the appropriate setting which is made available within your Account in order to inform us about your request.

Before responding to your request, we may ask you to verify your identity and provide further details so we can better respond to your request. We will endeavour to respond within an appropriate timeframe and, in any event, within any timeframe required by law.

Your request and choices may be limited in some cases, for example we will retain certain information about you as permitted by law or when we have compelling legitimate interests to keep them.

8. Submission of a complaint before a supervisory authority

You have a right to submit a complaint before a supervisory authority which is competent in the member State in which your ordinary residence, your place of work or the place in which the infringement of your rights was committed (in France, the French Data Protection Authority – CNIL), if you consider that the personal data processing under this Privacy policy is a violation of the applicable regulations.

This complaint submission may be exercised without prejudice of other legal action before any administrative or judicial court. In fact, you have also a right to effective administrative and judicial redress if you consider that the personal data processing under this Privacy policy is a violation of the applicable regulations.

9. Cookies and other tracking technologies

A cookie is a small text file that is stored and/or read by your web browser on the hard disk of your end device (e.g. computer, laptop or smartphone) by websites you visit.

9.1. How do we use cookies

We and our third-party service providers may use cookies and other similar technologies to collect information in order to offer you a better and more personalised browsing experience, to allow you to access and use the Services without re-entering your username or password, to remember your preferences, to understand Users activities, the usage of our Services and the interests Users, to identify areas for improvement such as navigation and user experience, to improve our Website and Services, to measure and document the effectiveness of different features, offers and electronic communications, and to present you with information and messages relevant to your use of our Website and Services.

These cookies and other technologies are essential in order to provide you with the Services and to enable you to move around the Website and use its basic functions, for functionalities when it recognizes you, for performance and for analytics to gather information about how to Website and our Services are used.

We may also use social media cookies. These cookies are placed only with your consent. You have the possibility to have information on their nature, accept them or refuse them.

We do not use targeting cookies or advertising cookies. However, should we decide to use them in the future, we will inform you in advance, so that you may have the possibility to consent or not to their placement.

We use Google Analytics, an audience analysis statistics tool that generates a cookie that enables us to measure the number of visits to our Website, the number of page views and visitors' activity on the Website. Your IP address is also collected to determine the city you are connecting from. This cookie is placed only with your consent. You have the possibility to accept them or to refuse them.

9.2. How to opt-out

To opt-out of our use of cookies, you can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from websites you visit. You will not be able to opt-out of any cookies or other technologies that are strictly necessary for the Services. If you do not accept cookies, however, you may not be able to use all aspects of our Services.

10. Right to define instructions related to the processing of data after your death

You have the right to define instructions with regard to the storage, the erasure and the communication of your personal data after your death.

These instructions may be general directions, which are focused on all personal data concerning you. In such a case, they must be registered with a digital trusted third party who is certified by the French data protection authority (CNIL).

These instructions may also be specific to the data processed by our company. You are then required to provide these instructions to us at the:

- Postal Address: ARTCHY, 176 avenue de Charles de Gaulles, 92522 Neuilly-sur-Seine, France ;
- Email Address: hello@archivevalley.com,

By providing to us these instructions, you hereby expressly consent that they be stored, transmitted and carried out on the terms and conditions set forth herein.

You have the right to appoint in your instructions a person in charge of their execution. After your death, this person shall be entitled to take knowledge of these instructions and to request to us their implementation. Failing to such an appointment, your heirs shall be entitled to take knowledge of these instructions and to request to us their implementation.

You may modify or revoke your instructions at any time, by writing to us at the above mentioned contact addresses

11. **Links to other websites and social media**

Our Website and Services may contain links to and from the websites of our partner networks and our Archive Vendors networks. If you follow a link to any of these websites, please note that these websites have their own privacy practices and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal Data to these websites.

12. **Can we change the Privacy Policy?**

We reserve the right to change this Privacy Policy at any time, taking into account currently applicable data protection provisions. Any changes we may make to our Privacy Policy will be posted on this page. Where appropriate, we will notify you or seek your consent. Please check back frequently to see any updates or changes to our Privacy Policy.

13. **Contact us**

For any questions, you can contact us at the following address:

ARTCHY, 176 avenue de Charles de Gaulles, 92522 Neuilly-sur-Seine, France
or use hello@archivevalley.com.

This Privacy Policy became effective on the 10th September, 2018.