



PRIVACY POLICY

I. FOREWORD

Bayard Presse SA, a Public Limited Company governed by a Management Board and a Supervisory Board with a share capital of €16,500,000, its registered office at 18 rue Barbès, 92120 Montrouge, along with its subsidiaries, and in particular Bayard Editions, Milan Presse, Editions Milan, Bayard Média Développement and Bayard Services, hereinafter jointly referred to as “Bayard Group” provides content, products and services through various online platforms.

This Privacy Policy details Bayard Group’s commitments regarding the protection of your personal data as customer or web visitor and service user. It sets out how your personal data is collected and used, as well as your rights in this respect.

Bayard Group complies with the French Data Protection Act, no. 78 of 6 January 1978 as amended, the French “Trust and the Digital Economy” Act, no. 2004 – 575 of 21 June 2004 as well as the General Data Protection Regulation 2016/679 of 27 April 2016 (“GDPR”).

Bayard Group has appointed a Data Protection Officer who is responsible for properly applying the law and ensuring your rights to access, rectify, object, erase, restrict and portability created by the aforementioned texts (dpo@bayard-presse.com).

Bayard Group's Privacy Policy applies on top of the General Terms and Conditions of Usage and General Terms and Conditions of Sale of websites where they exist.

II. WHAT PERSONAL DATA IS COLLECTED ON OUR WEBSITES AND WHY?

As Data controller under the French Data Protection Act and the GDPR, Bayard Group is responsible for the personal data it collects.

The data is collected to allow you, as client, prospect or ordinary user of our services, to receive personalised information, to manage your orders, as well as enable us to offer you tailored commercial offers and, where applicable, to pass on offers from our partners. This data also allows our departments to run and improve our marketing activities and services for our clients.

When collecting your personal data, you are advised when the requested information is required, in order to be able to enjoy a service, and when it is optional, as well as of the consequences of not providing us with a particular piece of information. You are also informed of how Bayard Group will use your data, of your right to access, rectify, object, erase, data portability and processing restrictions, and of the fate of your data after your death.

Self-reported data: Bayard Group collects the data needed to use the service of your choice, or to manage your order. The data collected for this purpose may include: your first names and surnames, your postal address, your email address, your telephone number and your date of birth. This may be supplemented by information on your household (number and age of children, areas of interest).

You may also be asked if you would like to receive commercial offers from Bayard Group or its partners. Pursuant to the French “Trust and the Digital Economy” Act, you must clearly express your consent by ticking a box confirming your agreement, as the case may be. You will of course be able to change your mind at any time and exercise your rights to object, erase or restrict. However, you cannot call into question the legality of the processing prior to the removal.

All this data is stored in our customer database, in order to communicate with you and tailor offerings to your needs.



Behavioural data: you may fill out online surveys run by Bayard Group in your capacity as a customer and/or user of products or services. Such surveys are anonymous. However, we may ask for your agreement to retain self-reported behavioural data that is linked to your customer account. You are then advised of your rights to access, rectify, erase and object and how to exercise them.

Browsing data: We may also collect data concerning any interactions you have with Bayard Group services (page loads, button clicks, click rates on newsletters, banners, etc.) in order to provide tailored offerings, and in general improve our services in line with customer expectations. In such circumstances, we therefore collect and process this data with your agreement. You are then advised of your rights to access, rectify, object and erase, data portability and processing restrictions, and how to exercise them.

This data is then collected by trackers and/or cookies. A cookie is a small text file stored on your computer's hard disk at the request of the server running the website visited. It contains information on browsing history on this website and facilitates subsequent usage of the website the next time you visit. The information collected by a cookie can only be read by the party creating it. You can refuse to store cookies, but should you do so you may have reduced access to the services on offer (see Clause VII).

Data not collected directly from you: In certain instances, your Personal Data may have been collected from third parties. Accordingly, Bayard Group may collect Personal Data from its partners. These sources are not public. Where necessary, we will certainly provide you with full information on the processing as well as all necessary information on how to exercise your right to object, erase, restrict, access, rectify and portability.

Data of minors under the age of 15: if you create an account on one of our websites **in the name of your child** in your capacity as holder of parental authority, you are informed that personal data relating to your child under the age of 15 will be processed and used by the Bayard Group in accordance with this Privacy Policy.

In the event that your child is under 15 years of age, and his/her consent is necessary for the processing of personal data in accordance with Article 6 (1) (a) of the GDPR, you will be asked, in your capacity as holder of parental authority, to consent to the processing of your child's data by Bayard Group.

III. HOW DOES BAYARD GROUP USE YOUR PERSONAL DATA?

1. Self-reported data

Self-reported data is required in order to record and manage your orders and use the services offered by Bayard Group websites.

Data on your areas of interest or the make-up of your household may allow Bayard Group to make tailored offerings.

Your email address may be used in the following manner:

- *If you are a customer of a Bayard Group company, that company may offer you similar products to those you have already ordered.*
- *When collecting your email address, or at some later point, you may be asked to tick a box confirming you agree to receive commercial offers from Bayard Group. If you agree to tick this box, Bayard Group may email you offers for products it markets.*
- *Similarly, you may elect to receive offers from Bayard Group partners by ticking the appropriate box. If you agree, Bayard Group partners may email you commercial offers.*

In any event, you may opt out of receiving commercial offers by email:

- By using the unsubscribe link at the bottom of all commercial emails from Bayard Group; or
- By sending a letter to the following address: Bayard (CNIL), TSA 10065, 59714 Lille Cedex 9.
- Or by writing an email to our DPO at the following address: dpo@bayard-presse.com.

Moreover, in accordance with French Act 2014-344 of 17 March 2014 on consumer affairs, you can opt out of cold-calling by adding your number to the national "Bloctel" opt-out list: <https://conso.bloctel.fr>.



Bayard Group would, nevertheless, like to inform you that there are exceptions. In fact, by law you can be called if:

- *You are our customer;*
- *You have given your number unequivocally;*
- *The call is to offer to send you newspapers, periodicals or magazines or to support the work of some charity.*

Should Bayard Group be notified of your death, this information will be recorded in our files so that no further marketing materials are sent. Your data will then be erased from our database.

2. Browsing data

When you visit Bayard Group websites, cookies may be stored on your computer. The Bayard Group complies with Article 82 of the French Data Protection Act no. 78-17 of 6 January 1978, as amended, the GDPR and the CNIL recommendation(s) concerning cookies and tracers.

- When you first visit a website, a consent management application informs you that the website publisher and its partners use cookies to provide you with the services. The various purposes justifying the use of cookies are presented to you. You can then accept or refuse them. Similarly, the list of partners of the website publisher using cookies is displayed to you, with the possibility of accepting or refusing them.
- The following trackers and cookies are not concerned and may be deposited without your consent in accordance with the recommendations of the CNIL:
 - o trackers to save your choice regarding the depositing of trackers (or your desire not to express a choice);
 - o trackers to identify you with a service that you have requested;
 - o trackers intended to memorise the content of a shopping cart on a merchant site;
 - o user interface customisation trackers (for example, for the choice of language or presentation of a service), when such customisation constitutes an intrinsic element expected by the service user;
 - o trackers used to balance the load of hardware contributing to a communication service;
 - o trackers used by paid sites to limit free access to their content to a predefined quantity and/or over a limited period;
 - o audience measurement trackers that benefit from the consent exemption within the framework specified by Article 5 of the Guidelines on cookies and other trackers of 4 July 2019.

Once your consent has been sent, it will be retained for thirteen (13) months by Bayard Group. At the end of this period, or before in the event of the addition of purposes or partners, you may be asked to provide new consent.

You can change your choices at any time by clicking on the “Cookie management” link at the bottom of our websites.

Pursuant to current regulations, browsing data may be sent to the relevant authorities upon request.

3. Security of personal data

Bayard Group uses all technical means to ensure the security of your personal data, and to prevent any risk of loss, deterioration or improper use thereof.

IV. WHO RECEIVES YOUR PERSONAL DATA?

The Personal Data collected is for Bayard Group and its subsidiaries. Your other Personal Data is not communicated to third parties, except in the following instances:



- When you have already agreed to share and/or disclose your Personal Data, including via functionality offered by Bayard Group websites;
- When Bayard Group must share your Personal Data with its subcontractors, service providers and/or technical service providers for the purpose of providing the requested services, in particular the shipping and delivery of your subscriptions and orders and the management of your subscriptions, as well as the resolution of operating problems of the services, the processing of payments, the analysis of data, the processing of mailing campaigns, the management of information flows of subscriptions and re-subscriptions, the hosting of services and the processing of certain marketing aspects of the services;
- Where required by law, regulation or order of a competent regulatory or judicial authority or, should it prove necessary, to protect its rights and interests, Bayard Group may share your data;
- In the event of a change of control at Bayard Group and its subsidiaries or the disposal of some or all of its assets, Bayard Group will be permitted to transfer your Personal Data;

You are also informed that the Bayard Group may send your name and postal address to its business partners so that they can offer you their services. You may object to this.

Bayard Group may also send your email address to its business partners, on the express condition that you have agreed to this transmission by ticking a box.

Bayard Group does not share your other Personal Data with third party advertisers for the purposes of targeted marketing unless you have already consented. It should, however, be noted that advertisers may obtain your Personal Data from other public sources. Bayard Group may not be held liable in this regard.

However, Bayard Group may use and share with third parties certain technical or non-personal aggregate data regarding your browsing on Bayard Group websites. The collection, processing and disclosure of such anonymised data shall not be subject to the restrictions set out herein.

V. HOW LONG IS YOUR PERSONAL DATA STORED?

The period of time for which your Personal Data is retained may differ depending on the purpose for which it was collected.

Bayard Group may be required by law to retain certain information for a minimum period. In other cases, your data will only be retained to complete the intended purpose (in this scenario, for the period strictly necessary for the management of the commercial relationship, namely seven years from the end of your last subscription agreement with Bayard Group or, if you are not a customer, three years from your last contact with Bayard Group), or in line with applicable regulations.

The information stored on your device (e.g.: cookies), or any other item used to identify you and allowing its traceability as well as raw traffic data containing an ID, will not be retained for more than thirteen months.

VI. WILL YOUR PERSONAL DATA BE TRANSFERRED ABROAD?

In order to deliver its services and in particular to manage information on subscriptions and subscription renewals, Bayard Group may transfer, purely for these purposes, your Personal Data to sub-contractors based outside the European Union (specifically in Morocco and Madagascar). To ensure your privacy and Personal Data are respected, the sub-contractors in question sign up to standard contractual clauses established by the European Commission.

VII. COOKIES

A. COOKIE MANAGEMENT

A cookie is a text file that stores information on your web browsing. This file, served by a server when you visit a website, is saved on the user's hard disk and cannot either contain a virus or be executed. It isn't running. Moreover,



you can read it, delete it or change it. A cookie cannot be used to retrieve Personal Data or information from your hard disk or read your email address.

Bayard Group websites use cookies for a whole series of reasons. A cookie in particular allows you to receive personalised offers, identify you when you log in to your customer account, store items in your basket after you log off, but also indirectly pay for the free services we offer you on our various websites.

Pursuant to the Order of 24 August 2011 on the application of European directives on the protection of online privacy, a cookie cannot be stored on your computer without your prior consent (except in the case of the legal exceptions provided in III(2) of this Privacy Policy). Bayard Group is thus obliged to get your prior consent, which is valid for at most thirteen (13) months.

How do you express your preferences?

You have a number of options for managing Cookies, accepting or refusing them. You can:

- *Use the consent management platform (CMP) (a);*
- *Configure your browser as you see fit (b);*
- *In the case of advertising cookies, use a system developed by the Internet advertising industry (c);*
- *Directly express your choice to the party creating the cookie in the case of analytical cookies or cookies used by social media platforms (d).*

a) Use the consent management platform offered to you when you first connect to the website

On the first page of the consent management platform, you have comprehensive information on the purposes of the various cookies used on the website. You can either:

- Accept all cookies and continue browsing;
- Configure your choices:
 - On the second page of the consent platform, you can exercise your choices according to each purpose of data collection by the cookies deposited by the website. You can click on “Accept all” or “Reject all” and continue browsing, or configure your choices regarding partners.
 - On the third page, you can configure your choices by partner.

Please note that your preference can only be recorded if you use the same browser and have not deleted your browsing history and/or cleaned your cookies in the meantime.

You will be asked again each time you have deleted your history and/or cleaned your cookies or every thirteen (13) months.

b) Configure your browser

Most browsers accept cookies by default. You can, however, decide to block these cookies or ask your browser to alert you when a website attempts to store a cookie on your device. With that in mind, we hereby inform you that you can configure your browser to block cookies being stored. Each browser manages cookies and your preferences in a different way. Use the help menu on your browser to learn how to modify your cookie preferences.

- **Safari:** <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
- **Opera:** <https://help.opera.com/en/latest/web-preferences/#cookies>
- **Chrome:** <https://support.google.com/chrome/answer/95647?hl=en&hlrm=en>
- **Internet explorer:** <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>
- **FireFox:** <https://support.mozilla.org/en-US/kb/disable-third-party-cookies>



c) Set your preferences online using an industry platform to refuse purely advertising cookies

The “Youronlinechoices” platform, funded by the Internet advertising industry in the form of the European Digital Advertising Alliance (EDAA) and managed in France by Interactive Advertising Bureau France, allows you to refuse or accept the Cookies used by member companies to tailor the adverts you may see on your device to your browsing information: <https://www.youronlinechoices.com/uk/your-ad-choices>.

Please note, your preferences will not stop adverts being displayed but will block technologies designed to tailor advertising to your areas of interest.

d) By directly refusing at the party creating this cookie in the case of analytical cookies or cookies used by social media platforms

➤ **Analytical cookies**

Bayard Group uses a tool enabling it in particular to measure traffic on its websites: **Google Analytics**.

If you do not want this tool to collect or use your information, you can unsubscribe at this page: <https://tools.google.com/dlpage/gaoptout?hl=en>

You can also deactivate the Google Analytics advertising functionality, using the Network Advertising Initiative opt-out page at this address: <http://www.networkadvertising.org/choices/>

➤ **Social media platform cookie**

To review the purpose and scope of the data collection, processing and use of data by the social media platforms you have joined, along with your rights and options to change preferences to protect your privacy, we would encourage you to check out their Cookie management policies on their websites.

- Facebook: <http://www.facebook.com/about/privacy/>
- Google+: <https://policies.google.com/privacy?hl=en>
- Twitter: <http://twitter.com/privacy>
- Instagram: <https://instagram.com/legal/cookies/>
- YouTube: https://www.youtube.com/static?template=privacy_guidelines

In order to give you an overview of the usefulness for you of the different types of cookies, they are presented below.

B. COOKIES – GLOSSARY

Functionality cookies and the cookies required for proper functioning of Bayard Group websites.

These cookies are solely served by Bayard Group and are required for the proper functioning of the websites you use as well as to access the functionality of websites designed to ensure your browsing experience: browse as a subscriber on one of our press publications without having to log in each time, for example. They may also enable how our websites display to reflect your device preferences and the visualisation software installed on your device.

Analytical cookies

Our websites employ analytical cookies designed to record the traffic, usage and performance of our websites, and to improve the functioning and user-friendliness thereof (for example, the most visited pages, visitor searches, etc.)



Bayard Group uses Google Analytics, which collects the information needed for the analysis described above.

Sharing cookies (social media links)

To enable you to share articles and content with your friends and family or comment on them, our sites contain sharing links to the social media platforms (Facebook, Twitter). When you use these sharing buttons, a third-party cookie is installed. If you are logged on to the social network when you are browsing our website, the sharing buttons allow the content viewed to be linked to your user account.

Advertising cookies

Our advertising department sells advertising space on our websites. Selling advertising space on our websites in particular allows Bayard Group to pay for the free provision of quality services for users and subscribers on its websites. Without doing so, we could not, for example, offer you several free articles per month on www.la-croix.com.

The adverts shown on our websites may contain:

- Cookies created by the advertiser (namely the party on whose behalf the advertising is shown) or by a third party connected with this advertising (audience measurement for example), and in particular make it possible to calculate the sums payable by the advertisers but also to limit the number of times you see an advert;
- Cookies created by our advertising department: these are cookies used to show you adverts tailored to your areas of interest on our websites. They are in particular used to limit the number of times you see an advert.

Moreover, certain cookies may be created by advertising intermediaries (Trading Desk, Google AdSense, SSP) and track you from one website to another to display advertising.

VIII. HOW CAN YOUR RIGHTS TO ACCESS, RECTIFY, OBJECT, DELETE, PORTABILITY AND RESTRICTION OF YOUR PERSONAL DATA BE EXERCISED?

Pursuant to the provisions of the French Data Protection Act and the GDPR, you can ask to be sent your Personal Data and require that, as applicable, your Personal Data be rectified, supplemented, updated, locked or deleted, where incorrect, incomplete, misleading, outdated, or where its collection, use, communication or retention is forbidden.

Pursuant to Article 18 of the GDPR, you can also, where applicable, ask to restrict processing (for example, when you are challenging the accuracy of your Personal Data and while Bayard Group verifies the accuracy of your Personal Data, or when Bayard Group no longer needs your Personal Data for processing purposes but they are still needed by you to challenge, exercise or defend your legal rights).

Pursuant to Article 20 of the GDPR, you can also, subject to the technical processes used by Bayard Group, request your Personal Data, in a structured, commonly-used and machine-readable format, to transmit it to another data controller for processing carried out by automated means to which you have given your consent.

For all these requests, simply contact the following address:

Bayard Group
Data Protection Officer
18 rue Barbès
92128 Montrouge Cedex
dpo@bayard-presse.com



Pursuant to French Decree 2007-451 of 25 March 2007 implementing the French Data Protection Act, your requests should be in writing, signed and accompanied by a photocopy of an identity document containing your signature. The request should indicate the address to which the response should be sent. Bayard Group has one (1) month from receipt of your request in which to respond.

For your information, you may also contact the CNIL (French Data Protection Authority) (contact details can be found here: <https://www.cnil.fr/fr/vous-souhaitez-contacter-la-cnil>) should Bayard Group not have followed up your request within one month. Where necessary, this period may be extended by two (2) months, depending on the complexity and number of requests.