



PRIVACY POLICY

I. FOREWORD

Bayard 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 15 boulevard Gabriel Péri, 92240 Malakoff, along with its subsidiaries, and in particular Bayard Editions, Milan Presse, Editions Milan, Bayard Média Développement and Bayard Services, La Société d'Etudes et de Revues (SER), ADF Bayard Musique, BIPEL, Bayard Endowment Fund, 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@groupebayard.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 by emails 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 may withdraw your consent at any time. You are informed that if you place an order with a Bayard group company, it may send you offers for products similar to what you have already ordered, on the legal basis of its legitimate interest. You will of course be able to object at any time and exercise your rights to access, erase your personal data or restrict the processing. However, you cannot call into question the legality of the processing prior to the removal.



When you give your mobile phone number to a Bayard group company when placing an order, it may inform you that you are likely to receive commercial offers by SMS for products similar to what you have already ordered. You are then informed how you can object to this at any time and upon collection of your telephone number.

If you agree to receive commercial offers from Bayard partners, your email address will never be transmitted to our partners. Those emails are sent by Bayard and the partners do not have access to your email address until you subscribe to the proposed offer.

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.

This table presents all the reasons for which we collect your personal data and specifies the legal bases and retention periods.

Purpose	Data collected	Legal basis for processing	Retention period
Management of mail orders and subscriptions. Management of loyalty programmes.	Name, email address, postal address, telephone no.	Management of the contract	Seven years after the end of the last subscription or order or exercise of the right of erasure

Purpose	Data collected	Legal basis for processing	Retention period
Sending of newsletters	Email address	Consent for prospects or legitimate interest with right to object for customers	Three years for prospects. Seven years after the end of the last subscription or order for customers or exercise of the right of erasure
Phone reminder	Name, telephone no.	Management of the contract	Seven years after the end of the last subscription or order or exercise of the right of erasure
SMS reminder	Telephone no.	Legitimate Interest for customers.	Seven years after the end of the last subscription or order or exercise of the right of erasure
Monitoring of customer relations: Customer service and complaint management Satisfaction surveys	Surname, first name, email address.	Management of the contract Consent	Retention period for customer data or until exercise of the right of erasure.
Bayard & Vous survey panel and Notre Temps Consulting Panel	Surname, first name, email address.	Consent	Retention period for customer data or until exercise of the right of erasure.
Selecting customers for studies and surveys	Surname, first name, email address, telephone no.	Legitimate interest or consent	Retention period for customer data or until exercise of the right of erasure.
Accounting and tax obligations	Last name, first name, postal address, accounting data of the account	Compliance with a legal obligation to retain data (establish accounting evidence of the order)	Three years after the end of the last subscription.
Sales prospecting actions by email with prospects	Email address, surname, first name	Consent	Three years or until exercise of the right of erasure.



Purpose	Data collected	Legal basis for processing	Retention period
Sales prospecting actions by email with customers for similar products of the same legal entity	Email address, surname, first name	Legitimate interest with right to object	Seven years after the end of the last subscription or order or exercise of the right of erasure
Sales prospecting actions by post or telephone with human intervention with customers	Last name, first name, postal address or telephone number	Legitimate interest with right to object	Retention period for customer data or until exercise of the right of erasure
Sales prospecting actions by post or telephone with human intervention with prospects whose contact details have been sent by a partner of Bayard Group	Surname, first name, postal address, telephone no.	Legitimate interest with right to object	Time required for the campaign and the establishment of statistics and one year maximum. Or until exercise of the right of erasure.
Electronic sales prospecting actions with prospects whose contact details have been sent by a partner of Bayard Group	Email address	Consent obtained by the partner	Time required for the campaign and the establishment of statistics.
Donation prospecting actions by post with customers.	Surname, first name, postal address	Legitimate interest with right to object	Retention period for customer data or until exercise of the right of erasure
Donation prospecting actions by email with customers.	Surname, first name, postal address	Legitimate interest with right to object	Retention period for customer data or until exercise of the right of erasure
Travelers on trips organized by BIPEL on its behalf or on behalf of its clients	Surname, first name, postal address, email address telephone n ^o , Passport n ^o	Management of the contract	3 years after the departure of the trip

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, as well as, where applicable, the management of your donations.

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.*

Your postal address and telephone contact details may be used to propose offers from Bayard Group.

In all cases, you may ask not to receive any more sales offers by email or object to sales prospecting by post or telephone, by Bayard Group or its partners:

- By using the 'unsubscribe' link at the bottom of all marketing emails from Bayard Group;
- or by using the online forms of the Customer Relations Department:
 - o Adult market: <https://forms.bayard.io/contact/bayard/>
 - o Bayard Jeunesse: <https://www.bayard-jeunesse.com/contact/form/index>
 - o Milan Jeunesse: <https://milan-jeunesse.com/contact/form/index>
 - o SER (Etudes, Christus): abonnements.etudes@ser-sa.com
- or by sending a letter to the following address: Bayard (CNIL), TSA 10065, 59714 Lille Cedex 9.
- Or by sending an email to our DPO at the following address: dpo@groupebayard.com.

Prospecting by telephone:

In accordance with French Act No. 2014-344 of 17 March 2014 on consumer affairs, you can object to cold calling by adding your number to the national "Bloctel" opt-out list: <https://www.bloctel.gouv.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. Data collected from our partners

Bayard Group may collect your contact details from its partners. In this case, you are informed that:

- these data may consist of your name, postal address, telephone number, and, with your consent only, your email address;
- The Controller is Bayard Group;



- The data are collected by Bayard Group in order to provide you with offers on its subscriptions and products, on the basis of our legitimate interest in carrying out sales prospecting by post or telephone, and, with your consent, by electronic means;
- Data are retained only for the duration of the campaign and the establishment of statistics and are not reused for other purposes;
- Data may be transferred to our service providers (subcontractors) only to manage the campaign and handle the mailing;
- Upon request, we will tell you which partner transferred your contact details;
- You may exercise your rights of access to personal data, the rectification or erasure of personal data, the restriction of processing, as well as your right to object to processing, by email to our DPO: dpo@groupebayard.com

3. **Browsing data**

When you visit Bayard Group websites or Smartphone applications, cookies may be stored on your computer or device. 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 or application, a consent management platform informs you that the website or application publisher and its partners use cookies or trackers to provide you with the services. The various purposes justifying the use of cookies or trackers are presented to you. You can then accept or refuse them. Similarly, the list of partners of the website publisher using cookies or trackers 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 17 September 2020.

Once your consent has been sent, Bayard Group will retain it for twelve (12) months. 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 or on the parameters of the application.

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

Users of Bayam are informed that an audience measurement tracker that benefit from the consent exemption is being used on the application.



4. 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 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, postal address and telephone number to its business partners so that they can offer you their services. You may object to this on this form : <https://forms.bayard.io/contact/bayard> or contact our DPO : <https://www.groupebayard.com/fr/contact/contactez-notre-dpo/>.

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.

Please find below the Bayard Group’s business partners who might collect or use your personal data for marketing or targeted advertising:

1. Marketing Partners

a) Partners for exchange or rental of postal files

Your postal data may be transmitted to some of our commercial partners, for a single use, in order to be able to send their offers or their requests to collect donations.

You can therefore receive prospecting from companies in the following sectors:

Agricultural activities	Professional training
Craft activities	Hygiene/Health/Beauty
Consulting agencies	Mass retail
Food/Catering/Wine	Real estate
Automobile/motorcycle	Games/Toys



Banking/Insurance/Credit	Leisure/Sport/travel/Tourism
Building/Construction/exterior/interior design	Optics/hearing aids
Charity sector	Public organizations
Retail	Press/Media
Culture/Publishing/Cinema	Childcare
Home appliance	Personal care
Energy (gas, fuel oil, electricity, etc.)	Telephone/Internet/Computers
Studies/surveys	Textile/Ready to wear/leather goods
Events	Business services
Training/Schools	IT and software publishers

b) Partners for whom you have given your consent to receive their offers by email

When you give your consent to receive offers from our partners by email, you are informed of the list of sectors concerned and if possible, the list of partners likely to receive your email address. Here is the list:

- For <https://www.notretemps.com> : <https://www.notretemps.com/info-partenaires>
- For <https://www.la-croix.com/> : <https://www.la-croix.com/Info-Partenaires>
- For <https://www.notrefamille.com/> : <https://www.notrefamille.com/info-partenaires>
- For Bayard Jeunesse:
 - Family travels: EOLE, ALMA MUNDI
 - Camps: TELLIGO, UCPA
 - Escape games: KAIROS, JOHN DOE
- For Bayard Group:
 - Cruises : Rivages du monde, Hurtigruten, Croisieurope
 - Travels: Bipel, Ictus voyages, Terralto, Routes bibliques, Les maisons du voyage
 - Family travels: Eole, Alma mundi
 - Camps: Telligo, Ucpa
 - Escape games: Kairos, John doe
 - Writing workshops: Aleph ecriture
 - Others: Courrier international

c) Phone number enrichment partners

We can enrich our customer base with telephone numbers from partners who collect them on our behalf. Your telephone number may only be transmitted to us if you have given your explicit consent or if you have been correctly informed of this transfer during the collection of your data by these partners. For example, you may have participated in competitions or online activities where your contact details are requested. In this case, a notice informs you of the possible transmission of your data to Bayard, or asks for your explicit consent, in particular for the reception of SMS

These partners are:

- REKKOLT : <https://www.rekkolt.com/>
- PN Data : <https://www.pndata.fr/>



2. Advertising partners

Through its advertising agency, Bayard Media Développement, the Bayard Group works with certain partners to offer you, with your consent, targeted advertising and targeted content when you browse our sites. The display of personalised advertising and content is made possible by tracking your browsing activities through the use of cookies and other trackers set on your terminals. This enables the Bayard Group to obtain the income it needs to finance the production of site content and to pay the journalists who write this content.

The processing of targeted advertising is carried out exclusively based on consent for all partners belonging to the IAB advertising chain from 20 November 2023 onwards. For each of these partners, you can grant or withdraw your consent at any time by logging on to the Consent Management Platform (CMP), which is displayed when you first open the site, or by clicking on the “Cookie management” link at the bottom of the site.

The list below details the partners currently in a contract with the Bayard Group. The personal data collected may be shared with various players in the advertising chain in order to activate targeted advertising and offer personalised advertising based on your Internet browsing habits. You can grant or withdraw your consent to the sharing of your data with the various partners via the CMP.

“Bayard editorial sites” means: <https://www.notretemps.com/>, <https://www.la-croix.com/>, <https://www.notrefamille.com/>, <https://www.enfant.com/>, <https://www.familiscope.fr/>.

- **Google Advertising Products**

Google Advertising Products enables publishers to display targeted advertising on its websites. When you visit a Bayard Group editorial site, Google may collect personal data about you in order to display targeted advertising.

To fully understand how Google collects and uses your data, we recommend that you read their privacy policy: <https://policies.google.com/privacy>

- **Critéo**

When you visit certain Bayard Group editorial sites, cookies, tags, pixels, third-party web beacons and other similar technologies (collectively, “Tags”) may be placed on those sites by Criteo in order to track interaction with advertising content and to target and optimise advertising. The data collected are identifiers that allow Criteo to recognise your browser or mobile device and attribute the data collected to it, without identifying you.

You can access Critéo’s privacy policy here: <https://www.criteo.com/privacy/>

- **Liveramp**

When you browse the Bayard Group’s editorial sites, we may share with our partner, LiveRamp, and the companies in its group acting as joint data controllers, personal data that we collect from you, such as your email address (in hashed and pseudonymous form), your IP address or information about your browser or operating system. LiveRamp uses this information to create an online identification code in order to recognise you on your devices without allowing you to be identified directly. We may place this code in our cookie or in a LiveRamp cookie and allow it to be shared with our advertising partners and other third party companies around the world, to enable them to tailor content and advertising to you based on your interests, throughout your online experience (web, emails, mobile apps, connected objects, etc). These companies may, in turn, use this code to associate demographic information or information of interest that you have provided during your interactions with them. You can access LiveRamp’s privacy policy and object to LiveRamp processing your personal data at any time by clicking on this link: <https://liveramp.fr/politique-confidentialite-produits-services/>

- **Invibes**

When you visit one of the Bayard Group’s editorial sites, Invibes may share personal data or information collected, such as your email address (in which case it would be encrypted and pseudonymised), your IP address and/or information about your browser. Invibes may use this information, as data controller, to create an identifier for the purpose of identifying you on your various devices. This identifier does not contain any information that can be used to identify you. This identifier may be placed in a first cookie belonging to the Bayard Group or in an Invibes cookie.



Invibes or the Bayard Group may share this identifier with advertising partners with the aim of activating consent-based interest and/or personalised advertising in relation to your Internet experience.

You can read Invibes' privacy policy here: <https://www.invibes.com/terms.html>

- **Hubvisor**

Hubvisor is a partner of the Bayard Group, which is present on its editorial sites through cookies. Hubvisor does not collect any personal data from visitors to the sites. It enables players in the advertising chain to deliver personalised advertising on the site when the user logs on.

- **Ogury**

When you visit one of the Bayard Group's editorial sites, Ogury may collect data about you in order to display targeted advertising. This data cannot be used to identify you directly. This includes, for example, an advertising identifier, your IP address, the language of the site you are visiting, and identifiers required to display the ad.

You can access Ogury's privacy policy here: <https://ogury.com/privacy-policy/>

- **Outbrain**

When you visit Bayard's editorial sites, you may be offered content recommended by our partner Outbrain based on your areas of interest. Outbrain collects data about your browsing habits and identifiers that enable us to display content to you. These identifiers cannot be used to identify you.

You can read Outbrain's privacy policy here: <https://www.outbrain.com/privacy/>

- **Media Square**

When you visit the Bayard Group's editorial sites, our partner, Media Square, may collect data about you and share it with players in the advertising chain (Appnexus, Rubicon Project, Nugg.Ad), in order to display personalised advertising to you. This data includes connection data such as the date and time of connection and/or browsing, the type of browser, the language of your browser, the type of workstation, the type of terminal used, the anonymised IP address, the pages viewed and geolocation data.

You can access Media Square's privacy policy here: <https://www.mediasquare.fr/e-privacy/>

- **Adyoulike**

When you visit the Bayard Group's editorial sites, Adyoulike may collect data about you in order to display personalised advertising. This data includes a cookie ID, your geolocation and IP address, and your behaviour in relation to the displayed ad. This data does not allow you to be identified.

You can read Adyoulike's privacy policy and refuse the collection of your data here: https://www.adyoulike.com/privacy_policy.php

- **Smart Adserver**

Smartadserver is a solution that enables the Bayard Group to generate revenue through targeted advertising. When you visit the Bayard Group's editorial sites, Smart Adserver may collect your personal data in order to display advertising to you, and share it with its own partners in the advertising chain for the same purpose. This data does not allow you to be identified personally. This includes your IP address, data enabling your browser to be recognised, geolocation data (postcode, telephone area code, country, region) and the time of your last visit.

You can access Smart Adserver's privacy policy and their EQUATIV solution here: <https://equativ.com/end-users-privacy-policy/>

- **Teads**

Teads is a player in targeted advertising, enabling the Bayard Group to monetise its advertising space and earn revenue. When you visit Bayard's editorial sites, Teads may collect data about you in order to display targeted advertising. This data is used to display advertising without identifying you directly. This includes your IP address, data enabling us to identify your browser and the type of device you are using, geolocation data (country and city) unless you are connecting from a mobile application and have granted your consent to precise geolocation (but Teads does not use or retain this information).



You can access Teads' privacy policy here: <https://privacy-policy.teads.com/>

- **Triplelift**

Triplelift is a targeted advertising partner whose tool is plugged directly into Google Ad Server and makes it possible to select the ads to be displayed for the user. The data collected by Teads is not directly identifiable. It includes advertising identifiers and geolocation data.

You can access Teads' privacy policy here: <https://privacy-policy.teads.com/>

- **Adagio**

Adagio is an advertising partner that enables the most appropriate ads to be displayed on editorial sites. When you visit the Bayard Group's editorial sites, Adagio may collect data about you and share it with its subcontractors in the advertising chain, including Rubicon, in order to display ads. The data collected does not allow us to recognise you as an individual. It includes your IP address, anonymised so that it no longer provides a precise geolocation, and a Rubicon user identifier. Adagio does not transfer data outside the European Community.

You can access Adagio's privacy policy here: <https://adagio.io/privacy>

- **Powerspace**

Subscribers to "Notre Temps" newsletters may see contextual advertising on the newsletters they receive. The Powerspace partner receives the anonymised email address of the person receiving the newsletter as well as the gender, age and postcode of the recipient. This data does not allow Powerspace to identify a natural person. Once the advert is displayed in the newsletter, if the recipient clicks on the advert, browsing data, including the IP address truncated at city level and the type of user terminal, is sent to the user for statistical purposes only.

You can read Powerspace's privacy policy and disable targeting advertising here: <https://powerspace.com/fr/privacy/>

- **Magnite**

When you visit Bayard group editorial websites, our partner Magnite may collect data about you and share it with players in the advertising chain in order to display personalized advertising to you. This data includes: a cookie identifier, your IP address, the type of browser, the language of your browser, the type of position, the type of terminal used, the pages consulted, and geolocation data.

You can access Magnite's privacy policy here: <https://www.magnite.com/legal/advertising-platform-privacy-policy/> and opt out of this service here: <https://www.magnite.com/%20legal/user-choice-portal/>

- **ConnectAd**

ConnectAd is an advertising partner that can display targeted advertising when you connect to Bayard editorial sites. It shares data about you with other partners in the advertising chain. Part of ConnectAd's processing is based on legitimate interest. You can find out how ConnectAd processes your data and object to the collection of your data by this service provider by clicking on this link : <https://www.connectadrealtime.com/privacy>

- **Amplify**

When you visit the Notre Temps site, our partner Amplify may, with your consent, display personalized advertising on the pages you consult.

3. Digital commerce partners

The Bayard Group works with partners to find new customers, promote its editorial content and propose commercial offers. These partners may collect your personal data on Bayard Group sites with your consent.

a) Acquisition and affiliation partners

When you click on a Bayard ad on a third-party site and are redirected to a Bayard online shop, Bayard's acquisition partners may collect data about you in order to attribute this new visit to the site from which you came.



This data is used to pay the sites and compile statistics. In general, it does not allow you to be identified. You will always be asked for your consent when you enter the Bayard online shop before any personal data is collected.

Some of these partners also offer cashback activities that will only be activated if you are registered on a cashback site.

Partner	Sites concerned	Privacy policy
Taboola	https://www.bayard-jeunesse.com/ https://milan-jeunesse.com/	https://www.taboola.com/fr/policies/privacy-policy-fr
Tiktok	https://www.bayard-jeunesse.com/	https://www.tiktok.com/legal/page/eea/privacy-policy/fr
Rakuten	https://www.bayard-jeunesse.com/ https://milan-jeunesse.com/	https://go.rakutenadvertising.com/hubfs/Services-Privacy-Policy-English.pdf
Kwanko	https://www.la-croix.com/	https://www.kwanko.com/gdpr/privacy-policy/
Effinity	https://librairie-bayard.com/ https://boutique.notretemps.com/	https://www.effinity.fr/politique-de-confidentialite/

b) Advertising retargeting partners

When you visit one of our websites without making a purchase, some of our partners may follow your browsing activities and offer you ads linked to the Bayard Group websites that you have visited. This tracking may only be carried out if you have given your consent. If you are registered on social networks, you may also see ads for Bayard products that you have viewed while browsing on these networks.

Partner	Sites concerned	Privacy policy
Taboola	https://www.bayard-jeunesse.com/ https://milan-jeunesse.com/	https://www.taboola.com/fr/policies/privacy-policy-fr
Weborama	https://www.la-croix.com/ https://www.bayard-jeunesse.com/ https://milan-jeunesse.com/	
Bing Ads	https://www.bayard-jeunesse.com/ https://milan-jeunesse.com/ https://boutique.notretemps.com/ https://librairie-bayard.com/ https://www.notretemps.com/ https://www.notrefamille.com/ https://www.enfant.com/ https://www.familiscope.fr/ https://www.terre-sauvage.com/	https://about.ads.microsoft.com/en-us/policies/legal-privacy-and-security#privacy-and-data-protection-policies;



Partner	Sites concerned	Privacy policy
Criteo	https://www.bayard-jeunesse.com/ https://milan-jeunesse.com/ https://boutique.notretemps.com/ https://www.notretemps.com/ https://www.notrefamille.com/ https://www.enfant.com/ https://www.familiscope.fr/	https://www.criteo.com/privacy/
Linkedin	https://www.la-croix.com/	https://www.linkedin.com/legal/privacy-policy
Facebook/META	https://www.bayard-jeunesse.com/ https://milan-jeunesse.com/ https://boutique.notretemps.com/ https://librairie-bayard.com/ https://www.notretemps.com/ https://www.notrefamille.com/ https://www.enfant.com/ https://www.familiscope.fr/ https://www.terre-sauvage.com/ https://www.la-croix.com/ Bayard Jeunesse publishing sites	https://www.facebook.com/privacy/policy/
Pinterest	https://www.bayard-jeunesse.com/ https://boutique.notretemps.com/	https://policy.pinterest.com/fr/privacy-policy

c) Targeting on advertising platforms and social networks

When you have given your consent to the collection of your data for the purposes of personalized advertising and analysis of the performance of these advertisements, we may share your data in a hashed and therefore pseudonymized manner with social networks or advertising platforms. In this case, a Bayard first party cookie is placed with an identifier. This identifier as well as your navigation and form filling data are collected in the Bayard infrastructure. This data may be your email address, your name, your telephone number, your IP address or your purchasing behaviour. This will allow us to offer you advertisements for our products on these platforms and to analyse the effectiveness of these advertisements. They are kept for 30 days by the Bayard group then deleted.

Here are our partners:

Partner	Bayard Website	Privacy Policy
Linkedin	https://www.la-croix.com/	https://www.linkedin.com/legal/privacy-policy



Partner	Bayard Website	Privacy Policy
META	https://www.bayard-jeunesse.com/ https://milan-jeunesse.com/ https://boutique.notretemps.com/ https://librairie-bayard.com/ https://www.notretemps.com/ https://www.la-croix.com/ https://www.lepelerin.com/ https://www.prionseneglise.fr/ https://bayam.tv/	https://www.facebook.com/privacy/policy/
Google Ads	https://www.bayard-jeunesse.com/ https://milan-jeunesse.com/ https://boutique.notretemps.com/ https://librairie-bayard.com/ https://www.notretemps.com/ https://www.la-croix.com/ https://www.lepelerin.com/ https://www.prionseneglise.fr/ https://bayam.tv/	https://policies.google.com/privacy
Pinterest	https://www.bayard-jeunesse.com/ https://milan-jeunesse.com/ https://boutique.notretemps.com/ https://librairie-bayard.com/ https://www.notretemps.com/ https://www.la-croix.com/ https://www.lepelerin.com/ https://www.prionseneglise.fr/ https://bayam.tv/	https://policy.pinterest.com/fr/privacy-policy

d) Referral Partner : Mention Me

Whenever you place an order on the <https://www.bayard-jeunesse.com/> or <https://milan-jeunesse.com/> online stores, you can choose to send a referral to your friends, through the Mention Me window that will appear. You can also start the referral process via a landing page on the website. You are free to decide whether or not to send a referral. If you decide to do so, you can send a personally-created link to a friend via email, Facebook, Messenger, or WhatsApp. Subsequently, both you and the person to whom you have sent a referral will receive a referral reward, provided that they place an order on this website.

To this end, the Bayard Group will share your personal data (email address, name, and order details) in encrypted and pseudonymised form with Mention Me, so that you can participate in our "referral programme". This enables us to determine which customer is the referrer of a new customer, and who should receive a reward for their



referral. Only people who are not yet customers of Bayard or Milan Jeunesse can benefit from the discount offer as referees.

Your personal data will be processed by Mention Me on behalf of the Bayard Group on the legal basis of legitimate interest for the following purposes:

- Enrolling customers in our referral programme;
- Programme monitoring and protection against gambling or fraudulent use of the programme;
- Communicating with customers about the programme and promotional codes;
- Providing Bayard with reports and statistics on the operation of the programme.

If you agree to send a referral to a friend, their email address, name, and IP address will be processed. The referee's email address and IP address will also be processed for this purpose, once they have freely entered their details in the "Referral" form. In both cases, data is exclusively shared in pseudonymised form.

Once you, or your friend, decide to take part in the programme, your data will be processed with your explicit consent only or on the basis of the consent of the referee. You or your friend may withdraw your consent at any time.

You can also access the referral programme via your Bayard customer account in the Referrals Area.

For more details on how Mention Me processes your personal data, please consult Mention Me's privacy policy: https://mention-me.com/help/privacy_policy_s#referrers

You can object to this processing and to benefiting from referral offers via this link: <https://www.mention-me.com/referral-unsubscribe-data-request>

Subcontractor: Mention-Me Ltd

Website: www.mention-me.com

4. Content retargeting partner

- **Taboola**

This partner enables us to recommend content videos, experiences, engagements, tools, instruments and advertisements based on your browsing and your interests.

For example, if you visit the websites <https://la-croix.com/>, <https://www.notretemps.com/>, <https://www.notrefamille.com/>, <https://www.enfant.com/>, <https://www.familiscope.fr/>, the Taboola cookie is implemented on these sites. You know you are interacting with a Taboola widget when you see the "Taboola feed" logo next to the recommendations. If you click on the "sponsored" hyperlink, you will see a detailed notification that allows you to navigate to Taboola's privacy policy where you can opt out of personalized recommendations.

In all cases, your consent to personalized content recommendations is required. You can accept or refuse these treatments and this partner via the consent management platform of the Bayard site on which you are browsing.

5. Email retargeting partners

Some of our partners may retarget you by email following a visit to one of our websites in order to provide you with offers corresponding to what you have previously viewed. Such targeting can only be carried out with your consent.



Partner	Sites concerned	Privacy policy
Digital Squad/Squadata	https://www.bayard-jeunesse.com/ https://milan-jeunesse.com/ https://boutique.notretemps.com/ https://librairie-bayard.com/ https://www.notretemps.com/ https://www.lepelerin.com/ https://www.prionseneglise.fr/	https://www.squadata.net/private-policy/

6. Path analysis partners

Bayard uses external service providers to analyse the traffic on its websites and to optimise the user experience. Your consent is required to activate this processing.

Partner	Sites concerned	Privacy policy
Content Square: user path analysis and optimisation.	https://www.bayard-jeunesse.com/ https://milan-jeunesse.com/ https://boutique.notretemps.com/ https://librairie-bayard.com/ https://www.la-croix.com/	https://contentsquare.com/privacy-center/

7. Analytics partners

• Google Analytics

Bayard Group uses a tool enabling it in particular to measure traffic on its websites: **Google Analytics**. Bayard Group collects your consent to the use of this tool during your browsing.

If you do not want this tool to collect or use your information, you can also 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/>

• Wsistat

Some Bayard group websites also measure the number of pages viewed and the number of visits, as well as users' activity on the website and the frequency of their return visits, thanks to Wsistat. The information collected by this solution is anonymous. If you do not wish to be audited or wish to exercise your right to withdraw your consent, please visit the [wysistat.net](https://www.wysistat.net) privacy page and follow the instructions provided.

List of websites using the Wsistat measurement solution exempt from consent:

- <https://www.la-croix.com/>
- <https://africa.la-croix.com/>
- <https://www.notretemps.com/>
- <https://www.notrefamille.com/>
- <https://www.familiscope.fr/>
- <https://www.enfant.com/>



- <https://www.citations.com/>
- <https://www.prenoms.com/>
- <https://www.vosquestionsdeparents.fr/>

- **Matomo**

Some Bayard Group sites use the MATOMO traffic analysis tool, in the version that is exempt from obtaining consent, in accordance with the [CNIL \(French Data Protection Agency\) recommendation of 23 September 2021](#). In this case, no personal data about you are collected or transmitted to third parties.

However, you can object to the use of this tool while you are browsing by clicking on this link: matomo.org/docs/privacy-how-to/#step-3-include-a-web-analytics-opt-out-feature-on-your-site-using-an-iframe.

The sites and application using Matomo are:

- Mobile application l'jourlactu
- The website <https://www.fonds-dotation-bayard.com/>

- **Mixpanel**

Some Apps intended to minors use the MIXPANEL traffic analysis tool, in the version that is exempt from obtaining consent, in accordance with the CNIL (French Data Protection Agency) recommendation of 23 September 2021. In this case, no personal data about you are collected or transmitted to third parties.

The web sites and Apps using Mixpanel are :

- The Web App <https://app.bayam.tv/> and the mobile App Bayam
- “Mon permis Smartphone” App.

- **Piano**

The La Croix International site uses the Piano Analytics tool in its version exempt from collecting consent according to the CNIL recommendation of September 23, 2021. In this case, no personal data concerning you is collected or transmitted to third parties. The statistical data produced is aggregated and does not contain personal data. However, you can deactivate the collection of anonymous data [here](#).

- **Marfeel**

Notre Temps and La Croix use the Marfeel solution to analyze the audience of their site, in consent exemption mode in compliance with the configuration requested by the CNIL. The data collected is anonymized and no personal data is stored. However, you can object to being tracked by Marfeel in the consent management application offered on our sites.

The sites and applications using Marfeel are:

- <https://www.notretemps.com/>
- <https://www.la-croix.com/>

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 twenty-five months.

VI. WILL YOUR PERSONAL DATA BE TRANSFERRED ABROAD?

In order to deliver its services and in particular to manage information on subscriptions and renewals, and purely for these purposes, Bayard Group may transfer your personal data to processors based outside the European Union (specifically in Madagascar).

In the context of hosting and statistical analysis of websites, your data may be transferred to the United States. To make sure that your privacy and personal data are respected, the processors in question sign up to standard contractual clauses established by the European Commission. In the event of transfer to the United States by our processors for the hosting and statistical analysis of sites, the data are encrypted or pseudonymised.

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 twelve (12) 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;
- Continue browsing without accepting cookies or trackers;
- 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 or trackers in the application. 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 twelve (12) 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 (See IV. 6.)**
- **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://policies.google.com/technologies/cookies>

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 Adsens, 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
15 boulevard Gabriel Péri
92240 Malakoff
dpo@groupebayard.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.