

# HORSE REPUBLIC Privacy Policy

### 1 - Preamble

Horse Republic places great importance on the protection of user data on its website www.HorseRepublic.com and its mobile applications (collectively the 'Site').

Horse Republic adheres to the General Regulation on Data Protection, No. 2016/679 of 27 April 2016, the '*Data Protection and Freedom of Information Act*' No. 78-17 of 6 January 1978, and the Law '*To Support Confidence in the Digital Economy*' No. 2004-575 of 21 June 2004.

This Privacy Policy sets out the commitments of Horse Republic for the protection of personal data of Internet users visiting this Site and using the services offered on the Site. It also informs you of the procedures for collecting and using your personal data and the options available to you in this regard.

Horse Republic reserves the right to modify this Privacy Policy at any time, and especially if necessary to comply with any regulatory, jurisprudential, editorial and/or technical changes.

You will be advised of any changes via the posting of an amended version of the Charter on our Site.

Horse Republic has appointed a Data Protection Officer who is responsible for, among other matters, the right to information, right of access, the right to correct, dispute, or delete data, as well as the right to limitation and portability that you have pursuant to this regulation (email: hello@horserepublic.com)

This Privacy Policy applies in addition to the provisions of the Terms of Service (TOS) and the General Sales Conditions (GSC), of which it is a component.



### 2 - Responsible party for the processing of personal data

Data are collected by, Horse Republic, with head office at 126 Avenue du Général Leclerc, 92100 Boulogne-Billancourt, and registered with the Trade and Companies Register of Nanterre under number 840 973 945.

### 3 - Collection and use of data

Horse Republic may be required to collect and process declarative data and behavioral data of users of the Site (hereafter collectively '*personal data*').

Users of the Site state that they are adults. Otherwise, the users must state that they have first received the consent of their parents or legal representatives for the collection and use of personal data.

### 3.1. Data that may be collected

The term 'p*ersonal data*' means any information that can identify you directly or indirectly.

It is possible that such information will be collected on our Site. This data can be:

- $\checkmark$  your identity (title, surname, first name, date of birth)
- ✓ your contact details (postal address and/or email, phone number)
- ✓ your equestrian practice (whether or not you own horses, your status, practiced disciplines, F.F.E license, stable location, social media presence),
- ✓ data related to your account on our site (email address, password),
- ✓ data related to your activity on our site (presence and participation in contests and competitions, dates and places of contests and competitions, reviews, evaluations, responses to surveys),
- ✓ data relating to your location (precise or approximate)



 $\checkmark$  data necessary for the execution of the services we offer (navigation data and connection, IP address, data relating to the transaction, such as transaction number, details of the purchase, subscription, service subscribed to, frequency, payment identifiers, bank details, and activity on the site including reviews given about competitions or stables).

These will be collected only if you have previously given your consent.

It may be also be the case that Horse Republic will use analytical tools to collect non-personal data. Non-personal data will not identify you personally.

This data is anonymous and not linked to any of the personal data of the user. It may include, for example, anonymous information about the use of the website, the type of browser, operating system, IP address, connection duration, pages visited for statistical purposes, and for security.

This information is generally optional and is only linked to the user's personal data subject to his or her consent.

Automatic collection of non-personal data can also take place using cookies *(see Section 4 – Cookies).* 

#### 3.2. Purpose of personal data processing

Your data is collected to allow you to access all of our services (access to additional content) and to help us improve the quality of our business relations.

This personal data in the context of the use of the Site is thus subject to processing for the following purposes:

• When you subscribe to our services in order to manage, monitor, and renew your subscription;



- When you create a user account on the Site in order to access the different services;
- When you subscribe to our Newsletter or our marketing communications or those of our partners;
- When we collect data needed to improve user experience;
- When we collect your data to send you communications (via email and/or notifications) and targeted advertising;
- When we collect your data to present you with content that may be of interest to you based on your precise or approximate location;
- When we carry out statistical studies and monitor usage of our website.

Horse Republic only collects data that is adequate, relevant, and limited to what is necessary for the purposes for which the data is processed.

These purposes are specific and in no case will your data will be further processed in a way incompatible with those purposes, unless you give prior consent to do so.

## 3.3. Recipients of personal data

The data collected is mainly intended for use by Horse Republic.

If you agree, you will also receive communications and commercial offers concerning products and/or services provided by our partners, particularly advertisers, advertising agencies, and promotional firms. Our partners will then have at have at their disposal your declarative data.

If Horse Republic is contractually required to transmit your personal data to third parties, this will take place in such a way that the partner will comply with the regulations on personal data.

Your declarative data may also be disclosed to service providers with whom you will be connected by Horse Republic in order to ensure the effectiveness of services and bookings with those providers, who will then act as subcontractors within the meaning of Article 28 GDPR.



These providers will be located in the European Union, and therefore also subject to regulations in effect. Should data be transferred to entities outside the European Union, we will ensure a sufficient and appropriate level of data protection before such transfer.

Finally, some of your data may be communicated to any judicial and administrative authorities, at their request, pursuant to regulations.

### 3.4. Protection of personal data:

In order to respect your privacy, your personal data will be kept for the period necessary for the purpose of processing it.

Personal data will be kept for the period during which you use our services, and deleted no later than three years after our last contact.

Your site login information will only be kept for a period of thirteen months.

For purchases and Premium subscriptions made from the Horse Republic app, payment is made online via AppleStore (see terms for <u>AppStore</u>) or GooglePlay Store via the internal payment system of these platforms. Horse Republic does not have access to this data. To find out how these third-party operators handle your personal data, you are invited to consult Horse Republic's own privacy policies.

In case that another transaction should be carried out from the web site, it would be carried out using a secure system developed by Horse Republic and Stripe (see <u>Stripe terms of service</u>) The security of payment transactions is ensured through SSL encryption (Secure Socket Layer). This technology encrypts the data of all the exchanges between two computers connected to the Internet. During a payment transaction, SSL encrypts the credit card number and expiry date of the card entered on the purchaser's keypad before sending it to the electronic payment system. Banking information will be kept only for the period necessary to complete the transaction or subscription.



Transactions relating to merchandising products are carried out through the secure system set up by Horse Republic and the company Shopify (see <u>Shopify's</u> <u>Terms of Service</u>).

Other transactions (registrations for events or classes, etc.) are carried out using the security system set up by Horse Republic and the PayPal company (see <u>PayPal's Terms of Service</u>).

### **3.5. Protection of personal data:**

To ensure proper respect for your privacy, Horse Republic does its best to take all appropriate steps to ensure the security and confidentiality of your personal data in order to protect against loss, accidental destruction, alteration, and unauthorized access.

Since personal data is confidential, Horse Republic limits access solely to employees of the company or service providers who require it in connection with processing.

All data collected by Horse Republic is stored within the European Union.

### 3.6. Right of access, modification, correction

This Privacy Policy has been drawn up pursuant to the applicable legislation according to which you have several rights with respect to the processing of your personal data.

Specifically, you have in particular the following rights:

- the right to be informed about the use of your personal data,
- the right to access personal information transmitted,
- the right to request the correction of inaccurate or incomplete personal data,
- the right to request that Horse Republic remove your personal data or cease processing it,



- the right to withdraw your consent to receive information from us,
- the right to request that we disclose your data to you or transfer it to another provider (portability).

The majority of mobile devices allow you to control or disable location-based services for each application in your device's settings.

You can change your communication preferences (emails and/or notifications) at any time on the site.

These rights may be exercised at any time by email sent to hello@horserepublic.com or by writing to the company at Horse Republic, 126 Avenue du Général Leclerc, 92100 Boulogne-Billancourt.

# 4 – Cookies

Horse Republic may collect your browsing data using data collection tools (cookies).

A cookie is a collection of information, usually small in size and identified by a name that can be passed to your browser by a website that you connect to. Your web browser will retain the cookie for a certain period and return it to the web server every time that you connect again.

Cookies are required to enable you to benefit from certain features of our services. If you choose to disable the tools via your web browser, access to services might be affected.

Cookies used by Horse Republic serve different purposes:

- Navigation cookies allow easier navigation on the Site, or may be required for the provision of services (shopping cart cookies, session cookies)
- usage cookies allow anonymous visitor statistics to be gathered,



• for example, behavioral analysis cookies can help us to determine what information on the site might be of interest you and thus help to improve your navigation.

You may opt-out or accept the installation of behavioral analysis cookies, geolocation and/or usage cookies and/or the installation of cookies by Horse Republic partners by configuring your Internet browser from your device.

#### 5 - Transfer of data outside the European Union

Horse Republic does not transfer personal data to countries that are not members of the European Union or the EU Economic Area

This Privacy Policy was updated on 1 June 2023.