

Privacy Policy

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The controller of the Websites/Applications and/or the services provided by TELEMAQUE is the TELEMAQUE Company, located 80 route des Lucioles, 06560 VALBONNE, FRANCE (for more information: legal.telemaque.fr/legal_mentions).

The Data Protection Officer is registered under the following number: DPO-3876. The Data Protection Officer can be reached by mail at TELEMAQUE, Data Protection Officer, 80 Route des Lucioles, 06560 VALBONNE, FRANCE, by phone on +33 4 92 90 99 90 and by email at dpo@esmeralda.chat.

This Privacy Policy on personal data and its management allows us to explain **in more detail how we collect data, process and store it, and the rights you have in relation to that data.**

This Privacy Policy applies to customers and users of offers and services of the TELEMAQUE Websites/Applications. It may be supplemented at any time by specific information which will be brought to your attention, regarding offers or new services.

You are completely free to browse this Site/Application subject to accepting the Terms of Use (legal.telemaque.fr/terms_use) to access the services as well as the rules concerning the processing of your personal data and our cookie policies.

What data does TELEMAQUE collect?

Personal data is any information that directly or indirectly identifies you, including first name, name, date of birth, age, gender, postal address, email address or telephone number.

Depending on the case, TELEMAQUE processes your personal data, directly collected from you or resulting from the use of services. TELEMAQUE is also likely to be the recipient of

data which has been collected from you by a third-party provider in connection with psychic services.

TELEMAQUE collects and processes the following data categories:

- ✓ Data to identify you: name, first name;
- ✓ Personal characteristics: date of birth, time of birth, place of birth;
- ✓ Contact data: postal address, email, landline and mobile phone number;
- ✓ Personal life: occupation, marital status;
- ✓ Economic and financial data: means of payment, payment history, payment card (first six and last four numbers);
- ✓ Connection data, service usage: connection logs, acceptance of terms and conditions, acceptance of the Privacy Policy, acceptance of collection and processing, beep sound during telephone consultation;
- ✓ Probationary data: call records, email exchanges, and/or anything you send to TELEMAQUE;

Personal data is collected for the purposes of carrying out the services offered, psychic services via telephone and keeping the client informed regarding services, offers and information dedicated to psychic services.

Creating a customer profile (online and during phone calls)

When creating a Customer account, you will be asked for different information in order to identify yourself. These may vary depending on the medium used (internet, offer on partner site, telephone). This information is exhaustive: your first name, name, telephone number, email address, physical address, date of birth, city of birth, time of birth, profession, confirmation that you are not subject to any protective measures, your payment card information which is immediately encrypted.

Log-in (online and during phone calls)

When a user logs into the Site, the website records their IP address, the connection and validation logs for the Terms of Use, the acceptance logs for the Privacy Policy, the acceptance logs for consent regarding the use of personal data.

Profile (online and during phone calls)

The use of services provided on the Site/Application (including that of the partners) helps to fill in a profile, which may include an email address, a telephone number, a date of birth, a gender (female/male).

Cookies (online)

Cookies are used on the Site/Application. Users can disable cookies from their browser settings at any time. For simply viewing the site, you do not need to provide us with personal data except IP address and navigation/cookie data.

Do not disclose more information about yourself than necessary and ensure that this information is relevant and directly related to the purpose or solution of the Site/Application. Please do not share sensitive information regarding your philosophical, political, trade union or religious views, sexual orientation, or health. Also, do not disclose personal information about a third party without their permission.

Why does TELEMAQUE collect and process your data?

The collection and processing of your data allows us to perform the services you want to use (in particular regarding personal psychic readings), to offer you personalized services and commercial offers that may be of interest to you in the context of a better understanding of their expectations and requests.

More specifically, data processing by TELEMAQUE has the following purposes:

Welcome, identify and provide services:

- ✓ Manage and authenticate user/customer access and identify them;
- ✓ Check and authenticate customer-transmitted data;
- ✓ Manage access and use of psychic services in relation to psychic reading subscription;
- ✓ Manage call tracking;

- ✓ Store customer or user data in the context of the commercial activity of TELEMAQUE.

Satisfy:

- ✓ Manage requests relating to customers' rights;
- ✓ Communicate as part of customer management;
- ✓ Billing and cashing in payments.

Accompany:

- ✓ Ensure the Quality and Collection Service in order to take into account your comments, your feedback, your incoming mail, your emails but also assist you in finding solutions when experiencing payment difficulties;
- ✓ Recover unpaid debts;
- ✓ Ensure the Litigation Department: management of any disputes with clients and legal requisitions.

Secure:

- ✓ Prevention and detection of fraud, malware (malicious software) and security incident management.
- ✓ Manage telephone recordings for quality and probationary purposes: calls made can be listened to in real time or recorded for training or quality control of service and security. This includes the use of records for processing complaints and detecting fraud. The recordings are kept for a limited period and then automatically destroyed, unless the TELEMAQUE Company has a legitimate interest in keeping a recording for longer, including within the framework of an investigation relating to fraud and for legal purposes;
- ✓ Store and archive customer or user data to meet legal obligations.

Communicate:

- ✓ Join our Newsletter;
- ✓ Personalize services by displaying ads based on the user's browsing history, depending on their preferences;

- ✓ Manage the operation and optimizations of the site - e-marketing activities: we use your data for marketing purposes. These activities include:
 - The use of your contact details to send you regular information relating to psychic services. You can unsubscribe from these email marketing communications easily and at any time by clicking on the "Unsubscribe" link which you will find in all our newsletters and communication media.
 - Personalized offers, created based on your personal information, may be offered to you, mobile applications and websites/third-party applications (including social networks), and the content of the site displayed to you may also be personalized. These may be offers from the TELEMAQUE Company, co-branded sites, or other offers from partners that may interest you.
 - When you take part in other promotional activities (by competition), information will be used for the proper management of these activities.
- ✓ We may also contact you on other occasions by email, post, telephone or text message, depending on the contact details you previously provided to us. We also process requests that you send us, particularly for the following reasons: requests for information, consultations, making an appointment and to benefit from offers. If you have not completed your call or received a response within a sufficient time, we may contact you to call you back to find out more about your request and to assist you. When you use our services, we may send you a questionnaire or invite you to leave a comment on your experience. We send other information relating to your consultations such as summaries, appointment reminders, offers, Terms of Use, invoices;
- ✓ Improved services: we also use personal data for analytical purposes to improve our services, user experience, operation and quality of our services, but also to conduct tests and solve problems;
- ✓ Personalize services by displaying ads based on the user's browsing history, depending on their preferences.

Who has access to your data?

The data collected is intended for the internal services of the TELEMAQUE Company and its subcontractors in order to support the execution of the Services, including trusted third parties for card payment, hosts, email service providers, contractors specializing in fraud detection and authentication services.

Data may also be processed by partners of the TELEMAQUE Company, specifically where partners are involved in the provision of services. You may also be asked to consent to other processing requests.

The Customer acknowledges and accepts that the provision of services requires the use of third parties:

- For hosting and storage purposes;
- When the user uses payment services: for the implementation of these services, the TELEMAQUE Company is in contact with third-party banking and financial companies. If this request concerns data relating to the payment card, TELEMAQUE will pass on the request to the trusted third parties concerned, responsible for processing the Customer's payment data;
- When the user/Customer authorizes a third-party site to access their data (for example chat via Facebook Messenger). You share information relating to our Services on the websites (in their desktop or mobile version, including the corresponding applications) of social networks (Facebook, Twitter, etc.) of our Partners in particular via the share buttons, to use said Social Networks;
- When the site uses partners to provide psychic services (via tarot, numerology, chat, free question). These partners have limited access to user-completed data within the framework of the execution for the purpose of performing the services. They have a contractual obligation to use them in accordance with the provisions of the applicable personal data protection regulations;
- If required by law, the site can transmit data to respond to complaints made against the Site/Application and comply with administrative and judicial procedures
- If the TELEMAQUE Company is involved in a merger or receivership procedure, it may be required to sell or share all or part of its assets, including personal data. In this case, users would be informed before the personal data is transferred to a third party.

No handover to third parties other than those specified:

As part of the services shared with TELEMAQUE's partners, your personal data will be transmitted to the partners only in the context of the services concerned and in accordance with your authorization.

In any event, no repetitive, global or structural transfer of personal data will be made.

Your personal data will not be shared with any other third party, other than partners, without your prior consent in this regard, and if this communication is necessary for the provision of services.

What are the guarantees provided by TELEMAQUE regarding your data?

Collection process

This data is collected through the various forms present on our website and when you connect with the Customer Relations Centre in a totally transparent way.

The mandatory nature of the information to be provided is usually signalled by an asterisk. In their absence or failure to complete them, TELEMAQUE will not be able to provide the requested service. The same applies to data collected over the phone.

Data retention time

TELEMAQUE does not keep your data for longer than necessary.

The retention period is linked to the service with which they are associated and, in any event, for the duration of the commercial relationship and/or fiscal, accounting needs, management of any disputes, recovery needs, punishable criminal activity and in order to prevent possible illegal behavior, to conduct satisfaction surveys and ensure the compliance of files.

This collection is carried out in accordance with the law, declarations made in advance with the CNIL and the General Data Protection Regulation (GDPR) concerning customers and potential customers. We do not collect unnecessary or excessive data.

Data is also subject to a duly declared intermediate archive in order to comply with legal, accounting and tax obligations.

Security and privacy

We take care of the security of your data as if it was ours. Data collected by the TELEMAQUE Company and its partners is placed in a secure environment inaccessible to the public so as to prevent any unauthorized access, use, loss, modification, destruction or disclosure.

All our data is saved and stored for the time necessary to manage the commercial relationship and to secure the rights of both Users/Customers and the TELEMAQUE Company.

TELEMAQUE is committed to implementing and maintaining, at its expense, an appropriate IT security program, taking into account the latest developments, the costs of implementation and the nature, scope, context and purposes of the processing of personal data and the risk (of varying probability and severity) for the rights and freedoms of Users/Customers. This program includes rigorous technical and organizational measures. Only people authorized to process your data within the TELEMAQUE Company and its partners (qualified staff, host) have secure access.

Technical and organizational measures can benefit from technological advances and future developments. Consequently, TELEMAQUE is authorized to use all suitable alternative measures in this regard. These alternative measures cannot, however, present a level of security lower than that required by law for such measures. All important changes must be properly documented and notified to the Client.

Is your data processed outside the EU?

Due to the organizational structure of the TELEMAQUE Company, the user/Customer authorizes the Site/Application to transfer, store and process their information within the European Union. By using the Site/Application and telephone services, the user consents to the transfer of their personal data under these conditions.

The data collected may be processed outside the European Union with regard to hosting providers (in particular Google Cloud and Amazon Web Services). In this case, the TELEMAQUE Company makes the necessary arrangements with its subcontractors and partners to guarantee an adequate level of protection of your data and this in full compliance with the applicable regulations.

The user/Customer also authorizes the Site to transfer the information listed below in its subsidiaries outside the EU. In any event, said data cannot identify them, namely: first name, date of birth and city. In no case will this data be stored.

In any case, the site remains responsible. Such transfers are framed by organisational and technical measures to ensure an adequate level of protection for such data.

About Cookies and Anonymous Data

We also automatically and knowingly collect certain technical and anonymous data from you, including IP address, visit dates and times, and pages viewed.

This data does not allow us to identify you directly or indirectly and serves to better understand the behavior of everyone on the Sites/Applications of the TELEMAQUE Company in order to improve and simplify the experience on these Sites/Applications.

About IP addresses: We collect and process IP addresses for the purposes of statistics, verification and validation of clicks as part of our activity. These are treated in accordance with the principles of protection of personal data defined by the legislation in force.

Note: User ID and Site/Application configuration allow you to publish data on your Facebook profile. If you choose to post data, posts will only be available to those who can see your profile updates on Facebook.

About cookies: cookies are used on the Sites/Applications. Users can disable cookies from their browser/application settings.

All this anonymous data is deleted after 13 months.

When you create your profile on a Web Site, your computer stores encrypted data sent by our services. This data is gathered in a small file called a cookie. This cookie allows us to recognize you when you connect to the Site and to personalize the information delivered (Horoscopes or reports). However, none of the data about you appearing in the session cookie is stored and/or processed by the TELEMAQUE Company or its partners.

We also use security cookies to authenticate users, prevent fraudulent use of login information and protect user data from unauthorized third parties.

The TELEMAQUE Company and its partners also use:

- Session Cookies, which can be used to maintain user data while browsing, but also through multiple visits.
- Tracking Cookies (Analytics) which record coded data to which the TELEMAQUE Company and its partners do not have access but which is used to send you offers on other communication platforms and collect statistics used to monitor the website.
- Marketing Cookies: TELEMAQUE and its service providers use the services of affiliation or web-marketing companies, which may install cookies for the purposes of technical statistics, advertisements, affiliate services and display of advertising (e.g. Google, Facebook...). These companies are likely to deposit and read their own cookies on which we have no information or access.

If you don't want our site to drop cookies on your computer, you can:

- Either leave our site;

- Or prohibit the use of cookies via your browser.

Be aware however that in this case you may not be able to use the site properly and certain services may not be accessible to you.

To avoid storing cookies, you can change your browser settings so that it prevents the reception of cookies. You can also delete any cookie already on your computer by accessing "Options" or "Preferences" in your browser.

We provide you with the following links for the most used browsers, to help:

- Google Chrome
(<https://support.google.com/chrome/answer/95647?hl=fr>)
- Mozilla Firefox
(<https://support.mozilla.org/fr/kb/activer-desactiver-cookies-preferences?redirectlocale=fr&redirectslug=activer-desactiver-cookies>)
- Microsoft Internet Explorer (<https://support.microsoft.com/fr-fr/help/17442/windows-internet-explorer-delete-manage-cookies>)
- Apple Safari
(https://support.apple.com/kb/ph17191?locale=fr_FR&viewlocale=fr_FR)

What are your rights and how to exercise them?

At any time, you can:

- Ask us for a copy of the personal data we hold about you;
- Inform us of any changes relating to your personal data, or ask us to modify any personal data that we have about you;
- In certain situations, you may ask us to delete, block or limit the processing of your personal data, or object to some of our methods of processing your personal data;
- Request the portability of your Data from May 25, 2018.

In certain situations, you can also ask us to send the personal data that you have transmitted to us to a third party;

- When we use your personal data following your agreement, you have the right, and this at any time, to revoke it in accordance with the law in force. In addition, when

processing your personal data, in a legitimate interest or in the public interest, you can refuse at any time that we use your personal data subject to the law in force;

- You can also ask us at any time to stop receiving advertisements by contacting us directly and free of charge, or by using the unsubscribe link included in any telemarketing email we may send you. If you wish to object to the processing of your personal data on the basis of a legitimate interest and that no unsubscribe process is available directly, please contact us at dpo@esmeralda.chat.

Please inform us immediately of any changes or inaccuracies in your personal data by contacting us.

If we have personal data about you that is not accessible on our site, you can send us your request free of charge. For any request regarding this Privacy Policy and the exercise of your rights or if you have a complaint, please contact our Data Protection Officer at:

dpo@esmeralda.chat. To exercise your rights, you can choose to send your request (by stating your email address, surname, first name, postal address, telephone number and enclose a copy of an identification document):

- By email at dpo@esmeralda.chat;
- Online by clicking the link at the bottom of the site in question: My Personal Data.
- By mail at TELEMAQUE, Data Protection Officer, 80 Route des Lucioles, 06560 VALBONNE, FRANCE

A reply will be sent to you within one (1) month of the date your application is received.

In the event of a request to delete your data and/or if your right to request the erasure of your data is exercised, we may, however, keep it as an archive for the duration necessary to meet our legal, accounting and tax obligations.