

SIEL BLEU ONLINE – Data Protection Policy

Version: 1

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Any change that Siel Bleu makes to this Confidentiality Policy will be posted on this page in the future. Please consult this page regularly for any updates made to this Confidentiality Policy.

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INTRODUCTION

This Confidentiality Policy describes how Siel Bleu processes your Personal Data when you use the Siel Bleu online « PF and Me » website at <https://pf-and-me.sielbleu.org/> ('**Website**') and services proposed by Siel Bleu ('**Services**').

Questions, comments and requests regarding this Data Protection Policy must be sent to the following email address: fizzup@sielbleu.org.

Term	Definition
Siel Bleu	The association Sport Initiative Et Loisir Bleu (Siel Bleu), domiciled 42 rue de la Krutenau, 67 000 Strasbourg, SIRET no.: 41538198700056 editor of the website https://pf-and-me.sielbleu.org/ .
CP Trainer	Prevention officer (' <i>Chargé de Prévention</i> ') in charge of a personal online training programme (coaching) for a user on the site.
CPO	Organizing prevention officer (' <i>Chargé de Prévention Organisateur</i> ') (Siel Bleu employee) in charge of organizing and managing participants within a group class.
Recipient	Person or entity, public authority, the department or any other body that receives communication of personal data.
Personal Data	Any information relating to a person enabling them to be identified, directly or indirectly, in particular by reference to an identifier, such as a name, ID number, localization data, an online username, or one or more elements specific to their physical, physiological, genetic, psychological, economic, cultural or social identity.
Purpose	Get Phy objective when processing your Personal Data.
Basis of Processing	Basis on which processing is implemented pursuant to articles 6 to 9 of the GDPR.
GDPR	Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of individuals with regards to processing of personal data and the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation).
User Service	Service comprising the site directors, Siel Bleu employees (i.e. CP Trainers and CPOs).
Processing	Any operation or set of operations completed or not completed using automated methods applied to personal data or sets of personal data, including collecting, recording, organizing, structuring, retaining, adapting or modifying, retrieval, consultation, use, disclosure by transmission, publication or any other form of provision, reconciliation or interconnection, limitation, deletion or destruction.

Transfer outside the EEA	Any transfer of personal data from a country in the European Union to a country outside the EEA (European Economic Area) i.e. Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, UK, Iceland, Liechtenstein and Norway.
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1. OVERVIEW OF PROCESSING USED BY SIEL BLEU

The table below summarizes the Personal Data Processing used by Siel Bleu. This table should also be used together with the information contained in the following sections.

Purpose of Processing	Basis of Processing	Recipients
Signing up to Get Phy services	Execution of the agreement between Siel Bleu and the user.	The Siel Bleu User Service and technical department. An external technical service provider carrying out maintenance work. AWS host.
Creating and managing your online account	Execution of the agreement between Siel Bleu and the user. Consent: At your request and always with your agreement, we can access your online account to help you complete your user procedures.	The Siel Bleu User Service and technical department. An external technical service provider carrying out maintenance work. AWS host.
Creating and updating your sports profile to offer you a personalized training program adapted to your needs	<u>For 'non-sensitive' data:</u> Execution of the agreement between Siel Bleu and the user. <u>For 'sensitive' data (e.g. health data):</u> Your explicit consent that your data be used to adapt the offer to your specific needs.	The Siel Bleu User Service and technical department. An external technical service provider carrying out maintenance work. AWS host.
Tracking your sessions and progress	Execution of the agreement between Siel Bleu and the user.	The Siel Bleu User Service and technical department. An external technical service provider carrying out maintenance work.

Purpose of Processing	Basis of Processing	Recipients
		AWS host.

<p>Tracking your sessions and progress</p>	<p>Consent when this information comes from a connected object.</p>	<p>The Siel Bleu User Service and technical department.</p> <p>An external technical service provider carrying out maintenance work.</p> <p>AWS host.</p>
<p>Contact in order to provide this service (e.g. information on class times)</p>	<p>Execution of the agreement between Siel Bleu and the user.</p>	<p>The Siel Bleu User Service and technical department.</p> <p>An external technical service provider carrying out maintenance work.</p> <p>AWS host.</p>
<p>Improving our offers and services (e.g. through a satisfaction survey)</p>	<p>Legitimate Siel Bleu interest in improving services and measuring the effects of its programs on users.</p>	<p>The Siel Bleu User Service and technical department.</p> <p>An external technical service provider carrying out maintenance work.</p> <p>AWS host.</p>
<p>Completing anonymous statistics</p>	<p>Legitimate Siel Bleu interest in getting to know user preferences better and reporting on their actions with their partners (e.g. mutual insurance companies, insurers).</p>	<p>The Siel Bleu User Service and technical department (not including CP Trainer and CP Organizer).</p> <p>An external technical service provider carrying out maintenance work.</p> <p>AWS host.</p> <p>Service providers and third-party partners (e.g. mutual insurance companies).</p>

<p>Purpose of Processing</p>	<p>Basis of Processing</p>	<p>Recipients</p>
<p>Meeting other users, access to interest groups</p>	<p>Consent</p>	<p>Other users who have also consented to share their information.</p> <p>The Siel Bleu User Service and technical department.</p> <p>An external technical service provider carrying out maintenance work.</p> <p>AWS host.</p>

<p>Sales prospecting of existing users for similar products or services by email</p> <p>Sales prospecting by phone or post</p>	<p>Legitimate Siel Bleu interest in promoting its offers and services.</p>	<p>The Siel Bleu User Service and technical department.</p> <p>An external technical service provider carrying out maintenance work.</p> <p>AWS host.</p>
<p>Sales prospecting by email in other cases</p>	<p>Consent</p>	<p>The Siel Bleu User Service and technical department.</p> <p>An external technical service provider carrying out maintenance work.</p> <p>AWS host.</p>
<p>Online payment and payment tracking (card or bank check)</p>	<p>Execution of the agreement between Siel Bleu and the user.</p>	<p>Monetico (online payment services from the Credit Mutuel – CIC group).</p> <p>Authorities for investigation and taking legal proceedings (in the event of fraud, for example).</p> <p>The Siel Bleu User Service and technical department.</p>

Purpose of Processing	Basis of Processing	Recipients
<p>Litigation management</p>	<p>Legitimate Siel Bleu interest in providing proof.</p>	<p>External advice (lawyers, accountants, tax advisers, for example).</p>
<p>Measuring the performance of the Website and improving how it works (cookies)</p>	<p>Consent</p>	<p>The Siel Bleu User Service and technical department (not including CP Trainer and CP Organizer).</p> <p>An external technical service provider carrying out maintenance work.</p> <p>AWS host.</p> <p>Google Analytics.</p>
<p>Measuring the audience of the Website and types of Internet browsers (e.g. Firefox, Chrome or Internet Explorer) and operating systems (e.g. Windows or Mac OS) used by users (cookies)</p>	<p>Consent</p>	<p>The Siel Bleu User Service and technical department (not including CP Trainer and CP Organizer).</p> <p>An external technical service provider carrying out maintenance work.</p> <p>AWS host.</p> <p>Google Analytics.</p>

Improving user experience (cookies)	Legitimate Siel Bleu interest in improving the user experience	The Siel Bleu User Service and technical department (not including CP Trainer and CP Organizer). An external technical service provider carrying out maintenance work. AWS host. Google Analytics.
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Purpose of Processing	Basis of Processing	Recipients
Enabling and facilitating communication by electronic means (cookies)	Legitimate Siel Bleu interest in communicating with their users	The Siel Bleu User Service and technical department (not including CP Trainer and CP Organizer). An external technical service provider carrying out maintenance work. AWS host.
Protecting rights, property or the security of Siel Bleu and its users	Legitimate Siel Bleu interest in preventing risks of fraud	The Siel Bleu User Service and technical department (not including CP Trainer and CP Organizer). External advice (lawyers, accountants, tax advisers, for example).

2. WHAT CATEGORIES OF PERSONAL DATA ABOUT ME ARE COLLECTED?

The information you provide Siel Bleu with. You may provide Siel Bleu with information by contacting Siel Bleu through the Website, or by email, phone or through a trainer.

Technical information (for example, IP address, information on your browser etc.). When you visit the Website, Siel Bleu collects the information they are sent by your computer, your mobile phone or any other device.

The information provided by third parties (for example, mutual insurance companies, provident funds). If you receive Get Phy services through a third party, this third party may send us information, directly or indirectly, to enable us to check your identity and set up the first steps of your tracking (e.g. by creating your online account). In some cases, health data about you may be sent to Siel Bleu in order to better adapt your program. For more information on sending conditions, please contact the body you are affiliated with, if applicable.

3. ON WHAT BASIS ARE MY PERSONAL DATA PROCESSED?

As described in the table above, the Processing used by Siel Bleu is based on (i) the legitimate interests of Siel Bleu, (ii) the execution of the agreement or (iii) your consent.

You may not oppose this Processing when used to meet a legal obligation or when required for the execution of the sales agreement.

When the Processing is based on the legitimate interest of Siel Bleu, you may oppose this. To do this, please refer to Section 8 about your rights.

When Processing depends on your consent, you can withdraw it at any time via fizzup@sielbleu.org.

4. WHAT ARE COOKIES AND WHY ARE THEY COLLECTED?

Cookies are text files containing small amounts of information downloaded onto your computer or device when you visit a webpage. Cookies are then returned to the original webpage at each subsequent visit, or another webpage which recognizes this cookie.

Subject to your consent, Siel Bleu uses cookies to:

- Measure performance and audience of the Website, including analyzing types of Internet browsers (e.g. Firefox, Chrome or Internet Explorer) and operating systems (e.g. Windows or Mac OS) used by visitors (cookies);
- authenticate and follow the users signed in to their <https://pf-and-me.sielbleu.org/> user account to improve the user experience and make the service more adapted to user needs;
- know and analyze the pages and articles visited by users not signed in.

You have the right to choose whether to accept the cookies and Siel Bleu tells you how you can exercise this right below. However, please note that if you refuse cookies, you may not be able to use all the features of the Website.

Most browsers allow you to change the cookies settings. These settings can be found under the 'options' menu or 'preferences' in your browser. For a better understanding of the settings, the following links may be useful, otherwise please use the 'Help' option in your browser for more details:

- [Set cookies in Internet Explorer](#)
- [Set cookies in Firefox](#)
- [Set cookies in Chrome](#)
- [Set cookies in Safari web](#) and [iOS](#).

Siel Bleu also uses cookies, independently of your consent and for its legitimate interest, to enhance your online experience, in order:

- To prevent pop-up windows appearing unnecessarily; and
- to enable or facilitate communication electronically.

Siel Bleu uses Google Analytics, a web analysis tool that helps Siel Bleu understand how users behave on a website. As with many services, Google Analytics uses permanent cookies to track user interactions, as with Siel Bleu where they are used to collect information on how users use the Website. This information is used to generate reports and to help Siel Bleu improve the Website. These reports show the Website trends without identifying visitors individually. You can disable Google Analytics without affecting how you visit the Website – for more information on how to disable Google Analytics on all the websites you use, visit this [Google page](#).

More information about cookies and how to manage them can be found at the following address: <http://www.allaboutcookies.org/fr/>.

5. WHO ARE MY PERSONAL DATA SENT TO?

Siel Bleu does not sell or lease your Personal Data to other people.

Furthermore, Siel Bleu does not share your Personal Data with other people, except in the situations described in the summary table above.

We also send your Personal Data to third parties in the event Siel Bleu transfers one of its entities and/or assets and your Personal Data are affected by this transfer.

Siel Bleu will share your Personal Data with legal authorities, the independent administrative authorities or any other organization if required by law.

6. ARE MY PERSONAL DATA SENT OUTSIDE THE EEA?

The Recipients are located in France or in a member state of the EEA.

In the case of Google Analytics, transfers may be made to third countries in particular the United States and other countries in which Google is established ([learn more](#)). Transfers made to the United States are part of Privacy Shield. Transfers made to the other countries outside the EEA for which no adequacy decision has been adopted by the Commission are monitored by standard contractual clauses.

If other transfers out of the EEA were to take place in the future, Siel Bleu would ensure that these transfers are managed and would update this policy.

7. HOW LONG ARE MY PERSONAL DATA RETAINED?

Siel Bleu keeps your Personal Data as described in the summary table above.

After you have stopped using our Website, Siel Bleu stores your Personal Data in an incorporated and anonymous format.

8. WHAT ARE MY RIGHTS?

In some circumstances, you have rights regarding the Personal Data that Siel Bleu has about you.

The table below provides an overview of these rights and how you can exercise them. Please note that Siel Bleu will check your identity before responding to any request about exercising your rights. To exercise any of your rights, please send an email to the following address: fizzup@sielbleu.org. Please note that for each of these rights Siel Bleu may have valid legal reasons for refusing your request. In this case, Siel Bleu will inform you.

Access right	You have the right to know if Siel Bleu processes Personal Data about you and, if yes, access these Data and certain information on how Siel Bleu uses them and with whom Siel Bleu shares them. You can request a copy of these Data
Right to portability	You can ask to receive Personal Data that Siel Bleu holds about you, in a structured, commonly used format and readable by machine, and the right to request that Siel Bleu transfers personal data to another party (i) if Processing is necessary for the execution of the agreement or (ii) if Processing is based on your consent and Processing is completed using automated methods.
Right to rectification	If you think the Personal Data that Siel Bleu holds about you are inaccurate or incomplete, you have the right to ask for them to be corrected or modified.
Right to be deleted	You may request that Siel Bleu deletes your Personal Data in the following circumstances: (i) When you think it is no longer necessary for Siel Bleu to hold these Personal Data, (ii) When Siel Bleu processes them based on your consent and you wish to withdraw your consent, (iii) When Siel Bleu processes your data based on its legitimate interests and you oppose such treatment, (iv) When you no longer want Siel Bleu to use your data to contact you commercially or (v) When you think Siel Bleu is processing your Personal Data illegally.
Right to the limitation of Processing	You can ask Siel Bleu to limit the Processing of your Personal Data (i) if you challenge the accuracy of your Personal Data, (ii) if the Processing is illegal and you oppose their deletion, (iii) if you think Siel Bleu no longer needs your Personal Data but you still need them for the observation, exercise or defense of your legal rights or (iv) if you are opposed to the Processing of Personal Data that Siel Bleu has on you.

Right to opposition	You have the right to oppose the Processing of your Personal Data by Siel Bleu and Siel Bleu will review your request. To this end, please provide Siel Bleu with details of your arguments so that Siel Bleu can assess if there is a legitimate and urgent reason for Siel Bleu to continue processing these data or if Siel Bleu needs to treat them to exercise or defend its legal rights.
Right to give post-mortem guidelines	You have the right to define guidelines for the storage, deletion and communication of your Personal Data after your death.

9. HOW CAN I MAKE A COMPLAINT?

If you wish to make a complaint about how Siel Bleu processes your Personal Data, please contact Siel Bleu first at the following email address fizzup@sielbleu.org and Siel Bleu will treat your request in a timely manner.

You retain the right to make a complaint to the data protection authority in the country of the European Union where you live or work where you think Siel Bleu has violated regulations regarding the protection of Personal Data. In France, this authority is the CNIL.