

# Privacy policy

*Heaven Haven*

## ARTICLE 1: PREAMBLE

The purpose of this Privacy Policy is to inform users of the Heaven Haven site:

- About how their personal data is collected. Any information used to identify a user is considered personal data. As such, it may include: his first and last names, his age, his postal or email address, his location or his IP address (non-exhaustive list);
- On the rights they have regarding this data;
- The person responsible for processing the personal data collected and processed;
- The recipients of this personal data;
- On the website's cookie policy.

This policy supplements the legal notices and the General Conditions of Use available to users at the following address:

[192.168.14.210/documents/Terms-and-conditions-of-use-of-Heaven-Haven-website.pdf](http://192.168.14.210/documents/Terms-and-conditions-of-use-of-Heaven-Haven-website.pdf)

## ARTICLE 2: PRINCIPLES RELATING TO THE COLLECTION AND PROCESSING OF PERSONAL DATA

In accordance with Article 5 of European Regulation 2016/679, personal data are:

- Treated lawfully, fairly and transparently to the person concerned;
- Collected for specific purposes (cf. Article 3.1 hereof), explicit and legitimate, and not subsequently treated in a manner incompatible with those purposes;
- Adequate, relevant and limited to what is necessary for the purposes for which they are processed;
- Accurate and, if necessary, kept up to date. All reasonable steps must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, are deleted or rectified without delay;
- Kept in a form allowing the identification of the persons concerned for a period not exceeding that necessary for the purposes for which they are processed;
- Processed in a manner that ensures appropriate security of the data collected, including protection against unauthorized or unlawful processing and against loss, destruction or accidental damage, using appropriate technical or organisational measures.

Processing is lawful only if and to the extent that at least one of the following conditions is met:

- The data subject has consented to the processing of his personal data for one or more specific purposes;
- The processing is necessary for the execution of a contract to which the data subject is a party or for the execution of pre-contractual measures taken at the request of the data subject;
- Processing is necessary to comply with a legal obligation to which the controller is subject;
- Processing is necessary to safeguard the vital interests of the data subject or other natural person;
- The processing is necessary for the performance of a mission of public interest or falling within the exercise of public authority of which the controller is invested;
- The processing is necessary for the purposes of legitimate interests pursued by the controller or by a third party, unless the interests or fundamental freedoms and rights of the data subject which require the protection of personal data prevail, in particular where the person concerned is a child.

### ARTICLE 3: PERSONAL DATA COLLECTED AND PROCESSED IN CONNECTION WITH BROWSING THE WEBSITE

#### **Article 3.1: Data collected**

The personal data collected in the course of our activity are the following:

- Name;
- First name;
- E-mail address;
- Mailing address;
- Telephone;
- Country of residence;
- Town of habitation;

The collection and processing of this data meets the following purpose(s):

- Processing of any invoices to be sent to the user
- Response to requests sent via the contact form

#### **Section 3.2: Method of Data Collection**

When you use our site, no data is collected automatically.

Personal data is collected when you perform the following operations on the platform:

- Create an account
- Sending a request via the contact form

They are kept by the controller under reasonable security conditions for a period of: *36 months*.

The Company may retain certain personal data beyond the time limits stated above in order to fulfil its legal or regulatory obligations.

### **Article 3.3: Data Hosting**

The Heaven Haven site is hosted by: Oceanside Properties LLC, headquartered at 2 Pl. Dean Gosse, 38000 Grenoble.

The host can be contacted at the following telephone number: 07.66.33.39.06

### **Article 3.4: Cookie Policy**

The site may use «cookies» techniques.

A “cookie” is a small file (less than 4 KB), saved by the site on the user’s hard drive, containing information about the user’s browsing habits.

These files allow it to process statistics and traffic information, facilitate navigation and improve service for the user’s convenience.

For the use of "cookies" files involving the recording and analysis of personal data, the consent of the user is mandatory.

This user consent is deemed to be valid for a maximum period of 6 (six) months. At the end of this period, the site will again ask the user’s permission to save "cookies" files on its hard drive.

- a. User opposition to the use of "cookies" files by the site

Cookies that are not essential to the functioning of the site are only placed on the user’s device after obtaining their consent. The user may withdraw his consent at any time by:

- Access the “Account settings” section of the profile page

More generally, the user is informed that he can oppose the registration of these "cookies" files by configuring his navigation software

For information, the user can find at the following addresses the procedure to follow in order to configure his navigation software to oppose the registration of "cookies" files:

- Chrome : <https://support.google.com/accounts/answer/61416?hl=fr>
- Firefox : <https://support.mozilla.org/fr/kb/enable-and-disable-cookies-website-preferences>
- Safari : <http://www.apple.com/legal/privacy/fr-ww/>
- Internet Explorer : <https://support.microsoft.com/fr-fr/help/17442/windows-internet-explorer-delete-manage-cookies>
- Opera : <http://www.opera.com/help/tutorials/sécurité/cookies/>

In case the user decides to disable the "cookies" files, he can continue his navigation on the site. However, any malfunction of the site caused by this manipulation cannot be considered as being due to the editor of the site.

- b. Description of the "cookies" files used by the site.

The website editor draws the user's attention to the fact that the following cookies are used during navigation:

- Session cookie

#### ARTICLE 4: DATA CONTROLLER AND DATA PROTECTION OFFICER

##### **Article 4.1: The data controller**

The personal data are collected by Oceanside Properties, LLC with a capital of \$10,000, whose registration number is <https://www.HeavenHaven.com/>.

The person responsible for processing personal data may be contacted as follows:

By mail to: 2 Pl. Doyen Gosse, 38000 Grenoble;

By phone: 07.66.33.39.06;

By email: [sebastien.ruet@etu.univ-grenoble-alpes.com](mailto:sebastien.ruet@etu.univ-grenoble-alpes.com).

#### ARTICLE 5: USER RIGHTS IN DATA COLLECTION AND PROCESSING

Any user concerned by the processing of his personal data can claim the following rights, in application of the European regulation 2016/679 and the French Data Protection Act (Law 78-17 of 6 January 1978):

- Right of access, rectification and right to erasure of data (set out in Articles 15, 16 and 17 of the GDPR respectively);
- Right to data portability (Article 20 GDPR);
- Right to limitation (Article 18 GDPR) and opposition to data processing (Article 21 GDPR);
- Right not to be subject to a decision based exclusively on an automated process
- Right to determine the fate of data after death;
- Right to refer to the competent supervisory authority (Article 77 GDPR).

To exercise your rights, please send your letter to Oceanside Properties, 2 Pl. Doyen Gosse, 38000 Grenoble or by email to [sebastien.ruet@etu.univ-grenoble-alpes.fr](mailto:sebastien.ruet@etu.univ-grenoble-alpes.fr)

In order for the data controller to be able to grant his request, the user may be required to provide him with certain information such as: his first and last names, e-mail address and account number, personal space or subscriber.

Visit [cnil.fr](http://cnil.fr) for more information on your rights.

#### **ARTICLE 6: CONDITIONS FOR AMENDING THE PRIVACY POLICY**

The publisher of the Oceanside Properties website reserves the right to modify this Policy at any time to ensure that users of the site comply with the applicable law.

Any modifications may not affect purchases previously made on the site, which remain subject to the Policy in force at the time of purchase and as accepted by the user at the time of validation of the purchase.

Users are encouraged to read this Policy each time they use our services, without the need to notify them formally.

This policy, published on 16/01/2023.

