

# Privacy Policy – mobile app

## I - INTRODUCTION

The contact details of the teachers are never sent to the students, and reciprocally.

Milkmind does not sell or rent any information or data about its members.

## II - Privacy Policy

### 1. General

Milkmind SAS (whose registered office is located at 15 rue Blomet 75015 Paris, France), in its capacity as data controller, attaches great importance to the protection and respect of your privacy. This policy is intended to inform you of our practices regarding the collection, use and sharing of information that you are required to provide to us through our platform (the "Platform") accessible from the website [www.milkmind.com](http://www.milkmind.com).

This policy sets out how we treat the personal data that we collect and that you provide to us. We invite you to read this document carefully to know and understand our practices regarding the processing of your personal data that we implement.

### 2. Information We Collect

We may collect and process the following data:

#### 2.1. Information that you provide to us directly

By using our Platforms, you are required to send us information, some of which is likely to identify you ("Personal Data"). This is particularly the case when you fill out forms (such as the registration form), when you get in touch with another Milkmind member, when you contact us - whether by phone, email or any other means. communication – or when you tell us about a problem.

This information contains in particular the following data:

**2.1.1.** The data needed to register for the service we provide on our Platform. This data includes your first and last name, postal address, e-mail address, mobile phone number, landline phone number, date of birth, password. Among this information, only your surname, first name, date of birth, e-mail address and

password are mandatory. Otherwise, Milkmind will not be able to provide you with the services offered by our Platforms and you will not be authorized to create an account on our Platform;

**2.1.2.** A photograph;

**2.1.3.** A postal address;

**2.1.4.** A copy of all exchanges between Milkmind and you;

**2.1.5.** A copy of all course requests or publications made on our Platform;

**2.1.6.** The details of the financial or accounting operations carried out on our Platform or by any other means, containing in particular information relating to information relating to the courses reserved or for which you have published an announcement on our Platform. Milkmind does not save any information on your card details as it is securely managed by Stripe;

**2.1.7.** Details of your visits to our Platform and the content you have accessed;

**2.1.8.** If applicable, your answers to our surveys and questionnaires and the opinions you left to evaluate a course carried out with another member of our community, this information being in particular likely to be used in the context of research and analysis of the user behavior;

**2.1.9.** The data that we may ask you to provide when you report a problem with our Platform or our services;

## **2.2. Data we collect automatically**

We also collect information about your use of our Platform (such as your date of registration, your average rating received, etc.) which may be displayed on your public profile.

## **2.3. Duration of retention of your data**

Your data will be secure and kept indefinitely unless you request their deletion via the email address [contact@milkmind.com](mailto:contact@milkmind.com)

## **3. How do we use the data we collect?**

**3.1** Perform contracts between you and us or between us and our business partners and provide you with requested information and services. This

processing is necessary for the performance of our respective contractual obligations.

**3.2** Sending you information about our services (such as lesson booking confirmations) by email. This processing is necessary for the performance of our respective contractual obligations and/or carried out with your consent.

**3.3** To allow you to personalize your profile on our Platform. This processing is carried out on the basis of your consent.

**3.4** Enable you to communicate and interact with other members of our community. This processing is necessary for the performance of our respective contractual obligations and/or carried out with your consent.

**3.5** Give you access and allow you to communicate with our member relations service. This processing is (i) necessary for the performance of our respective contractual obligations, (ii) carried out with your consent and/or (iii) necessary for the establishment, exercise or defense of legal claims.

**3.6** Ensure compliance with applicable law and our terms and conditions. In the event of breaches on your part, we may suspend your account on our Platform; This processing is (i) necessary for the performance of our respective contractual obligations, (ii) carried out with your consent and/or (iii) necessary for the establishment, exercise or defense of legal claims.

**3.7** To send you, in accordance with the applicable legal provisions and with your consent when required by law, marketing, advertising and promotional messages and information relating to the use of our services and booking methods. This processing is based on your consent and/or our legitimate interest (providing you with relevant information).

**3.8** To notify you of changes to our services. This processing is necessary for (i) the performance of our respective contractual obligations, (ii) compliance with our legal obligations and/or (iii) the establishment, exercise or defense of legal claims.

**3.9** Manage our Platform and perform internal technical operations in the context of problem solving, data analysis, testing, research, analysis, studies and surveys. This processing is based on our legitimate interest (to ensure the security of our Platform and to improve their characteristics).

**3.10** Improve and optimize our Platform, in particular to ensure that the display of our content is adapted to your device. This processing is based on our legitimate interest (providing you with relevant content).

**3.11** To allow you to use the interactive features of our services if you wish. This processing is necessary for the performance of our respective contractual obligations and/or carried out with your consent.

**3.12** help us maintain a safe and healthy environment on our Platform. This processing is (i) based on our legitimate interest (ensuring the security of our Platform), (ii) necessary for compliance with our legal obligations and/or (iii) necessary for the establishment, exercise or defense of a right to justice.

**3.13** Evaluate the effectiveness of the advertising messages we send and adapt them to our members. This processing is based (i) on our legitimate interest (to measure and optimize the effectiveness of our campaigns) and/or (ii) on your consent.

#### **4. Who are the recipients of the information we collect and why do we send them this information?**

**4.1.** As part of the use of our services, some of your information is transmitted to other members of our community, through your public profile.

**4.2.** You can delete your account directly from your dashboard in the profile section or write to us at [contact@milkmind.com](mailto:contact@milkmind.com) so that a member of our team can delete your account. We do not store any data from deleted accounts in our back office.

We do not pass on your content or information for resale to any third party company.

#### **5. How do we use and moderate your posts?**

**5.1.** We may read the messages that you exchange with other members of our community via our Platform, in particular for the purposes of fraud prevention, improvement of our services, user assistance, verification of compliance by our members with the contracts concluded with us. For example, in order to prevent a member from circumventing our online reservation system, we authorize ourselves to browse and analyze the messages exchanged on our Platform in order to ensure that they do not contain any contact details or references to other websites.

**5.2.** We never learn about your communications with other members of our community for promotional or targeted advertising purposes. Where possible, we use automated systems to moderate messages transmitted between members via our Platform, without any individual decision being taken.

## **6. Targeted advertisements and e-mails that we send to you**

In accordance with applicable legislation and with your consent when required, we may use the data you provide to us on our Platform for commercial prospecting purposes (for example to (i) send you our welcome email, (ii) send you our referral program or other communications that may be of interest to you).

## **7. Is your data transferred, how and where?**

As a rule, we store your Personal Data within the European Union. However, to the extent that, for example, some of our service providers are located in countries outside the European Union ("Third Countries", ie. United States), we transfer some of your Personal Data to Third Countries. This may in particular be the case towards Third Countries for which the European Commission has not taken a decision of "adequate protection". In such a case, we ensure that this transfer is carried out in accordance with the applicable regulations and guarantees a sufficient level of protection of the privacy and fundamental rights of individuals (in particular by the standard contractual clauses of the European Commission).

## **8. What are your rights over your personal data?**

**8.1.** You have the right to receive a copy of your Personal Data in our possession ("right of access").

**8.2.** You can also request the erasure of your Personal Data as well as the rectification of erroneous or obsolete Personal Data ("right of erasure and right of rectification") by writing to us at [contact@milkmind.com](mailto:contact@milkmind.com). Please note that we may retain certain information about you when required to do so by law or when we have a legitimate reason to do so. This is the case, for example, if we believe that you have committed fraud or violated our rules and that we wish to prevent you from circumventing the rules applicable to our community.

**8.3.** You also have the right to object at any time for reasons relating to their particular situation, (i) to the processing of your Personal Data for direct

marketing purposes or to processing carried out on the basis of our legitimate interest ("right to 'opposed').

**8.4.** You have the right to limit the processing carried out on your Personal Data ("right to limitation"). Please note that this right only applies if (i) you dispute the accuracy of your Personal Data for the duration allowing us to verify the accuracy of the latter; (ii) in the event of unlawful processing on our part and you request a restriction of their use rather than erasure, (iii) we no longer need the personal data for the purposes of the processing but they are still necessary for the establishment, exercise or defense of legal claims; iv) in the event of exercise of your right of opposition during the verification period relating to the point of knowing whether the legitimate reasons which we pursue prevail over yours.

**8.5.** You have the right to lodge a complaint with the competent supervisory authority or to obtain compensation from the competent courts if you consider that we have not respected your rights.

**8.6.** You also have the right to the portability of your data, i.e. the right to receive the Personal Data that you have provided to us in a structured, commonly used and machine-readable format and the right to transmit this data to another data controller ("right to portability").

**8.7.** You also have the right to define directives relating to the fate of your Personal Data after your death.

**8.8. Confidentiality of your password**

You are responsible for maintaining the confidentiality of the password you have chosen to access your account on our Platform.

You agree to keep this password secret and not to communicate it to anyone.

**8.9.** In accordance with article 223-2 of the Consumer Code, both students and Milkmind teachers can subscribe to a list opposing cold calling.

**9. Links to other websites**

Our Platforms may occasionally contain links to the websites of our partners or third-party companies. Please note that these websites have their own privacy policies and that we are not responsible for the use made by these sites of the information collected when you click on these links. We invite you to read the privacy policies of these sites before transmitting your Personal Data to them.

**10. Modification of our privacy policy**

We may change this privacy policy from time to time. We advise you to check this page regularly to take note of any changes or updates to our privacy policy.

## **11. Dispute**

In accordance with articles of the Consumer Code L.611-1 and following, it is provided that for any dispute of a contractual nature that could not be resolved within the framework of a complaint previously lodged with our customer service, you can, as a consumer, have free recourse to mediation by contacting the National Association of Mediators (ANM) either by post by writing to 62, rue Tiquetonne 75002 PARIS or by e-mail by completing the online referral form at the following address: [www.anm-conso.com](http://www.anm-conso.com).

## **12. Contact**

For any question relating to this privacy policy or for any request relating to your personal data, you can contact us at:

- sending an email at [contact@milkmind.com](mailto:contact@milkmind.com)