



mytvchain.io

Personal Data Protection Policy

Last updated: 21 April 2022

This Personal Data protection policy (referred to as "**Personal Data Protection Policy**" or "**Policy**") describes the information that we collect about you by means of or through the intermediary, in whole or in part, of our websites or one of our pages on social networks, but also more generally in the context of your relations with us, and how we treat them.

This Personal Data Protection Policy also specifies the rights you have over your Personal Data in application of the applicable legal and regulatory provisions.

If you have any questions, comments or concerns regarding this Personal Data Protection Policy, you can of course send them to us at the contact details given below.

We respect the confidentiality and ensure the security of your Personal Data (as defined below) as well as the protection of your privacy. In this context, we make sure that all the technical and organizational measures aimed at ensuring the security of your Personal Data are implemented in accordance with the security standards in force.

This Personal Data Protection Policy aims to inform you of our practices concerning the way in which we collect, use, process and share the information concerning you that you are required to provide to us, including personal information, in connection with your use of MyTVchain Sites (as defined below).

When this Policy mentions the terms "**MyTVchain**", "**we**", "**us**", "**our**", or the "**Company**", they refer to the company MyTVchain which is responsible for the information concerning you, in accordance with this Personal Data Protection Policy (referred to as the "**Data Controller**").

MyTVchain is a French *Société par actions simplifiée*, with share capital of 10.000 euros, whose registered office is situated 1501 Route des Dolaines, OX53, Sophia Antipolis, 06560 Valbonne, and registered with the Registre du Commerce et des Sociétés of Grasse under the number 842 064 222.

The Company operates websites accessible to the public at the following url addresses (hereinafter the "**Sites**"):

- mytvchain.io
- mytvchain.com
- nft.mytvchain.io
- token.mytvchain.io

These Sites aim to:

- provide users with information enabling them to discover the activity and services (hereinafter referred to as “**Services**”) offered by the Company, as well as its news (events, publications, etc.);
- offer functionalities and / or information allowing users to contact the Company and present the Services offered by the Company, the projects carried out by the latter and to come, or the team working on these projects;
- provide users with various associated Services as detailed in our general conditions available on the Sites.

During your navigation and your interactions on the Sites, on the pages administered by the Company on social networks or, in general during your interactions or exchanges with the Company, the latter may be required to collect and process Data of a personal nature concerning you (also referred to as “**Personal Data**”) for the management of the activities it carries out and for its own account, as Data Controller, whether you are a customer, prospect, contact, Internet user, candidate, supplier, service provider or partner, potential or current (also referred to as “**you**” or “**the affected person(s)**” or “**the user(s)**” in this Personal Data Protection Policy).

In this context, the Company applies the principles defined by the legal and regulatory provisions on the protection of Personal Data, in particular in Regulation (EU) 2016/679 of April 27, 2016 on the protection of natural persons at with regard to the Processing of Personal Data (also referred to as “**RGPD**”) and Law 78-17 of 6 January 1978 relating to computers, files and freedoms (known as the “**Data Protection Act**”) and its decrees.

1. Information collected

We are likely to collect and process the following data:

1.1 Information you send us directly

We make use of the information that you transmit directly, namely:

- **Information necessary for the use of the Service**

By using the Service, you are required to send us information, some of which may identify you. This information is necessary for the proper performance of the Services and to enable us to comply with our legal obligations. Without them, we may not be able to provide you with all the Services you request.

- **Subscription information**

When subscribing, we ask you to provide us with certain information such as your first name, last name, e-mail address, title, telephone number. This information is compulsory, except for the following Site: nft.mytvchain.io, this Site being dedicated to the sale of non-fungible tokens (“**NFTs**”) which does not imply the collection of Data. Otherwise, we will not be able to provide you with the proposed Services.

- **Communications with support**

When you communicate with Support, we collect information concerning your communications and any information that you decide to transmit during exchanges with the Service as part of your support or request for assistance.

1.2 Information collected automatically during your use

When you use the Services, we automatically collect information, including Personal Data, about the Services you use and how you use them. This information is necessary in view of our legitimate interest in providing and improving the functionality of the Services.

- **Location**

When you use certain features and subject to your prior consent, we may collect information about your location, as determined by data such as your IP address or the GPS of your mobile device, to provide you with a better user experience. Most mobile devices allow you to control or disable the use of location services in apps and from device settings.

- **Use**

We collect information about your interactions with the Services, such as your content views, your entries, and other actions requiring your intervention.

- **Subscription**

We collect data relating to your subscriptions and a copy of the declarations made and forms completed for subscription purposes.

- **Device**

We automatically collect connection and device data when you access the Services. This information includes but is not limited to information about how you have used the Service, IP address, time stamp, hardware and software data, data about the device and its use, unique identifiers, error reports, cookies, and the pages you have viewed or viewed from the Service.

- **Cookies and similar technologies**

For more information, please see section 6 entitled "Cookie Management Policy"

1.3 Specific information

- **Personal Data of minors**

We only offer our Services to adults with legal capacity.

Also, in general, the use of the Sites and the Company's dedicated pages on social networks is reserved for adults with legal capacity, the Company cannot under any circumstances be held responsible for the use of the Site or its pages on social networks by minors or incompetent persons, and therefore the consequences that may result therefrom, in particular with regard to the processing of their Personal Data.

As an exception, we may be required to process Personal Data of minors of at least fifteen years of age when they come into contact with the Company with a view to applying for a job or internship offer.

2. Uses of the information collected

We use, store and process information, including personal information about you, in order to power, understand, improve and develop the Services, to create and maintain a secure environment, as well as to comply with our legal obligations.

2.1 Legal basis

We only use your Personal Data if you have consented to it or if this use is based on one of the legal grounds provided by law.

- **The protection of our legitimate interests** (article 6, paragraph 1, point 1 (f) of the GDPR).
- **The performance of a concluded contract or of an engagement under which you are and / or we are engaged** (Article 6, paragraph 1, point (b) of the GDPR).
- **Compliance with a legal or regulatory obligation** (article 6, paragraph 1, point 1 (c) of the GDPR).

2.2 Rationale for collection

We collect and process information about you for various reasons:

- Execute your subscription instructions.
- Manage our business relationship.
- Offer you products, contracts and services and carry out market research.
- Collect information from data analysis.
- Improve the quality of products, contracts and services and ensure the effectiveness of our support.
- Keep in mind our exchanges with you (by electronic message or any other type of communication).

- Ensure the continuity of our services.
- To ensure the defense of our rights and the respect of legal and regulatory obligations insofar as your interests do not take precedence.
- To safeguard the legitimate interests of third parties insofar as your interests do not take precedence.
- Claiming, exercising, or defending your rights.
- For reasons of public order or public interest.

2.2.1 Feed, improve and develop the Service

- Allow you to access and use the Service.
- Allow you to communicate with Support as part of a request for assistance.
- Manage, protect, improve, and optimize the tools and experience of the Service.
- Send you accompanying or service-related messages, updates, alerts.
- We process this information given our legitimate interest in improving the Service and the experience of our Users.

2.2.2 A secure environment of trust

- Detect and prevent fraud, spam, abuse, security incidents and other harmful activities.
- Conduct safety investigations and risk assessments.
- Comply with legal obligations.

2.2.3. Provide, personalize, evaluate, and improve support.

- Send you promotional messages, commercial and other information that may be of interest to you.
- Manage referral programs.
- Perform profiling on your characteristics and preferences to send you promotional messages, marketing information, and the like that we believe may be of interest to you.

3. Data sharing

We are likely to transfer and disclose your data to:

- Technical subcontractors.

3.1 Data sharing with Partner Suppliers and subcontractors

We use third party subcontractors to help us provide the services related to the Service. Our Service may occasionally contain links to the sites of our subcontractors, such as third-party integrations, payment services, subscription security and identity validation in accordance with the legislation.

We therefore work in close collaboration with subcontractor companies who may have access to your Personal Data. We only share your data with processors in the following cases:

- When we use subcontractors in terms of technical services, payment services, analytical solutions, or to help us carry out the development, maintenance of products, allow the service via third party platforms and software tools. These subcontractors have limited access to only the information that is necessary for the performance of these tasks on our behalf and have a contractual obligation to protect and use it only for the purposes for which it was disclosed and in compliance with this Personal Data Protection Policy. We can at any time check with these subcontractors that they are using the data that we transmit to them correctly.

3.2 Data sharing for structural causes

In the event that we sell or acquire a business or assets, we reserve the right to share your Personal Data with the potential seller or buyer of this business or these assets. If all or part of the Service is purchased by a third party, the data in our possession will, where applicable, be transferred to the new owner. In this case, we will notify you by the most appropriate means before your Personal Data is transferred and is governed by another Personal Data Protection Policy and we will tell you the options available to you then.

3.3 Data sharing outside the European Union

If as part of the data processing procedures described above, your Data is processed in countries outside the European Union ("EU") or the European Economic Area ("EEA"), we guarantee that your Data will be processed in accordance with applicable European standards. To the extent necessary, and in order to ensure the security of Data transfers to recipients located outside the EU or the EEA, we will use, where appropriate, Data transfer agreements based on clauses EU standard contractual arrangements, or other mechanisms authorizing the transfer of such Data and including appropriate technical and organizational measures.

For non-EU countries to which the EU recognizes a level of protection of Personal Data similar to that in force within the EU or simply adequate according to the protection standards in force within the EU, no approval or regulatory agreement is required. We will nevertheless, ensure that your Data will be processed in accordance with the standards in force and to ensure the optimal security of transfers of Personal Data to these countries.

4. Rights of data subjects

We are required to inform you about your rights relating to your Personal Data, the duration of processing of your requests as well as possible refusals with regard to said processing of requests.

4.1 Rights conferred

As mentioned above, we comply with the GDPR as well as the regulations applicable in France. In this context, certain rights are conferred on you:

4.1.1 Right of access (Article 15 of the GDPR)

You can have access to your Personal Data in our possession at any time. This information relates in particular to the categories of Data that we process, the purposes of the processing, the source of the data if we have not collected it directly from you and, where applicable, the recipients to whom we have transferred your data. You are entitled to receive a free copy of your data: if you wish to receive additional copies, we reserve the right to charge you for them.

4.1.2 Right to rectification (Article 16 of the GDPR)

You can ask us at any time to rectify your incorrect or obsolete Personal Data. Based on the most recent information available to us, we will take all appropriate measures to ensure that the Data we hold about you and that we process on an ongoing basis is accurate, complete, up-to-date and relevant.

4.1.3 Right to deletion (Article 17 of the GDPR)

You can request the deletion of your Personal Data at any time and free of charge.

In accordance with article 17 GDPR, this may be the case if:

- your Data is no longer necessary for the purposes for which it was collected or processed.
- you have revoked your consent on which the processing of your Data is based and if there is no other legal basis justifying its processing or storage;
- you object to the processing of Data for commercial prospecting purposes;
- the Data has been processed unlawfully;

However, we may retain certain information about you when required by law to comply with our legal obligations or when we have a legitimate reason to do so, such as improving security.

Please note that if you request the deletion of your personal information, we still retain some of your data even after your account is closed:

- when reasonably necessary to fulfill our legal obligations and, in particular, to comply with legal retention periods, comply with regulatory requirements, resolve disputes, maintain security, respond to requests from authorities, prevent fraud and abuse.
- When you have shared information with Support, it may be retained even after deletion of your Account. However, this information will no longer be attributed to you and will be subject to an anonymization procedure.
- Because we maintain the tools of the Service to protect them from accidental or malicious loss and destruction, residual copies of your personal information may not be deleted from our backup systems for a limited period of time.

4.1.4 Right to object (Article 21 of the GDPR)

You have the right to object free of charge, freely and at any time to the processing of your Personal Data. In such a case, we will no longer process your Personal Data.

However, this right will not apply if we can demonstrate compelling reasons justifying the processing of your Personal Data and which outweigh your own interests.

4.1.5 Right to limitation (Article 18 of the GDPR)

You have the right to restrict the processing carried out on your Personal Data. You can ask us to stop using all or part of your Personal Data or to limit our use of it if:

- you dispute the accuracy of the data for the period allowing us to verify the accuracy of the data;
- the processing is unlawful, but you nevertheless oppose the deletion of your Data and otherwise demand the limitation of the processing of your Data.
- we no longer need your Data, but you need it to enforce, exercise or defend your rights;
- you object to the processing, as long as it is not certain that the legitimate reasons that we invoke outweigh yours.

4.1.6 Right to portability (Article 20 GDPR)

You have the right to the portability of your data, the right to receive the Personal Data that you have provided to us in a structured, commonly used and readable format, and the right to transmit this data to another controller.

However, you only have this right if the processing of your Data is based on your consent or if it is necessary for the execution of a subscription. You can ask us to personally send you a copy of your Data. We can also send them directly to another data controller that you have designated to us beforehand.

4.1.7 Death

You have the right to define guidelines relating to the fate of your Personal Data after your death.

To do this, you can contact us by referring to our Contact section.

4.2 Time limits for the execution of requests concerning rights

In principle, we endeavor to respond to all requests regarding the above rights within a period of one (1) month maximum.

However, and in accordance with the provisions of article 12.3 of the GDPR, this period may be extended by a maximum of two months for reasons relating to the complexity and the number of requests that we will have to process. In this case, we will notify you of the extension of the response time within one month of receiving your request.

4.3 Restriction of information in the exercise of rights

In some specific cases, we may be unable to provide information on all of your data due to legal requirements. If we are led to refuse your request for information, in such a case, we will inform you by any means of the reasons for this refusal.

5. Security

We ensure the security of your Personal Data as well as the protection of your privacy. In this context, we make sure that all the technical and organizational measures aimed at ensuring the security of your Personal Data are put in place, in particular by our partners, and this in accordance with the security standards in force.

5.1 Security measures implemented

Pursuant to article 32 of the GDPR, we are constantly putting in place and updating administrative, technical, organizational and physical security measures to protect your information against unauthorized access, loss, destruction or alteration. Some of the safeguards we use to protect your information are firewalls and data encryption, as well as information access controls. If you know or have reason to believe that your Account credentials have been lost, stolen, misappropriated, compromised, or in the event of actual or suspected unauthorized use of your Account, please contact us as set out in our Contact section.

5.2 Sharing the use of an identical terminal with a third party

If the terminal, you use to access our site is used by several people and when the same terminal has several navigation software, we cannot ensure with certainty that the Personal Data transmitted to us by this terminal is well yours. Sharing the use of your terminal with others is at your discretion and your responsibility.

6. Use of cookies - Cookie Management Policy

We use cookies and similar technologies in order to offer you a personalized and secure service and to guarantee you an optimized and personalized navigation on the Site.

The term "cookie" covers the various tracers that are placed or read on your terminal when you browse Internet pages. Cookies are used on the Site for various purposes set out below and mainly to facilitate your navigation, or to produce visit statistics.

We do not collect any tracers that allow you to be identified, directly or indirectly, without your prior and express consent. You can oppose the collection of cookies at any time.

6.1 Definition of cookies and other tracers

A cookie, sometimes called a "tracker" or "connection cookie", is a data file saved on your device's hard drive and read by your browser on your device when you first visit a web page. The vast majority of websites use cookies to optimize the functionality offered. Cookies also help to maximize the security of interactions by retaining your preferences for your subsequent visits from the same device.

Some cookies expire when you close your browser while others remain on your device to be used again on subsequent visits.

Certain functions of cookies can also be carried out by means of similar technologies, such as pixels, web beacons, tracking URLs, making it possible to know for example the status of consultation of a specific email or access to a link.

6.2 Use of cookies

Cookies allow us to recognize your computer, tablet or mobile in order to personalize the services we offer you through the Site. We use cookies in particular to ensure personalized navigation on the Site. Cookies allow you to connect to the Service, save your connection preferences, subscribe to online products and services and use tools such as our simulators and comparators.

We use these technologies for different reasons, for example:

- Determine user preferences.
- Optimize navigation.
- To allow the use and simplify the operation of the Service.
- Analyze the performance, efficiency, and proper functioning of the Service.
- Better understand interactions with the Service and how to improve it.
- Offer personalized content.
- Secure the Service.
- Maintain the confidentiality of your information when you browse our website.

To this end, we display a banner at the bottom of your screen when you first connect to the Site. You always have the possibility of refusing at any time the deposit of cookies on your terminal by configuring your Internet browser. If this is the case, however, we cannot guarantee you optimal and personalized operation of the Site and we cannot be held responsible for any consequences linked to the alteration of your browsing conditions on the Site which would result from your choice to refuse, block or limit the use of cookies necessary for the proper functioning of the Site.

The information collected through cookies does not in any way allow you to be identified directly or indirectly and is only intended to help us improve the performance of the Site. These may be analytical cookies, such as audience measurement cookies, advertising cookies, or even social network sharing cookies.

6.3 Categories of cookies

In accordance with the recommendations of the CNIL, cookies strictly necessary for the operation of the Site are not subject to any prior obligation on your part. Conversely, we ask for your express prior consent before any implementation of cookies issued by third parties, which are subject to the latter's confidentiality policies. We therefore invite you to consult the latter on the websites of said third parties.

6.4 Managing cookies

When you first browse, we ask for your consent before using cookies. You have the possibility to modify your preferences concerning the content of personalized cookies. Most browsers automatically accept cookies, so you can revoke your consent to the use of cookies at any time by changing your browser or device settings.

Please note that if you choose to decline cookies, you will still be able to view the Service, however some sections may not work as expected, or even not work at all.

6.5 Help with cookie management

The configuration for managing cookies varies for each browser. This is described in the assistance menu of your browser.

To guide you in your settings, the CNIL has developed a page dedicated to controlling cookies, which can be consulted through the following link: <https://www.cnil.fr/fr/cookies-les-outils-pour-les-maitriser>.

7. Retention of your data

We keep your data as long as you use the Service. We are also likely to keep them even if you decide to no longer use our Service, in particular to comply with applicable legislation, to defend our interests or assert our rights or those of third parties when they are legitimate. Certain data may be kept for an additional period for the management of complaints as well as to meet our legal or regulatory obligations or to respond to requests from authorized authorities.

Your Personal Data is anonymized at the end of the following periods three (3) years after your last use of the Service

8. Modification of this Personal Data protection policy

We may need to modify this Personal Data Protection Policy at any time, in accordance with this clause. If we make a change, we will post the new version and update the date of the last update at the top of this Privacy Policy. We advise you to regularly consult this page to take note of any modifications or updates made. If you do not agree with the terms of the new Personal Data Protection Policy, you can delete your Account. If you do not delete your Account before the date of entry into force of the new Personal Data Protection Policy, your access and use of the Service will be subject to the new Personal Data Protection Policy.

9. Complaints to the supervisory authority

If you consider that we have not responded adequately to your request or your questions, you are entitled to lodge a complaint with the competent authority in matters of Personal Data protection, the National Commission for Informatics and Liberties (CNIL), at the following Internet address:

- <https://www.cnil.fr/fr/plaintes> ;
- or to the following postal address: **CNIL - 3 PLACE DE FONTENOY - TSA 80715 - 75334 PARIS CEDEX 07.**

10. Consultation of applicable texts

The text of the General Data Protection Regulation (GDPR) is freely accessible at the following Internet address: <https://eur-lex.europa.eu/legal-content/FR/TXT/?uri=CELEX:32016R0679>; or on the CNIL website at the following internet address: <https://www.cnil.fr/fr/reglement-europeen-protection-donnees> as well as all applicable texts on the protection of Personal Data and protection of rights and freedoms on the Internet (<https://www.cnil.fr>).

To understand your rights, you can also refer to the explanations provided by the Cnil here: <https://www.cnil.fr/fr/les-droits-pour-maitriser-vos-donnees-personnelles>.

We point out that in application of articles L.223-1 et seq. Of the Consumer Code, you can, if you are a consumer, object at any time to being canvassed by telephone, by registering for free on the site www.bloctel.gouv.fr.

11. Contact

For any questions relating to this Personal Data Protection Policy or the Service's information processing practices, you can contact us by:

- sending an email to contact@mytvchain.com
- or by writing to us at the following address: **1501 ROUTE DES DOLAINES, OX53, SOPHIA ANTIPOLIS, 06560 VALBONNE.**

Please note that we may ask you to verify your identity before taking any action on your request.