

Download Page Privacy Policy UNLOCKTME

Version of the 12/07/2022

Unlocktme is a website that allows a user (the “**User**”) to access and download content through a URL hyperlink made available to the User by a third party using the Unlocktme mobile application (the “**Uploader**”), , as described in Unlocktme’s User Terms of Use..

The website is made available by Behind The App, a French registered company with a social capital of 1.000€, with its head office located 14, rue Charles V, 75004, Paris, France, registered in the Paris Trade and Commerce Register under number 903 375 608 (hereinafter “**Unlocktme**”, “**we**”, “**us**”, “**our**”).

This Privacy Policy applies to Users that use the Unlocktme Download Pages to access to and download a File.

1. Definitions

The following definitions apply to this Privacy Policy :

Data Protection Laws : means (i) the Regulation (EU) 2016/679 (General Data Protection Regulation) of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data as currently in effect and as may be amended from time to time, France’s Law no°78-17 of 6 January 1978 on data processing, files and freedoms and any regulation(s) that complete or replace such law and France’s Law no°2018-493 of 20 June 2018; (ii) where applicable, regulations adopted within the European Union and local laws that may apply to Personal Data processed within the scope of the User’s Terms of Use.

Download Page: Webpage accessible with a dedicated URL address sent to the User by an Uploader, from which the User can access and download a File against a payment.

File: File that a User can download thanks to the Services.

Parties: Unlocktme and the User, together.

Services: File transfer service provided by Unlocktme to the Uploader.

Stripe:

For Users based in the United States of America: Stripe, Inc., a Delaware registered corporation, headquartered at 185 Berry Street, Suite 550, San Francisco, CA, 94107, USA.

For Users based in the European Union: Stripe Payments Europe, Ltd, an Irish Private Company Limited by Shares, headquartered at A&L GOODBODY, IFSC, North Wall Quay, D01 H1O4, Dublin, Ireland.

For Users based in the United Kingdom: Stripe Payments UK, Ltd, a UK registered private limited company, registered at 9th Floor, 107 Cheapside, London, EC2V 6DN, United Kingdom.

Other entities may be applicable when Uploader resides in another country. More information at <https://stripe.com/fr/legal>.

Uploader: Any natural person that uploads a File and makes it available through a Download Page.

User: Any natural person that accesses a Download Page to access and download a File.

2. Cookies

Unlocktme uses cookies for the provision of the Download Pages and of the Services.

This helps us to provide with a good experience when you browse the Downloading Pages and also allows us to improve our site.

Cookies are small text files that we store on User’s browser or the hard drive of User’s computer, smartphone, Smart TV or another smart device. Cookies contain information that is transferred to User’s computer’s hard drive or browser. Cookies also provide information to the owners of the site about how people are using the Download Pages.

Cookies that are not strictly necessary for the purpose of the provision of the Services are only used with User’s express consent.

Cookies are retained for the following durations:

Cookie	Purpose	Strictly necessary (YES/NO)	Retention period
_ga	Used to distinguish users.	NO	2 years
_gid	Used to distinguish users.	NO	24 hours
_ga_XHWG1ZLWHD	Used to persist session state.	NO	2 years

3. Personal data

1. General

For the purposes of this Privacy Policy, the terms "Personal Data" "Data Controller" and "Data Processor" have the meaning defined in the Data Protection Laws. Each of the Parties is responsible for complying with its respective obligations under the Personal Data Protection Laws in accordance with the terms and conditions set forth below.

2. Personal Data categories

The Personal Data that may be collected and/or processed by Unlocksme as Data Controller are:

- Name, Last name;
- Email address;
- Transaction Information (Payment amount, date, etc.) ;
- Information about the User's device (IP address, technical characteristics and identification data) and the User’s interactions with the Download Page and/or its contents (including the File).

3. Collection of Personal Data

Unlocksme collects and processes Personal Data provided by the User when the User benefits from the Services.

4. Legal basis and purposes of processing

Unlocksme uses this Personal Data to carry out these Terms of Use allowing access to the Download Page and to download the File.

5. Retention period of Personal Data

Personal Data is kept for a period not exceeding that necessary for the purposes for which it is processed. The Personal Data relating to the User are deleted when the User stops navigating the Download Pages except to the extent that legal and/or regulatory requirements applicable to Unlocksme justifies a longer retention period.

Transactional and/or tax data is retained for the duration of the contractual relationship, plus the applicable statute of limitations for tax purposes, i.e., 10 years from the date the Service was performed.

6. Exercise of the User's rights

In accordance with the Personal Data Protection Laws, the User may exercise, where applicable, the following rights:

- *Right of access*: the User may obtain information concerning the processing of his Personal Data and a copy of the same;
- *Right of rectification*: if the User considers that his Personal Data is inaccurate or incomplete, they may request that they be modified accordingly;
- *Right to erasure*: the User may request the deletion of his Personal Data, to the extent permitted by law;
- *Right to limit the processing*: the User may request the limitation of the processing of their Personal Data;
- *Right to object*: the User may object to the processing of their Personal Data for reasons relating to their particular situation. The User has the absolute right to object at any time to the use of his Personal Data for commercial prospecting purposes, or for profiling purposes if such profiling is linked to commercial prospecting.
- *Right to Withdraw Consent*: If the User has given consent to the processing of their Personal Data, they may withdraw that consent at any time. However, processing carried out for the performance of these Terms of Use does not rely on the User's consent.
- The right to define directives concerning the conservation, deletion or communication of their Personal Data, applicable after their death.
- *Right to the portability of Personal Data*: where permitted by law, the User may request the return of the Personal Data they have provided, or, where technically possible, the transfer of such data to a third party.

If the User wishes to exercise any of the above rights, the User may send a request by e-mail to contact@unlocksme.com. The User must include a scan/copy of his or her proof of identity, where necessary, to enable Unlocksme to identify the User.

In accordance with applicable law, in addition to the rights mentioned above, the User may file a complaint with the relevant Data Protection Authority, such as the CNIL (Commission Nationale de l'Informatique et des Libertés) in France, or to any other competent national data protection authority.

7. Recipients of Personal Data

In order to achieve some of the purposes mentioned in this article, Unlocksme may transfer User's Personal Data to Stripe (e-mail address, transaction data).

We use Stripe for payment. Stripe collects and processes personal data under its own liability, including identifying information about the devices that connect to its services. Stripe uses this information to operate and improve the services it provides to us, including for fraud detection and prevention. You can learn more about Stripe and its processing activities via privacy policy at <https://stripe.com/privacy>.

8. Transfer of Personal Data outside of the EEA.

The Personal Data processed by Unlocksme for the provision of the Services is processed, stored and physically located in the European Economic Area (EEA).

However, in order to carry out payments under these terms of services, transfer outside of the EEA may be necessary. In such cases, Unlocksme ensures to set adequate appropriate safeguards and compliance measures to ensure an adequate level of protection of personal data transferred outside the EEA and Switzerland. These measures include the updated EU Commission's SCCs to accommodate international data transfers.