

## Privacy policy

### 1. Introduction

- 1.1 We are committed to safeguarding the privacy of all data collected and used by Le Bonheur Agence Immobilier.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of Le Bonheur clients and visitors, in other words, where we determine the purposes and means of the processing of all personal data collected.
- 1.3 We use cookies on our website, most of these cookies are required for our website to function correctly (in particular with regard to the search system for properties), these cookies hold no personal information about you the visitor. Before the creation of any cookie that holds personal data about you (email, name, address etc), we will ask you for your consent whenever you sign up to any service that uses such cookies.
- 1.4 Our website incorporates privacy levels which affect how we will process your personal data and your requests to us. By request, you can specify whether you would like to receive direct marketing communications from us. Each and every direct marketing communication from us has the option for to opt out.
- 1.5 In this policy, "us", "our" or "we" refer to Le Bonheur Agence Immobilier.

### 2. Third party websites, external links and services

- 2.1 Le Bonheur can not be held responsible for any data policies or content on any third party websites mentioned or linked to from any pages within the Le Bonheur website
- 2.2 Le Bonheur assumes no responsibility or liability including any losses which may occur out of use of a third party web site or service.
- 2.3 Third party web sites are not covered by our Privacy Policy and Le Bonheur accept no responsibility or any liability for these sites.

### 3. Comment nous utilisons vos données personnelles

- 3.1 This Section we set out the purposes for which we may process personal data and the legal bases and operational requirements of the processing.
- 3.2 We reserve the right to process "**usage data**". The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is obtained from our internal website programming as well as third party analytical services such as Google, Bing, Yahoo. This usage data may be processed to provide us with statistical data of properties being viewed. The

legal basis for this processing is your initial consent as well as our legitimate interests, namely monitoring and improving our website and services to both our clients and our registered property sellers.

- 3.3 We reserve the right to process "**account data**" where you have decided to supply it to us. The account data may include your name and email address, the interest you have in any property that you have enquired after and any other information that you have supplied to us in any form or other communication. The source of the account data encompasses our website, email communications, telephone calls or face to face meetings. The account data will be processed for the purposes of providing our services to you and proposing properties that may match your search criteria, maintaining our databases and communicating with you. The legal basis for this processing is your implied consent by supplying us directly with this information, to allow us to perform our service between you and us.
- 3.4 We reserve the right to process "**profile data**". The profile data may include your name, address, telephone numbers, email address, gender, date of birth, country of birth, relationship status, interests and hobbies, property search preferences, your job title or role, . The profile data may be processed for the purposes of enabling and monitoring properties we have for sale and sending you communications that inform you of relevant available properties or services related to buying or selling said properties. The legal basis for this processing this information is your consent in giving us these details directly and the proper administration of our services between you and us.
- 3.5 We may process information contained in any enquiry you submit to us "**enquiry data**". The enquiry data may be processed for the purposes of offering, marketing and selling our services to you. The legal basis for this processing this information is your consent in giving us these details directly and the proper administration of our services between you and us.
- 3.6 Le Bonheur does not retain any "**transaction or payment data**". At no time do we hold on our databases any credit card or bank details of our clients or potential clients.
- 3.7 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters "**notification data**". The notification data may be processed for the purposes of sending you our relevant notifications and/or newsletters. The legal basis for this processing is your consent in giving us this information to enable us to perform the service between you and us .
- 3.8 We may process any of your personal data identified in this policy where necessary for Le Bonheur to exercise its services to you or in the defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.9 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining quotations, professional advice or professional services relating to the buying or selling of specified properties. The legal basis for this processing is our legitimate services to you the client.

- 3.10 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject under French, European or International law, or in order to protect your vital interests or the vital interests of another natural person.
- 3.11 Please do not supply any other person's personal data to us, unless we have a genuine reason and prompt you to do so.
- 3.12 Le Bonheur takes all reasonable care to prevent any unauthorized access to and use of your personal data. Our staff maintain a responsibility to keep your information confidential and will only use it to offer relevant products and services related to your enquiry.
- 3.13 Le Bonheur does not sell, rent any personal information we hold. Any personal information is used to promote properties and provide services to you and are not passed to any third party organization for marketing purposes.

#### **4. Disclosing your personal data to others**

- 4.1 We may disclose some of your personal data to other estate agencies insofar as reasonably necessary for the purposes of providing our services, and on the legal bases, set out in this policy.
- 4.2 We may disclose your personal data to our professional advisers insofar as reasonably necessary for the purposes of obtaining quotes, professional advice or services, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 4.3 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

#### **5. International transfers of your personal data**

- 5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
- 5.2 The hosting facilities for our website and database may be at some time outside the EEA. The European Commission has made an "adequacy decision" with respect to the data protection laws of each countries. Transfers of data will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.
- 5.3 We may disclose your personal data to companies or professionals operating outside the EEA where these companies are a part of our trusted services network that you have requested either quotations or services from. These services may include, but are not limited to: Mortgage services, Insurance Services, Financial services, Investment services.

5.4 You acknowledge that your personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

## **6. Retaining and deleting personal data**

6.1 This section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.3 Given the nature of our services it is not possible for us to specify in advance the periods for which your personal data will be retained. We determine the period of retention based on the following criteria:

- (a) the period of retention of all personal data is determined on the activity of the clients communications with Le Bonheur.
- (b) the personal data of clients that are deemed to be actively "in the market" for property will be retained until such time as we are informed otherwise by the client. If we have no communication with a client for a period of one year their status will be registered as inactive and all their information will be automatically deleted after one year.
- (c) the personal data of any client can be removed from our database on simple request from that client.

6.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **7. Amendments**

7.1 We may update this policy from time to time by publishing a new version on our website.

7.2 You should check occasionally to ensure you are happy with any changes made to this policy.

7.3 We will notify you of any significant changes to this policy by email or notification on our website.

## **8. Your rights**

8.1 In this Section 8, we have summarized the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries.

8.2 Your principal rights under data protection law are:

- (a) the right to access;

- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to object to processing;
- (e) the right to data portability;
- (f) the right to withdraw consent.

- 8.3 You have the right to confirmation as to whether or not we process your personal data and access to any personal data held by us about you, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a fee.
- 8.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 8.5 You have the right to object to our processing of your personal data. In this case we would not be able to continue to provide our services to you. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defense of legal claims.
- 8.6 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 8.7 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 8.8 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
  - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

- 8.9 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of

your habitual residence, your place of work or the place of the alleged infringement.

8.10 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

8.11 You may exercise any of your rights in relation to your personal data by written notice to us

## **9. Les cookies**

9.1 A cookie is a text file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

9.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

9.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **10. Cookies that we use**

10.1 We use cookies for the following purposes:

(a) authentication - we use cookies to identify you when you visit our website and as you navigate our website.

(b) status - we use cookies to help us to determine if you are logged into our website.

(c) personalization - we use cookies to store information about your preferences and to personalize the website for you.

## **11. Cookies used by our service providers**

11.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

11.2 We use Google Analytics to analyze the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at:  
<https://www.google.com/policies/privacy/>.

## **12. Managing cookies**

12.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version.

12.2 Blocking all cookies will have a negative impact upon the usability of many websites including Le Bonheur.

12.3 If you block cookies, you will not be able to use all the features on our website.

### **13. Our details**

13.1 This website is owned and operated by *SARL Landau*

13.2 We are registered in France under registration number 493 925 911 00015, and our registered address is *Le Bonheur, Place de la Liberation, 65700, Maubourguet*.

13.3 Our principal place of business is at *Le Bonheur, Place de la Liberation, 65700, Maubourguet*.

13.4 You can contact us using our website contact form or by email to [contact@le-bonheur.com](mailto:contact@le-bonheur.com) .