

# Privacy Policy

## Recove

### ARTICLE 1: PREAMBLE

This privacy policy aims to inform users of the website:

- About how their personal data is collected. Personal data refers to any information that can identify a user. This may include: first and last names, age, mailing or email address, location, or IP address (non-exhaustive list);
- About the rights they have regarding this data;
- About the person responsible for processing the collected personal data;
- About the recipients of this data;
- About the site's cookie policy.

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

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

- Processed lawfully, fairly, and transparently with regard to the data subject;
- Collected for specified (see Article 3.1), explicit and legitimate purposes and not further processed 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, where necessary, kept up to date. Every reasonable step must be taken to ensure that inaccurate personal data, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Retained in a form that allows identification of data subjects for no longer than is necessary for the purposes for which the data are processed;
- Processed in a manner that ensures appropriate security of the data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organizational measures.

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

- The data subject has given consent to the processing of their personal data for one or more specific purposes;
- Processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract;
- Processing is necessary for compliance with a legal obligation to which the controller is subject;
- Processing is necessary to protect the vital interests of the data subject or another natural person;
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, unless these interests are overridden by the

fundamental rights and freedoms of the data subject, especially when the data subject is a child.

## **ARTICLE 3: PERSONAL DATA COLLECTED AND PROCESSED WHILE BROWSING THE SITE**

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

The personal data collected in the course of our activity includes:

- User identification data: Pinterest access token, Pinterest username, Pinterest profile picture
- Interaction data: items viewed by the user, pins consulted by the user, items saved by the user

The purpose of collecting and processing this data is to:

- Facilitate login via Pinterest
- Allow users to find the items they saved
- Recommend relevant articles

### **Article 3.2: Data collection methods**

When you use our site, **the following data is collected automatically for the proper functioning and improvement of our services, even if it is not directly identifying information:**

**Technical data:** Information about the device used (device type, operating system), connection logs, session identifiers.

**Aggregated usage data:** Anonymized statistics on how features are used (e.g., total number of searches or clicks on pins, without linking them to a specific user).

Other personal data is collected when you perform the following actions on the platform:

- Logging in: the Pinterest access token, Pinterest username, and profile picture are saved in BigQuery
- Clicking on a pin: the event is collected in Amplitude
- Clicking on the profile: the event is collected in Amplitude
- Launching a Vinted item search: the event is collected in Amplitude
- Saving an item: the event is collected in both Amplitude and BigQuery

This data is stored by the data controller under reasonable security conditions, for a duration of: 1 year.

The company may retain certain personal data beyond the stated period to comply with its legal or regulatory obligations.

### **Article 3.3: Partners and Data Hosting**

The site shoprecove is hosted by:

Recove

3 rue du Talus du Cours 94160 Saint-Mandé, France

`pe@shoprecove.com`

**We also use third-party services to collect and process certain data, in accordance with this privacy policy and security standards.**

**These partners include:**

- **Amplitude:** For event tracking and usage analytics (clicks, searches, etc.). See their privacy policy here: <https://amplitude.com/privacy>
- **Google BigQuery:** For secure storage of user and interaction data. See Google's privacy policy here: <https://policies.google.com/privacy>
- **Pinterest:** For user login and access to profile and pin data. Your data is handled according to Pinterest's privacy policy: <https://policy.pinterest.com/privacy-policy>
- **Vinted:** For browsing and interacting with items. Your data is handled according to Vinted's privacy policy: <https://www.vinted.fr/privacy-policy>

## ARTICLE 4: DATA CONTROLLER AND DATA PROTECTION OFFICER

### Article 4.1: Data Controller

Personal data is collected by **Recove** (Pierre-Emmanuel DIOT), a sole proprietorship registered under number 98074283700019.

The data controller can be contacted via:

Mail: 3 rue du Talus du Cours 94160 Saint-Mandé, France

Phone: +33 6 87 62 75 38

Email: `pe@shoprecove.com`

### Article 4.2: Data Protection Officer

The Data Protection Officer (DPO) is:

Pierre-Emmanuel DIOT

3 rue du Talus du Cours 94160 Saint-Mandé

`pe@shoprecove.com`

If you believe that your data protection rights have not been respected after contacting us, you can file a complaint with the CNIL.

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

Any user affected by the processing of their personal data may exercise the following rights, under Regulation 2016/679 and the French Data Protection Act (Law 78-17 of January 6, 1978):

- Right of access, rectification, and erasure of data (Articles 15, 16, and 17 of the GDPR);
- Right to data portability (Article 20 of the GDPR);
- Right to restriction (Article 18 of the GDPR) and objection to processing (Article 21 of the GDPR);
- Right not to be subject to a decision based solely on automated processing;
- Right to define the fate of data after death;
- Right to contact the relevant supervisory authority (Article 77 of the GDPR).

To exercise your rights, please send your request to:

Recove, 3 rue du Talus du Cours 94160 Saint-Mandé, France

or by email: `pe@shoprecove.com`.

To enable the data controller to process your request, you may be asked to provide identifying information such as your full name, email address, and account or subscriber number.

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

#### **ARTICLE 6: CHANGES TO THE PRIVACY POLICY**

The website editor reserves the right to modify this policy at any time to ensure compliance with applicable laws.

Any changes will not affect previous purchases, which remain governed by the policy in effect at the time of purchase and accepted by the user.

Users are encouraged to review this policy regularly when using our services, even without formal notice of changes.

This policy was created on **January 13, 2025**, and last updated on **January 13, 2025**.