

**Cookie Management Charter**

1. Preamble

This Cookie Management Charter is intended for users (hereinafter referred to as “Users” or “You”) of the Free2Move SAS Website <https://www.free2move.com/fr-FR/> (hereinafter referred to as the “Site”). A User is defined as any person who accesses or browses the Site as a customer or as a simple Internet user.

By expressing your consent in a clear affirmative action, you agree that cookies and other trackers as described below may be placed on your desktop or laptop computer, tablet, smartphone, or any other equipment or terminal, in accordance with this Cookie Management Charter. However, you can withdraw your consent at any time by means of solutions accessible while you browse on the Site.

1. Who collects my data?

The company responsible for processing your data collected via the Site is Free2Move SAS, a simplified joint stock company whose registered office is located at 45 rue de la Chaussée d'Antin, 75009 Paris, registered in the Paris Trade and Companies Register under number 790 020 606 (hereinafter “Free2Move” or “We”).

Some of the cookie providers used by Free2Move may reuse the information collected for their own purposes. In this case, the User is invited to consult the cookie provider’s Privacy Policy for further information on how they carry out their processing operations.

**Read more**

The **data** **controller** is, within the meaning of the French Data Protection Act (No. 78-17) of 6 January 1978 and Regulation (EU) No. 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter “GDPR”), the person who determines the purposes and means of the processing. Where several controllers determine the purposes and means of the processing, they are referred to as joint controllers.

1. What is a cookie?

A cookie is a text file that is deposited and read, in particular, when you browse a website, regardless of the type of terminal equipment used.

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**Cookies** record certain information about your browsing and online behaviour, allowing us to facilitate and improve your experience as a web user.

**Storing these files** on your terminal requires your prior consent unless they are strictly necessary for the proper functioning of the Site.

1. What are cookies for?

The cookies used on the Site are used to differentiate you in order to improve your browsing experience and the services we offer you. Free2Move may place two types of cookies on your browser:

* Functional and technical cookies necessary for the use of the Site, which allow us to authenticate you, identify you, speed up your browsing and facilitate access to its various features. They may also allow your preferences to be recorded, your choices in terms of cookies to be saved, and the various uses of the Site to be measured.
* Commercial cookies intended to improve the Site’s interactivity, such as audience measurement cookies which are used to establish statistics on our Site’s audience. Our goal is to improve, to offer you optimal comfort when visiting our Site.
1. What cookies do we use?

Free2Move SAS is committed to transparency in the processing of your data.

In this respect, and to ensure that your information is as clear as possible, you will find below the various cookies used on the Site and their purpose:

* **First-party cookies**

**Functional and technical cookies** are used to enable and improve your browsing on the Site. They allow information to be sent to our Site and to your browser: your terminal's display preferences (language, resolution), the saving of your choices regarding cookies, etc.

|  |  |  |
| --- | --- | --- |
| **Name of the cookie** | **Purpose of the cookie** | **Duration** |
| **country** | Country selected by the user | 1 year |
| **language** | Language selected by the user | 1 year |
| **currency** | Currency selected by the user | 1 year |
| **cookieConsent** | Acceptance of cookies by the Internet user | 1 year |
| **authToken** | User’s authenticated session token | 14 days |
| [**Inspectlet**](https://www.google.fr/search?q=inspectlet) | A tool to understand user behaviour on the site. | 1 year |
| [**Google Tag Manager**](https://www.google.com/analytics/tag-manager) | Manage all user tags. | 1 year |
| **Calendly** | These cookies are used by Calendly. For more information: https://calendly.com/fr/privacy/#cookies-and-other-tracking-mechanisms  | See Calendly |

**Cookies to measure the audience of the Site** help us to understand the use of the Site in order to improve the quality of the services offered to you.

|  |  |  |
| --- | --- | --- |
| **Name of the cookie** | **Purpose of the cookie** | **Duration** |
| **utm** | Google Analytics only produces reports when the user is logged in. | 7 days |
| **\_ga** | This cookie created by Google Analytics is used to measure data relating to the use of the Site. For more information: https://support.google.com/analytics/answer/6004245. | 2 years |
| **\_gat** | This cookie is created by Google Analytics to monitor the rate of requests to its servers. This cookie helps identify areas for improvement on the Site. For more information: https://support.google.com/analytics/answer/6004245. | Duration of the session |
| **\_gat\_UA-44093115-14** | These cookies are used by Google Analytics. They anonymously collect all the statistical data on the website: data related to campaigns, but also to user behaviour (e.g.: number of visitors, number of sessions, etc.). For more information: https://support.google.com/analytics/answer/6004245. | Duration of the session |
| **\_gid** | This cookie is necessary for the operation of Google Analytics to measure data about the use of our website. For more information: https://support.google.com/analytics/answer/6004245. | 1 day |

* **Third-party cookies**

When you visit the Site, it is possible that cookie companies may place cookies on your terminal.

The use of these cookies is subject to the same restrictions on personal data protection established by the French Data Protection Act and GDPR. In your browser settings, you can disable these third-party cookies on their own or together with ours.

**Read more**

**Cookies related to advertising operations**, used by advertising providers on the Site.

They make it possible to identify the services consulted or purchased and facilitate the customisation of the advertising offer. The purpose of the cookies contained within the advertisements is to provide information and statistics on the relevance of their delivery (number of users clicking on the advertisement, number of times it is displayed, etc.)

|  |  |  |
| --- | --- | --- |
| **Name of the cookie** | **Purpose of the cookie** | **Duration** |
| **\_fbp** | This cookie, created by Facebook, allows the Site's users to see targeted advertisements for products on their platform. | 90 days |
| **\_gcl\_au** | These cookies are used by Google AdSense to test the effectiveness of advertising on various websites using their services. | 90 days |
| **\_\_cf\_bm** | Used to distinguish humans from robots | 1 day |

**Social network buttons**

We have included buttons on our Site for Users to promote web pages or share on social networks such as Facebook.

Please read the privacy statement of these social networks (which may change from time to time) to find out what they do with your personal data processed using these cookies.

1. How to manage cookies

You can control the installation of cookies on the Site by configuring, at any time, your browser software in order to:

* Accept or reject cookies on the Site;
* Set cookies that you encounter while browsing the Site.
* Systematically refuse all cookies;

You can express your choices, manage, block or authorise cookies directly in the banner displayed on our Site or in the cookie configuration settings.

You can also set cookies directly in your browser, using the setting options of the main browsers listed below:

**With Internet Explorer**

**Tools** → **Internet options** → **Privacy** tab → Choose the **desired options**

**With Microsoft EDGE**

**Menu** → **Settings** → **Show advanced settings** → **Cookies** → Choose the **desired options**

**With Firefox**

**Menu** → **Options** → **Privacy** tab → Choose the **desired options**

**With Chrome**

**Menu** → **Settings** **→ Advanced Settings** → **Content** Settings → Choose the **desired options**

**With Safari**

**Safari** → **Preferences** → **Security** → Show **cookies** → Choose the **desired options**

**With Opera**

**Tools → Preferences → Privacy** tab**→ Cookies section → Manage cookies →** Choose the **desired options**

**Read more**

By choosing to block our cookies, your browsing of the Site and/or use of certain features may be impaired. So if you choose to delete all cookies, your online experience will potentially be affected and your browsing preferences will be erased.

1. IP address and other trackers

In addition to the Cookies detailed in Article 5 of this Charter, Free2Move SAS also processes certain technical information about the User in order to ensure that the User is able to consult the Site in optimal display conditions, and to identify any abnormal functioning of the Site.

The following information may be collected by Free2Move: your IP address, the identifier of your terminal, your computer's metadata (date and time of use, configuration, language preferences, etc.) or the geographical area of your connection.

**Read more**

Your computer's metadata includes information processed in an electronic communications network for the purpose of transmitting, distributing or exchanging electronic communications content generated when you browse the Internet.

1. Consent and legal basis

Free2Move SAS may install so-called "technical" cookies that allow access, registration and consultation of information stored on your terminal. Storing these cookies does not involve the prior collection of your consent but is based on the pursuit of the legitimate interest of Free2Move SAS to ensure the proper functioning of the Site.

These are:

* Cookies whose purpose is to enable or facilitate the transmission of communication by electronic means;
* Cookies that are strictly necessary for the provision of an online communication service on the Site; and
* Cookies to store your choice of cookies.

Free2Move SAS also uses “commercial” cookies to improve your experience on the site. These cookies allow Free2Move SAS to provide you with customised offers adapted to your interests according to your browsing history. Storing these cookies requires your prior consent.

In all cases, you are informed of the purposes for which your data is collected by us via the various online data collection forms or via our [Privacy Policy](https://www.free2move.com/api/media/20210910/5JvTFCyJlfdjMciIyj-NI-Vqx89m2UFtBCIYwO5ZodYhBm8YMowveE8yJuVcv85InjWwtxM63ctT5_hwT5aAPnuuEfXVNoCeMj2HJsMnDM4dxEhkqY0qwwozKLt1-LMh/free-2-move-privacy-policy-english-202109.pdf).

1. Your rights

In accordance with the Data Protection Act and GDPR, you have the following rights:

* The right to access ([Article 15 GDPR](https://www.cnil.fr/fr/reglement-europeen-protection-donnees/chapitre3#Article15)), rectify ([Article 16 GDPR](https://www.cnil.fr/fr/reglement-europeen-protection-donnees/chapitre3#Article16)), update, complete your personal data;
* The right to block or erase your data ([Article 17 GDPR](https://www.cnil.fr/fr/reglement-europeen-protection-donnees/chapitre3#Article17)), if it is inaccurate, incomplete, ambiguous, out of date, or if its collection, use, disclosure or storage is prohibited;
* The right to withdraw your consent at any time ([Article 13-2c GDPR](https://www.cnil.fr/fr/reglement-europeen-protection-donnees/chapitre3#Article13));
* The right to restrict the processing of your data ([Article 18 GDPR](https://www.cnil.fr/fr/reglement-europeen-protection-donnees/chapitre3#Article18));
* The right to object to the processing of your data ([Article 21 GDPR](https://www.cnil.fr/fr/reglement-europeen-protection-donnees/chapitre3#Article21));
* The right to portability of the data you have provided to us, where your data is subject to automated processing based on your consent or on a contract ([Article 20 GDPR](https://www.cnil.fr/fr/reglement-europeen-protection-donnees/chapitre3#Article20));
* The right to determine what happens to your data after your death and to choose whether or not we disclose your data to a third party that you have designated. In the event of your death and in the absence of instructions from you, we undertake to destroy your data, except where its retention is necessary for evidential purposes or to meet a legal obligation.

You can exercise your rights in one of the following ways:

* Either by email, to the following address privacy@free2move.com
* Or by post to the following address FREE2MOVE,  Service Commercial - Vos droits - 45, rue de la Chaussée d'Antin, 75009 Paris ,FR

To find out more about your rights, you can also consult the website of the local authority responsible for personal data protection in France, the Commission Nationale de l'Informatique et des Libertés, which can be accessed at the following address <https://www.cnil.fr/>.

**Read more**

You can deactivate these cookies at any time by referring to the procedures detailed in article 6 of this Charter.

To find out more about how we manage your personal data, you can read our [Privacy Policy](https://www.free2move.com/api/media/20210910/5JvTFCyJlfdjMciIyj-NI-Vqx89m2UFtBCIYwO5ZodYhBm8YMowveE8yJuVcv85InjWwtxM63ctT5_hwT5aAPnuuEfXVNoCeMj2HJsMnDM4dxEhkqY0qwwozKLt1-LMh/free-2-move-privacy-policy-english-202109.pdf)*.*

1. Retention periods

The information stored in your terminal (e.g. cookies) or any other element used to identify you for audience statistics purposes is not kept beyond a period of thirteen (13) months, unless you give your consent. This period is not automatically extended when you visit our application again.

The technical information necessary for your browsing as referred to in article 7 of this Charter is kept for a period of six (6) months.

However, the information collected through the trackers may be kept for a maximum period of twenty-five (25) months.

After this period, your data is either deleted or anonymised, making it impossible to identify you in an irreversible manner.

1. Updating the charter

We may update this Cookie Management Charter to reflect, for example, changes in the cookies we use or for other operational, legal or regulatory reasons. We therefore invite you to consult this Charter regularly in order to remain informed about the use of cookies and related technologies.

The date at the top of this Charter is the date of the last update.