



## PRIVACY POLICY

(effective July 1, 2018)

Republicans in France (also known as “RIF”), is committed to protecting the privacy and security of your personal information. Republicans in France collects different types of information from you when you use our web-based services (“services”).

This Privacy Policy and our [Cookie Policy](#) will help explain what information we collect, how we use it and what options you have in relation to it.

The key points of our Privacy Policy are provided in the summary below. However, you can also learn more by simply following the links below or by continuing to scroll down:

### PRIVACY POLICY SUMMARY

At Republicans in France, we are committed to protecting your privacy. Republicans in France will hold any information you provide us here with the utmost care, with appropriate security measures in place that protect the confidentiality of your personal information.

Republicans in France will use the information you provide for the following purposes: to validate your membership; to provide you with access to “members only” sections of the Republicans in France website; to allow Republicans in France officers as appropriate to contact you with voting reminders and with information about upcoming activities and/or events. To register as a member of Republicans in France, we will not ask you for any sensitive information (such as social security number, driver’s license or passport number), and we will not otherwise maintain any information about you that you have not freely provided to us.

If you join Republicans in France, you will have given us permission to transfer your name, contact information, and any voting state information you may have provided to the Republicans in France membership database, and have agreed to this privacy statement. You may revise or update your information at any time by going to your “my profile” link on the website.

Republicans in France will not use any information provided to us here for any purpose other than in connection with your membership in Republicans in France and the activities of Republicans in France. Republicans in France will not disclose your information to third parties for any other purpose unless we first obtain your consent, except as required by applicable law or regulation. Republicans in France may use aggregate information about its members for statistical reports, but it will not be possible to identify you from such reports.

Any information that you provide to the Republicans in France membership database will be collected and transferred to the database stored on a secure server maintained by the Republicans in France. Republicans in France is committed to protecting your information with a very high level of privacy protection.

If you have any questions about our privacy policy, the information we have collected from you online, the practices of this site, or your interaction with this website, please send an email to: [president@republicansinfrance.com](mailto:president@republicansinfrance.com).

## **INTRODUCTION**

This Privacy Policy explains how we collect, use and protect your personal information when you use our Services.

By using our services you acknowledge that you have read and understood the terms of this Privacy Policy, including how we use your personal information.

Republicans in France, as the data controller, is responsible for collecting and using your personal information. See '**Your questions and how to contact us**' section of this Privacy Policy (paragraph 8) for more details.

We reserve the right to update this Privacy Policy from time to time by changing it as it applies to your use of any of the Services. The date of the current Privacy Policy is the Effective date set out above. We want you to enjoy using our services and urge you to follow common sense whenever disclosing personal information - in connection with our services or elsewhere.

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## **1. LEGAL BASIS FOR COLLECTING YOUR PERSONAL INFORMATION**

When we collect and process personal information from you, your consent and agreement to abide by our contractual terms establish the primary legal basis for doing so:

- When you browse our public websites, you consent to our collection of personal information by agreeing to our Cookies Policy, this Privacy Policy, and our Terms of Service as they apply to browsing.
- When you register as a member of Republicans in France, you consent to our collection of personal information by agreeing to our Cookies Policy, this Privacy Policy, and our Terms of Service as they apply to browsing and accessing our members-only Services.
- Other legal bases for collecting and processing your personal information include:
  1. Compliance with legal obligations to which Republicans in France is subject;
  2. Legitimate interests of Republicans in France, provided that such legitimate interests do not interfere with other fundamental rights and freedoms you possess.

**If you live in the European Union and we have obtained your personal information, but you did not provide it to us, then we will provide you with a copy of this Privacy Policy and any other information required by law at the time of our first communication to you or within 30 days after receiving your information, whichever occurs first.**

## **2. INFORMATION WE COLLECT AND RECEIVE**

We collect personal information about you and the devices you use to access and interact with us and our services. We collect:

- (a) Registration information : you give us when you sign up as a member of RIF
- (b) Technical and device information : information from your mobile or computer device when you use our services
- (c) Feedback : your questions, suggestions, or views
- (d) Third party information : information about your use of our services that is shared with third party platforms and services connected with our services

#### **(a) Registration information**

When you register or sign up to use our services we collect information about you including your name, user name, if applicable, and additional information that you chose to provide. We also collect your contact information so that you can sign-up to receive communications from Republicans in France. As part of any required sign in to use our services, we will verify the information that you use to login.

You can also choose to sign-up for our services using third party services such as your Facebook account in which case Facebook will ask you for permission to provide certain personal information such as your username and contact details. Facebook may share this personal information with us subject to Facebook's privacy policy and the privacy settings of your Facebook account. This may also enable Facebook and us to link your activities with your personal registration information at their site and may include notifying your friends about your activities while using our services. We may also use analytics technologies to link your online activities so that we can serve targeted ads. If you sign up via third party services, you should visit the third party website and review their privacy policy and your registration profile or account to understand how your data is processed by them and to find out what your options are.

We do not control the information that is sent from your browser to third parties, including social media platforms, analytics companies and advertising networks which receive information in the normal course of your online activities.

#### **(b) Technical and device information**

We collect information from your web browsing activity about the way you use our services. We may also collect information about you from the notifications or messages you post or send online as well as what you search for, look at and engage with. Information obtained from social features used in connection with our online services, such as forums and chat functionality, may be stored, copied or used by Republicans in France, the public, or third-party companies.

By accessing our services, we may collect technical information from your mobile or computer device, for example your location information where you choose to share this with us, which devices are connected to the Internet, hardware settings, components of your devices, installed software, updates and plugins to facilitate the use of our services. We may automatically collect information such as your operating system, Internet Protocol address, your browser type, browser language preferences and when, how often and how long you interact with our services. We, and or third party services may use cookies and similar technologies, or collect data about your device(s) to create a device fingerprint of the components of your specific device(s).

See also our [Cookie Policy](#)

### **(c) Feedback**

We will collect personal information from the messages and reviews you post on our social forums, and when you contact us, for example with a question, problem or comment. If you contact our team by email or post, we will keep copies of your correspondence with us for as long as necessary to deal with your query. For more information, see section 2 (e), below, on how we use third party information.

### **(d) Third party information**

We may share information obtained from your use of our services with third parties to provide you with an optimal experience, to facilitate use of the Services and to enable you to use our Services on various platforms.

## **3. HOW WE USE THE INFORMATION WE COLLECT**

We may use the information we collect from you in the following ways:

### **(a) Registration information**

- (i) to create your membership account and so you can access our members only services;
- (ii) to identify you when you sign-in;
- (iii) to give you access to your user preferences;
- (iv) to contact you for your views on our services;
- (v) to contact you regarding member events
- (vi) to notify you of changes or updates to our services; and
- (vii) for marketing purposes, based on your communication preferences.

Your registration information enables us to provide you with access to our services under the agreements we have with you. It helps us to authenticate your access, to contact you for your views or to provide information important to our members, and to notify you of important changes or updates to our services.

Where we have your consent and in accordance with your stated communication preferences, we may also contact you for marketing purposes to let you know by post, email, telephone, mobile or in-app messaging about our other services or provide you with information important to our members, such as events, political news, fundraising solicitations, overseas voting information and reminders, and so on.

If you no longer want us to use your data in this way or generally change your mind about receiving communications, you can unsubscribe at any time, either by using the unsubscribe option in the communication you receive or by changing your communication settings. Please note that we will retain a record of the user information when you unsubscribe from our marketing information for the legitimate purpose of ensuring that we do not contact you further in this way, during the period of your objection.

### **(b) Technical and device information**

- (i) to provide services you request;

- (ii) to provide you with an optimal experience;
- (iii) to understand how you interact with our services;
- (iv) to measure and analyze the use and effectiveness of our services;
- (v) to understand which of your devices are using our services;
- (vi) to provide a safe and fair online environment in connection with our services;
- (vii) to measure and analyze the use and effectiveness of our services;
- (viii) to customize and optimize the targeting of our advertising in connection with our services and across other websites and services;
- (ix) to operate and improve our services; and
- (x) to fix errors.

We analyze information about how you engage with our services to understand how our services are used and to provide you with an optimal user experience. We use anonymous data in order to analyze and produce statistics relating to the habits, usage patterns and demographics of users as a group or as individuals. This allows us to deliver personalized content, helps us understand the features of our services that appeal to you and allows us to manage our communications strategy, among other things.

When you interact with or visit our website, we may automatically collect information about you such as the type of internet browser or mobile device you use, any website from which you have come to the Republicans in France website, and your IP address (the unique address which identifies your device on the Internet) and your operating system, which are automatically recognized by our web server.

We use internet log files to monitor traffic related to our services, resolve technical problems and to detect and prevent fraud. We use these technologies to provide us with information, such as when an email is opened, or to develop statistics on the effectiveness of communication with our members on or through our websites. In some cases, we use this information to send you communications based on your interests.

We also use technical and device information to operate and improve our services, measure our effectiveness, set up and maintain accounts, identify and fix errors and to help keep online content fair and safe and to resolve related disputes.

#### **(d) Feedback**

- (i) to reply to your questions or queries;
- (ii) to record comments and information which you provide via our website or other forums we provide; and
- (iii) to conduct analysis and research to improve and develop our services.

We use your feedback to reply to your questions or queries, to provide customer support and resolve problems relating to any of our services under the agreements that we have with you. We may also publish reviews that you submit to us for this purpose about the services and may conduct analysis of feedback for the purpose of improving and developing our services.

### **(e) Third party information**

- (i) to facilitate sharing on social networks; and
- (ii) to enhance your experience when using our services.

Based on your affirmative consent, we share information obtained from your use of our services with third parties to provide you with an optimal experience, to facilitate use of our services and to enable you to share our content on various platforms. For example, our website may allow you to share our content via email, Facebook, or Twitter. To enable this functionality, we may share your information through the websites and services of third parties and/or use cookies which are stored on your device.

See also our [Cookie Policy](#)

## **4. WHEN WE SHARE INFORMATION**

We may share the information we collect about you (subject to the necessary security, contractual and transfer safeguards). In delivering services to you, we may share your personal information with:

- Authorized officers or volunteers of Republicans in France. The Republicans in France membership database is maintained, and personal information is processed, by authorized officers of the organization only; only authorized officers of Republicans in France are granted access to personal information of other members, subject to limitations and restrictions intended to protect your privacy.
- Third parties in order to undertake various activities or services on our behalf in supporting the services. This includes website and application support and hosting providers for online services and providers for the delivery of promotional, digital advertising or other communications, such as MailChimp.
- We may use the information that you provide if we are under a duty to disclose or share your information in order to comply with (and/or where we believe we are under a duty to comply with) any legal obligation; or to enforce the relevant terms of service and any other agreement; or to protect our rights or the rights of third parties. This includes exchanging information with other companies and organizations such as credit agencies, law enforcement or government bodies or the courts in connection with a criminal investigation, suspected illegal activity, fraud prevention and detection, or in legal proceedings.

We do not control information which is sent from your browser to third parties, including social media platforms, analytics companies and advertising networks that receive information in the normal course of your online activities.

Personal information may be transferred to other countries where Republicans in France or its service providers maintain operations. These countries may not have equivalent data protection laws to the country from where you access the services or, in the case of transfers subject to European law, may not be subject to an adequacy decision by the European Commission (EC). An adequacy decision is a decision taken by the EC establishing that a third country provides a comparable level of protection of personal data to that in the EU, through its domestic law or its international commitments.

Where Republicans in France transfers personal information it will seek to take account of any applicable legal obligations relevant to personal information transfers. In the case of transfers of personal information out of the European Economic Area, it will, in the absence of an EC adequacy decision relevant to the destination country, seek to rely on appropriate safeguards such as a valid Privacy Shield certification (in the case of a data transfer to a Privacy Shield certified US recipient - <https://www.privacyshield.gov/welcome>) or enter into appropriate EC approved standard contractual clauses relevant to personal data transfers between data controllers or between a data controller and a data processor, (see [http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm)).

## **5. SECURITY AND DATA RETENTION**

Your privacy is important to us, and we place great importance on the steps we take, including technical and organizational measures, to protect your information from unauthorized access and against unlawful processing, accidental loss, destruction and damage.

Where you have chosen a password which allows you to access any of our services, you are responsible for keeping this password confidential. We advise you not to share your password with anyone. We will not be liable for any unauthorized transactions entered into using your username, personal information and/or password.

Your personal information will be retained by us for the duration of your use or access to our services and may be retained for a period after this time as necessary and relevant to our legitimate operations, our terms with you and in accordance with applicable laws and obligations. This may include retention necessary to meet time required to enforce any obligations in our agreements, or to identify, issue or resolve legal proceedings.

We may retain a record of your stated objection to the processing of your data, including in respect of an objection to receiving communications from Republicans in France for the sole purpose of ensuring that we can continue to respect your wishes to not contact you further, during the term of your objection.

We will take appropriate steps to seek to destroy or permanently de-identify personal information at the point this information is no longer needed by us for our business or legal purposes.

For more information about exercising your rights with respect to our data processing activities, or if you no longer wish to use our services, see details below about your choices and rights.

## **6. YOUR CHOICES AND RIGHTS**

You have options and choices over how we use your personal information. You may be required to register or sign in to use or access some of our services and may need to provide personal information to create a user profile which is associated with your use of our services. If you wish to amend the personal information that

you use to access our services, you can do so by logging into your account on the corresponding platform.

If you sign up to receive communications from us, you will be asked to confirm your communication preferences and given the opportunity to unsubscribe at any time.

You can contact us directly with requests to correct, erase, restrict, object to, or move your personal information. If you do not want us to process and/or access your personal information, you may be unable to use some of our services. You have options and choices regarding how we use your information. We provide you with tools to access and update specific information relating to your use of the services at any time.

We respect the rights you may have under applicable law to request access to your personal information and where applicable, to request to receive that information in a commonly used electronic format (or ask for this information to be provided in that format to a third party where feasible). You may also have the right under applicable law to request the correction or erasure of your personal information, to seek to object to the further processing under certain circumstances of your information or to request that the processing of specific information about you is restricted while we verify or investigate your concerns about this information.

If you remain unhappy with a response you receive, you can also refer the matter to your data protection supervisory authority. If you reside in the European Union, see [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm))

## **7. CHILDREN'S INFORMATION**

In principle, members of Republicans in France must be of voting age in the United States, which means that they are over the age of 18. However, any United States citizen may join Republicans in France if he or she will be 18 or older on the date of the next federal election. Because federal elections occur every two years, it is possible for a 16-year-old to join Republicans in France.

Protecting the privacy of young children is especially important to Republicans in France. For that reason, Republicans in France does not knowingly collect or maintain personal information or non-personally identifiable information from users under 16 years of age, other than as permitted by law in support of our internal operations.

If Republicans in France learns that personal information of users under the age of 16 has been collected, other than for support of the internal operations, Republicans in France will take reasonable steps to remove such information. If you believe that we may have unintentionally collected personal information about your child who is under 16 years of age, you may contact us using the details provided below.

## **8. YOUR QUESTIONS AND HOW TO CONTACT US**

If you have any questions or comments about this Privacy Policy you can contact us by email at: [president@republicansinfrance.com](mailto:president@republicansinfrance.com)