



## PRIVACY POLICY

Version of 30.05.2022

At Blueside-Home, we attach particular importance to Your personal data, because if You entrust it to us, we must take the greatest care of it and above all explain to You in a transparent manner how we collect and use it.

This Privacy Policy is addressed to You, in Your capacity as an Internet user, Customer or Owner, who accesses the Platform via the website <https://blueside-home.com/en>

The purpose of this document is to inform You of the manner in which Your personal data may be collected and processed by Blueside-Home.

### What is personal data?

« Personal data », means any information relating to You and that allows to identify You, directly or indirectly. Your name and surname or a photo of you for instance can allow to identify You directly. Your email address enables to identify you indirectly.

### What is a processing?

« Processing » means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means (collections, recording, organization, structuring, storage, adaptation or alteration retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction).

Respect for privacy and personal data is a priority for Blueside-Home, which is why we are committed to processing them in strict compliance with the Data Protection Act of January 6, 1978 (hereinafter the "Data Protection Act") as modified and the EU General Data Protection Regulation of April 27, 2016 (hereinafter the "GDPR").

Under all circumstances, we will comply with these two basic principles:

- You remain in control of Your Personal Data;
- Your Data will be processed in a secure manner with transparency and confidentiality.

## WHO IS RESPONSIBLE FOR THE PROTECTION OF YOUR DATA ?

The Data controller is Blueside-Home, a simplified joint stock company with a single shareholder, registered with the Paris Trade and Companies Registry under number 904 868 569, whose Head office is located at 229 rue Saint-Honoré - 75001 Paris.

### [More information](#)

**Legal reminder:** According to the Data Protection Act and the GDPR, **the Data Controller** is the person who determines the means and purposes of the processing of personal data. When two or more Data controllers jointly determine the purposes and means of the processing, they are called **Joint Data controllers**. **The Data processor** processes personal data on behalf of the Controller and acts under the Controller's authority.

Blueside-Home is a simplified joint stock company with a single shareholder, registered in the Paris Trade and Companies Register under number 904 868 569, whose Head office is located at 229 rue Saint-Honoré – 75001 Paris.

Blueside-Home is represented by Mrs. Natacha Jovanovic.

For any question relating to the management and use of Your personal data, You can contact us:

- Either by email, at [support@blueside-home.com](mailto:support@blueside-home.com);
- Or by sending a letter, at Blueside-Home – 229 rue Saint-Honoré – 75001 Paris.

## HOW DO WE COLLECT YOUR DATA ?

All of Your personal data is collected directly from You, either when You register on the Platform, or during exchanges with our services.

In addition, data related to Your navigation on the Platform can be used to target Your needs and interests and to target our commercial and advertising offers accordingly.

## WHY AND ON WHAT BASIS DOES Blueside-Home PROCESS YOUR DATA ?

Your various data may be collected by Blueside-Home for the following purposes:

- **Access to the Platform and provision of the Services**

### [Legal base](#)

Legal base:

- Contractual, the processing is necessary for the performance of a contract or pre-contractual measures.
- **Managing and monitoring Your Bookings, the execution of the Services and the billing**

[More details & legal base](#)

Legal base:

- Contractual, the processing is necessary for the performance of a contract or pre-contractual measures.

- **Respond to your requests for information**

Legal base:

- Your consent.

- **Send our newsletter**

[More details & legal base](#)

Legal base:

- Your consent.

- **Propose commercial offers for our Services**

[More details & legal base](#)

Legal base:

- Your consent.

- **Manage and respond to claims of rights granted by the Data Protection Act and the GDPR**

[More details & legal base](#)

Legal base:

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- Legal obligation (GDPR and Data Protection Act).
- **Ensure the proper functioning and continuous improvement of the Platform and its features**

[More details & legal base](#)

Legal base:

- Our legitimate interest in guaranteeing the best level of operation and quality of the Platform in particular by using visitor statistics;
- Your consent when required.

Blueside-Home will also be authorized to use such data for the purpose of fulfilling a legal or regulatory obligation.

In any case, and for each defined purpose, Blueside-Home will do everything in its power to ensure the security and confidentiality of the personal data entrusted to them, in compliance with the laws and regulations in force.

### WHICH DATA ARE PROCESSED?

The mandatory or optional nature of the personal data requested and the possible consequences of a lack of response are specified at the time of their collection.

You can see the details of the personal data we may have about you below:

For access to the Platform and provision of Services	<ul style="list-style-type: none"> <li>- Name, surname;</li> <li>- Email address;</li> <li>- Phone;</li> <li>- Photography.</li> </ul>
To manage and follow-up Your booking reservations, the execution of the Services and billing	<ul style="list-style-type: none"> <li>- Name, surname;</li> <li>- Phone;</li> <li>- Email address;</li> <li>- Mailing Address;</li> <li>- Mailing address for billing;</li> <li>- Data relating to the means of payment:               <ul style="list-style-type: none"> <li>- Bank details;</li> <li>- Credit card number, cryptogram, validity date (data processed and collected by the PSP).</li> </ul> </li> </ul>
To answer your inquiries	<ul style="list-style-type: none"> <li>- Name, surname;</li> <li>- Email address;</li> <li>- Phone.</li> </ul>
To send our newsletter	<ul style="list-style-type: none"> <li>- Name, surname;</li> <li>- Email address.</li> </ul>
To send commercial offers for our services and those of our recipients	<ul style="list-style-type: none"> <li>- Name, surname;</li> <li>- Email address.</li> </ul>
To manage claims of rights granted by the Data Protection Act	<ul style="list-style-type: none"> <li>- Name, surname;</li> <li>- Email address.</li> </ul>
To ensure the proper functioning and continuous improvement of the Platform and its functionalities	<ul style="list-style-type: none"> <li>- Data relating to Your navigation on our Platform via Cookies.</li> </ul>

## WHO ARE THE RECIPIENTS OF YOUR DATA?

As part of their respective responsibilities and for the purposes recalled above, the key persons who may have access to your data are the following:

- Authorized personnel at Blueside-Home (administrative, accounting, marketing, sales, logistics and IT departments);
- Providers in charge of management and hosting of the Platform;
- Owners (they will be able to see the name, photo, email, and exchange messages with You);
- If applicable, the authorized personnel of our processors such as banking partners;
- If applicable, the relevant jurisdictions, mediators, accountants, auditors, attorneys, bailiffs, debt collection companies, police or military authorities in case of theft or judicial requisition, assistance;
- Third parties likely to deposit cookies on your devices when you give your consent.

### [More details of our providers:](#)

- The Payment Service Provider: Stripe.
- The provider for sending emails and newsletters (transmission of email address): Mailgun.
- The provider for the storage (cloud) of photos (including ID card and profile photos): OVH.
- The provider for sending sms (transmission of phone numbers): OVH.
- The provider for the analysis of the statistics of frequentation: Google.

Your data is not shared, exchanged, sold or loaned to anyone other than those mentioned above.

### WHAT IS THE RETENTION PERIOD OF YOUR DATA?

We only retain your Personal Data for as long as is necessary for the purposes as described above, and summarized in the chart hereafter:

For access to the Platform and provision of Services	For the duration of the relationship and for 3 years after the end of the commercial relationship.
To manage and follow-up Your booking reservations, the execution of the Services and billing	For the duration of the relationship and for 3 years after the end of the commercial relationship.
To answer Your inquiries	3 years from the end of the business relationship. Or 3 years from the date of Your last contact with Blueside-Home.
To send our newsletter	3 years from the end of the business relationship. Or 3 years from the date of Your last contact with Blueside-Home.
To send commercial offers for our services	3 years from the end of the business relationship. Or 3 years from the date of Your last contact with Blueside-Home.
To manage claims of rights granted by the Data Protection Act	1 year in case of exercising the right of access or rectification. 3 years in case of exercising the right of opposition.
To ensure the proper functioning and continuous improvement of the Platform and its functionalities	13 months. After this period, the raw traffic data associated with an identifier is either deleted or anonymized.

## INFORMATION REGARDING THE PROVISION OF PAYMENT SERVICES

### What are the purposes of the processing?

The client wishing to reserve the property must use payment services.

The payment services required for the Platform are provided by the Payment Service Provider.

The Payment Service Provider, in order to provide payment services, is legally required to carry out anti-money laundering, anti-terrorist financing and anti-fraud controls.

Therefore, the payment service provider, the Owner and Blueside-Home process Customer data for:

- **The provision of payment services**

Legal base:

- Contractual: the processing is necessary for the execution of pre-contractual measures taken at Your request, for the provision of payment services.

- **The implementation of control procedures**

Legal base:

- Legal obligation: processing of data necessary to fight against fraud, terrorist financing and money laundering pursuant to a legal obligation incurring on the PSP as a payment service provider.

### What is the status of the various parties involved?

Data processing for the implementation of control procedures

The Payment Service Provider is legally obliged to process the data necessary for the implementation of control procedures. In this respect, the Payment Service Provider must be considered as the Data Controller for the implementation of the control procedures.

Processing of payment data for the execution of transactions

With respect to the processing of payment data for the purpose of carrying out transactions, the PSP has to be considered as the processor, carrying out the processing on behalf of the users of its services.

When the Owner is a professional, he is the Data Controller.

When Blueside-Home processes data related to the transactions necessary for the Booking, Blueside-Home acts as Data Controller, regardless of the status of the Owner.



[More details](#)

The Platform's payment service provider is Stripe (<https://stripe.com/fr/legal>), which is subject, as such, to all legal and regulatory obligations applicable to Payment Institutions under French jurisdiction.

If You have any questions regarding the management and use of Your personal data, You may contact the PSP or Blueside-Home:

- Either by email, to [support@blueside-home.com](mailto:support@blueside-home.com)
- Or by mailing a letter, at the following address: 229 rue Saint-Honoré – 75001 Paris
- Or by phone at +33 1 89 27 91 71

**Legal reminder:** According to the Data Protection Act and the GDPR, **the Data Controller** is the person who determines the means and purposes of the processing of personal data. When two or more Data controllers jointly determine the purposes and means of the processing, they are called **Joint Data controllers**. **The Data processor** processes personal data on behalf of the Controller and acts under the Controller's authority.

**Concerning data collection and processing of banking data**

As part of the operation of the Platform, Blueside-Home may collect personal data relating to Your payment data. This data is processed in accordance with the purposes for which it was collected.

The mandatory or optional nature of the personal data requested and the possible consequences of a lack of response in Your regard are specified at the time of their collection.

Personal data concerning the payment, that Blueside-Home may have about You are, as follows:

<p>For the provision of payment services and the performance of control procedures</p>	<ul style="list-style-type: none"> <li>- Means of payment data: postal or bank statement, name of the person holding the bank account;</li> <li>- Transaction data such as transaction number, purchase details;</li> <li>- Invoice payment data: payment terms, discounts granted, receipts, balances and outstanding payments.</li> </ul>
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The data necessary for payment is collected by the Payment Service Provider, through the software solution implemented on the Platform, during the Booking process. It is then stored on the PSP's secure servers and, in some cases, transmitted to the Owners.

Transaction data (invoices, transaction details, Owner and Customer information) are processed by Blueside-Home or by the Professional Owners, if applicable, as separate data controllers.

It is expressly agreed that, Blueside-Home the Payment Service Provider and other parties involved in the processing of the data:

- Will not process the data in a way that is incompatible with the defined purposes;



- Will take all technical and organizational measures to ensure the security and confidentiality of the Customer's personal data.

## Consent

The processing of the Customer's personal data is necessary for the payment of the Bookings. As the Customer has chosen to book a Property, Blueside-Home and the Payment Service Provider do not need to obtain the Customer's consent, such processing being necessary for the performance of the service contract and the provision of the associated payment services.

In addition, the PSP processes customer data necessary to fight against fraud, terrorist financing and money laundering as part of its legal obligation as an authorized banking institution.

## Payment data retention period

Except as provided in the following paragraphs, bank details will cease to be retained as soon as the transaction has been completed by the Payment Service Provider, i.e. as soon as full payment, for the desired Booking, has been received by the Owner.

It should be noted that for payments made by credit cards, such data may be retained as evidence if the transaction is disputed, in temporary files for a period of thirteen (13) months (or fifteen (15) months in case of postponed payment). In any case, the visual cryptogram is not concerned by this data retention, and the bank account details are deleted at the expiration of the date indicated above.

For a longer retention of Your payment data in order to avoid having to fill it in for each transaction, Your consent will be expressly requested and the data will be retained until (i) the expiration of the validity date or (ii) the termination of the contract between You and Blueside-Home.

You may at any time reverse your decision and delete and/or modify this data

## INFORMATION REGARDING SOCIAL NETWORKS

While browsing the website, Users can click on the icons dedicated to the social networks Facebook and Instagram available on the Site.

Social networks enhance the user-friendliness of the Platform and help promote it through sharing.

When Users use these buttons, Blueside-Home may have access to personal information that Users would have indicated as public and accessible from their Facebook and Instagram profiles.

However, Blueside-Home does not create or use any Facebook or Instagram database and does not exploit any User's privacy data in this way

## More information

In order to limit the access of third parties to personal information on Facebook and Instagram, we invite You to configure Your profiles and/or the nature of Your publications via the dedicated spaces on social media in order to limit the audience.

## WHAT ARE YOUR RIGHTS?

Pursuant to the Data Protection Act and the GDPR, you have the following rights:

- A right to access ([article 15 GDPR](#)), rectify ([article 16 GDPR](#)), update and complete your data ([More information](#));
- A right to lock or erase your personal data ([article 17 GDPR](#)), if it is inaccurate, incomplete, dubious, obsolete or is prohibited from being collected, used, shared or retained; ([More information](#));
- A right to withdraw your consent at any time ([article 13-2c RGPD](#));
- A right to restrict the processing of your data ([article 18 GDPR](#));
- A right to object to the processing of your data ([article 21 GDPR](#)) ([More information](#));
- A right of portability of the data you have provided us when your data has undergone automated processing based on your consent or a contract ([article 20 GDPR](#));
- A right to determine what happens to your data after your death and to choose whether we should send your data to a third party whom you designate. ([More information](#)).
  - In the event of death, and in the absence of any instructions from you, we undertake to destroy your data unless it proves necessary to retain it for evidentiary purposes or to comply with a legal requirement.

You may exercise your rights by emailing the following address [support@blueside-home.com](mailto:support@blueside-home.com) or by mailing a letter to 229 rue Saint-Honoré – 75001 Paris.

Finally, You can also file a claim with the supervisory authorities, specifically the [CNIL](#) or any other competent authority. (<https://www.cnil.fr/fr/plaintes>).

## WHAT ABOUT LOGIN DATA AND COOKIES?

For the proper functioning of the Platform, Blueside-Home use login data (date, time, IP address, page viewed) and cookies (small files saved on your computer) in order to identify you, log your visits and gather visitor traffic analytics and statistics for the Platform, particularly with respect to the pages viewed.

You can consent, refuse or choose the type of cookies that You accept to be deposited on Your terminals.

[More information \[https://blueside-home.com/en/legal\]](https://blueside-home.com/en/legal)

In this regard, Blueside-Home has drafted a Cookie Management Policy available via the following link: [\[https://blueside-home.com/en/legal\]](https://blueside-home.com/en/legal)

To learn more about cookies (how to manage them, delete them, identify them), You can also refer to the CNIL's website by clicking on the following link : <http://www.cnil.fr/Vos-droits/Vos-traces/les-cookies/#c5554>



## **IS YOUR DATA TRANSFERRED OUTSIDE THE EUROPEAN UNION ?**

In principle, Blueside-Home processes Your data within the European Union.

Nevertheless, due to the nature of its activity, and subject to informing You in advance, Blueside-Home may transfer Your data outside the European Union. In this case, Users will be informed of the measures taken to control such transfer and to ensure the confidentiality of their data.

## **WHAT SECURITY MEASURES ARE IN PLACE TO PROTECT YOUR DATA?**

Blueside-Home and any processor shall implement appropriate technical and organizational measures to ensure the security of the processing and confidentiality of the personal data, according to current technical means and in accordance with the Data Protection Act and the GDPR.

Blueside-Home takes the necessary precautions, with regard to the nature of your data and the risks of processing, to safeguard the security of personal data, and especially to prevent it from being altered, damaged, or that unauthorized third parties have access to it (physical protection of the premises, authentication process with personal and protected access via usernames and passwords, logging and tracking login sessions...).