

# INDIGO – Privacy Policy

**Version: 1.0**

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Any changes that Indigo makes to this Privacy Policy will be posted on this page in the future. Please check this page frequently for updates to this Privacy Policy.

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## INTRODUCTION

This Privacy Policy describes Indigo's processing of your Personal Data in connection with your use of the Indigo Associations Platform accessible at the following address (the "Platform"), in connection with the use of the Indigo application accessible at the following address (the "Application").

Questions, comments and inquiries about this Privacy Policy should be directed to the email address : [data@indigo.world](mailto:data@indigo.world).

<b>Term</b>	<b>Definition</b>
<b>Indigo</b>	Indigo is a simplified joint-stock company established in France and headquartered at 14B rue de Sève, 92100 Boulogne-Billancourt. Indigo is the Data Processing Manager for the Treatments set forth in this Privacy Policy.
<b>Recipient</b>	Natural or legal person, public authority, service or any other body that receives personal data.
<b>Personal Data</b>	Any information relating to a natural person that makes it possible to identify him/her, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, a location data, an online identifier or one or more elements specific to his/her physical, physiological, genetic, psychological, economic, cultural or social identity.
<b>Finality</b>	Goal pursued by Indigo when processing your personal data.
<b>Basis of the treatment</b>	Basis on which the Treatment is implemented in accordance with Articles 6 to 9 of the GDPR.
<b>RGPD</b>	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46 / EC (General Regulation on Data Protection).
<b>Treatment</b>	Any transaction or set of transactions performed or not using automated processes and applied to data or sets of personal data, such as collection, registration, organization, structuring, retention , adaptation or modification, extraction, consultation, use, transmission, dissemination or any other form of provision, reconciliation or interconnection, limitation, deletion or destruction.
<b>Transfer outside of the EEA</b>	Any transfer of Personal Data from a country of the European Union to a country outside the EEA, ie the European Economic Area, namely Austria, Belgium, Bulgaria, Croatia, the Republic of Cyprus, the Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece,

	Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Countries Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, the United Kingdom, Iceland, Liechtenstein and Norway.
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1. Overview of treatment implemented by **INDIGO**

The table below summarizes the personal data processing implemented by Indigo. This table is completed by the details in the following sections.

Purpose of the Treatment	Information collected	Basis of Treatment	Recipient	Transfer out of EEA	The duration of the conversation
Creation, security and personalization of the Association's account	Surname First name Email Address Telephone number Facebook profile description of the head of the Association (optional)	Execution of the platform usage contract	Technical Service / IT Development  Marketing and Communication Department	No	Until the contact of the person in charge of the Association changes or the Association's account is deleted.  If the account is not used for a period of two years, Indigo will inform you of its upcoming deletion and give you the opportunity to reactivate it.
Establishment and management of a communication space between users of the Application and the Platform of Associations	Online chat history	Execution of the contract of use of the Platform	Technical Service / IT Development	No	Until the Association's account is cancelled.  If the account is not used for a period of two years, Indigo will inform you of its upcoming deletion and give you the opportunity to reactivate it.
Newsletter Management	E-mail address	Consent	Technical Service / IT Development  Marketing and Communication Department	Yes, to the US where Mailchimp data is hosted. Mailchimp has certified its compliance with the Privacy Shield approved certification mechanism	Until you withdraw your consent or 3 years from the last contact you received.

Management of the opposition list	E-mail address	Indigo's legitimate interest in ensuring that users' right of opposition is effective	Marketing and Communication Department	No	3 years from the exercise of the right of opposition
Contact form	Email address and message body	Indigo's legitimate interest in responding to requests from its users	Technical Service / IT Development  Marketing and Communication Department	No	3 years after data collection or after last contact received
Storage and backup of the Personal Data you provide to Indigo via the Platform	Personal data collected via the use of the Platform	Execution of the platform usage contract	Amazon Web Services	No	Until the Association's account is deleted.  If the account is not used for a period of two years, Indigo will inform you of its upcoming deletion and give you the opportunity to reactivate it.
Measuring the audience and performance of the Platform	Cookies  Information on the version and type of Internet browser used (eg Firefox, Chrome or Internet Explorer) and the operating system used (eg Windows or Mac OS)	Consent	Technical Service / IT Development  Marketing and Communication Department	No	13 month
Improvement of the platform's operation	Cookies  IP adress	Indigo's legitimate interest in improving the	Technical Service / IT Development	No	13 month

<p>Detection, prevention and resolution of fraud, spam, abuse, security incidents and other harmful activities</p> <p>User identification (in case of user notification and for moderating posted comments)</p>	<p>Information about your device (type, version)</p> <p>Information on the version and type of Internet browser used (eg Firefox, Chrome or Internet Explorer) and the operating system used (eg Windows or Mac OS)</p>	<p>Platform's operation</p> <p>Indigo's legitimate interest in the detection, prevention and resolution of fraud, spam, abuse, security incidents and other harmful activities.</p> <p>Indigo's legitimate interest in identifying the reported user and moderating his or her reported comments</p>	<p>Marketing and Communication Department</p>		
<p>Improved user experience</p>	<p>Cookies</p>	<p>Indigo's legitimate interest to enhance the user experience</p>	<p>Technical Service / IT Development</p> <p>Marketing and Communication Department</p>	<p>No</p>	<p>13 month</p>
<p>Allow and facilitate communication by electronic means on the Platform</p>	<p>Cookies</p>	<p>Indigo's legitimate interest in communicating with its users</p>	<p>Technical Service / IT Development</p> <p>Marketing and Communication Department</p>	<p>No</p>	<p>13 month</p>

## 2. What the personal data collected by **INDIGO**?

You provide information to Indigo when creating the account of the Association for which you are responsible, by subscribing to newsletters or by contacting Indigo via the Platform (by email, telephone, social networks, etc.).

Technical information (e. g. IP address, browser information, etc.) is also transmitted to Indigo by your device when you use the platform.

The information collected by Indigo is presented in the summary table above.

## 3. What foundations does **INDIGO** treat your personal data?

As described in the summary table above, Indigo's Treatments are based on (i) the performance of the contract for the use of the Platform, (ii) the legitimate interests of Indigo, or (iii) your consent.

You may not object to such Processing when it is necessary for the use of the Platform.

When the Processing is based on Indigo's legitimate interest, you may object to it. To do this, please refer to Section 8 regarding your rights.

When the Treatment is based on your consent, you may withdraw it at any time by sending an email to the following address: [data@indigo.world](mailto:data@indigo.world)

## 4. What are cookies used for and why are they collected?

Cookies are text files containing small amounts of information that are downloaded to your device when you visit a web page or use an application. Cookies are then returned to the original web page or application on each subsequent visit, or to another web page or application that recognizes this cookie.

Subject to your consent, Indigo uses cookies to:

- measure the performance and audience of the platform, including analysis of the types of Internet browsers (e. g. Firefox, Chrome or Internet Explorer) and operating systems (e. g. Windows or Mac OS) used.

You have the right to choose whether or not to accept these cookies and Indigo explains how to exercise this right below. However, please note that if you refuse cookies, you may not be able to use all the features of the platform.

Most browsers allow you to change the cookie settings. These settings can be found in the "options" or "preferences" menu of your browser. To better understand these settings, the

following links may be useful, otherwise use the "Help" option of your browser for more details:

- [Set cookies in Internet Explorer](#)
- [Set cookies in Firefox](#)
- [Set cookies in Chrome](#)
- [Set cookies in Safari web](#) and [iOS](#).

Indigo uses cookies, regardless of your consent and for its legitimate interest in:

- improve the functioning of the Platform;
- detect, prevent and resolve fraud, spam, abuse, security incidents and other prejudicial activities;
- identify the user (in case of notification of the user and for the moderation of the reported comments);
- improve the user experience;
- enable and facilitate communication by electronic means on the Platform.

Indigo uses Google Analytics, a web analytics tool that helps Indigo understand how users interact with the platform. Google Analytics uses persistent cookies to track user interactions. This information is used to generate reports and help Indigo improve the platform. These reports reveal platform trends without identifying individual visitors. You can disable Google Analytics without affecting the way you visit the Platform - for more information on whether to disable Google Analytics on any of the websites you use, visit this [page Google](#).

You will find more information about cookies and how to administer them at the following address: <http://www.allaboutcookies.org/fr/>.

## 5. To whom are your personal data transmitted?

Indigo does not sell or rent your Personal Data to others.

As detailed in the summary table above, access to your personal data is strictly limited to:

- Indigo employees and employees who are authorized by reason of their duties and who are bound by confidentiality;
- Indigo's subcontractors contractually responsible for performing the tasks necessary for the proper functioning of the Platform and its services, namely the cloud storage of your Personal Data (Amazon Web Services which stores your Personal Data in Ireland).

As part of the performance of their services, Indigo's subcontractors comply with the provisions of the RGPD.



Indigo will also disclose your Personal Data to third parties if Indigo disposes of any of its entities and / or assets and your Personal Data is affected by such assignment.

Indigo will share your Personal Data with judicial authorities, independent administrative authorities or any other organization if required by law.

**6. Are your personal data transmitted outside the EEA?**

Most recipients of Personal Data are located in France or in a Member State of the EEA.

As part of the implementation of the Indigo newsletter, your e-mail address is transferred to the United States where data from Indigo's provider, Mail Chimp, are hosted. Mail Chimp has certified its compliance with the approved certification mechanism [Privacy Shield](#).

**7. How long are your personal data stored?**

Indigo retains your Personal Data as described in the summary table above.

After you terminate the use of the Platform, Indigo will store your Personal Data in an aggregate, anonymous format.

**8. What are your rights?**

In certain circumstances, you have rights to the Personal Data Indigo holds about you.

The table below gives an overview of these rights and how you can exercise them. Please note that Indigo will verify your identity before responding to any request to exercise your rights. To exercise any of your rights, please send an email to the following address: [data@indigo.world](mailto:data@indigo.world). Please note that for each of these rights, Indigo may have valid legal grounds to refuse your request, in which case Indigo will inform you.

Right	Contents
Permission to access	You have the right to know whether Indigo processes your Personal Data and, if so, to access such Data and certain information about how Indigo uses it and with whom Indigo shares it. You may request a copy of this Data.
Right to portability	You may request to receive Indigo's Personal Data about you in a structured, commonly used and machine-readable format, and the right to request Indigo to transfer such Personal Data to a third party (i) if the Processing is necessary for the performance of the contract or (ii) if the Processing is based on your consent and the Processing is performed by automatic processes.

<b>Right of rectification</b>	If you believe that Indigo's personal information about you is inaccurate or incomplete, you have the right to request that it be corrected or amended.
<b>Right to erasure</b>	You may ask Indigo to delete your personal data in the following circumstances: (i) when you consider that it is no longer necessary for Indigo to hold such Personal Data, (ii) when Indigo processes them on the basis of your consent and you wish to withdraw your consent, (iii) when Indigo processes your data on the basis of its legitimate interest and you object to it, (iv) when you wish Indigo to use your data only to solicit you commercially or (v) when you believe that Indigo processes your personal data unlawfully.
<b>Right to Limitation of Treatment</b>	You may ask Indigo to limit the Processing of your Personal Data (i) if you dispute the accuracy of your Personal Data, (ii) if the Processing is unlawful and you object to its deletion, (iii) if you believe that Indigo no longer needs your Personal Data but still needs it to find, exercise or defend rights or (iv) if you have opposed the Processing of Personal Data that Indigo holds about you.
<b>Right of opposition</b>	You have the right to object to the processing of your personal data by Indigo and Indigo will examine your request. To this end, please provide Indigo with details of your reasoning so that Indigo can assess whether there is a legitimate and compelling reason for Indigo to continue to process these data or whether Indigo must process them to exercise or defend its rights in court.
<b>Right to give post-mortem directives</b>	You have the right to set guidelines for the storage, erasure and disclosure of your personal data after your death.

## 9. How can you make a complaint?

If you have a complaint about how Indigo processes your personal data, please contact Indigo first at [data@indigo.world](mailto:data@indigo.world) and Indigo will endeavour to process your request as soon as possible.

You retain the right to complain to the data protection supervisor of the European Union country in which you reside or work, if you believe that Indigo has violated data protection rules.