

Confidentiality policy

Updated on: 26/10/2018

This confidentiality policy defines and informs you how the *Société d'Economie Mixte pour les Evènements Cannois* (hereinafter referred to as the "SEMEC") uses and protects the personal data you provide to us, if applicable, when you use this website.

The terms and concepts used in this confidentiality policy (hereinafter referred to as the "Policy") correspond to those used in the General Data Protection Regulation 2016/679 of 27 April 2016 (hereinafter referred to as the "GDPR").

The policy may be modified or supplemented at any time by the SEMEC, in particular with a view to compliance with any changes in legislation, regulations, jurisprudence or technology. In such a case, its update date will be clearly visible in the header. As a result, the Policy must be consulted regularly in order to find out any modifications thereto.

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1. Identity of the data controller

The data controller is the *Société d'Economie Mixte pour les Evènements Cannois*, which has its head office at: La Croisette CS 30051 - 06414 Cannes Cedex.

The contact details for the SEMEC are as follows:

Telephone: +33 (0)4 92 99 84 00

E-mail: rgpd@palaisdesfestivals.com

2. Data Protection Officer (DPO)

Our data protection officer is *Maître* Alexandra MASSON-BETTATI, barrister of Nice.

Contact details: rgpd@palaisdesfestivals.com

3. Processing purposes

We only use your personal data for the following purposes:

- Provide the information, services or products you are requesting (newsletter, sales offer, contact form, recruitment, etc.)
- Gathering information allowing for the SEMEC's websites, services and products to be improved (especially via cookies, etc.).

All the processing carried out and the purposes thereof are set out and can be viewed in the personal data processing table, available in [Appendix 1](#).

4. Legal basis for processing

Your personal data is only collected in the cases provided for by current regulations, namely the existence of a legitimate interest in using your data and your consent to its use.

In order to satisfy a legitimate interest, the data collected only aims to improve and ensure accessibility of our website, services and products. In any case, we permanently weigh up our legitimate interest in carrying out necessary and proportionate data processing against your interests, rights and fundamental freedoms.

As these legal bases are different and specific to the processing concerned, all the processing carried out and the legal bases therefor are set out and can be viewed in the personal data processing table, available in [Appendix 1](#).

We guarantee that only the data strictly required to meet the purposes defined in [Article 3](#) is collected, so that, failing a response from you when asked, the services and information requested can be provided.

5. Category of personal data processed

Depending on the purpose, and on the services and products requested, we may have to process different categories of personal data:

- Identification data (surname, forename, photograph);
- Contact details (e-mail address, telephone number);
- Data relating to professional life (CV, covering letter);
- Data linked to your browsing on the website (cookies);

As the personal data processed is different and specific to the processing concerned, all the processing carried out is set out and can be viewed in the personal data processing table, available in [Appendix 1](#).

6. Personal data recipients

We are the only recipients of your personal data. Whether in an individual or abbreviated form, this is never provided to third parties, the processors on whom we call to achieve the purposes set out in Article 3 notwithstanding. Likewise, we guarantee and ensure you that these processors fully comply with the regulations currently in force.

Neither we nor our processors market your personal data.

7. Personal data conservation period

We only keep your personal data for the time strictly required for the collection purposes as defined in [Article 3](#).

As the conservation periods are different and specific to the data concerned, all the processing carried out and their conservation periods are set out and can be viewed in the personal data processing table, available in [Appendix 1](#).

8. Protection of your personal data

We guarantee to implement suitable technical and organizational measures in accordance with the applicable legal provisions, in order to protect your personal data against alteration, accidental or unlawful loss, use, disclosure or unauthorized access. Without this list being exhaustive, these measures consist in:

- Appointing a data protection officer;
- Raising awareness of confidentiality requirements in all our employees;
- Securing access to our premises and our IT platforms;
- Implementing a general corporate IT security policy;
- Securing the access, sharing and transfer of data;
- A high level of requirement in terms of data protection when selecting our processors and partners.

9. Rights over personal data

9.1. *Users' rights*

You have the following rights in relation to your personal data:

- **Right of access:** You have the right to obtain confirmation whether your personal data has been processed and, when it has, the methods framing its use.
- **Right of rectification:** You have the right to have rectified any incorrect, inaccurate or incomplete personal data held.
- **Right to erasure:** You have the right to have your personal data erased. We are obligated to carry out this erasure as quickly as possible when:
 - o The data collected is no longer needed with regard to the purposes for which it was collected or if it has been processed in a different way;
 - o You have withdrawn your consent needed for the treatment;
 - o You have objected to the processing carried out;
 - o The personal data collected forms the subject of unlawful processing;
 - o The personal data must be erased in order to comply with a legal obligation.
- **Right to restriction:** You have the right to restrict the processing of your personal data under the following scenarios:
 - o The accuracy of the data collected is disputed;
 - o The processing is unlawful;

- We no longer need your personal data to fulfil the purposes of processing, but this is, however, still needed for the establishment, exercise or defence of rights in court;
- You have objected to the processing.

You can also exercise your right to object: you can object to your personal data being processed when this has been collected to fulfil our legitimate interest, unless there are legitimate and urgent reasons for the processing that supersede your rights.

9.2. *How to exercise your rights*

To exercise your rights, please send an e-mail specifying your request to the following address: rgpd@palaisdesfestivals.com.

In accordance with Article 12 of the GDPR and due to the obligation of security and confidentiality incumbent on us when processing personal data, your request will be handled subject to you providing proof of your identity, particularly by producing a double-sided scan of your valid identity document. This proof of ID will be destroyed immediately after the right has been exercised.

In any case, an e-mail will be sent to you to confirm that your request has been received. This will be handled within a maximum of one month.

Furthermore, you can unsubscribe from our electronic communications at any time via the options available within these messages.

10. Complaining to the CNIL

If, despite our efforts to maintain the confidentiality of your personal data, you believe your rights have not been respected, you have the option of lodging a complaint with the *Commission Nationale de l'Informatique et des Libertés* (CNIL: French Data Protection Agency) You can send a request by e-mail by clicking on the following link: <https://www.cnil.fr/fr/plaintes/internet> or by letter to the following address: Commission Nationale de l'Informatique et des Libertés (CNIL), 3 Place de Fontenoy – TSA 80715 – 75334 PARIS CEDEX 07.

11. Cookies

Please see our policy on the use of cookies for further information.

Appendix 1 -Processing list

The following table summarizes the personal data processing we carry out, the data collected for these purposes, its conservation period, as well as the legal bases on which this processing rests.

The conservation periods shown in this appendix may be posted in the event of a dispute or if you have exercised one of the rights listed in [Article 9.1 of the Policy](#).

Processing	Data collected	Legal bases	Purposes	Conservation period
Newsletter subscription	E-mail address	Consent	Information and offers sent about Cannes as a destination and about the Palais des Festivals	3 years from last contact
Contact request	Surname, forename, e-mail address	Legitimate interest	Answering requests sent to our employees	6 months after contact
Job application	Surname, forename, e-mail address, telephone number, CV, covering letter	Legitimate interest	Collection of applications for posts to be filled	2 years
Cookies	Data linked to your browsing on the website	Consent	Operation and optimization of services Visitation logs. Personalization of content and adverts	13 months