



# Website personal data protection policy

We care about your privacy. Wojo is committed to protecting your data both when you log on to our website and when you come to work in our spaces.

The purpose of this Privacy Policy (the 'Policy') is to explain your rights and how we collect, use and share your personal data when you log on to and browse the **websites** at <http://www.wojo.com> or <https://app.wojo.com> (the 'Site' or 'Website').

The use of 'we' or 'our' in this Policy refers to **WOJO SAS**, the company that determines how and why your personal data is processed. We are the 'data controller' for your personal data.

We process your personal data in accordance with applicable regulations, in particular Regulation (EU) 2016/679 (General Data Protection Regulation, or the '**GDPR**') and the Law 3/2018, on Data Protection and Digital Rights Act ("DPDRA").

## ● The personal data we collect and process

We collect your data, as indicated below, (i) directly from you or indirectly (ii) through your company and (iii) your use of our spaces and the services and benefits we offer.

The data we collect and process may include:

- your contact details (e.g. last name, first name, telephone number, email address, Wojo membership card number) and your professional details (e.g. company, job title, position);
- your Accor loyalty programme membership number;
- information about your booking and schedule (e.g. spaces and rooms you have booked, office preferences, payment order);
- communications processed on our Sites (e.g. your opinions, recommendations, questions/comments during or following a session at a Wojo establishment);
- information about your use of our Sites (e.g. technical data about your device or computer identifiers, such as IP address, geographical area, pages browsed by the user, date and time when they were browsed, geographical location, connection route (social media, search engine, partner site, directory));
- information about your geolocation, with your consent.

The data we collect is limited to the information required for the purposes given below. Mandatory data is indicated as such on the data collection forms.

## ● Purposes of processing your data

We process your personal data for the purposes and on the bases given below when:



- it is necessary for the provision of our services and the performance of contractual obligations with you or your company. In the latter case, the processing of your personal data is based on the execution of the contract. For more information on this matter, please consult the contract we have signed or the information form sent by your company;
- it is a necessary part of our legitimate interest or that of a third party, namely (i) to analyse your needs in accordance with our corporate purpose and improve our services, (ii) and, where applicable, for Wojo and/or its partners or affiliates to send commercial or other information, such as service updates, newsletters, new offers, news, etc., (iii) to protect our information systems and (iv) to prepare or carry out corporate restructuring processes, including changes of ownership, mergers or acquisitions, sales or transfers of business or assets;
- it is necessary for fulfilment of our legal or regulatory obligations;
- where applicable, you have given your prior consent to the processing and said consent has been obtained in accordance with data protection regulations.

We will endeavour to keep the personal data we hold or control up to date. To this end, you can collaborate with us by informing us of any changes to your personal data.

## ● Disclosures to third parties

For the purposes described above, we may need to disclose your personal data to the following recipients, always in compliance with data protection regulations:

- our subcontracting parties, partners, service providers, professional advisers; we may hire or bring in other companies to perform certain functions on our behalf or manage our services. They are under contractual and legal obligation to protect your privacy and the confidentiality of your data. In particular, these include our IT suppliers, online payment and billing services, booking and mailing management services;
- as part of a corporate restructuring or due diligence process in connection with a merger, acquisition or other business transaction (or in connection with the implementation of any of such transactions), we may need to share your information with prospective buyers or sellers and their advisers.

Finally, in order to comply with legal and regulatory obligations, we may also share your personal data with public organisations, judicial or administrative authorities and regulatory bodies.

Some of our partners may also collect information about you in order to provide you with Wojo services (e.g. our online payment service providers may collect your payment details and credit card number). For more information, please see their privacy or data protection policies.

## ● Term during which your personal data will be stored

Your personal data will be stored for as long as necessary to achieve the purposes for which they were collected.

To determine the period for which your personal data will be stored, we assess the amount, nature and sensitivity of the personal data, the potential risk resulting from unauthorised use or disclosure of the personal data, the purposes for which we process your personal data and our legal obligations. At the end of said period, your personal data will be erased or archived in accordance with legal and regulatory requirements.

## ● Technical and organisational security measures

We apply appropriate technical and organisational security measures (such as regular checks on access authorisations, depending on equipment, password protection, traceability of accesses and incidents, regular data backup, use of anti-virus software and firewalls, penetration testing, physical locks, etc.), to ensure a level of security appropriate to the risks involved in the processing and the nature of the personal data that is to be protected.

Access to personal data is restricted to authorised employees only and exclusively for their professional duties; said employees also have an obligation of confidentiality.

## ● Transfers outside the EU

The recipients of your data are located mainly in the European Union; however, they may also be located outside the EU. For the latter, we take the security measures and legal precautions required for the security and integrity of the personal data we transfer, such as adopting the European Commission's standard contractual clauses.

## ● Your rights

You have the following rights:

- 1. Right of access:** you can request access to the personal data we hold about you and to certain information on how they are processed. In some cases, prior request from you, we will be able to provide you with an electronic copy of your data;
- 2. Right to request the rectification:** you can ask to rectify any of your data that are inaccurate or incomplete; you must then specify what the inaccuracy is;
- 3. Right to restriction of processing:** under certain circumstances, processing can be restricted; you can make this request at any time and we will decide how to proceed;
- 4. Right to object:** you can object to any processing based on our legitimate interest on grounds relating to your particular situation and, in any case, when we send you marketing communications;
- 5. Right to erasure ('right to be forgotten'):** under certain circumstances, you can request the erasure of your personal data; when we consider, on legal grounds, that your request is admissible, we will erase your personal data without undue delay;
- 6. Right to data portability:** under certain circumstances, you can ask us to provide your personal data in a commonly used, machine-readable format; if it is technically possible, you can also ask us to transmit your data to another data controller;
- 7. Right to withdraw your consent:** in the event that the processing of your personal data is based on your consent, you can withdraw it at any time;

- 8. Right to issue instructions** regarding the storage, erasure and disclosure of your personal data after your death. In the event of death, unless otherwise instructed by you, your relatives or others similarly associated with the deceased, and her/his heirs may contact us to request access to her/his personal data and, where appropriate, its correction or erasure.

In addition to the above-mentioned rights, we also guarantee the respect of your digital rights provided for on Title 2 Chapter 2 of the DPDRA.

Some of these rights apply only in certain circumstances. You may exercise your rights by email to [rgpd@wojo.com](mailto:rgpd@wojo.com) or by post (registered post is recommended): WOJO, Service Juridique, 82, Avenue du Maine, 75014 Paris.

When you contact us to exercise your rights, we may ask you to provide identification before processing your request.

You can also lodge a complaint about the processing of your personal data with the competent data protection authority, i.e. the *Agencia Española de Protección de Datos (AEPD)*, the Spanish Data Protection Agency).

## ● Cookies

### What is a cookie?

A cookie is a simple text file stored temporarily or permanently on your fixed or mobile device (but also, in some cases, in your web browser) by the server of the site you are browsing. It is sent back to the website in question so that it can recognise you on your return.

### We use two types of cookies on the Wojo website:

#### Internal cookies necessary for the site to work correctly

These cookies make it possible for the site to work correctly. You can object to and delete them using your browser settings; however, doing so may affect your user experience.

Cookie name	Purpose	Expiration time
Frontend	Site session ID	1 hour
Frontend_cid	Site HTTPS session ID	1 hour
Store	Current Store_view. Contains the code of the store_view selected by the user when changing language.	12 months
_dc_gtm_UA_xxxxxxxx-x	Manages the loading of all the page scripts to ensure that they work correctly.	1 minute
didomi_token	Manages consent information for third-party platforms, as well as user data.	1 minute
euconsent	Contains the consent of the IAB TCF and third-party platforms in the IAB standards.	12 months



### **Third-party cookies for improved site interactivity, audience measurement or advertising**

The Wojo site uses certain services provided by **third-party sites**. These include:

- services to ensure correct operation of the features on the site (payment services, invoicing, booking management and your customer account);
- site audience measurement services: Content Square, Doubleclick.net, Google Analytics, Google Optimizer, Google Adsense;
- services with associated advertising: Microsoft Bing, LinkedIn, Facebook, YouTube, Twitter.

These features use third-party cookies stored directly by said services. On your first visit to wojo.com, a pop-up window informs you of the use of these cookies and asks you to make your choice. They are installed on your device only if you accept them. You can find more information and set your options to accept or refuse cookies by going to the site footer (footer banner) and clicking on 'Gestion des cookies' ('Cookie management'). You can set your preferences for the site as a whole or on a service-by-service basis.

## **Amendment**

This Policy may be amended from time to time. You will be informed of any significant changes to this policy by email or by any other method we choose as permitted by applicable law.

Version of 01/03/2021