



MojoCircle.com and ClubMojoCircle.com

Website Privacy Policy

Effective Date 8th September 2021

1. Data Protection

The protection of your privacy and your personal data is taken very seriously and is of utmost concern to us. Club MojoCircle is a community of trust that ensures the highest standards for the protection of your personal data and your privacy through this privacy policy (the "Privacy Policy"). This Privacy Policy is designed to help you better understand how we collect and deal with your personal data and information. We work hard to earn and keep your trust. Therefore, we use personal data solely to provide you with the Club MojoCircle Services. We shall never rent, sell, or otherwise provide personal data to any third party for advertising or for marketing purposes without your consent.

We are responsible for the handling of your data, which we process according to your wishes and the requirements of the French and EU data protection laws. Personal data is data that identifies you or makes you identifiable. We only process personal data if this is permitted by law or if you have given your prior consent.

2. Data Collected

If you register for our platform, with your prior consent, we shall collect and process the following data:

- first and last name;
- physical addresses;
- email addresses;
- telephone numbers;
- date of birth (as our offer is only aimed at persons who have reached the age of 18).

Further data to be collected shall be listed in Appendix 1.

The provision of personal data and registration data is necessary for the conclusion of the contract (legal basis: Art. 6(1) (b) GDPR).

When visiting our website, our web server records the domain name or the IP address of your computer when you visit our internet page. This procedure is technically necessary and customary to enable the use of our website. Here we are supported by our technical service providers, which we use as contract processors. The above-mentioned data is logged and used for the purpose of defense against illegal use or attempted attacks on our web server (Art. 6 (1) (f) GDPR). The data will be deleted when no longer needed.

*[If certain data fields are designated as mandatory fields and/or marked with an asterisk (*), the provision of this data is either required by law or contract, or we need this data for the conclusion of the contract, the desired service, or the stated purpose. Of course, you also have the right to specify the data in the mandatory fields at your discretion. Failure to provide this information may result in the contract not being fulfilled by us or the desired service not being provided, or the stated purpose not being achieved.]*

3. Our Services

Data are used only for managing your membership activity (membership, event booking, payment, emailing...). We only hold the data necessary to offer the services provided on our website. We do not ask for or use more data than necessary to provide you with a proper membership service. This means we only process and hold data related to [purchases and subsequent support related to those purchases], in accordance with Article 6(1)(b) of the General Data Protection Regulation (GDPR). Any processing of your data is only done to provide or perform the services or products you have purchased.

4. Required Period and Security

We only hold personal data for as long as necessary. Once the data is no longer needed, we delete it. We ensure that the appropriate physical, technical and organisational measures are taken to prevent alterations, loss of your data, or unauthorised access to your data.

5. Rights in Data Protection

Personal data is yours. As a Club MojoCircle user, you have the following rights regarding the processing of personal data:

1. Right of access by the data subject to the personal data concerned
2. Right to rectification or erasure or restriction of processing
3. Right to data transfer
4. If the processing of your personal data is based on your consent (Art. 6 (1) (a) or Art. 9 (2) (a) GDPR), you have the right to withdraw your consent at any time. We will inform you about this in detail in the following sections.
5. Right of appeal to a supervisory authority

You have the right to object to the processing of your data at any time for reasons arising from your particular situation if the legal requirements are met. If you object to the processing of your data for advertising purposes or wish to revoke your consent, a short message to contact support@mojocircle.com is sufficient at any time. Your data will then no longer be processed for the advertising purposes covered by the advertising objection or the revocation of consent. This does not affect the legality of the processing carried out until the objection or revocation. After your objection to the processing of your personal data for advertising purposes or the revocation of your consent, we are obliged under data protection law in accordance with the requirements of the French data protection supervisory authorities to include the necessary data (name, address, e-mail address) in our internal advertising blacklist and - only for this purpose - to permanently store/block and use for comparison with our future advertising files. (Art. 21 (3), Art.17 (3) (b), Art.6 (1) (c) GDPR). Moreover, you have a right to correction, deletion, restriction of processing, objection, and the right to data transfer if the legal requirements are met. In all these cases, please contact support@mojocircle.com. Finally, you have the right to complain to a competent data protection supervisory authority.

6. Card & Payment Processing Data

We use third-party payment providers to handle card and payment processing data securely, so we can provide our contractual service to you (legal basis: Art. 6 (1) (b) GDPR). We never see or store any card or payment information. In accordance with Article 6(1)(b) of the General Data Protection Regulation (GDPR) any other data is only used to process your purchase securely. Furthermore, we

use companies as contract processors in order to be able to offer our customers payment methods customary in the market. These include credit card via PayPal and Stripe (Art. 6 (1) (f) GDPR). In accordance with Article 6(1)(c) of the General Data Protection Regulation (GDPR), we need to retain data related to all purchases to fulfil our existing legal obligations to account for tax on all transactions.

7. Backup & Data Storage

For storage and backup purposes, customer data and email subscription data may be passed to and stored securely with third party service providers located outside the EEA (European Economic Area). This is done to backup and preserve your data where it is needed to carry on offering a service to you. The service is provided in compliance with EU data protection regulations using a data processing agreement. At any time, you have access to the details of such third-parties and you can file a request for information using this email: support@mojocircle.com or our contact form on our website.

8. Email Updates

If you subscribe to our [updates/newsletter/e-magazine/email service], you agree that we will regularly email Club MojoCircle news and information, updates about current offers as well as interesting information about living in France and event invitations. All subscription emails sent by us contain clear information on how to unsubscribe from our email service, although being able to receive administrative emails is necessary as an active member. Our email service is an opt-in service only; with your prior consent required in accordance with Article 6(1)(a) of the General Data Protection Regulation (GDPR). This means to subscribe you must enter your details into the email subscription page and submit them to us. You can revoke your consent at any time, e.g. in your account settings, via the email address support@mojocircle.com, [or by clicking on the unsubscribe link in any newsletter (to unsubscribe from that newsletter)]. We will use your data until you revoke your consent.

9. Data Sharing with Partners

We do not share commercial or technical data with our partners unless we have specifically sought and obtained your prior approval in writing. Where we request such approval, we will always fully disclose how your data is used. Please note that even when we have your specific consent, we only share data with partners that operate their own privacy policy in full accordance with the General Data Protection Regulation (GDPR).

The list of the partners we use can be found in Appendix 2.

10. Cookies

Our website uses "cookies" to track use and allow customers to purchase from our website. Cookies are small text files that are stored on your computer. Please note that these cookies do not contain or pass any personal, confidential or financial information or any other information that could be used to identify individual visitors or customers purchasing from our website. Please note that you are free to refuse cookies.

11. Our Promise

We never sell, rent or exchange mailing lists without your prior written consent.

12. Changes

This Privacy Policy must be adapted from time to time to the actual circumstances and the legal situation. Please check the Privacy Policy before using our platform to keep up to date with any changes or updates.

13. Contact Us

If you have any questions relating to our Privacy Policy, please email us on Support@mojocircle.com or use our contact form. We process your data to answer your service requests (Art. 6 (1) (b, f) GDPR). The communication of address and telecommunication data marked as mandatory data is necessary in order to process and answer your request. The voluntary provision of further data makes it easier for us to process your enquiry.

This policy was last updated on 08 September 2021 by

Janeen Sonsie, 283 Avenue Henri Giraud, 06140, Vence, France

Email: contact@mojocircle.com
From within France: 07 73 27 48 46
International: +33 7 73 27 48 46
SIREN Number: 849934252 - Registered in France

Appendix 1: DATA TO BE COLLECTED

1. Email address
2. First name
3. Surname
4. Nickname
5. Current Address
6. Country of origin
7. Expat Women Facebook group member (y/n)
8. Expat Women Meetup group member (y/n)
9. Birthday (year optional)
10. Work status
11. Relationship status
12. Number of children
13. What do you want to get from this Club?
14. What would you like to enhance in your life?



Appendix 2 : Partners we use

The MojoCircle.com and ClubMojoCircle.com domains and websites are hosted with SiteGround.com

Payment gateways are PayPal and Stripe

ActiveCampaign is used as the auto-responder and for CRM functionality

Survey Monkey may be used from time to time for surveys

WordPress is the website content management

Various Wordpress plugins – a list can be made available on request to support@mojocircle.com

Please note that even when we have your specific consent, we only share data with partners that operate their own privacy policy in full accordance with the General Data Protection Regulation (GDPR).