



tropee

Privacy Policy

21 December 2022

Version 1.0

NOTICE

The platform tropee.com is edited by Tropee SAS, a French simplified joint stock company registered in the trade and companies register of Bobigny under number 884 482 332, with registered offices located 95 avenue du Président Wilson, 93100 Montreuil, France.

The purpose of this document is to provide information regarding the processing of personal data by Tropee in compliance with article 13 of the GDPR.

We do not have a data protection officer but you may contact us at the following email address : team@tropee.com. // The data protection officer is François Mahl, whom you may contact at the following email address : team@tropee.com.

For all legal general questions please contact team@tropee.com.

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1. Definitions

1. Where drafted in upper case, the following definitions are applicable to the entire Privacy Policy.

Blockchain	refers to a type of technology that supports the distributed recording of encrypted data and as the case may be, the Ethereum and Polygon blockchain.
Blockchain Address	refers to a unique sequence of numbers, letters and cryptographic functions stored on a Blockchain.
Personal Data	refers to any information relating to an identified or identifiable natural person, as defined in article 4 of the GDPR.
Tropee, We, Us, Our	refers to Tropee SAS, a simplified joint-stock company, registered with the trade and companies register of Bobigny under number 884 482 332, with registered offices located 95 avenue du Président Wilson, 93100 Montreuil, France.
Services	refers to the services provided by Tropee, as provided on the Platform and defined in the T&Cs.
T&Cs	refers to the terms and conditions applicable to the Services.
Users, You, Your	refers to any data subject to the collection and processing of Personal Data by Tropee.
Platform	refers to Tropee's website and digital marketplace available at tropee.com , including all its subdomains.

2. Unless stated otherwise, definitions stated in the singular shall have the same meaning in the plural form.
3. Any term defined in article 4 of the GDPR and mentioned in this Privacy Policy shall have the same meaning.

2. Foreword

4. Tropee believes that trust is the key to successful and lasting relationships. In this respect, the protection of Your Personal Data and privacy is no exception. For this reason, Tropee takes great care to collect and process Your Personal Data only with the utmost care and in strict compliance with the applicable legal framework.
5. In drafting this Privacy Policy and making it available to Our Users, We intend to fulfill Our duty to inform data subjects within the meaning of articles 13 and 14 of the Regulation EU (2016/679) of the EU Parliament and the Council of 27 April 2016 (the "GDPR").
6. Tropee operates the Platform, which provides for the Services described in the T&Cs.
7. This Privacy Policy will describe how Your Personal Data is processed when You navigate on the Platform and use the Services offered by Tropee.
8. We may amend this Privacy Policy from time to time, in which case We will update You by any available means, including by way of notification on the Platform.

3. Our role; other recipients

9. Tropee acts as a data controller regarding User's Personal Data.
10. Tropee shares Your Personal Data with French service providers who assist Tropee in fulfilling the purposes specified in this Privacy Policy. As Tropee's subcontractors, such service providers may have access to Your Personal Data for the sole purpose of carrying out the specific tasks assigned to them. Tropee will ensure that contractors provide adequate safeguards for the performance of the assignment and comply with applicable laws and regulations.
11. Tropee does not transfer Your Personal Data outside of the European Union.
12. Where appropriate, Tropee will share Your Personal Data with the relevant courts and any other governmental and/or public authority requesting access to Personal Data, to the extent legally permitted.
13. In any event, Tropee will only disclose Your Personal Data to the above-mentioned recipients on a strict need-to-know basis and only to the extent necessary to achieve the identified processing purposes.
14. If Tropee considers that it is not necessary to keep Your Personal Data in its active database, Tropee will archive it and ensure that access to it is restricted to a limited number of persons with a genuine need to access the Personal Data.

4. Data We collect; Purposes and legal basis

15. **Account Management.** Users must create an Account on the Platform to access the Services. To manage this Account, and in particular to allow Users to access content reserved for Account holders only, We collect and process the following Personal Data that You communicate to Us:
 - Email address;
 - Cryptocurrency Wallet address;
 - Account username;
 - Or other registration-related information.
16. The legal basis for this processing is (i) Your consent and (ii) the need for Vitality to perform a contract to which You are a party (Our T&Cs).
17. **Navigational information.** In order to enhance the User experience, We want to understand Your interactions with the Services. Therefore, We need to analyze various navigational information collected through Cookies to analyze performance related to Your use of the Platform:
 - Unique identifiers (browser type and settings, device type and settings, operating system);
 - Interaction information (IP address, system activity, date and time of the requests);
 - Pages and services You browse on the Platform.
18. To do so, Tropee relies on its legitimate interest to (i) understand how its Platform is browsed by Users; and (ii) improve the Platform if necessary.

19. **Communications.** We collect and process Personal Data in order to respond to any questions, requests or feedback that Users may submit to us, including:
- Identification information (username, email address);
 - The content of the message that You send to Us.
20. This processing is based on Your consent to Tropee's legitimate interest in managing its relationship with Users.

5. Data storage

21. We will store Personal Data as long as You use the Platform and more broadly any of Our Services.
22. Once Your Account has been inactive for a certain period of time, or if You choose to delete Your online Account or end Our relationship in any manner, We will nevertheless keep and store Your Personal Data for a certain period of time.
23. We will keep Your Personal Data at least 3 years after the end of Our relationship (materialized, for instance, by the deletion of Your Account), for various legal reasons, including statute of limitation rules and potential litigation where We may be involved and where We might need Your Personal Data.
24. This includes, at the moment, all of the Personal Data We process.

6. Other information

25. Users are never compelled to provide Personal Data that We may request. However, We draw Your attention to the fact that if You refuse, access to the Services may be limited, suspended or impossible.
26. In any event, and regardless of the purpose of the processing in question, We will adhere to a strict principle of data minimisation and will therefore only collect and process Personal Data that is necessary for the purposes mentioned above.

7. Your rights

27. Users are informed that they have the following rights regarding the processing of their Personal Data, under the conditions provided for in articles 15 to 22 of the GDPR:
- A right of access to the Personal Data collected by Tropee;
 - A right to the rectification and/or erasure of the Personal Data collected by Tropee;
 - A right to the restriction of the processing;
 - A right to Personal Data portability.
28. According to French privacy laws (articles 84 to 86 of Act n°78-17 of 6 January 1978), Users also have the right to specify instructions defining how Vitality shall manage Person Data after their death under the conditions of such law.
29. Although You have rights, the exercise of such rights is not unlimited; each of the rights offered by the GDPR may be subject to specific conditions.

30. This being said, in order to exercise their rights or for any question on privacy, Users shall make a request accompanied by a proof of their identity by email at Tropee.
31. We will process the requests within a reasonable timeframe taking into account the complexity and the number of requests. We shall strive to reply without undue delay and at the latest within one month of receipt of the request. We may extend this period to three (3) months in the case of a complex request.
32. The exercise of the rights offered by the GDPR are in practice free. However, where Your requests may involve important costs, You may have to bear some of them.
33. Finally, Users have the option to refer to the competent supervisory authority, the French *Commission Nationale Informatique et Libertés* (“**CNIL**”), in order to submit a claim. Contact information of the CNIL can be found on its [website](#).

8. Security

34. *Describe the client's security measures, ex :*
 - *SSL certificate,*
 - *Access limited to it to only those employees of the company or service providers who need it in order to carry out the processing,*
 - *All persons with access to Personal Data are bound by a duty of confidentiality and may be subject to disciplinary action and/or other sanctions if they fail to comply with these obligations.*

9. Cookies

35. A *cookie* is a small computer file playing the same role as a tracker, stored and read for instance at the moment where a website is visited, an email is read or a mobile app is used, whatever the device used.
36. In compliance with EU privacy regulations, Users are informed that “non-essential” cookies may be deposited on their device without their consent. Non-essential cookies include (i) cookies having as their essential purpose to allow or enable electronic communications and (ii) are strictly necessary for the provision of online communication service.