

GDPR - Privacy Policy

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1. General

1.1. Purpose of this Privacy Policy

The company CAMINOV ("FRINGUANT" brand) offers its partners a service of recommending clothing sizes based on a body scan, via a smartphone camera. Thanks to the morphological information that we capture thanks to our artificial intelligence, we can associate users' measurements with the dimensions of the clothes of partner brands. This allows us to provide personal and precise advice for each product. Our tool is accessible via a plug-in present on the websites of partner brands, included in their sales journey.

The purpose of this privacy policy is to inform you of the purposes and methods of the processing of your personal data by CAMINOV (brand "FRINGUANT"), in accordance with the provisions of [Regulation No. 2016/679/EU of the European Parliament and of the Council of 27 April 2016, on the General Data Protection Regulation \(GDPR\)](#), to Law [No. 78-17 of 6 January 1978 relating to information technology, files and freedoms](#), as well as your related rights.

For any request for further information, we invite you to contact the Data Controller, or its Data Protection Officer (DPO), whose contact details are recalled below.

1.2. Situations in which this Privacy Policy applies

This Privacy Policy applies to the following situations:

- You are a customer of a partner of CAMINOV (brand "FRINGUANT"), and, as part of the sales process that the latter offers you, on its website, you have subscribed to the "find my size" option, which allows you to access our clothing size recommendation service, via a body scan;
- You are a simple visitor to the CAMINOV website ("FRINGUANT" brand), <https://www.fringuant.com> and you are concerned about the personal data concerning you that may be collected there, when you have filled in the contact form, or subscribed to a newsletter;
- You are a customer of the company CAMINOV (brand "FRINGUANT"), or work for such a customer, and, in this capacity, you have entrusted your contact to this company.

2. Identity of the controller, data protection officer and supervisory authority

2.1. As data controller and processor of FRINGUANT

The Data Controller is the person who determines the purposes and means of the processing of personal data, i.e., their "why?" and "how?"

CAMINOV (brand "FRINGUANT") acts as a data controller (**FIG. 1.**) but also as a subcontractor of the partner brand, which administers the sales funnel into which the "plug-in" of our size selection assistance application is integrated, via a body scan (**FIG. 2.**).

2.2. Data controller

For all personal data processing where CAMINOV (brand "FRINGUANT") acts as data controller (**FIG. 1.**) :

CAMINOV (brand "FRINGUANT")

Simplified joint stock company

75 boulevard Malesherbes

75008, PARIS

Registered under number 918 734 864 with the Paris Trade and Companies Register

SIRET N°918 734 864 00013

VAT N°FR44918734864

represented by Mr Jacques ALLIBERT, in his capacity as Managing Director

CAMINOV ("FRINGUANT" brand) also acts as a subcontractor, on behalf of the partner brand that manages the sales process, within the framework of which the CAMINOV "plug-in" ("FRINGUANT" brand) is integrated. It is the partner brand that then acts as the data controller,

and thus determines the purposes and means of the processing activities in question, in particular the purposes, legal bases and storage periods.

When CAMINOV (brand "FRINGUANT") acts as a subcontractor (**FIG 2.**), the data controller is the partner brand, which administers the sales funnel within which the CAMINOV "plug-in" ("FRINGUANT" brand) is integrated. For any questions relating to the protection of your personal data and the exercise of your rights, in the context of this processing of personal data, we invite you to contact this partner brand.

2.3. Data Protection Officer

The Data Protection Officer (DPO) of CAMINOV (brand "FRINGUANT") is:

Maître Alexis DEROUDILLE

Lawyer at the Paris Bar 44 rue de la Clef 75005 Paris, France Toque n°2449 SIRET n°
83964295600024 (SIREN n°839 642 956)

www.deroudilleavocat.com

2.4. Competent supervisory authority

The competent supervisory authority for the protection of personal data is:

The National Commission for Information Technology and Civil Liberties (CNIL)

3 place de Fontenoy
75007 PARIS,
site internet: www.cnil.fr

3. How do we collect your personal data?

3.1. What is personal data?

Personal data means any information relating to a natural person from which that person can be identified, either directly or indirectly.

Directly identifying data are, for example, your first and last name. Other data is not directly identifying but is nevertheless qualified as *personal data*, insofar as it provides information about you, in particular, when it is cross-referenced with each other, or cross-referenced with identifying data. This is the case, for example, with your postal address, telephone number, geolocation history, etc.

Although not directly identifiable, your precise physical measurements nevertheless constitute personal data.

3.2. How do we collect your personal data?

In most cases, we collect the personal data in question directly from you. This is the case when you carry out your body scan, via the "plug-in" that we provide, within the sales path of our partner brands, or directly from our website.

However, we may also collect certain information, indirectly, as a data processor, on behalf of partner brands. This includes, for example, data about your interaction with partner brands' sites.

4. What categories of personal data do we collect?

4.1. Categories of Personal Data We Collect Directly from You

CAMINOV (brand "FRINGUANT") collects certain personal data directly from you, in the following circumstances:

- You are a user of the website of one of our partner brands, and, as part of the purchase of an item from this brand, you have subscribed to the "find my size" option; in this case, we collect, on behalf of our partner, the clothing brand, data relating to your measurements, via our body scanning system (e.g. height in cm, shoulder circumference, hips, etc.), the suggested size (S, M, L, XL, XXL, etc.), your gender, as well as information relating to your browsing (in particular to avoid you having to carry out a body scan again);
- You are a visitor to our <https://www.fringuant.com> website, and you have entered personal data on this website (e.g. via a contact form), or you have used our body scanning tool from this website;
- You are a point of contact for one of CAMINOV's customers, partners or suppliers, and the latter therefore has your contact data (surname, first name, e-mail address, telephone number, etc.)

4.2. Categories of personal data we collect indirectly from you

CAMINOV ("FRINGUANT" brand) also collects certain personal data indirectly from third parties, on behalf of the partner brand, as a subcontractor of the latter:

- You are a user of the website of one of our partner brands, and, in the context of the purchase of an item of this brand, you have subscribed to the "find my size" option, in which case the partner brand, or its service provider platform (the "DMS" platform), may communicate to us, with your consent, information about you, relating to your interaction with its website (e.g. Order ID, cancelled order, modified order, full or partial refund, affected items, use of a promo code, currency used, etc.) : This information is collected on behalf of the partner brand.

5. What are the purposes, legal bases and retention periods for the processing of your personal data?

5.1. For what purposes do we collect your personal data?

The main purposes for which CAMINOV (brand "FRINGUANT") collects and processes personal data concerning you, as a subcontractor of its partner, the clothing brand, are **(c.f. FIG. 1)**:

- allow you, with our partner brands, to obtain from our partner brands the clothing size that best corresponds to your body measurements, via the "find my size" option, and the use of a body scan;
- To allow you not to have to carry out a body scan again, if you have already subscribed to the "find my size" option;
- To allow you to get personalized recommendations on the clothing sizes that best suit your body type.
- to enable Fringuant's partner to obtain additional information on the user's interaction with the purchase content, with a view to producing statistical data;

CAMINOV (brand name "FRINGUANT") may also be required to collect and process personal data as an independent data controller, with a view to the following purposes (**see FIG. 2.**):

- to develop anonymised statistical data for the attention of partners;
- develop a morphological database (anonymised statistics), which we share with our partners for research purposes on the notion of height and on the different types of morphologies and morphological postures;
- to enable Fringuant to ensure the invoicing of its partners.
- to allow CAMINOV ("FRINGUANT" brand) to exchange with its co-contractors, partners and suppliers;
- to allow visitors to Fringuant's website to access the services of CAMINOV ("FRINGUANT" brand);
- allow you to apply for a job offer at CAMINOV ("FRINGUANT" brand), or submit an unsolicited application

5.2. On what legal basis do we process your personal data?

Under the GDPR, any processing of personal data must have a *legal basis*, i.e. a legal basis that allows it. Depending on the purpose, the processing we carry out on behalf of our partner, the clothing brand, or on our behalf may be based on the following legal bases (**see FIG. 1.**) :

- Your consent
- the necessity with regard to the performance of a contract or pre-contractual measures to which you are a party,
- our legitimate interests or those of our partner
- the necessity with regard to compliance with a legal obligation to which we are subject

How long do we keep your data?

Once your personal data has been collected, CAMINOV (FRINGUANT brand) keeps your data for a period of 36 months, following this collection.

The data collected via the trackers, with your consent, is only kept for a period of 6 months.

The contact data that you have entrusted to us via the contact form on the CAMINOV website (brand "FRINGUANT"), or the data relating to an application (CV, cover letter), are kept for a maximum period of two years, following their collection.

We then compile statistics based on this measurement data and user behavioural information, which we share with our partners for analysis purposes. These statistics are completely anonymous.

(FIG. 1.) Table of correspondences between categories of data collected, purposes, legal bases and retention periods

Categories of data collected	Who is concerned	Collection method	Purposes of the processing	Legal bases	Shelf life (maximum)
Data concerning users of Fringuant's Body Scan (data subjects: visitors to the websites of Fringuant's partner brands, users of the body scan service)					
Anonymised statistical data (inferred from the above)	Anonymized data	Direct collection	Preparation of statistical data for the attention of partners	The processing is necessary for the purposes of the legitimate interests pursued by Fringuant and its partner (Article 6.1. f° of the GDPR)	
Morphological database	Anonymized data	Direct collection	Development of a morphological database Analysis of data for research purposes, in particular on clothing sizes and their adaptation to morphology	The processing is necessary for the purposes of the legitimate interests pursued by Fringuant and its partner (Article 6.1. f° of the GDPR)	

Transmission of data from the morphological database to partners	Anonymized data	Direct collection	Development of a morphological database Analysis of data for research purposes, in particular on clothing sizes and their adaptation to morphology	The processing is necessary for the purposes of the legitimate interests pursued by Fringuant and its partner (Article 6.1. f° of the GDPR)	
Statistics on the number of users needed to bill customers	Anonymized data	Indirect collection	Enable Fringuant to ensure the invoicing of its partners	The processing is necessary for the purposes of the legitimate interests pursued by Fringuant and its partner (Article 6.1. f° of the GDPR)	
Data concerning suppliers (data subjects: employees or legal representatives of Fringuant's client companies)					
If applicable, contact details of supplier representatives	Contact data (name, surname, email address, telephone number)	Direct collection	To allow Fringuant to exchange with its partners and suppliers	The processing is necessary for the performance of the contract to which the data subject is a party, or for the performance of pre-contractual measures (Article 6.1 b° of the GDPR)	
Data concerning visitors to the website (data subjects: persons visiting the Fringuant website)					
Data collected on the website's contact forms	Contact data (name, surname, email address, telephone number)	Direct collection	To allow visitors to the website to access Fringuant's services	The processing is necessary for the purposes of the legitimate interests pursued by Fringuant (Article 6.1. f° of the GDPR)	2 years after collection
Career data	RESUME. Cover letter Current position	Direct collection	To allow website visitors to apply for a job offer or to submit an unsolicited application	The processing is necessary for the performance of the contract to which the data subject is a party, or for the performance of pre-contractual measures (Article 6.1 b° of the GDPR) The processing is necessary for the purposes of the legitimate interests	2 years after collection

				pursued by Fringuant (Article 6.1. f° of the GDPR)	
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(FIG. 2.) Processing of personal data for which CAMINOV (brand "FRINGUANT") acts as a subcontractor of the partner brand

Categories of data collected	Who is concerned	Collection method	Purposes of the processing	Legal bases	Shelf life (maximum)
Data concerning users of Fringuant's Body Scan (data subjects: visitors to the websites of Fringuant's partner brands, users of the body scan service)					
Precise measurement data obtained from the photo scan: height in cm, shoulder width, hip width, etc. Suggested size (S, M, L, XL, XXL, etc.) Sex	Users of Fringuant partners who have subscribed to the "find my size" option	Direct collection	To allow users of Fringuant's partner brands to get the garment size corresponding to their body measurements	The processing is necessary for the performance of the contract to which the data subject is a party, or for the performance of pre-contractual measures (Article 6.1 b° of the GDPR)	36 months, from the date of collection
IP addresses, user login logs Geolocation data inferred from IP addresses	Users of Fringuant partners who have subscribed to the "find my size" option	Direct collection	Allow users who have already subscribed to the "find my size" option to be exempted from scanning again	The processing is based on the consent of the data subject (Article 6.1. a° of the GDPR) Consent is collected by the partner brand	6 months
Transmission of the data collected as part of the body scanning service to third-party partners (Precise measurement data obtained through photo scanning)	Users of Fringuant partners who have subscribed to the "find my size" option	Direct collection (automatic) Indirect collection: data obtained from the service provider platforms of the partner brands ("DMS" platforms)	To provide you with personalised advice and information on offers from our partners, tailored to your clothing size However, this data will only be used by the respective partner brand if it has an appropriate purpose and legal basis for doing so – in most cases, this is your consent.	The processing is based on the consent of the data subject (Article 6.1. a° of the GDPR) Consent is collected by the partner brand	No storage

Pseudonymized data (identifiable from an order ID) obtained via partner brands, or via their service provider platforms regarding the use of their application (e.g. order ID, cancelled order, modified order, order fully or partially refunded, and which items concerned, use of a promo code, currency used, etc.)	Users of Fringuant partners who have subscribed to the "find my size" option	Direct collection (automatic) Indirect collection, the brand's service provider platform ("DMS" platform)	Allow the brand partner to identify the user who interacted with Fringuant Enable the brand partner to obtain additional information about the user's interaction with the purchase content, with a view to producing statistical data	The processing is based on the consent of the data subject (Article 6.1. a° of the GDPR) Consent is collected by the partner brand	6 months
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6. Who are the recipients of your data?

6.1. Authorized personnel

Access to the aforementioned personal data held by CAMINOV (FRINGUANT brand) is strictly reserved for our duly authorized personnel bound by a confidentiality commitment, and bound by a confidentiality commitment.

6.2. Subcontractors

CAMINOV (brand "FRINGUANT") entrusts the processing of your previously listed personal data to its subcontractors, as part of the performance of their subcontracting missions. This is particularly true of the service providers who develop and maintain the IT tools we use, as well as the hosting of data.

CAMINOV subcontractors ("FRINGUANT" brand) only process the personal data entrusted to them within the strict framework of the performance of their missions, and in accordance with the documented instructions they have received in this regard.

If you are a customer of one of our partners, we may share certain personal data about you with that partner. This is the case, in particular, with the statistical data that we compile based on information on user measurements.

6.3. Transmission of cadastral survey data to the partner brand in order to provide a personalised offer

CAMINOV ("FRINGUANT" brand) transmits the data collected as part of the body scan service to the partner brand, as part of the sales funnel into which the CAMINOV "plug-in" ("FRINGUANT" brand) is integrated (precise measurement data obtained through photo scanning). This information allows partner brands to give you personalized advice on their offers, adapted to your clothing size.

Such further processing is the responsibility of the respective partner brands, which will only process this data if they have the appropriate purpose(s) and legal basis(s) to do so.

Thus, for any information concerning their purposes and means (ends, legal bases, storage periods, etc.), as well as your related rights, we invite you to contact the partner brand involved.

6.4. Transmission of data from the morphological database to partners

CAMINOV (brand "FRINGUANT") develops a morphological database (anonymised) that it transmits to certain partners for research purposes, in particular on clothing sizes and their adaptation to morphology.

6.5. Other Exceptional Cases of Disclosure

Except in the cases listed above, your personal data may only be disclosed in accordance with the legislation of the European Union or a Member State, by virtue of a decision of a competent regulatory or judicial authority, or a supervisory authority of the European Union or a Member State, or for the purpose of defending legal claims.

7. Is your personal data transferred outside the European Union?

In the event of a transfer of personal data to a third country outside the European Union, CAMINOV (brand "FRINGUANT") ensures that the level of guarantees for the protection of personal data is at least equivalent to that in force in the European Union. To do this, we ensure that the subcontractor or partner is either located in a country that has been the subject of an [adequacy agreement with the Commission of the European Union](#), or has signed standard contractual clauses with CAMINOV ("FRINGUANT" brand) validated by the Commission of the European Union, or has subscribed to binding company regulations.

In addition, all data that is transferred to a service provider located outside the European Union has previously been encrypted "internally", which guarantees that the service providers in question will not, in any event, be able to access the said data "in the clear". This is an additional security guarantee for the privacy of your data.

8. What are your rights regarding your personal data?

In accordance with the provisions of Articles [15 to 22 of Regulation No. 2016/679/EU of the European Parliament and of the Council of 27 April 2016 on the General Data Protection Regulation \(GDPR\)](#), you have a number of rights regarding the personal data we hold about you.

In order to exercise these rights, we invite you to contact the Data Controller or its DPO at the addresses set out above.

8.1. Right of access and communication of data

You have the right to access the personal data concerning you that is being processed.

To help you with your process, the National Commission for Information Technology and Civil Liberties (CNIL) provides you with a sample [letter](#).

8.2. Right to object

Where the processing of your personal data by us is based on our legitimate interest (see table above), you have the right to object, on your own legitimate interest grounds, relating to your particular situation, to object to such processing, unless we oppose compelling legitimate grounds. To do so, simply contact us at the aforementioned address.

8.3. Right to deletion or right to be forgotten

You have the right to request that we delete personal information about you. This is the case, for example, if you have exercised your right to object, based on a legitimate reason specific to your particular situation.

To help you with your process, the National Commission for Information Technology and Civil Liberties (CNIL) provides you with a sample [letter](#).

8.4. Right to rectification

If you believe that the data we hold is inaccurate, incomplete or out of date, you have the right to have it rectified and/or updated.

To help you with your process, the National Commission for Information Technology and Civil Liberties (CNIL) provides you with a sample [letter](#).

8.5. Right to restrict processing

The restriction of data processing is an alternative measure to its pure and simple erasure. If the processing of your personal data is restricted, we can no longer use it without your express consent, with the exception of storing it. However, the exercise or defence of legal claims, the need to protect the rights of another natural or legal person, or for important reasons of public interest of the Union or of a Member State, allow us to disregard this obligation.

You have the right to obtain the restriction of the processing of personal data concerning you in the following situations:

- you contest the accuracy of your personal data for the period of time that allows us to verify the accuracy of your personal data; or
- in the event of unlawful processing by us and you require restriction of its use rather than erasure; or
- we no longer need the personal data for the purposes of the processing, but you still need the personal data for the establishment, exercise or defence of legal claims; or
- in the event of exercising your right to object during the verification period as to whether the legitimate reasons we pursue prevail over yours.

8.6. Right to data portability

You have the right to obtain the personal data you have provided to us in a structured, commonly used and machine-readable format, so that you can reuse it for your own purposes by transmitting it yourself to another controller.

8.7. Right to lodge a complaint with the competent supervisory authority

You have the right to lodge a complaint about the way we handle or process your data with the competent national supervisory authority (see above, 2.3. competent supervisory authority).

8.8. Fee Processing Times and Notification

We undertake to respond to your requests within a reasonable period of time, which may not exceed 1 month from receipt of your request, and to notify you of any operation carried out by us in accordance with your requests.