

Privacy policy

1. Definitions

- Data Controller: the natural or legal person, department or other body which, alone or jointly with others, determines the purposes and means for the processing of data.
- Consent: any free, specific, informed and unequivocal expression of will by which the data subject accepts, by a statement or clear positive act, that personal data concerning him or her may be processed.
- Employee: any salaried staff of the entity setting up a User account.
- Enterprise: Legal entity created on the platform and hosting the activities of the consultant working as a freelancer or inside a consulting firm.
- Little Big Connection (LBC): platform intended for key account clients enabling them to enter into relationships with SMEs and freelance consultants, with a view to carrying out projects that require a certain skills set.
- Platform: Integrated source to pay software dedicated to manage external workforce accessible after connection on www.littlebigconnection.com
- Personal data: any information relating to an identified or identifiable natural person. An "identifiable natural person" is a natural person who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, identification number, location data, online login or user name, or to one or more specific elements to his/her physical, physiological, genetic, mental, economic, cultural or social identity.
- Processing: any operation or set of operations, whether or not performed, using automated processes and applied to personal data or data sets, such as collection, recording, organization, retention, modification, retrieval or consultation.
- RGPD: General Regulation on Data Protection, namely, European Parliament and Council Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and the free movement of such data.
- User: the natural or legal person registered on the platform through a representative, and making use of the services made available to it.

2. Introduction

On 25 May 2018, a new European regulation, called the GDPR, came into force concerning the protection of individuals with regard to the processing of personal data by legal or natural persons.

Little Big Connection undertakes, when conducting its activities, and in accordance with the legislation in force, to ensure the protection, confidentiality and security of the personal data of Users of its services, as well as to respect their privacy.

This document describes the provisions that LBC is committed to implementing to meet data protection requirements.

Data controller identification

LITTLE BIG CONNECTION SA

28 rue Jacques Ibert, 92300 Levallois Perret

RCS 793 569 757

3. Definition of user data for the LBC platform

3.1. Data linked to the user profile – personal data

The User profile data are by default considered as personal data.

These data are as follows:

- User profile parameters (e.g. surname, first name, contacts...)
- The User's LBC digital CV
- References to assignments mentioned on the CV concerning the User
- All recommendations entered by the User
- All User recommendations

3.2. Data produced by the User in its professional capacity

Data can be produced on the platform by a user affiliated to a company, as part of its professional activity.

These data are:

- Company: all company configurations produced by the User
- Employees: employee invitations
- Requests for proposals: product bids
- Appointments
- Project Ratings and Comments

4. Purposes and uses of the data

4.1. Purpose and processing of User profile data – Personal data

The personal data of the User's profile, when the User is not affiliated with a company, can be made visible in a public way, should he/she decides to communicate the URL of his LBC profile to a third party. The sole purpose of the processing, after their retrieval, is to recruit and assign people to one or more future projects and is based on the User consent.

In addition, for statistical reasons and as well as for better management and use of the platform, the personal data of the User, including its skills, may be used, for our legitimate interests.

Finally, for our legitimate interest, data can be used for communicating with the User to better understand the platform's features (tutorials, alerts...) and also to offer targeted communication via a newsletter.

For the User's Profile, in order to optimize their visibility in the search tools of the platform and for the execution of the contract between LBC and the User/User's company, personal data such as First Name and Last Name shall be visible to all the other members registered as User Profiles on the Platform.

4.2. Processing of data produced by the User as Employee

Where the User is affiliated to a company, many processing operations will be carried out on its data. Such processing is based on the functionalities of the Little Big Connection tool that the User's company wished to use on the basis of a clear and predefined contract. Thus, the said contract needs to be read.

Agreements signed between the parties cover the management and use of this data, and in particular, and not exhaustively, the management of the customer's account, the identification and authentication of the customer or user and communication with the customer (technical and sales support, etc.).

5. Data recipients

In addition to the members of the platform and the companies with which a User is affiliated, personal data may be consulted and processed by LBC's duly authorized personnel, as part of the proper management of the platform and for the aforementioned purposes. A system of traceability of the latter's actions has been set up to guarantee data protection.

LBC reserves the right to share with its Group and international subsidiaries all previously detailed personal data and information. However, it must be emphasized that LBC does not sell or rent User personal data to third parties for commercial purposes.

Following a subpoena, court decision, warrant, court order or any other regulations, LBC may be required to disclose personal data and other related information, if necessary. LBC may also choose to exercise and assert its rights in court against any legal action.

6. Length of data retention duration

Little Big Connection shall keep the data only for as long as necessary to fulfill the purposes mentioned above or to meet legal obligations.

It is advisable to specify that after a period of three years of inactivity on the platform from the date of user enrollment, the User will be sent an e-mail proposing to keep its profile on the platform or delete it. After three unsuccessful reminders on the part of LBC, the account will be automatically deactivated.

7. LittleBIG Connection And The RGPD

7.1. Data security

Little Big Connection is concerned about the protection of personal data and commits to ensuring the highest level of protection of personal data in accordance with legal obligations and the RGPD

LBC has therefore defined technical and organizational measures to protect data appropriately according to their nature, the extent to which they are to be processed and are accessible. That can involve data anonymization, access rights management with a strongest password policy, secure flows with https, etc.

7.2. Rights of Users

The User shall benefit from rights relating to its personal data and to the processing carried out by LBC. The User can, thus, at any time request that it be granted access to personal data in order to have them corrected or deleted (insofar as this does not prevent the proper execution of the contract or compliance with the legal obligations of LBC). It can oppose one or more data processing methods, under the conditions provided by the Regulation. In addition, the User has the right to request restriction of data processing or data portability, and to withdraw his consent when appropriate.

The User may also file a complaint with the supervising authority in charge of monitoring compliance with obligations regarding personal data.

The User can exercise these rights by writing to the following e-mail address: personal-data@littlebigconnection.com. All requests must be accompanied by a photocopy of an ID card as a proof of identity.

Concerning the right to correct data, the User shall have free access to its profile on the platform and can thus modify certain data. It is important that the information provided to LBC be accurate and up-to-date.

As previously mentioned, the User has a right to be "automatically" forgotten if it has remained inactive on the platform for a period three years from the date of enrollment (see 3.4 "*Length of data retention*").

As concerns self-employed profiles such as "freelancers", two requests must be made:

- A first request concerning their professional activity by using the reversibility application form;
- A second request for deletion of personal data.

7.3. DPO and Data Protection Team

In order to comply with Article 37 of the GDPR, Little Big Connection has appointed a single Data Protection Officer. The Data Protection Officer is an external consultant based in Paris, France, and had been designated with all the relevant Data Protection Authorities within the European Union. You can contact the Data Protection Officer regarding any issue relating to personal data protection by sending an email to personal-data@littlebigconnection.com.

8. Cookies

8.1. Principle

When using our website and/or online platform, information relating to your navigation and the use on your terminal (computer, tablet, smartphone, etc.) on our platform / application, may be saved in our "Cookies" files installed on your terminal, subject to the settings that you have chosen regarding cookies and that you can change at any time. You're free to block, delete, or disable these technologies if your device allows this. You can manage your cookies and your cookie preferences in your browser or device settings.

8.2. What are cookies for ?

Only the issuer of a cookie may read or modify information contained therein.

When you connect to our platform, we may be able to install various cookies in your terminal. This is of course subject to your choices. This allows us to recognize the browser of your terminal during the validity period of the cookie. The cookies we issue are used for the purposes described below. Again, this is subject to your choices that depend on the settings of your browser used during your visit of our platform that you can express at any time to us. The retention period of this information is 13 months.

The cookies allow us to:

- Offer adapted advertising;
- Establish statistics and number of uses of our different functionalities allowing us to improve our displays on the platform, navigator...)
- Memorize information that you have already provided in certain forms (account information, access codes, products and services that you have already ordered ;
- Allow access to specific areas and personal space on our platform such as your account, account details, thanks to information that you have already provided ;
- To deploy specific security measures ;
- Improve performance of our services

8.3. Your preferences and choices

You have several options when it comes to the acceptance of cookies. Your preferred settings can modify your navigation on websites and conditions certain access to services. You can choose your preferences as detailed below.

The Service-Provider and Client-Beneficiary as users can refuse the installation of cookies by configuring their browser in the Internet tools/options section and then, depending on the browser, by clicking on the security, confidentiality or privacy icons.

8.4. Your browser settings

If your internet browser accepts cookies automatically, you can change the settings of your browser to erase cookies or prevent automatic acceptance if you prefer. These settings will typically be found in the 'options' or 'preferences' menu of your browser. The links below explain how you can control cookies via your browser – remember that if you turn off cookies in your browser then these settings apply to all websites not just one.

8.5. Your consent to Cookies

Accepting cookies is subject to your consent. You can change the settings at any time for free.

If you accept cookies, the cookies will be temporarily stored and will be only accessible to the website that issued the cookie.

8.6. Disabling Cookies

You have the right to choose whether or not to accept cookies and to set your own cookie preferences on your computer. If you refuse them or delete the ones already accepted, you will not be able to use certain functionalities that are needed to navigate on our platform. This will be the case if you choose certain spaces for which your identification is needed. This will also be the case when we – or when our Service Providers – for technical reasons, we will not be able to identify your browser, and therefore not be able to identify the language, the display preference settings or county location.

We decline any liability for the consequences due to the malfunctioning of the platform resulting from the disabling of the cookies.

8.7. How to make your choice

Within your browser, you can choose whether you wish to accept cookies or not. Different browsers make different controls available to you. Generally, your browser will offer you the choice to accept, refuse or delete cookies at all times, or those from providers that website owners use i.e. third party cookies, or those from specific websites. Each browser's website should contain instructions on how you can do this.

For Internet Explorer: <https://support.microsoft.com/fr-fr/help/17442/windows-internet-explorer-delete-manage-cookies>

For Safari: <https://support.apple.com/fr-fr/HT201265>

For Chrome TM: <http://support.google.com/chrome/bin/answer.py?hl=fr&hlrm=en&answer=95647>

For Firefox : <http://support.mozilla.org/fr/kb/Activer%20et%20d%C3%A9sactiver%20les%20cookies>

For Opera: <https://help.opera.com/en/latest/security-and-privacy/>