

Information Note for business partners

This Information Note describes how we process your personal data as well as your rights concerning the protection of your personal data. This Information Note also describes the obligations that apply to FRIMOUSSE when it provides you with personal data on its models.

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1. Who is responsible for processing your personal data?

The Frimousse agency ("Frimousse" or "we") whose registered office is at 8 rue du Ponthieu, 75008 Paris, is the data controller for your personal data.

2. What personal data do we collect?

We collect information concerning you, in particular;

- Name and position,
- Contact details, including those of your employer or the identity of your employer and your e-mail address and telephone number, when you provide us with this information,
- Bank details needed for our activities (we only collect bank details from companies whose invoices we are liable to pay by bank transfer),
- The information you provide us with when we offer you our models,

- The information that you provide us with so that we can attend meetings and events, and
- Any other information necessary to the provision of our services.

3. What use do we make of your personal data?

We process personal data for the following purposes. Whenever we process personal data, we do so on the basis of one of the legal grounds for the processing, which we have identified in the table below.

	Purposes	Legal grounds
1.	To provide you with business information and to send you "packages" by e-mail to propose several model profiles according to your needs.	This process is necessary to the management of our business relations and to our legitimate interests in that it allows us to serve you better.
2.	To carry out administrative operations relating to contracts, orders, receipts, invoices, payments, accounting, etc.	We consider that it is in our legitimate interests to process your data to enable us to implement our contracts and manage our business relationships.
3.	In order to comply with any applicable law, court order, legal proceedings or the requirements of a regulatory body.	This processing is necessary to comply with our statutory obligations.
4.	To perform the contracts to which you are a party.	We consider that it is in our legitimate interests that our contracts be performed correctly and to defend our rights if necessary.
5.	To assert our rights and statutory obligations and for the purposes of any legal proceedings involving you, brought by or against you.	We consider that it is in our legitimate interests to protect our organisation against any breach of a statutory obligation towards it and to defend ourselves in any litigation.
6.	To protect the rights of third parties.	This processing is necessary for Frimousse to comply with its statutory obligations. This processing is also necessary for the purposes of Frimousse's pursuit of its legitimate interests. We consider that we have a legitimate interest in ensuring that our activities do not infringe the rights of third parties.
7.	To produce financial statistics and turnover figures for each client.	We consider that it is in our legitimate interests to carry out analyses concerning our business activities in order to enable us to make business decisions.
8.	Organisation of marketing events, in particular meals or other events.	Your prior consent is necessary for us to collect information for the organisation of such activities.
9.	To comply with our statutory obligations in terms of the verification of suppliers.	This processing is necessary to comply with our statutory obligations.
10.	To keep client documentation.	We consider that it is in our legitimate

		interests to keep such documentation for the purposes of our business operations
11.	With a view to and/or in connection with a business transaction such as a merger/acquisition, restructuring or sale of the company.	We consider that it is in our interests to make decisions concerning the future of our company in an informed manner, with the aim of preserving and developing our business.
12.	To provide you with business information on our products and services.	We consider that it is in our legitimate interests to keep our clients informed of our products and services, because this helps us to ensure the sustainability and development of our business.

If you are an employee of one of the companies with which Frimousse works, we only use your contact details for the purposes of managing the relationship with your employer. We consider that it is in our legitimate interests to be able to communicate with you and to preserve our business activities with your employer.

4. Who do we share your personal data with?

We share your personal data with:

- Our IT service providers (in particular for the management of our computer database) and other providers, within the limits appropriate to the tasks entrusted to them;
- The models that we represent and, where applicable, their legal representatives, when we offer that they sign a contract with you;
- The authorities (tax or regulatory), our insurers, lawyers, auditors, banks or other third parties where it is justified by the legitimate interests of Frimousse (for example, in the event of the acquisition of the agency by a third party), to the extent allowed by the applicable law, or where necessary to comply with a statutory obligation by which we are bound. In particular, your data may be transmitted to the competent authorities, at their request, in connection with legal proceedings, for the purposes of legal research and requests for information by the authorities or in order to comply with other statutory obligations.

This list is not exhaustive and there may well be other cases where we share your data with third parties, when it is in the legitimate interests of Frimousse and permitted by the applicable law, or when it is necessary to comply with a statutory obligation by which we are bound.

5. How long do we retain your personal data?

We retain your personal data for as long as it is necessary to fulfil the purposes for which it has been collected. As a general rule, we retain your personal data for the length of time that is strictly necessary to the management of our business relationship with you.

In addition, we may retain some of your personal data for a longer period, in particular when we are legally obliged to do so or when these data are necessary to establish proof of a right or contract. In this case, your personal data will be archived and retained for the period required by the applicable regulations, or for the duration of the applicable statutory requirement.

When your personal data are no longer needed, we will ensure that they are erased or anonymised.

6. What are your rights?

You have a certain number of rights regarding your personal data. Each of these rights is explained in more detail below:

- **Withdrawal of consent.** You can withdraw your consent to any processing of your personal data that is based on your consent at any time.
- **Access.** You can ask us to confirm whether we are processing your personal data and, where appropriate, to inform you of the characteristics of the processing of your personal data, to allow you to access it and to obtain a copy.
- **Rectification.** You can ask to rectify or complete your personal data if they are incorrect or incomplete.
- **Erasure.** You can ask us to erase your personal data in the following cases: when they are no longer necessary for the purposes for which they were collected; you have withdrawn your consent; following the exercising of your right to object; your personal data have been the subject of unlawful processing; or to comply with a statutory obligation. We are not obliged to grant your request to erase your personal data, in particular if their processing is necessary to our compliance with a statutory obligation or to exercise a right during a judicial proceeding.
- **Restriction.** You can ask to restrict the processing of your personal data (i.e. ask that they be kept but not used) when: their accuracy is contested; processing them is unlawful, but you do not wish them to be erased; they are still necessary to exercise a right during a judicial proceeding. We check the existence of imperative reasons when you exercise your right to object. We can continue to use your personal data following a restriction request: with your consent; to exercise a right during a judicial proceeding; or to protect the rights of any other natural or legal person.
- **Portability.** You can ask us to provide you with your personal data in a structured format commonly used or readable by a machine, or you can ask for them to be transmitted directly to another data controller, but only if the processing is based on your consent or the performance of a contract signed with you and if the processing is automated.
- **Digital inheritance.** You have the right to leave instructions (general or specific) on what should happen to your personal data after your death.
- **Objection to the processing of personal data on legitimate grounds.** You can object to any processing of your personal data that is based on our "legitimate interests" (cf. article). If you exercise this right, we have to cease processing your data, unless we prove the existence of legitimate and imperative grounds for doing so that prevail over your fundamental rights and freedoms, or for the establishment, exercise or defence of legal claims.
- **Objection to the processing of personal data for direct marketing purposes.** You can also object at any time to the processing of your personal data for direct marketing purposes.

You also have the right to make a complaint to the competent supervisory authority concerning the processing of your personal data. In France, the supervisory authority with responsibility for personal data protection is the CNIL (www.cnil.fr).

7. What type of personal data concerning the models collected by Frimousse are liable to be passed on to you?

In the course of your business relationship with Frimousse, you may collect and process the personal data of Frimousse's models (photographs, height, shoe size, eye colour, hair colour, etc.).

8. What are your obligations concerning the models' data that Frimousse transfers to you?

Frimousse has taken numerous measures to ensure that its models' personal data are collected and processed in accordance with the current legislation and regulation. Frimousse expects you to meet the same requirements.

By entering into a relationship with Frimousse (receipt of packages, contracts for the provision of models, contracts for the use and recording of models' work, and generally, any contractual relations), you are acting as a processor of Frimousse personal data and therefore you undertake to:

- apply, within your company, all the measures required to ensure compliance with the requirements of the GDPR;
- process data only for the fulfilment of your business contract in accordance with the instructions given by Frimousse;
- inform Frimousse of any transfer of the personal data to a third party not identified or authorised in advance;
- guarantee the confidentiality of the personal data collected and processed in the course of our relations (said data meet the criteria of Article L. 151-1 of the French Commercial Code);
- ensure that anyone authorised to process the personal data in the performance of our agreements fulfils the same obligations;
- provide Frimousse with all the documentation necessary to demonstrate the fulfilment of all the aforementioned obligations and to enable the conduct of any audits that Frimousse wishes to carry out either directly or through a duly empowered third party and, to participate in such audits.

You undertake to notify Frimousse in writing of any personal data breach within a maximum of 24 hours of becoming aware of it. Such notification must be accompanied by any useful documentation available to enable Frimousse, if necessary, to report the breach to the relevant supervisory authority.

Such documentation must include at least:

- a description of the nature of the personal data breach including, if possible, the categories and approximate number of persons concerned by the breach and the categories and approximate number of personal data records concerned;
- the name and contact details of the data protection officer or another point of contact from whom further information may be obtained;
- a description of the probable consequences of the personal data breach;
- a description of the measures taken or proposed to remedy the personal data breach, including, where appropriate, measures to mitigate any negative consequences.

Insofar as it is not possible to provide such information all at the same time, it must be provided in stages as and when it becomes available.

Once you have the express written agreement of Frimousse, you may provide the person concerned at the earliest opportunity with any useful information concerning the incident that has occurred, when the data breach is liable to entail a serious risk to the rights and freedoms of the person concerned. The express written agreement of Frimousse concerns not only the principle of providing such information, but also its content.

When our relations come to an end, you undertake to destroy all the personal data that Frimousse has provided to you where they are no longer useful to the performance of our business relations.

9. Contact and complaints

For more information, to exercise your rights or make a complaint or ask a question concerning the protection of your personal data, please contact us on booking@agencefrimousse.com.

10. Updating of the Information Note

We may amend this Information Note occasionally, for example to keep up with changes in the law, technological progress and good business practices. We will inform you in the event of any substantial changes.