

# ShamanX

## Privacy and Data Protection Policy

Effective date: February 5, 2020

ShamanX (hereinafter "the Company", "we" or "us") is a French Limited Company and is accessible via our website [www.shamanx.com](http://www.shamanx.com) and delivers its services via our mobile application (hereinafter the "Application") available on IOS and Android. **ShamanX mission is "to enable Personal Development, Coaching, Mental and Physical Health by connecting individuals and companies, who can deliver advice and tips".**

The website, our services and ShamanX application (The "Application") are globally referred to as "Services".

The user is referred to as "User", "Member", "Visitor" or "you".

The User and the Company are the "Parties".

The Company attaches great importance to the integrity of your personal data, and therefore we endeavor to treat it in the most secure and transparent way possible. The purpose of this **Privacy and Data Protection Policy** (herein "**Privacy Policy**") is to define how the Company manages information and data that identifies you, directly or indirectly (the "Personal Data") when you use our Services, and to inform you of the rights you hold accordingly.

### Changes to Terms

We reserve the right to change or update the privacy policy at any time.

Any changes or updates will be effective immediately, and your continued use of the Application or the Services will constitute agreement with these amendments.

Effective Privacy Policy is available on [www.shamanx.com](http://www.shamanx.com)

### Data Collection and Protection

When you use our Services or create an account, the Company collects information including Personal Data. As a Visitor or Member of our Services, the collection, use and sharing of your Personal Data is subject to this Privacy Policy and other documents referred in this Privacy Policy, as well as updates.

Personal data is any information that relates to an **identified or identifiable living individual**; an identifiable individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number (e.g. social security number) location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (e.g. date of birth, biometrics data, fingerprints, DNA...).

Personal Data that can be collected on the website or the Application is mainly used by the Company to manage the relations with you, and if necessary, for the processing of your potential orders.

The Personal Data collected will be, in particular, the following:

- Email
- First and last name

In addition of Personal Data, the Company may collect additional information including the following non exhaustive list:

- Log Information: the Company collect standard log files when you use our Services, which include app version, access times and time spent
- Social Media Services: if you log into your account through a social media service account, the Company will have access to certain information from that account, such as your name and other account information, in accordance with the authorization procedures set by that social media service.
- Transactional Information: if you make a purchase or return, we collect information about the transaction, such as product description, price, subscription or free trial expiration date, and time and date of the transaction.

## **Use of Information**

The Personal Data and other information that the Company collects from Users aims to provide the Services, improve them and maintain a secure environment.

The legal base for processing is the execution of the contract between the Users and the Company. Also, the Company uses the information collected from Users mainly to:

- Allow access and use of the Application by the User;
- Provide, maintain and improve our Services, and develop new products and services;
- User assistance;
- Management of any disputes with Users;
- Send you transactional or relationship messages, such as for examples receipts, account notifications, customer service responses, and other administrative messages;
- Communicate with you about products, services proposed by the Company;
- Monitor and analyze trends, usage, and activities in connection with our Services;
- Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of the Company and others;

- Enable us to respond to your requests for rights of access, rectification and opposition, or your other rights with respect to Personal Data;
- Comply with the law, such as processing transactional records for tax filings;
- Personalize your online experience based on your preferences, interests, and browsing behavior.

## Right of Access, Rectification and Dereferencing of your Data

In accordance with the regulations applicable to Personal Data (GDPR), the Users have the following rights:

- **The right of access:** User shall have the right to obtain from the Company confirmation as to whether or not Personal Data concerning him are being processed, and, where that is the case, access to the Personal Data and other information about him;
- **The right of rectification:** if the Personal Data held by the Company is inaccurate, User may request that the information be updated;
- **The right to delete data:** User can request the deletion of a part or all his Personal Data, in accordance with the applicable data protection laws;
- **The right to limit processing:** User can ask the Company to limit the processing of Personal Data in accordance with the assumptions provided for by the GDPR;
- **The right to refuse data processing:** User can object to his data being processed in accordance with the assumptions provided for by the GDPR;
- **The right to portability:** User can request that the Company shares which of his Personal Data have been transmitted to another platform or third-party company.

You can exercise these rights by contacting us at the following address:

***ShamanX***

*17 rue Henry Monnier  
75009 Paris  
France*

or by email: [contact@shamanx.com](mailto:contact@shamanx.com).

All requests must be accompanied by a photocopy / scan of a valid identity document signed and mentioning the address at which the Company may contact the requester. The response will be sent within one month of receiving the request. This one-month period may be extended by two months if the complexity of the request and/or the number of requests requires it.

In addition, and since the law n ° 2016-1321 of October 7, 2016, User has the possibility of deciding what will be done with his data after his death. For more information on the subject, you can consult the CNIL website: <https://www.cnil.fr/>.

User can also lodge a complaint with the CNIL on the following website: <https://www.cnil.fr>.

However, we recommend that you contact us before filing a complaint with the CNIL, as we are at your entire disposal to resolve your problem.

## Data Retention Policy

The Company keeps your data for the time necessary to provide you with its services or assistance.

To the reasonably necessary extent or required to satisfy legal or regulatory obligations, resolve disputes, prevent fraud and abuse, or apply our terms and conditions, we may also retain some of your information if necessary, even after you have closed your account or that we no longer need to provide our services to you.

## Sharing of Personal Data with Third Parties

Personal Data may be shared with third-party companies in particular in the following cases:

- When the User executes a payment, for the implementation of these services, the Company is in contact with third-party banking and financial companies with which it has contracted;
- When the User authorizes the website of a third party to access her or his data;
- With companies and contractors that perform services for us, including email service providers, payment processors, fraud prevention vendors, maintenance of the Application, Users assistance and other service providers;
- If required by law, the Company may transmit data to respond to complaints presented against the Application and to comply with administrative and legal procedures,
- If we believe your actions are inconsistent with our User agreements or policies, if we believe you have violated the law, or to protect the rights, property, and safety of the Company or others;

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obliged not to disclose or use it for any other purpose. Our third-party partners have been chosen with care and are fully compliant with GDPR.

## Commercial Offers and Use

As a User, you could receive commercial offers from the Company. If you do not wish to do so, please send us an email: [contact@shamanx.com](mailto:contact@shamanx.com)

Your information may be used by the Company partners for commercial prospecting purposes, and with whom we may jointly offer services, in the case we believe that their services could interest you, provided that you have previously authorized it and in accordance with applicable law. In such cases, the name of our business partner will appear alongside that of the Company. If you do not wish to do so, please send us an email: [contact@shamanx.com](mailto:contact@shamanx.com)

If, during the consultation of the Services, you access to personal data, you must refrain from any collection, any unauthorized use and any act which could constitute an attack on the private life or the reputation of the people. The Company declines all responsibility in this regard.

The data is kept and used for a period in accordance with the legislation in force.

## Social Network

The Services may include publishing comments and interactive sharing features with social media platforms (e.g. LinkedIn or Facebook).

If you are already a User of these platforms, their cookies may be placed on your device when you use our Application or our Services. You should know that the Personal Data that you include and voluntarily transmit online on a blog accessible to the public, on a discussion space, on a social network, or in any way whatsoever online, or that you share on a forum open can be viewed and used by others without any restrictions. The Company is not able to control such uses of your information when you interact on social networks. When you use these services you therefore assume the risk that the Personal Data that you have transmitted may be consulted and used by third parties for various purposes.

## Cookies

Cookies are usually small text files, given ID tags that are stored on your computer's browser directory or program data subfolders. Cookies are created when you use your browser to visit a website that uses cookies to keep track of your movements within the site, help you resume where you left off, remember your registered login, theme selection, preferences, and other customization functions.

The website stores a corresponding file (with same ID tag) to the one they set in your browser and in this file they can track and keep information on your movements within the site and any information you may have voluntarily given while visiting the website, such as email address. Cookies are often indispensable for websites that have huge databases, need logins, have customizable themes, other advanced features.

Cookies usually don't contain much information except for the URL of the website that created the cookie, the duration of the cookie's abilities and effects, and a random number. Due to the little amount of information a cookie contains, it usually cannot be used to reveal your identity or personally identifying information. However, marketing is becoming increasingly sophisticated and cookies in some cases can be aggressively used to create a profile of your surfing habits.

There are two types of cookies: session cookies and persistent cookies. Session cookies are created temporarily in your browser's subfolder while you are visiting a website. Once you leave the site, the session cookie is deleted. On the other hand, persistent cookie files remain in your browser's subfolder and are reactivated when you visit the website that created that particular cookie. A persistent cookie remains in the browser's subfolder for the duration period set within the cookie's file.

The consent given will be valid for a period of thirteen (13) months. The User has the option of deactivating cookies from their browser settings.

All information collected will only be used to monitor the volume, type and configuration of traffic using this site, to develop its design and layout and for other administrative and planning purposes and more generally to improve services that we offer you.

## Other Web Technologies of Data Collection

"Pixels Beacons" (also known as Web Beacons, Web bugs, tracking bug, tracking pixel, pixel tags or clear GIFs) are tiny graphics with a unique identifier that may be included on our Services for several purposes, including to deliver or communicate with Cookies, to track and measure the performance of our Services, to monitor the activity of Users for the purpose of web analytics or page tagging. Unlike Cookies, that are stored on the User hard drive, Pixels Beacons are typically embedded invisibly on web pages or in e-mails.

"Social Media Widgets": the Company uses widgets such as a 'share button' or other interactive mini programs to link the Services with social network like LinkedIn, Facebook, WhatsApp... These features may collect your IP address, the page you are visiting on our Services, and may set a cookie to enable the feature to function properly. These social media features are either hosted by a third party or hosted directly on our Services. Your interactions with these features are governed by the privacy policy of the company providing it.

The Company may also use Google Analytics, Google Analytics Demographics and Interest Reporting to collect information regarding User behaviors and demographics on our Services and to develop content. This analytics data is not linked to any Personal Data. For more information about Google Analytics, please visit the following website:

[www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

You can opt out of Google collection and processing of data generated from your use of the Services by going to: [tools.google.com/dlpage/gaoptout](http://tools.google.com/dlpage/gaoptout).

The Company may use some of the above such as widgets and Google Analytics in particular (but not limited) for the following:

- The exploitation of our Services, Applications and tools;
- Tracking the volume, type and configuration of traffic when you use the App;
- Identifying irregular behavior on the Application or the website;
- Improving security and preventing fraudulent activities;
- Saving searches or similar functions.

## Contact Information

In case of questions relating to this Privacy and Data Protection Policy or our management of cookies (or other similar tools), you can contact us at the following address:

**ShamanX**  
17 rue Henry Monnier  
75009 Paris  
France

Or by email: [contact@shamanx.com](mailto:contact@shamanx.com).