

POLICY RELATING TO THE PERSONAL DATA OF CUSTOMERS

Capitalised terms shall have the meanings given to them in the general terms of use.

This document sets out MILA's policy relating to personal data (hereinafter "Policy Relating to Personal Data"). MILA, with its registered office at Gutenbergstrasse 1, CH-8002 Zurich (Switzerland), acts as the controller of the personal data provided when the CUSTOMER implements and uses the MILA PLATFORM.

1. Processing relating to the use of the Mila Platform

1.1 Personal data collected

- First name and last name
- Address
- Email address
- Phone number
- Password
- Bank data (bank card number, first name and last name of the holder, expiry data and security code)
- Data relating to monitoring the relationship (SERVICES supplied, interactions with MILA, namely as to how the SERVICE was performed, etc.)
- Data relating to online ratings

This information is necessary for concluding the contract between MILA and the CUSTOMER. Absent such information, the CUSTOMER would not be able to conclude a contract with MILA for the purpose of using the MILA PLATFORM.

The CUSTOMER undertakes to provide honest and complete information on the MILA PLATFORM, namely upon registering and when creating and updating his/her account.

1.2 Purpose and legal basis for the processing of personal data

The processing of personal data provided makes it possible for the CUSTOMER to register on the MILA PLATFORM. Once registered, the CUSTOMER has an account on the MILA PLATFORM and can submit requests for SERVICES to the SERVICE PROVIDERS.

The processing of personal data executed by MILA is necessary to implement a contract to which the CUSTOMER is a party in accordance with Article 5.1.b of European Regulation n° 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR").

1.3 Retention period for personal data

The personal data collected and processed in the course of such processing are retained by MILA for the duration of the contract concluded between MILA and the CUSTOMER. Thereafter, in order to establish evidence of a right or a contract or for the purposes of complying with a legal obligation, the relevant personal data will be subject to an interim archiving policy for a period not exceeding the time necessary for the purposes for which they are retained, in accordance with applicable law.

As regards the data relating to the CUSTOMER's bank card, they will be deleted once the transaction is completed, that is to say once the payment is made, which may be extended by the rescission period.

The number and the validity date of the CUSTOMER's bank card (not the visual cryptogram) may be retained for evidentiary purposes in the event the transaction is objected to, in interim archives, for the period set forth in Article L. 133-24 of the Monetary and Financial Code, namely 13 (thirteen) months after the debit date. This period may be extended to 15 (fifteen) months in order to take into consideration the possible use of deferred debit cards.

1.4 Recipient of the personal data

- The information relating to the CUSTOMER (first name, last name, address, mobile phone number, email address, order data) are transmitted by MILA to the SERVICE PROVIDER selected to perform the SERVICE requested by the CUSTOMER.

- The bank information (bank card number, first name and last name of the holder, expiry date and security code) disclosed by the CUSTOMER are transmitted by MILA's payment services provider, the Adyen company (processor).

- The data relating to the CUSTOMER's address are transmitted to the Arrivy company (processor), the provider of the geo-tracking solution for the SERVICE PROVIDERS set up by MILA.

1.5 Transfer of personal data

Because MILA is a company based in Switzerland, the personal data collected is transferred to and stored by MILA in Switzerland for the above purposes. Swiss data protection legislation has been recognised as offering a level of protection equivalent to that provided by European law (Decision n° 2000/518/CE of the European Commission dated 26 July 2000 pursuant to Directive 95/46/EC of the European Parliament and of the Council on the finding of adequate protection of personal data provided in Switzerland, as amended by the enforcement decision (UE) 2016/2295 of the European Commission dated 16 December 2016).

For the purpose of implementing the geo-tracking solution, MILA transfers the collected data to the service provider used by MILA, the company Arrivy Inc. This company acts as a processor of MILA and is located at 16357 118th Ln Ne, Bothell, Washington 98011 (United States of America). Because US data protection law does not offer a level of protection equivalent to that provided by European law, the protection of the CUSTOMER's personal data is guaranteed through an Agreement for contracted data processing within the framework of the EU GDPR, standard contractual clauses, technical and operational measures of Arrivy and a data processing register. The CUSTOMER may obtain a copy of the appropriate guarantees implemented by MILA upon written, reasoned request.

2. Processing of non-nominal data

MILA may share general sociodemographic, non-nominal data with selected partners to enable them to target their ads (by age category, gender, etc.). MILA will not disclose to them information enabling the identification of the CUSTOMER.

3. Hotjar

We use [Hotjar](#) in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices (in particular device's IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our website). Hotjar stores this information in a pseudonymized user profile.

Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar's privacy policy by clicking [on this link](#).

You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our site and Hotjar's use of tracking cookies on other websites by following this [opt-out link](#).

4. Security

MILA undertakes to implement appropriate technical and organisational measures to protect the personal data against accidental or unlawful destruction, accidental loss, alteration, distribution, or unauthorised access.

5. Rights of the customer

- **The right to be informed:** The CUSTOMER has the right to obtain clear, transparent and easily comprehensible information about how MILA uses his/her personal data and about his/her rights. This is the reason why MILA is providing this information in this Policy Relating to Personal Data.
- **Right of access:** The CUSTOMER has the right to access his personal data so that he/she can be up to date and can verify that MILA uses his/her personal data in accordance with applicable law.
- **Right to rectification:** The CUSTOMER has the right to have his/her personal data rectified if they are inaccurate or incomplete.
- **The right to erasure:** This right allows the CUSTOMER to request the erasure or the destruction of his/her personal data when there is no overriding reason for MILA to continue to use them. This is not a general right and there are exceptions.
- **The right to restriction of processing:** In some circumstances, the CUSTOMER has the right to request that the processing of personal data by MILA be restricted.
- **The right to data portability:** The CUSTOMER has the right to receive his/her personal data supplied to MILA in a structured, commonly used and machine-readable format and the right to transmit those data to another controller.
- **The right to lodge a complaint:** The CUSTOMER has the right to lodge a complaint with the competent authority tasked with protecting personal data (for example, the CNIL) regarding the manner in which MILA processes his/her personal data.
- **The right to object to the processing:** In certain circumstances, the CUSTOMER has the right, for reasons pertaining to his/her particular situation, to object to the processing of personal data implemented by MILA.
- **The right to give instructions relating to the fate of his/her personal data:** The CUSTOMER has the right to give instructions relating to the retention, the erasure, and the disclosure of his/her personal data upon death, according to the terms set forth in Law n° 78-17 dated 6 January 1978, as amended.

The CUSTOMER may exercise these rights by writing to Mila. For questions relating to the protection of personal data, please contact: privacy@mila.com

COOKIE POLICY

MILA uses cookies on its website www.mila.com to ensure optimal management of the MILA PLATFORM, facilitate site navigation, generate statistics, and monitor visitor traffic to improve the website.

When our website is visited, the following cookies are installed:

Cookie	Source	Function
connect1.sid	mila.com	user identification for the internal session of the application
_s	app.link	user identification for the internal session of the application for the specific management of mobile devices
NID	google.com	Most Google users have a preferences cookie in their browser called "NID". A browser sends this cookie with requests to Google's websites. The NID cookie contains a unique ID that Google uses to remember your preferences and other information, such as your preferred language (e.g., English), how many search results you wish to have shown per page (e.g., 10 or 20) and whether or not you wish to have Google's SafeSearch filter turned on.

Via the browser settings the user is informed of the presence of cookies and has the option of refusing them.

Managing cookie settings

The user can refuse the installation of cookies or receive a warning prior to accepting cookies by configuring his/her computer as follows:

- For Microsoft Internet Explorer:

Click on Settings. Click on Options, then under History click on Select. Activate the Cookie box, then click on Delete.

- For Firefox:

Choose the menu " Tools " > " Options "

In the History area, for the storage rules option, select use the personal settings for the history. Tick the box Accept cookies to activate cookies or untick it to deactivate cookies.

- For Opéra:

Choose the menu " File " > " Preferences " > " Advanced " > " Cookies " .

- For Google Chrome:

Click on the Chrome menu icon.

Select Settings. At the bottom of the page, click on Display advanced settings.

In the "Confidentiality" section, click on Content settings.

- For Safari :

Choose the menu " File " > " Preferences " > Confidentiality.