

# NEEDHELP PRIVACY POLICY

Version date: 2022

The purpose of this document is to inform all users of the website [www.needhelp.com](http://www.needhelp.com) (hereinafter the '**Website**') about the measures that NEEDHELP takes in order to protect users' data protection rights and to ensure that any personal data provided to NEEDHELP in the context of its services is kept confidential and secure.

Use of the Website is likely to entail the collection and processing of personal data within the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on personal data protection (hereinafter the '**GDPR**'), the French Data Processing and Civil Liberties Act no. 78/17 of January 6, 1978 in its current version (known as 'Loi Informatique & Libertés' in French, hereinafter the '**Data Processing and Civil Liberties Act**') and the UK Data Protection Act 2018 (hereinafter the '**UK Data Protection Act**').

This privacy policy (hereinafter the '**Policy**') has been drawn up to help Website users (hereinafter '**You**' or a '**User**') understand which data are collected, for which purposes, and what their rights are in this regard. This Policy supplements the Website's general terms and conditions of use ('**Terms and Conditions**').

This Policy may be modified from time to time. You will be informed of any modifications to this Policy before they are made, for example, by means of a banner on the Website, by notice to the email address provided on your user page and/or by any other means available to NEEDHELP. In this scenario, any updated version of the Policy will only apply from the date on which the updated version comes into effect.

## 1 — Identity of the data controller

The controller in respect of personal data collected as part of the service is We Share Trust, a French simplified joint-stock company (*société par actions simplifiée*, SAS), registered on the Commercial and Companies Register of Paris under number 799 782 859, with a capital of 108,306 euros and a head office at 46 rue Saint-Lazare 75009 Paris (France) (hereinafter '**NEEDHELP**' or '**We**').

## 2 — What is personal data?

The term '*personal data*' refers to all information relating to natural persons that may directly or indirectly identify them, for example your surname, first name or even your email address. Similarly, the IP addresses may also be personal data. An IP address is assigned to each device connected to the internet so that it may send and receive data.

## 3 — At what point is personal data collected and processed by NEEDHELP?

The Website connects people who have expressed a need for certain tasks to be performed (DIY, small jobs, etc.) with people who declare themselves to have the appropriate skills to meet this need. Everyone who uses the Website, whether to register a need or to register their skills and availability, are considered **Users** within the meaning of this Policy.

When You use the Website, in particular when You create an account on the Website (which is necessary for ordering services or advertising your services), We collect the information that You provide, including information concerning your identity, your needs and/or your skills. When You register a need through the Website, we collect and process all of the information relating to this need (the type of service, the place where the service is to be provided etc.).

In addition, when You visit our Website, We automatically collect certain information about your use of the Website and about the device used.

#### **4 — What personal data is collected and processed by NEEDHELP?**

In light of the above, the personal data that We collect and process in relation to Website Users is:

- **data relating to your identity**, such as your surname, first name, postal address, email address, as well as any data relating to changes to this information;
- **data relating to lifestyle habits**, in particular information relating to the services sought by Users;
- **data relating to the qualifications or, more generally, the skills** of the Users who offer services to other Users; if You are a professional, We collect information regarding your employment status (a company or self-employed worker), your current employer, your experience, your skills (including whether You own a driving license and have your own transport), and your right to work. We are likely to request a sworn statement that confirms a clean police record, your bank account details, languages spoken, information about your potential geographical working area and your preferred channel(s) of communication with Us;
- **financial data**, in particular data relating to transactions made through the Website (estimates and invoices, etc.), and the preferred payment method;
- **data relating to the services provided**: if You submit a review in relation to any of the services, NEEDHELP will process the information that You provide for the purposes of publishing these reviews on the Website;
- **data relating to criminal sentences or violations (only in the United Kingdom); and**

- **technical data**, which is data relating to use of the Website: browser type/version, operating system used, the page visited, the page visited prior to accessing the Website (referrer URL), IP address, logs, the *user agent*, date and time of the server request and the HTTP status code.

## **5 — On what lawful basis is personal data collected and processed by NEEDHELP?**

We collect and process Users' personal data in strict compliance with data protection law, in particular the GDPR, the Data Processing and Civil Liberties Act, the UK Data Protection Act and other potentially applicable texts, as well as the laws of the applicable personal data protection authority (i.e. the CNIL in France, the ICO in the UK).

In accordance with Article 6 of the GDPR, NEEDHELP collects and processes personal data on foot of an identified lawful basis, such as:

- **your consent**: in most cases, we collect personal data on the consent of Users, who agree to provide personal data for processing purposes;
- **fulfilment of the contract** entered into between Users on the Website. This processing is necessary in order to comply with the contract (for issuing an estimate, placing an order, performing the services provided, invoicing, etc.);
- **NEEDHELP's legitimate interest**: We automatically collect certain data (including Website navigation data) for the purposes of collecting statistics and to help us identify and correct potential errors in how the Website functions. These collection and processing activities are unlikely to affect your your basic rights or interests.

## **6 — For what purposes is personal data collected and processed by NEEDHELP?**

NEEDHELP collects and processes all personal data for clearly defined and legitimate purposes. The data entrusted to Us is never re-used for any purposes other than:

- **To create a User account on the Website**, which allows You to register Your interest in particular services or to offer Your services to other Users;
- **To help facilitate the services requested through the Website;**
- **To allow NEEDHELP to correspond with You**, for example, where you wish to contact our customer service department;
- **To allow NEEDHELP to manage the Website**, in particular through analysing connection data and certain data that allows NEEDHELP to **keep the Website secure**, in particular to limit the risk of bank fraud;

**To allow NEEDHELP to send You targeted advertising:** if You have expressed your consent to receiving targeted advertising, We will process and use your User profile data, your booking data and any additional information, as well as the time you spent accessing your User profile, in order to better understand your habits and potentially send you information about additional services that are likely to interest You. You can revoke your consent to your data being used for advertising purposes at any time by sending an email to the following address: [privacy@needhelp.com](mailto:privacy@needhelp.com).

## 7 — How long does NEEDHELP keep personal data?

We store the personal data of Website Users for no longer than is necessary to fulfil the specified purposes or to meet our contractual and legal obligations.

Data is kept for the following periods:

- **Data relating to the User account:** this data is kept while the User account remains active, on the understanding that You can close this account at any time. If your account is inactive for 2 (two) years, We will send You an electronic letter to inform you that your User account will close, unless you log into the account again. We will keep the data relating to your User account for up to 2 (two) years after the account is closed. Despite the above, the data belonging to a User who has been penalised as a result of violation of the NEEDHELP Terms and Conditions and/or endangering third parties, for example in the event of expulsion from the Website, will be kept for 10 (ten) years;
- **Data relating to the requests for services made through the Website:** this data is kept for a period of 10 (ten) years from the date of the invoice, in accordance with our accounting and fiscal obligations;
- **Data relating to use of the Website:** this data is kept for 13 (thirteen) months;
- **Data relating to complaints:** this data is kept for 5 (five) years.

## 8 — Who do we share personal data with?

We engage technical service providers, who may process your data on their servers. These service providers may only process your data on our explicit instruction and are contractually obliged to ensure sufficient technical and organisational data protection measures.

In addition, your personal data may be transmitted to other Users of the Website for the purposes of placing service orders:

- If You wish to benefit from a service, We will send relevant information in relation to your search (type of service requested, location, etc.) to Users that

match your search criteria; We will also process your User profile data in order to manage, execute, process, invoice and monitor the service and contracts, and to perform other related services such as managing potential complaints and/or cancellations. In addition, we will use your User profile data, including your telephone number, to send you SMS notifications;

- If You offer services on the Website, We will send relevant information relating to your services (for example your skills, experience and location) to Users seeking similar services.

Depending on Your chosen payment method, We may pass on your credit card information (card number, expiration date, security code) or your bank details (hereinafter known as the '**Payment Information**') to our payment services provider Mangopay — MANGOPAY SA, based at 10 Boulevard Royal, L-2449 Luxembourg, who will collect, process and use the Payment Information for the purposes of processing payments or collecting funds from your account. NEEDHELP does not collect or keep this Payment Information.

We may share your personal data with other members of the Kingfisher Group in connection with the purposes listed below. Members of the Kingfisher Group may also use the personal data we share with them to improve our and their websites and other digital services, for analysis purposes and to offer you products and services that they believe may be of interest to you where permitted by law.

## **9 — How is personal data protected by NEEDHELP?**

In its capacity as data controller, NEEDHELP agrees to implement and maintain, at its own expense, the appropriate technical and organisational measures pertaining to data processing and security matters in accordance with Articles 32 to 34 of the EU GDPR and the UK GDPR.

NEEDHELP will also ensure that these technical and organisational measures are at all times adapted to the particular risks associated with their processing activities, in terms of the nature of the information collected, in particular in order to protect the data against destruction, loss, modification, unauthorised disclosure or access, whether accidentally or illicitly.

Therefore, with regard to the **technical measures** implemented by NEEDHELP:

- all data is kept and saved on remote servers that are protected against third-party attacks (*Google Cloud Platform, Google Drive*);
- our databases are secured with complex passwords; and
- the management software used is only accessible with login details and passwords.

With regard to **organisational measures**, only certain members of NEEDHELP management or the people who require the data in order to effectively fulfil

contractual obligations are authorised to access such data.

NEEDHELP also agrees to maintain, update and keep complete and accurate registers of the data processing activities that it implements. These registers detail NEEDHELP's processing activities.

## **10 — What are your rights with regard to your personal data?**

NEEDHELP will respect your rights under applicable data protection laws

To this end, You have the right to request access to any personal data relating to you that is held by NEEDHELP, as well as the right to the rectification or erasure of this data, the right to restrict the processing of Your personal data, and the right to object to the processing. In the event that you restrict or object to data processing, NEEDHELP may no longer be in a position to allow You to access your User account or to use the Website.

Please note that NEEDHELP may, in spite of the above, keep certain information relating to you in order to meet its legal obligations and for the purposes of observing, exercising or defending legal rights, in particular following violation of the NEEDHELP Terms and Conditions.

If you are based in France, You may also define the instructions as to how Your data is kept, erased and communicated after your death. In the absence of such instructions, Your personal data will be kept in accordance with the paragraphs above, unless Your descendants request that the data be erased more quickly.

To exercise these rights, You can send an email to the following address: [privacy@needhelp.com](mailto:privacy@needhelp.com)

Finally, You have the right to file a complaint at any time with the relevant data protection authority. To do so, You may contact the relevant data protection authority in the region where You live. The national data protection authorities in Europe are:

### **Austria**

Österreichische Datenschutzbehörde  
Hohenstaufengasse 3  
1010 Wien  
Tel. +43 1 531 15 202525  
Fax +43 1 531 15 202690  
e-mail: [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)  
Website: <http://www.dsb.gv.at/>

### **Belgium**

Commission de la protection de la vie privée  
Rue de la Presse 35  
1000 Bruxelles  
Tel. +32 2 274 48 00  
Fax +32 2 274 48 10

e-mail: [commission@privacycommission.be](mailto:commission@privacycommission.be)  
Website: <http://www.privacycommission.be/>

### **Bulgaria**

Commission for Personal Data Protection  
2, Prof. Tsvetan Lazarov blvd.  
Sofia 1592  
Tel. +359 2 915 3523  
Fax +359 2 915 3525  
e-mail: [kzld@cpdp.bg](mailto:kzld@cpdp.bg)  
Website: <http://www.cpdp.bg/>

### **Croatia**

Croatian Personal Data Protection Agency  
Martićeva 14  
10000 Zagreb  
Tel. +385 1 4609 000  
Fax +385 1 4609 099  
e-mail: [azop@azop.hr](mailto:azop@azop.hr) or [info@azop.hr](mailto:info@azop.hr)  
Website: <http://www.azop.hr/>

### **Cyprus**

Commissioner for Personal Data Protection  
1 Iasonos Street,  
1082 Nicosia  
P.O. Box 23378, CY-1682 Nicosia  
Tel. +357 22 818 456  
Fax +357 22 304 565  
e-mail: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)  
Website: <http://www.dataprotection.gov.cy/>

### **Czech Republic**

The Office for Personal Data Protection  
Urad pro ochranu osobnich udaju  
Plk. Sochora 27  
170 00 Prague 7  
Tel. +420 234 665 111  
Fax +420 234 665 444  
e-mail: [posta@uouu.cz](mailto:posta@uouu.cz)  
Website: <http://www.uouu.cz/>

### **Denmark**

Datatilsynet  
Borgergade 28, 5  
1300 Copenhagen K  
Tel. +45 33 1932 00  
Fax +45 33 19 32 18  
e-mail: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)  
Website: <http://www.datatilsynet.dk/>

**Estonia**

Estonian Data Protection Inspectorate (Andmekaitse Inspektsioon)

Väike-Ameerika 19

10129 Tallinn

Tel. +372 6274 135

Fax +372 6274 137

e-mail: [info@aki.ee](mailto:info@aki.ee)

Website: <http://www.aki.ee/en>

**Finland**

Office of the Data Protection Ombudsman

P.O. Box 800

FIN-00521 Helsinki

Ratapihantie 9

FIN-00520 Helsinki

Switchboard: +358 (0)29 566 6700

Registry: +358 (0)29 566 6768

e-mail: [tietosuoja@om.fi](mailto:tietosuoja@om.fi)

Website: <http://www.tietosuoja.fi/en/>

**France**

Commission Nationale de l'Informatique et des Libertés - CNIL

8 rue Vivienne, CS 30223

F-75002 Paris, Cedex 02

Tel. +33 1 53 73 22 22

Fax +33 1 53 73 22 00

e-mail:

Website: <http://www.cnil.fr/>

**Germany**

Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit

Husarenstraße 30

53117 Bonn

Tel. +49 228 997799 0; +49 228 81995 0

Fax +49 228 997799 550; +49 228 81995 550

e-mail: [poststelle@bfdi.bund.de](mailto:poststelle@bfdi.bund.de)

Website: <http://www.bfdi.bund.de/>

The competence for complaints is split among different data protection supervisory authorities in Germany. Competent authorities can be identified according to the list provided under [https://www.bfdi.bund.de/bfdi\\_wiki/index.php/Aufsichtsbeh%C3%B6rden\\_und\\_Landesdatenschutzbeauftragte](https://www.bfdi.bund.de/bfdi_wiki/index.php/Aufsichtsbeh%C3%B6rden_und_Landesdatenschutzbeauftragte)



**Greece**

Hellenic Data Protection Authority  
Kifisias Av. 1-3, PC 11523  
Ampelokipi Athens  
Tel. +30 210 6475 600  
Fax +30 210 6475 628  
e-mail: [contact@dpa.gr](mailto:contact@dpa.gr)  
Website: <http://www.dpa.gr/>

**Hungary**

Data Protection Commissioner of Hungary  
Szilágyi Erzsébet fasor 22/C  
H-1125 Budapest  
Tel. +36 1 3911 400  
e-mail: [peterfalvi.attila@naih.hu](mailto:peterfalvi.attila@naih.hu)  
Website: <http://www.naih.hu/>

**Ireland**

Data Protection Commission  
21 Fitzwilliam Square South  
Dublin 2  
D02 RD28 Lo-Call: +353 7650100  
e-mail: [info@dataprotection.ie](mailto:info@dataprotection.ie)  
Website: <http://www.dataprotection.ie/>

**Latvia**

Data State Inspectorate  
Director: Ms Signe Plumina  
Blaumana str. 11/13-15  
1011 Riga  
Tel. +371 6722 3131  
Fax +371 6722 3556  
e-mail: [info@dvi.gov.lv](mailto:info@dvi.gov.lv)  
Website: <http://www.dvi.gov.lv/>

**Lithuania**

State Data Protection  
Žygimantų str. 11-6a  
011042 Vilnius  
Tel. + 370 5 279 14 45  
Fax +370 5 261 94 94  
e-mail: [ada@ada.lt](mailto:ada@ada.lt)  
Website: <http://www.ada.lt/>

**Luxembourg**

Commission Nationale pour la Protection des Données  
15, boulevard du Jazz  
L-4370 Belvaux  
Tel. +352 2610 60 1  
Fax +352 2610 60 29  
e-mail: [info@cnpd.lu](mailto:info@cnpd.lu)  
Website: <http://www.cnpd.lu/>

**Malta**

Office of the Data Protection Commissioner  
Data Protection Commissioner: Mr Joseph Ebejer  
2, Airways House  
High Street, Sliema SLM 1549  
Tel. +356 2328 7100  
Fax +356 2328 7198  
e-mail: [commissioner.dataprotection@gov.mt](mailto:commissioner.dataprotection@gov.mt)  
Website: <http://www.dataprotection.gov.mt/>

**Netherlands**

Autoriteit Persoonsgegevens  
Prins Clauslaan 60  
P.O. Box 93374  
2509 AJ Den Haag/The Hague  
Tel. +31 70 888 8500  
Fax +31 70 888 8501  
e-mail: [info@autoriteitpersoonsgegevens.nl](mailto:info@autoriteitpersoonsgegevens.nl)  
Website: <https://autoriteitpersoonsgegevens.nl/nl>

**Poland**

The Bureau of the Inspector General for the Protection of Personal Data -  
GIODO  
ul. Stawki 2  
00-193 Warsaw  
Tel. +48 22 53 10 440  
Fax +48 22 53 10 441  
e-mail: [kancelaria@giodo.gov.pl](mailto:kancelaria@giodo.gov.pl); [desiwm@giodo.gov.pl](mailto:desiwm@giodo.gov.pl)  
Website: <http://www.giodo.gov.pl/>

**Portugal**

Comissão Nacional de Protecção de Dados - CNPD  
R. de São. Bento, 148-3°  
1200-821 Lisboa  
Tel. +351 21 392 84 00  
Fax +351 21 397 68 32  
e-mail: [geral@cnpd.pt](mailto:geral@cnpd.pt)

Website: <http://www.cnpd.pt/>

### **Romania**

The National Supervisory Authority for Personal Data Processing  
President: Mrs Ancuța Gianina Opre  
B-dul Magheru 28-30  
Sector 1, BUCUREȘTI  
Tel. +40 21 252 5599  
Fax +40 21 252 5757  
e-mail: [anspdcp@dataprotection.ro](mailto:anspdcp@dataprotection.ro)  
Website: <http://www.dataprotection.ro/>

### **Slovakia**

Office for Personal Data Protection of the Slovak Republic  
Hraničná 12  
820 07 Bratislava 27  
Tel.: + 421 2 32 31 32 14  
Fax: + 421 2 32 31 32 34  
e-mail: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk)  
Website: <http://www.dataprotection.gov.sk/>

### **Slovenia**

Information Commissioner  
Ms Mojca Prelesnik  
Zaloška 59  
1000 Ljubljana  
Tel. +386 1 230 9730  
Fax +386 1 230 9778  
e-mail: [gp.ip@ip-rs.si](mailto:gp.ip@ip-rs.si)  
Website: <https://www.ip-rs.si/>

### **Spain**

Agencia de Protección de Datos  
C/Jorge Juan, 6  
28001 Madrid  
Tel. +34 91399 6200  
Fax +34 91455 5699  
e-mail: [internacional@agpd.es](mailto:internacional@agpd.es)  
Website: <https://www.agpd.es/>

### **Sweden**

Datainspektionen  
Drottninggatan 29  
5th Floor  
Box 8114  
104 20 Stockholm

Tel. +46 8 657 6100  
Fax +46 8 652 8652  
e-mail: [datainspektionen@datainspektionen.se](mailto:datainspektionen@datainspektionen.se)  
Website: <http://www.datainspektionen.se/>

### **United Kingdom**

The Information Commissioner's Office  
Water Lane, Wycliffe House  
Wilmslow - Cheshire SK9 5AF  
Tel. +44 1625 545 745  
e-mail: [international.team@ico.org.uk](mailto:international.team@ico.org.uk)  
Website: <https://ico.org.uk>

### **European Data Protection Supervisor**

#### **Rue Wiertz 60**

1047 Bruxelles/Brussel  
Office: Rue Montoyer 63, 6th floor  
Tel. +32 2 283 19 00  
Fax +32 2 283 19 50  
e-mail: [edps@edps.europa.eu](mailto:edps@edps.europa.eu)  
Website: <http://www.edps.europa.eu/EDPSWEB/>

## **11 — Do international data transfers occur?**

*For Users based in the EU:*

We share your personal data with third party service providers, some of which are outside the European Economic Area (the “**EEA**”). For each of these transfers outside the EEA, NEEDHELP ensures that it provides an appropriate safeguard to the personal data transferred (such as the EU Standard Contractual Clauses, binding corporate rules, codes of conduct or certification mechanisms pursuant to the EU GDPR) unless the third country outside the EEA was recognised by the European Union as having adequate data protection legislation under the meaning of the EU GDPR (for example, Switzerland and Canada).

*For Users based in the UK:*

We share your personal data with third party service providers, many of which are outside the UK. For each of these transfers outside the UK, NEEDHELP ensures that it provides an appropriate safeguard to the personal data transferred (such as the UK Addendum or the UK International Data Transfer Agreement) unless the third country outside the UK was recognised by the UK government as having an adequate data protection legislation under the meaning of the UK GDPR (for example, Switzerland and Canada).

## **12 — For more information**

For any further information about the way in which NEEDHELP collects and processes Your personal data, please send an email to the following address: [privacy@needhelp.com](mailto:privacy@needhelp.com).

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