

OP3FT PRIVACY POLICY

Published by the OP3FT, the non-profit organization whose purpose is to hold, promote, protect and ensure the progress of the Frogans technology, in the form of an open standard for the Internet, available for all, free of charge.

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PURPOSE OF THE POLICY

1. The OP3FT is a non-profit organization acting in the public interest. The OP3FT's purpose is to hold, promote, protect and ensure the progress of the Frogans technology, in the form of an open standard for the Internet, available to all, free of charge.
2. The Bylaws governing the functioning of the OP3FT are published on the OP3FT's Web site at the following permanent URL (Uniform Resource Locator): <https://www.op3ft.org/en/resources/bylaws/access.html>.
3. To fulfill its mission, the OP3FT must maintain relations with different categories of persons involved in the Frogans project, who are neither salaried employees nor independent contractors of the OP3FT. Those persons, called Frogans project stakeholders, include visitors to the OP3FT's Web sites, End Users of Frogans Player, contributors to the development of the Frogans technology, participants in public consultations, etc.
4. In order to maintain relations with those Frogans project stakeholders, the OP3FT needs to process personal data, i.e. data of an identified or identifiable natural person, such as a name, a postal address, an E-mail address or an IP address. Processing of personal data may consist in collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction, whether or not by automated means.
5. The OP3FT being domiciled in France, the legislation applicable to the OP3FT and to this Policy is French legislation, including applicable European regulations, in particular the General Data Protection Regulation (GDPR).
6. The OP3FT values privacy and only collects personal data that are strictly necessary and relevant to fulfill its mission. Personal data are processed exclusively for the purposes presented in this Policy. The OP3FT does not sell or transfer personal data of Frogans project stakeholders.
7. The objective of this Policy is to present, for each category of Frogans project stakeholders, the personal data which are collected by the OP3FT and the ways in which these data are processed. This Policy also presents the security measures taken to protect personal data and the rights of Frogans project stakeholders.
8. This Policy also covers the processing of personal data by the FCR Operator, the entity which operates the Frogans Core Registry (FCR) by delegation of the OP3FT.
9. This Policy does not cover the processing of personal data by other entities which are solely responsible for this processing. For example, Publishers of Frogans sites are solely responsible for the processing of personal data of the End Users using their Frogans sites.
10. This Policy is published on the official Web site of the Frogans technology at the following permanent URL: <https://www.frogans.org/en/resources/opp/access.html>.
11. The official version of this Policy is provided in the English language. The OP3FT may also provide translations in other languages for information purposes.

12. In the case of modification of this Policy, only the version in force prevails. The version in force is indicated on the official Web site of the Frogans technology at the following permanent URL: <https://www.frogans.org/en/resources/opp/access.html>.

13. The Frogans technology is held by the OP3FT as part of its public-interest mission. Any person intending to use the Frogans technology must comply with a policy drawn up and adopted by the OP3FT. This policy, referred to as the Frogans Technology User Policy, is published on the official Web site of the Frogans technology at the following permanent URL: <https://www.frogans.org/en/resources/ftup/access.html>.

14. In this Policy, Frogans project stakeholders beginning with a capital letter correspond to categories of users defined in the Frogans Technology User Policy.

15. For the remainder of this Policy, the terms "you" and "your" refer to a Frogans project stakeholder.

1. PERSONAL DATA PROCESSED BY THE OP3FT

16. To fulfill its public-interest mission, the OP3FT processes personal data concerning you.

17. Part 1 covers the processing, by the OP3FT, of personal data of: visitors to Web sites published by the OP3FT (Section 1.a.), visitors to Frogans sites published by the OP3FT (Section 1.b.), End Users downloading, installing and using Frogans Player (Section 1.c.), contributors to the development of the Frogans technology (Section 1.d.), subscribers to Frogans technology mailing lists (Section 1.e.), participants in public consultations (Section 1.f.), people included in online directories (Section 1.g.), OP3FT donors (Section 1.h.), people related to the promotion of the Frogans technology (Section 1.i.), people reporting security problems or abusive use (Section 1.j.) and users subject to termination procedure for breach (Section 1.k.).

1.a. VISITORS TO WEB SITES PUBLISHED BY THE OP3FT

18. The OP3FT is the publisher of a number of Web sites, in particular:

- the OP3FT's Web site "op3ft.org" as well as the Web site "donate.op3ft.org";
- the official Web site of the Frogans technology "frogans.org" as well as the Web site "lists.frogans.org" and the Web site "conference.frogans.org";
- the Web site "get.frogans" for downloading the Frogans Player software.

19. The Web sites published by the OP3FT do not use any of the tracking mechanisms used on the Web such as, for example, cookies, HTML5 cookies, or Web browser fingerprinting.

20. However, when you visit a Web site published by the OP3FT, and each time you make a request to access a Web page or a resource of this Web site (for example an image, a document, or software), connection data are automatically collected by the servers hosting the Web site. The connection data associated with each request are:

- the date and time of the request;
- your IP address.

21. In addition to the connection data, technical data provided by your Web browser during the request are collected by the servers hosting the Web site. These technical data are:

- "HTTP User-Agent": information about the type, version and language of your Web browser, as well as about the type and version of your operating system or of your device;
- "HTTP Referer": information about the referring Web page.

22. Among the connection data and technical data, only your IP address is considered as personal data according to applicable legislation.

23. The connection data and technical data collected are recorded in log files automatically generated by the servers hosting the Web site. The log files, containing IP addresses, are used to improve the performance of Web sites, for technical analysis as well as for the detection of connection problems and security problems such as intrusions. The log files are stored for a period of no longer than one (1) year. After this storage period, they are deleted.

24. During the storage period of log files, an anonymized version of these log files is generated in which each IP address is replaced with technical information and a geographical indicator with no greater precision than to a city. The anonymization process is irreversible and prevents the IP addresses from being rediscovered. The anonymized log files, which contain no personal data, are used to create statistics of visits to Web sites published by the OP3FT. These anonymized log files are stored without a time limit.

25. When visiting certain Web sites published by the OP3FT, the OP3FT may invite you, in your capacity as a Frogans project stakeholder, to provide personal data. In this case, the processing of these personal data is presented in the Section corresponding to the concerned stakeholder. For example, if you subscribe to one of the Frogans technology mailing lists on the Web site "lists.frogans.org", please refer to Section 1.e.

1.b. VISITORS TO FROGANS SITES PUBLISHED BY THE OP3FT

26. The OP3FT is the publisher of several Frogans sites, in particular: "frogans*op3ft".

27. As a reminder, in order to protect privacy of End Users, the only tracking mechanism available in the Frogans technology consists in giving to a Frogans Site Publisher the possibility of recognizing an End User who comes back to its Frogans site, but only if that End User has consented to it in advance (and has not withdrawn consent afterwards). This mechanism respects the principle of "data protection by design".

28. The Frogans sites published by the OP3FT do not use the tracking mechanism available in the Frogans technology.

29. However, when you visit a Frogans site published by the OP3FT, and you make a request to access a Frogans slide of this Frogans site, connection data are automatically collected by the server hosting the Frogans site. The connection data associated with each request are:

- the date and time of the request;
- your IP address.

30. The server hosting the Frogans site does not collect any technical data on the version or the language of the Frogans Player software that you use, nor on the type of your terminal. Indeed, unlike Web browsers, these technical data are not provided by Frogans Player during requests.

31. Among the connection data, only your IP address is considered as personal data according to applicable legislation.

32. The connection data and technical data collected are recorded in log files automatically generated by the server hosting the Frogans site. The log files, containing IP addresses, are used to improve the performance of Frogans sites, for technical analysis as well as for the detection of connection problems and security problems such as intrusions. The log files are stored for a period of no longer than one (1) year. After this storage period, they are deleted.

33. During the storage period of log files, an anonymized version of these log files is generated in which each IP address is replaced with technical information and a geographical indicator with no greater precision than to a city. The anonymization process is irreversible and prevents the IP addresses from being rediscovered. The anonymized log files, which contain no personal data, are used to create statistics of visits to the Frogans sites published by the OP3FT. These anonymized log files are stored without a time limit.

34. When visiting certain Frogans sites published by the OP3FT, the OP3FT may invite you, in your capacity as a Frogans project stakeholder, to provide personal data. In this case, the processing of these personal data is presented in the Section corresponding to the concerned stakeholder.

1.c. END USERS DOWNLOADING, INSTALLING AND USING FROGANS PLAYER

35. Frogans Player is free-of-charge software that is used to browse Frogans sites. It is developed and updated by the OP3FT for as many devices as possible that are connected to the Internet and open to third-party applications, doing so without discrimination.

36. Frogans Player is downloadable from the Web site "get.frogans". This Web site is published by the OP3FT. The processing by the OP3FT of personal data of visitors to Web sites published by the OP3FT is presented in Section 1.a.

37. If the Web site "get.frogans" invites you to download Frogans Player via a third-party application download platform ("store"), your personal data are processed by this third party according to its own terms and conditions. The OP3FT does not retrieve any personal data concerning you from this third party.

38. When you install or update Frogans Player, no personal data are collected by the OP3FT. Moreover, no unique identifier is automatically generated, which would allow you to be indirectly identified or tracked during your use of Frogans Player.

39. When you use Frogans Player, connection data are automatically collected by servers, called FPU (Frogans Player Update) servers, which allow Frogans Player to check if it is up to date. The connection data associated with each check are:

- the date and time of the check;
- your IP address.

40. The FPU servers do not collect any technical data on the version or the language of the Frogans Player software that you use, nor on the type of your terminal. Indeed, these technical data are not provided by Frogans Player during the check.

41. Among the connection data, only your IP address is considered as personal data according to applicable legislation.

42. The connection data and technical data collected are recorded in log files automatically generated by the FPU servers. The log files, containing IP addresses, are used to improve update checks, for technical analysis as well as for the detection of connection problems and security problems such as intrusions. The log files are stored for a period of no longer than one (1) year. After this storage period, they are deleted.

43. During the storage period of log files, an anonymized version of these log files is generated in which each IP address is replaced with technical information and a geographical indicator with no greater precision than to a city. The anonymization process is irreversible and prevents the IP addresses from being rediscovered. The anonymized log files, which contain no personal data, are used to create statistics of visits to the Frogans sites published by the OP3FT. These anonymized log files are stored without a time limit.

44. In compliance with the Frogans Technology User Policy, the Publisher of a Frogans site must declare if its Frogans site is intended for an adult public and/or for End Users located in certain countries. When you open such a Frogans site, Frogans Player asks you to confirm that you can access this Frogans site. In order to automate this type of confirmation, you have the possibility of configuring Frogans Player to indicate that you are an adult and your geographic location. The data of your configuration are never transferred, neither to the OP3FT nor to any third party.

1.d. CONTRIBUTORS TO THE DEVELOPMENT OF THE FROGANS TECHNOLOGY

45. The OP3FT allows any person, called a contributor, to contribute to the development of the Frogans technology. The Frogans Technology Development Contributor Policy is available at the following permanent URL: <https://www.frogans.org/en/resources/ftdcp/access.html>.

46. When you provide a contribution, you are required to provide contact information that is collected and stored in a database called the "Contributors Database". Your contact information contains personal data such as your full name, your postal address, your E-mail address and information relating to your professional activities.

47. The OP3FT processes your personal data to manage your contribution and in order to preserve the integrity, stability and free-of-charge use of the Frogans technology, as well as the perpetual nature of the rights to use the Frogans technology.

48. The Contributors Database is an internal database. The OP3FT does not transfer your personal data to any third party, unless your contribution is the subject of legal proceedings.

49. The OP3FT may publish your full name as a contributor, but only after having obtained your explicit consent.

50. The OP3FT stores your personal data for the entire legal duration of intellectual property rights corresponding to your contribution.

1.e. SUBSCRIBERS TO FROGANS TECHNOLOGY MAILING LISTS

51. The Frogans technology mailing lists are provided by the OP3FT, in compliance with its Bylaws, in the context of the promotion, protection and progress of the Frogans technology. The mailing lists are available at the following Web site: "lists.frogans.org".

52. When you subscribe to one of the Frogans technology mailing lists, you are required to provide your E-mail address which is automatically collected and stored in a database called the "Subscribers Database". You may unsubscribe from the mailing lists at any time.

53. The OP3FT uses your E-mail address to allow you to receive messages posted to the mailing list(s) to which you have subscribed.

54. The Subscribers Database is an internal database. The OP3FT does not publish the list of subscribers to any mailing list.

55. In compliance with the specific terms of use of the Frogans technology mailing lists (available at the URL: <https://www.frogans.org/en/legal.html>):

- by posting a message to a mailing list, you are responsible for your own personal data included in the content of your message;
- internally, the OP3FT stores your posted message in its entirety;
- your posted message is published in the archives of the mailing lists Web site. However, your E-mail address will be partially masked so as to prevent automatic collection by third parties.

56. The OP3FT stores your personal data contained in the Subscribers Database throughout the duration of your subscription and during a further period of one (1) year from the date of your unsubscription.

57. In order to keep track of the historical development of the Frogans technology, and with a view to ensuring the traceability of community participation in the Frogans project, the OP3FT stores your posted messages and publishes them in the archives of the mailing lists Web site for the entire duration of the Frogans project.

1.f. PARTICIPANTS IN PUBLIC CONSULTATIONS

58. The OP3FT uses a public consultation procedure to involve Internet users in important decisions related to the Frogans technology, in compliance with Article 13 of its Bylaws.

59. All Internet users may participate in public consultations by posting their comments via email to the E-mail address created for each public consultation.

60. When you participate in a public consultation:

- by posting a comment, you are responsible for your own personal data that may be included in the content of your comment;
- internally, the OP3FT stores your posted comment, in its entirety;

- your posted comment is accessible from the Web page dedicated to the public consultation on the Web site of the OP3FT "op3ft.org". However, your e-mail address will be partially masked so as to prevent automatic collection by third parties;
- the OP3FT reserves the right to include your full name and your comments in a summary report downloadable from a dedicated Web page.

61. In order to keep track of the historical development of the Frogans technology, and with a view to ensuring the traceability of public consultation procedures, the OP3FT stores your posted comments and maintains the Web pages dedicated to public consultations for the entire duration of the Frogans project.

1.g. PEOPLE INCLUDED IN ONLINE DIRECTORIES

62. The OP3FT publishes online directories concerning Frogans project stakeholders.

63. For example, the OP3FT publishes a directory of Frogans Address Watch Providers, available at the following permanent URL: <https://fcr.frogans/en/resources/fawp-directory/access.html>.

64. The online directories published by the OP3FT contain personal data supplied willingly by persons wishing to be included in these directories.

65. The specific conditions for inclusion in an online directory are published on the access page of the directory.

1.h. OP3FT DONORS

66. The OP3FT can receive from any person, called a donor, lifetime gifts stemming from public generosity, in compliance with Article 20 of its Bylaws.

67. When you make a donation to the OP3FT, you may provide your contact information which is collected and stored in a database called the "Donors Database". Your contact information may contain personal data such as your full name, your postal address and your E-mail address.

68. The OP3FT processes your personal data to manage your donation, including sending you a tax receipt (upon request).

69. In order to ensure the transparency of donations received by the OP3FT and to thank its donors, the OP3FT publishes the list of donors on the Web site "donate.op3ft.org". As a donor, you can choose to be anonymized in this list. The OP3FT will only publish your name after receiving your express consent. The list of donors is available at the following permanent URL: <https://donate.op3ft.org/en/donors.html>.

70. The Donors Database is an internal database. The OP3FT does not transfer your personal data to any third party, except as required by the competent tax authority.

71. For tax purposes, the OP3FT stores your personal data for a period of ten (10) years after receiving your donation.

1.i. PEOPLE RELATED TO THE PROMOTION OF THE FROGANS TECHNOLOGY

72. As part of its mission to promote the Frogans technology:

- the OP3FT takes part in targeted international events which allow it to raise awareness about the Frogans project among Internet stakeholders;
- the OP3FT organizes public promotional events, such as the Frogans Technology Conferences.

73. During these events, the OP3FT collects information concerning any person interested in the Frogans project. This information is stored a database called the "Promotion Database".

74. As a person interested in the Frogans project, your information collected by the OP3FT contains personal data such as your full name, your postal address, your telephone number, your E-mail address, your photo, information relating to your professional activities and the history of your interaction with the OP3FT.

75. The OP3FT processes your personal data to manage its relationship with you, including the communication of information about the Frogans project likely to interest you, as well as the sending of invitations to events organized by the OP3FT.

76. The Promotion Database is an internal database. The OP3FT does not transfer your personal data to any third party.

77. The OP3FT stores your personal data for a period of three (3) years from the date of the last interaction with you.

78. To allow the greatest possible number of Internet users to obtain official information about the Frogans project, during every public promotional event organized by the OP3FT:

- the OP3FT can publicly broadcast, on the Internet, a video recording of the event; this broadcast can happen live or in the form of videos to be consulted after the event;
- the OP3FT can also publish photos taken during the event;
- these videos and photos can be accessible on a Web site published by the OP3FT, on content-sharing platforms such as YouTube, YOUKU or Flickr, as well as on social networks such as Twitter;
- the OP3FT undertakes to use the videos and photos solely for the purpose of promoting the Frogans technology.

79. When you attend a public promotional event organized by the OP3FT, you authorize the OP3FT to freely use and broadcast any videos and photos in which you may appear. If you do not want to be filmed or photographed, you must give notice of this upon arrival at the event.

1.j. PEOPLE REPORTING SECURITY PROBLEMS OR ABUSIVE USE

80. In compliance with its public-interest mission, the OP3FT makes available to users of the Frogans technology a mechanism for reporting security problems or abusive use of the Frogans technology. This mechanism is available at the following permanent URL: <https://report.frogans.org/en/main.html>.

81. When you report a security problem or an abusive use of the Frogans technology, you are required to provide contact information, which is collected and stored in a database called the "Report Database". Your contact information contains personal data such as your full name and your E-mail address.

82. The OP3FT processes your personal data to manage reports of security problems or of abusive use of the Frogans technology.

83. The Report Database is an internal database. The OP3FT does not transfer your personal data to any third party, unless your report results in legal proceedings.

84. The OP3FT stores your personal data throughout the duration of the reporting procedure and, for legal reasons, for a further period of five (5) years after the end of this procedure.

1.k. USERS SUBJECT TO TERMINATION PROCEDURE FOR BREACH

85. In compliance with Section IV.5 of the Frogans Technology User Policy, if a breach of any of your duties is ascertained by the OP3FT or reported by a third party, a termination procedure for breach is applied.

86. In order to notify you of a breach of any of your duties, the OP3FT needs to obtain the following contact information from you: your full name or the name of your organization, your postal address and your E-mail address. In order to do this:

- If you are a Publisher of a Web site, a Holder of a Frogans address or a Frogans network, or an FCR Account Administrator, the OP3FT retrieves your contact information by querying the FCR Whois database "whois.fcr.frogans";
- otherwise, the OP3FT will search for your contact information.

87. Your contact information collected by the OP3FT is stored in a database called the "Breach Database".

88. The Breach Database is an internal database. The OP3FT does not transfer your personal data to any third party, unless the termination for breach procedure results in legal proceedings.

89. The OP3FT stores your personal data throughout the duration of the termination procedure for breach and, for legal reasons, for a further period of five (5) years after the end of this procedure.

90. In the case of termination at the outcome of the procedure, the provisions covering the publication of legal information, as described in Section 3.b. of this Policy, apply.

2. PERSONAL DATA PROCESSED BY THE FCR OPERATOR

91. Frogans addresses and Frogans networks are registered in a core database, called the Frogans Core Registry or FCR. This database belongs to the OP3FT. The technical and commercial operation of this database is delegated to an entity putting itself at the service of Internet users, in a manner comparable to registry operators for domain names on the Internet. This entity is called the FCR Operator.

92. The FCR Delegation Agreement, signed between the OP3FT and the FCR Operator, is published on the official Web site of the Frogans technology at the following permanent URL: <https://www.frogans.org/en/resources/fcrda/access.html>.

93. Within the context of the Delegation Agreement, the FCR Operator processes personal data concerning you.

94. Part 2 covers the processing, by the FCR Operator, of personal data of: visitors to Web Sites published by the FCR Operator (Section 2.a.), visitors to Frogans sites published by the FCR Operator (Section 2.b.), End Users opening Frogans sites using Frogans addresses (Section 2.c.), FCR Account Administrators (Section 2.d.), Holders of Frogans addresses or of Frogans networks (Section 2.e.), and Hosts of Frogans sites (Section 2.f.).

2.a. VISITORS TO WEB SITES PUBLISHED BY THE FCR OPERATOR

95. The FCR Operator is the publisher of a number of Web sites, in particular:

- the Web site of the FCR Operator, "fcr.frogans";
- the FCR Whois database query service, "whois.fcr.frogans";
- the FCR Public Data download service, "public-data.fcr.frogans";
- the HTML interfaces of the FCR API such as "public.api.fcr.frogans" and "accadmin.api.fcr.frogans".

96. The Web sites published by the FCR Operator do not employ any of the tracking mechanisms used on the Web such as, for example, cookies, HTML5 cookies, or Web browser fingerprinting.

97. However, when you visit a Web site published by the FCR Operator, and each time you make a request to access a Web page or a resource of this Web site (for example an image, a document, or software), connection data are automatically collected by the servers hosting the Web site. The connection data associated with each request are:

- the date and time of the request;
- your IP address.

98. In addition to the connection data, technical data provided by your Web browser during the request are collected by the servers hosting the Web site. These technical data are:

- "HTTP User-Agent": information about the type, version and language of your Web browser, as well as about the type and version of your operating system or of your device;
- "HTTP Referer": information about the referring Web page.

99. Among the connection data and technical data, only your IP address is considered as personal data according to applicable legislation.

100. The connection data and technical data collected are recorded in log files automatically generated by the servers hosting the Web site. The log files, containing IP addresses, are used to improve the performance of Web sites, for technical analysis as well as for the detection of connection problems and security problems such as intrusions. The log files are stored for a period of no longer than one (1) year. After this storage period, they are deleted.

101. During the storage period of log files, an anonymized version of these log files is generated in which each IP address is replaced with technical information and a geographical indicator with no greater precision than to a city. The anonymization process is irreversible and prevents the IP addresses from being rediscovered. The anonymized log files, which contain no personal data, are used to create statistics of visits to Web sites published by the OP3FT. These anonymized log files are stored without a time limit.

102. When visiting certain Web sites published by the OP3FT, the OP3FT may invite you, in your capacity as a Frogans project stakeholder, to provide personal data. In this case, the processing of these personal data is presented in the Section corresponding to the concerned stakeholder. For example, if you are an FCR Account Administrator, please refer to Section 2.d.

2.b. VISITORS TO FROGANS SITES PUBLISHED BY THE FCR OPERATOR

103. The FCR Operator is the publisher of several Frogans sites, in particular: "frogans*stg-interactive".

104. As a reminder, in order to protect privacy of End Users, the only tracking mechanism available in the Frogans technology consists in giving to a Frogans Site Publisher the possibility of recognizing an End User who comes back to his Frogans site, but only if that the End User has consented to it in advance (and has not withdrawn consent afterwards). This mechanism respects the principle of "data protection by design".

105. The Frogans sites published by the FCR Operator do not use the tracking mechanism available in the Frogans technology.

106. However, when you visit a Frogans site published by the FCR Operator and you make a request to access a Frogans slide of this Frogans site, connection data are automatically collected by the server hosting the Frogans site. The connection data associated with each request are:

- the date and time of the request;
- your IP address.

107. The server hosting the Frogans site does not collect any technical data on the version or the language of the Frogans Player software that you use, nor on the type of your terminal. Indeed, unlike Web browsers, these technical data are not provided by Frogans Player during requests.

108. Among the connection data, only your IP address is considered as personal data according to applicable legislation.

109. The connection data and technical data collected are recorded in log files automatically generated by the server hosting the Frogans site. The log files, containing IP addresses, are used to improve the performance of Frogans sites, for technical analysis as well as for the detection of connection

problems and security problems such as intrusions. The log files are stored for a period of no longer than one (1) year. After this storage period, they are deleted.

110. During the storage period of log files, an anonymized version of these log files is generated in which each IP address is replaced with technical information and a geographical indicator with no greater precision than to a city. The anonymization process is irreversible and prevents the IP addresses from being rediscovered. The anonymized log files, which contain no personal data, are used to create statistics of visits to the Frogans sites published by the FCR Operator. These anonymized log files are stored without a time limit.

111. When visiting certain Frogans sites published by the FCR Operator, the FCR Operator may invite you, in your capacity as a Frogans project stakeholder, to provide personal data. In this case, the processing of these personal data is presented in the Section corresponding to the concerned stakeholder.

2.c. END USERS OPENING FROGANS SITES USING FROGANS ADDRESSES

112. When you open a Frogans site, connection data are automatically collected by servers, called FNS (Frogans Network System) servers, which resolve the Frogans address. The connection data associated with each resolution are:

- the date and time of the resolution;
- your IP address.

113. The FNS servers do not collect any technical data on the version or the language of the Frogans Player software that you use, nor on the type of your terminal. Indeed, these technical data are not provided by Frogans Player during resolution.

114. Among the connection data, only your IP address is considered as personal data according to applicable legislation.

115. The connection data collected are recorded in log files automatically generated by the FNS servers. The log files, containing IP addresses, are used to improve the resolution of Frogans addresses, for technical analysis, for the detection of connection problems and security problems such as intrusions, as well as for the establishment, exercise or defense of legal claims. To satisfy legal obligations applicable to electronic communications operators, these log files are stored for a period of one (1) year, during which time they may be transferred in response to requests from public authorities. After this storage period, these log files are deleted.

116. During the storage period of log files, an anonymized version of these log files is generated in which each IP address is replaced with technical information and a geographical indicator with no greater precision than to a city. The anonymization process is irreversible and prevents the IP addresses from being rediscovered. The anonymized log files, which contain no personal data, are used to create statistics on the resolution of Frogans addresses. These statistics may be published in the FCR Operator's monthly report. These anonymized log files are stored without a time limit.

2.d. FCR ACCOUNT ADMINISTRATORS

117. An FCR Account Administrator is an individual or an organization which has opened an FCR Account and which, in its capacity as a professional, provides registration-management services for Frogans addresses and for Frogans networks in the FCR to Holders of Frogans addresses and of Frogans networks. FCR Account Administrators are intermediaries between Holders of Frogans addresses or of Frogans networks and the FCR Operator.

118. When you open or update an FCR account, you are required to provide contact information which is collected and stored in the FCR. Your contact information contains personal data such as your full name, your postal address, your telephone number and your E-mail address.

119. The FCR Operator processes your personal data to provide its addressing services, in compliance with the FCR Delegation Agreement.

120. The FCR Operator stores your personal data for as long as your FCR account is open and for a further period of ten (10) years from the date of its closing.

121. In compliance with the Frogans Technology User Policy, you have accepted, in your capacity as an FCR Account Administrator, that the FCR Operator publishes personal data concerning you:

- in the FCR Whois database, in particular to allow all internet users to contact you;
- in the FCR public data, in particular to allow third parties to provide watch or referencing services;
- in the list of FCR Account Administrators, in particular to allow Holders of Frogans addresses or of Frogans networks to identify you easily; you are included in this list only if you have consented.

122. The FCR Operator publishes your personal data in the FCR Whois database for as long as your FCR Account is open and for a further period of three (3) years from the date of its closing.

123. The FCR Operator publishes your personal data in the FCR public data and in the list of FCR Account Administrators until the closing of your FCR account.

124. When you execute an action in the FCR API, for example to register or change the settings of a Frogans address, connection data are automatically collected by the FCR API servers. The connection data associated with each action are:

- the date and time of your action;
- your IP address;
- your FCR Account Administrator identifier.

125. Among the connection data, only your IP address and your FCR Account Administrator identifier are considered as personal data according to applicable legislation.

126. The connection data collected are recorded in log files automatically generated by the FCR API servers. The log files, containing IP addresses and FCR Account Administrator identifiers, are used to improve the performance of the FCR API, for technical analysis, for the detection of connection problems and security problems such as intrusions, as well as for the establishment, exercise or defense of legal claims. These log files are stored for a period of ten (10) years. After this storage period, these log files are deleted.

127. During the storage period of log files, an anonymized version of these log files is generated in which each IP address is replaced with technical information and a geographical indicator with no greater precision than to a city. The anonymization process is irreversible and prevents the IP addresses from being rediscovered. The anonymized log files, which contain no personal data, are used to create statistics on the use of the FCR API. These anonymized log files are stored without a time limit.

128. As a reminder, in your capacity as an FCR Account Administrator, you are responsible for the transmission, to the FCR Operator, via the FCR API, of the personal data of Holders of Frogans addresses or of Frogans networks, as well as the personal data of Hosts of Frogans sites. The processing of these personal data is presented respectively in Sections 2.e. and 2.f

2.e. HOLDERS OF FROGANS ADDRESSES OR OF FROGANS NETWORKS

129. A Holder of Frogans address or of a Frogans network is an individual or an organization which holds a Frogans address or a Frogans network registered in the FCR.

130. When you register a Frogans address or a Frogans network, you are required to provide contact information which is stored in the FCR. Your contact information contains personal data such as your full name, your postal address, your telephone number and your E-mail address.

131. Your contact information is collected through your FCR Account Administrator.

132. The FCR Operator processes your personal data to provide its addressing services, in compliance with the FCR Delegation Agreement.

133. The FCR Operator stores your personal data for the entire duration of the registration of your Frogans address or your Frogans network and for a further period of three (3) years from the date of the expiration, transfer or cancellation of the registration of your Frogans address or of your Frogans network.

134. In compliance with the Frogans Technology User Policy you have accepted, in your capacity as a Holder of a Frogans address or Frogans network, that the FCR Operator publishes personal data concerning you in the FCR Whois database, in particular to allow all Internet users to contact you, for example in the event of a dispute concerning your Frogans address. Your contact information contained in the FCR Whois database is published for as long as you are the Holder of this Frogans address or of this Frogans network.

135. In compliance with the Frogans Technology User Policy, if you are located in a country where the law entitles natural persons to benefit from the anonymization of their personal data, then you can anonymize your contact information in the FCR Whois database by requesting this of your FCR Account Administrator, who knows your real contact information.

136. If your contact information is anonymized, the FCR Operator does not know your real identity, and your contact information available through the FCR Whois query service is marked as being anonymized.

137. If your FCR Account Administrator is unable to anonymize your contact information, you are able to entrust the registration management of your Frogans address or of your Frogans network to a different FCR Account Administrator.

2.f. HOSTS OF FROGANS SITES

138. A Host of Frogans sites is an individual or an organization which hosts Frogans sites on a server it operates.

139. When you host a Frogans site, you are required to provide contact information which is stored in the FCR. Your contact information contains personal data such as your full name, your postal address, your telephone number and your E-mail address.

140. Your contact information is collected through the FCR Account Administrator managing Frogans address of the Frogans site that you host.

141. The FCR Operator processes your personal data to provide addressing services, in compliance with the FCR Delegation Agreement.

142. The FCR Operator stores your personal data for the entire duration that you host the Frogans site and for a further period of three (3) years from the date of the end of the hosting.

143. In compliance with the Frogans Technology User Policy, you have accepted, in your capacity as a Host of Frogans sites, that the FCR Operator publishes personal data concerning you in the FCR Whois database, in particular to allow all Internet users to contact you, for example in the event of a problem concerning the content of a Frogans site that you host. Your contact information contained in the FCR Whois database is published for as long as you host this Frogans address or of this Frogans network.

3. COMMITMENTS OF THE OP3FT AND THE FCR OPERATOR

144. The OP3FT and the FCR Operator declare and guarantee that the processing of personal data that they carry out respects applicable legislation and in particular the General Data Protection Regulation (GDPR).

145. Part 3 covers the limitations to the transfer of personal data (Section 3.a.), the publication of legal information (Section 3.b.), security measures to protect personal data (Section 3.c.), modalities for the exercise of your rights (Section 3.d.), data protection officers (Section 3.e.) and contacting the OP3FT or the FCR Operator (Section 3.f.).

3.a. LIMITATIONS TO THE TRANSFER OF PERSONAL DATA

146. The OP3FT and the FCR Operator undertake to never sell your personal data. They also undertake to never transfer your personal data to any third party for commercial reasons.

147. The OP3FT and the FCR Operator undertake to only transfer your personal data to any third party if there exists a legal obligation to do so or for reasons of operational stability. For example:

- the OP3FT and the FCR Operator may be required to transfer your personal data in response to requests by public authorities;
- the FCR Operator transfers each day a copy of the data contained in the FCR to a data escrow agent in compliance with the FCR Delegation Agreement signed between the OP3FT and the FCR Operator.

148. In order to provide transparency, the OP3FT and the FCR Operator may publish periodic reports containing statistical data about requests by public authorities, in particular the number and the nature of these requests as well as any follow-up on them.

149. If, for reasons of operational stability, the FCR Operator transfers personal data contained in the FCR to a processor located in a country outside of the European Union, the FCR Operator undertakes, in compliance with applicable legislation, that the concerned processor is located in a country which ensures an adequate level of protection of personal data or, failing this, undertakes to obtain a contractual undertaking for this level of protection from the concerned processor.

3.b. PUBLICATION OF LEGAL INFORMATION

150. In compliance with Sections IV.3 and IV.5 of the Frogans Technology User Policy, the OP3FT reserves the right to publish, in particular on its Web site "op3ft.org" or on the official Web site of the Frogans technology "frogans.org", legal information relative to any dispute with a user of the Frogans technology.

151. When the OP3FT publishes legal information containing personal data, the OP3FT anonymizes these personal data, apart from exceptions to be justified. For example, in the case of a termination of the license to use the Frogans technology due to a breach having serious consequences for users of the Frogans technology, and when it is necessary to inform those users, the OP3FT reserves the right to not anonymize these personal data.

152. When the OP3FT anonymizes personal data, the OP3FT cannot guarantee that the concerned natural person cannot be indirectly identified, for example from contextual elements contained in the published legal information.

153. Within the context of UDRP-F (Uniform Dispute Resolution Policy for Frogans Addresses) proceedings, the OP3FT may publish links giving access to decisions rendered by dispute-resolution service providers. These decisions may contain personal data about the parties involved in the dispute.

3.c. SECURITY MEASURES TO PROTECT PERSONAL DATA

154. In order to ensure the confidentiality and integrity of personal data, the OP3FT and the FCR Operator implement reasonable and appropriate security measures to protect these data from any unauthorized access, alteration, disclosure or destruction. For example:

- to prevent unauthorized entry to the OP3FT's or to the FCR Operator's premises, these premises are protected by physical security measures;
- Web sites published by the OP3FT or by the FCR Operator use a secured connection, for example by use of the TLS (Transport Layer Security) protocol which ensures the confidentiality and integrity of personal data transmitted;
- the OP3FT's and the FCR Operator's databases are regularly backed up and in an encrypted form;
- only certain persons, duly accredited by the OP3FT or by the FCR Operator, are authorized to process personal data.

3.d. MODALITIES FOR THE EXERCISE OF YOUR RIGHTS

Right of access to and right to rectification of personal data

155. The right of access allows you to request information about your personal data processed by the OP3FT or by the FCR Operator and to verify the accuracy of these data.

156. The right to rectification allows you to request the rectification of your personal data processed by the OP3FT or by the FCR Operator, that are not accurate.

157. You may exercise your rights of access to and to rectification of your personal data at any time, without giving any reason and free of charge.

158. In order to exercise your access and rectification rights, please send your request by email to one of the addresses indicated in Section 3.f. You must include in your request a document proving your identity.

159. In the case that you request the rectification of your personal data, the OP3FT or the FCR Operator (depending on the type of processing concerned) undertakes to limit the processing of your personal data during the examination period of your request, except if your request is clearly abusive.

160. You will obtain an answer within at most one (1) month after the reception of your request.

161. If your request is inaccurate or does not include all the required elements, you will be asked to provide supplementary information. You must provide this information within at most one (1) month, otherwise your request may be rejected.

162. If your request is rejected, you will obtain a reasoned response.

163. If your request concerns the access or the rectification of your personal data contained in the FCR Whois database, you must not send your request by email to the FCR Operator:

- in order to access your personal data contained in the FCR Whois database, please use the FCR Whois database query service "whois.fcr.frogans";
- if you are an FCR Account Administrator, please use the FCR API to access and rectify your personal data contained in the FCR Whois database;
- if you are a Holder of a Frogans address or a Frogans network, please contact your FCR Account Administrator to rectify your personal data contained in the FCR Whois database;
- if you are a Host of Frogans sites, to rectify your personal data contained in the FCR Whois database, please contact the Holder of the Frogans address of the Frogans site that you host, who will then contact its FCR Account Administrator.

Right to erasure of personal data

164. The right to erasure allows you to request the erasure of your personal data processed by the OP3FT or by the FCR Operator.

165. You may exercise your right to erasure of your personal data, at any time and free of charge, whenever:

- your personal data are no longer necessary, regarding the purpose for which they were collected or processed;
- you no longer agree to, or you object to, the processing of your personal data;
- the processing of your personal data is unlawful according to the law of the country applicable to you.

166. In order to exercise your right of erasure, please send your request by email to one of the addresses indicated in Section 3.f. You must include in your request a document proving your identity.

167. You will obtain an answer within at most one (1) month after the reception of your request.

168. If your request is inaccurate or does not include all the required elements, you will be asked to provide supplementary information. You must provide this information within at most one (1) month, otherwise your request may be rejected.

169. Your request can also be rejected in cases specified in the applicable legislation.

170. If your request is rejected, you will obtain a reasoned response.

Right to restriction of the processing of personal data

171. The right to restriction of processing allows you to request restriction of use of your personal data processed by the OP3FT or by the FCR Operator.

172. The methods intended to restrict the processing of your personal data may, for example, consist in:

- temporarily shifting your data to another processing system;
- making your data inaccessible to users;
- temporarily removing your data contained in a Web site or in a Frogans site published by the OP3FT or by the FCR Operator.

173. You may exercise your right to the restriction of the processing of your personal data, at any time and free of charge, whenever:

- you contest the accuracy of your personal data processed by the OP3FT or by the FCR Operator;
- the processing of your personal data is unlawful according to the law of the country applicable to you (but you do not wish to exercise your right to erasure);
- the processing of your personal data is no longer necessary for the OP3FT or the FCR Operator (but the storage of some of your personal data may be necessary for the exercise or the legal defense of your rights);
- you object to the processing of your personal data.

174. In order to exercise your right to restriction of processing, please send your request by email to one of the addresses indicated in Section 3.f. You must include in your request a document proving your identity.

175. You will obtain an answer within at most one (1) month after the reception of your request.

176. If your request is inaccurate or does not include all the required elements, you will be asked to provide supplementary information. You must provide this information within at most one (1) month, otherwise your request may be rejected.

177. If your request is rejected, you will obtain a reasoned response.

Right to personal data portability

178. The right to portability allows you to obtain your personal data in a structured form, commonly used and machine-readable, for example in order to transmit them to another organization offering equivalent services.

179. With regard to your personal data contained in the FCR or in the FCR Whois database, please note that the FCR Operator is the sole entity responsible for the technical and commercial operation of the FCR. It is therefore not possible to transfer your data to another organization offering equivalent services. In the case of termination of the FCR Delegation Agreement signed between the OP3FT and the FCR Operator, your personal data contained in the FCR or in the FCR Whois database will be automatically transferred to the new operator designated by the OP3FT.

180. As a Holder of a Frogans address or a Frogans network, you may change the FCR Account Administrator who manages the registration of your Frogans address or your Frogans network in the FCR. In this case, the request to change FCR Account Administrator must be made directly with your new FCR Account Administrator.

Right to object to the processing of personal data

181. The right to object allows you to object to the processing of your personal data by the OP3FT or by the FCR Operator.

182. You may exercise your right to object to the processing of your personal data, at any time and free of charge, provided that you state the reasons appertaining to your particular situation.

183. In order to exercise your right to object, please send your request by email to one of the addresses indicated in Section 3.f. You must include in your request a document proving your identity.

184. In the case that you make a request in order to object to the processing of your personal data, the OP3FT or the FCR Operator (depending on the type of processing concerned) undertakes to limit the processing of your personal data during the examination period of your request, except if your request is clearly abusive.

185. You will obtain an answer within at most one (1) month after the reception of your request.

186. If your request is inaccurate or does not include all the required elements, you will be asked to provide supplementary information. You must provide this information within at most one (1) month, otherwise your request may be rejected.

187. Your request can also be rejected in cases specified in the applicable legislation, especially if there are legitimate and compelling grounds for the OP3FT or the FCR Operator (depending on the type of processing concerned).

188. If your request is rejected, you will obtain a reasoned response.

Processing of personal data following the death of a Frogans project stakeholder

189. In your capacity as a Frogans project stakeholder, you may draft instructions concerning the storage, the erasure or the communication of your personal data after your death, provided that these instructions do not harm the interests of third parties. These instructions may be contained in a will, for example.

190. If you are an inheritor of a deceased Frogans project stakeholder, you may request the OP3FT or the FCR Operator (depending on the type of processing concerned) to respect the instructions of that stakeholder. In the absence of instructions, you may request access to the personal data of that stakeholder, if these data are necessary to settle the succession.

191. In order to exercise any of these rights, please send your request by email to one of the addresses indicated in Section 3.f. You must include in your request a document proving your identity, a document certifying the death of the Frogans project stakeholder, as well as the instructions or any other relevant document.

192. You will obtain an answer within at most one (1) month after the reception of your request.

193. If your request is inaccurate or does not include all the required elements, you will be asked to provide supplementary information. You must provide this information within at most one (1) month, otherwise your request may be rejected.

194. If your request is rejected, you will obtain a reasoned response.

3.e. DATA PROTECTION OFFICERS

195. The OP3FT and the FCR Operator have each appointed a data protection officer (DPO) whose mission is in particular to ensure the effective implementation of the provisions of this Policy.

196. You may contact these data protection officers by email to one of the addresses indicated in Section 3.f.

3.f. CONTACTING THE OP3FT OR THE FCR OPERATOR

197. To exercise your rights with regard to this Policy, please use one of the following E-mail addresses:

- for Frogans project stakeholders presented in Part 1 of this Policy, contact the OP3FT: contact-privacy (at) op3ft (dot) org
- for Frogans project stakeholders presented in Part 2 of this Policy, contact the FCR Operator: contact-privacy (at) stg-interactive (dot) com