

# GDPR Policy

*Last updated: April 2025*

The present privacy policy (hereafter the “**GDPR Policy**”) applies to the Observatoire de l’Immobilier Durable, a French non-profit association whose mission is to help property players address sustainability issues (hereafter “**OID**”) and any User or Registered User (as defined below).

OID makes available to Users and Registered Users the Platform on the website R4RE Resilience For Real Estate, accessible at the address [r4re.resilience-for-real-estate.com](https://r4re.resilience-for-real-estate.com), by which they can produce cartographic visualisations and analyses at territory and building scales using different tools.

The Platform features information published by OID. Editorial, graphic and technical monitoring of the Platform is ensured by OID on a daily basis. The terms and conditions pertaining to the Platform can be accessed from the website.

The GDPR Policy describes the policies and procedures concerning the collection, use and disclosure of your Personal Data when you use the Services and informs you of your privacy rights and how the law and OID protect you.

When using the Platform, you are informed that OID may process some of your Personal Data, in compliance with data protection legislation. In its capacity as Data Processing Controller, OID agrees to ensure the respect of your private life and guarantees that your Personal Data are:

- processed in a lawful, fair and transparent manner;
- collected for specific, explicit and legitimate purposes;
- adequate, relevant and not excessive in relation to the purpose of the processing;
- processed appropriately in order to ensure the security of the Personal Data.

## DEFINITIONS:

For the purposes of this Privacy Policy:

- **OID** (also referred to by “us” and “our”): refers to the OBSERVATOIRE DE L’IMMOBILIER DURABLE (OID), association registered with the No. 794 031 278, whose headquarters are located at 12 rue Vivienne – 75002 Paris, France.
- **Platform**: refers to the platform R4RE Resilience for Real Estate, accessible from the website <https://r4re.resilience-for-real-estate.com>.
- **Services**: refers to the use of the R4RE Platform and its tools.
- **User** (also referred to by “you” and “your”): refers to the natural person concerned by the Personal Data.
- **Registered User**: refers to a User benefitting from a Personal Space linked to an Entity Account.
- **Personal Space**: refers to a unique account created for the Registered User, accessible using their Log-in Details, giving them access to the Services.
- **Entity**: refers to any organisation, company or enterprise that has an Entity Account on the R4RE Platform, to which one or several Personal Spaces are linked, that uses the Services and participates and contributes to Service data and analyses.
- **Entity Account**: refers to the account linked to an Entity that can be used to register several buildings in the form of a portfolio and analyse them, which Registered Users access via their Personal Space.
- **Cookies**: refers to cookies as defined in article 1.3 of the Privacy Policy.
- **Device**: refers to any tool that can be used to access the Services such as a computer, mobile telephone or digital tablet.
- **Personal Data**: refers to any information relating to an identified or identifiable natural person; an “identifiable natural person” is deemed as a natural person that can be identified, directly or indirectly, in particular by referring to an identifier, such as a name, identification number, location data, online identifier, or one or several specific elements related to their physical, physiological, genetic, psychological, economic, cultural or social identity.

- **Usage data:** refers to the data collected as defined in Article **Erreur ! Source du renvoi introuvable.** of the Privacy Policy.
- **Rights of the Individuals concerned** (referred to as “your Rights”): refers to the prerogatives granted to individuals concerning the protection of their Personal Data, such as access, rectification, erasure, and portability of data, and opposition to processing, in compliance with data protection legislation.
- **Data protection legislation:** refers to the legal corpus relating to the protection of personal data, comprising the updated French Law No. 78-17 of 6 January 1978 relating to data processing, data files and freedom, and any new laws and decrees made for its application, and the EU General Data Protection Regulation (GDPR), the reference on personal data protection, which came into force on 25 May 2018.
- **Data processing controller:** refers to the entity (natural or moral entity) that determines the purposes and means of the processing of personal data.
- **Country:** refers to France

## 1. Which data does OID process and collect on the Platform, and for what purposes?

### 1.1. Personal Data

When using our Service, we may ask you to provide certain information that can be used to contact or identify you.

The information linked to Users (natural persons) who have a Personal Space include:

- email address
- First name and family name
- Job position
- Entity
- Telephone number
- Date on which User added to the Platform
- User account status (expired or not)
- Usage Data.

The password created by the Registered User to access their Personal Space is not collected by OID.

Users' Personal Data may be collected:

- via the contact form featured on the Platform;
- when creating a Personal Space.

OID may use Personal Data for the following purposes:

- To provide and maintain our Services, including to monitor the use of our Services.
- To manage your Personal Space and your Entity Account: to manage your registration as a User of the Services and your Personal Space. The Personal Data that you provide can give you access to different functions of the Services that are available to you as a registered User.
- To contact you: to contact you by email, or other forms of electronic communication, such as notifications about updates or information related to functions, and newsletters, including security updates, when necessary or reasonable for their implementation.
- To provide you with news and general information on the events that we offer, unless you have indicated that you do not want to receive this type of information;
- To send you our Newsletter, if you consented to the processing of your Personal Data for this purpose when you registered;
- To manage your requests: to answer and manage the requests that you send us, allowing you to exercise your rights.
- To allow you to exercise your rights.

All of the processing of Personal Data mentioned above is based on one or several of the following legal clauses:

- Article 6.1.a) of the GDPR: the User has given consent to the processing of his or her personal data for one or more specific purposes.
- Article 6.1. b) of the GDPR: processing is necessary for the performance of a contract to which the User is party or in order to take steps at the request of the User prior to entering into a contract.

- Article 6.1.f) of the GDPR: Processing is necessary for the purposes of the legitimate interests pursued by OID, by allowing it to gather proof in the event of a possible dispute and/or to pursue its sales and marketing objectives.

## 1.2. Usage Data

The Usage Data are automatically collected upon use of the Services.

The Usage Data include information like the Internet Protocol address of your Device (e.g. IP address), browser type, browser version, the Service pages that you visit, the hour and date of your visit, the time spent on these pages, the unique log-in details of the device, and other diagnosis data.

When you access the Service from or via a mobile device, we may automatically collect information, through a third party, such as the type of mobile device that you use and the IP address of your mobile device. Note that these data are anonymised when collected and that we cannot therefore access them.

We may also collect the information that your browser sends each time that you visit the Platform or when you access the Platform from or via a mobile device.

In general, these Data are collected by OID for the following main reasons:

- To better understand the activities of Users of the Platform to improve the Services and guarantee a secure, personalised online experience.
- To improve the User experience by analysing navigation behaviours to optimise the ergonomics, browsing, and content of the Platform, thus making the User's experience more pleasant and intuitive.
- To analyse the Platform's performance, in particular by evaluating the loading time, click-through rate, and other key indicators to identify and resolve technical issues.
- To ensure the security of Personal Data and User transactions by detecting and preventing fraudulent or malicious activity.

The processing of these Usage Data is based on the following legislation:

Article 6.1.f) of the GDPR: processing is necessary for the purposes of the legitimate interests pursued by OID, by allowing it to pursue its commercial, marketing and security objectives.

## 1.3. Cookies

When you browse the Platform, Cookies are automatically stored on your Device. We use Cookies and similar monitoring technologies to follow activity on the Platform and store some information. The monitoring technologies used are beacons, tags and scripts to collect and monitor information and improve and analyse our Services.

- (i) **Cookies or browser Cookies:** This site uses Cookies, which are small files stored on your device. We use Matomo, an analytics app that respects the recommendations of the CNIL, to collect anonymised data, such as the IP address, in order to guarantee your privacy. No cookie consent banner is displayed because Matomo is set up to be exempt from prior consent. Cookies may be persistent cookies (remain after the browser is closed) or session cookies (deleted when the browser is closed).
- (ii) **Web beacons:** Some sections of our Services and emails may contain small electronic files known as web beacons (also called clear gifs, pixel tags and single-pixel gifs), which OID can use, e.g. to count the Users that have visited its pages or opened an email, and for other connected website statistics (e.g. record the popularity of a particular section and verify the integrity of the system and the server).

Cookies are collected to make your browsing easier by remembering information about your visit, measure audience engagement, and offer additional functions.

- Essential/Necessary Cookies

Type: Session Cookies

Administrated by: Us

Objective: These Cookies are essential to provide you with the Services available on the Platform and allow you to use some of its functions. They help authenticate Users and prevent the fraudulent use of Entity Accounts and Personal Spaces. Without these Cookies, the Services that you request cannot be provided, and we only use these Cookies to provide you with these Services.

- Cookie Policy / Cookie Consent Banner

Type: Persistent Cookies

Administrated by: Us

Objective: These Cookies identify whether Users have accepted the use of cookies on the website.

## - Functional Cookies

Type: Persistent Cookies

Administrated by: Us

Objective: These Cookies allow us to remember the choices that you make when you use the Platform, like your connection details or language preference. The aim of these Cookies is to give you a more personal experience and avoid you having to re-enter your preferences each time you use the website.

The processing of Cookies is based on the following legislation:

- Article 6.1.a) of the GDPR: the User has given consent to the processing of his or her personal data for one or more specific purposes.
- Article 6.1.f) of the GDPR: processing is necessary for the purposes of the legitimate interests pursued by OID, by allowing it to pursue its marketing and objectives.

## 2. Who are the Users of the Personal Data processed by the Observatoire de l'Immobilier Durable?

The main user of the Personal Data that you transmit is the Data Processing Controller: OID.

Your Personal Data may be transmitted to service providers outside OID in a sub-contracting capacity (hosts and IT developers). Your Personal Data are likely to be transferred and/or processed outside the European Union, in particular for Data hosting. In this case, and prior to being transferred, OID ensures that the transfer of your Personal Data is secure. Should the legislation of the country concerned by the transfer not be recognized as offering an adequate level of Data protection, OID shall ensure that the necessary measures are taken in compliance with the GPDR (cross-border data flow agreements complying with standard contract clauses decreed by the European Commission).

## 3. Where are the Personal Data processed by the Observatoire de l'Immobilier Durable?

The Personal Data are processed in France and any other place where the parties responsible for processing and/or their sub-contractors are located. For further information, please contact the Data Processing Controller.

#### **4. How long are your Personal Data stored?**

Users' Personal Data, along with Usage Data, Data provided when filling in the contact form, creating an Entity Account or a Personal Space, and exercising User rights are stored for a limited duration.

In general, Personal Data are stored for the amount of time necessary for the above-mentioned purposes. After three (3) years of deletion and/or inactivity of a Personal Space, the Personal Data are automatically purged and only pseudonymised and/or anonymised data are stored, in compliance with OID's legal, accounting and tax obligations.

With the aim of resolving conflicts, preventing fraud, abuse, and/or respecting legal obligations, OID reserves the right, in compliance with legal and regulatory requirements, to conserve some processed Personal Data for a limited period, even if they are no longer necessary for the purposes pursued.

In any event, except for the legal obligations of OID, the duration of storage of Personal Data shall not exceed three (3) years on an active basis, following two (2) years of intermediate archiving in a pseudonymised form.

In addition, the User is informed that anonymised Personal Data may be used for statistical or research purposes, or to improve the services offered by OID.

For Cookies, the duration of storage is limited to 13 months.

#### **5. Modifications of this GDPR Policy**

We may update our GDPR Policy at any moment. We shall inform you of any changes by publishing the new GDPR Policy on the Platform.

We shall inform you by email and/or a clear banner on the Platform before the change takes place and update the "last updated" date featuring at the top of the GDPR Policy. You are invited to consult this GDPR Policy from time to time to check for changes. Modifications made to this GDPR Policy are effective when they are published on this page.

#### **6. What are your Rights as a User?**

## 6.1. What are your rights?

The Personal Data Protection Regulation recognises that Users have the possibility to exercise a number of rights:

- **Right of access:** You have the right to obtain confirmation of whether your Personal Data are processed or not and, if they are, to obtain access to such Data and to certain complementary information.
- **Right to rectification:** You can update or change information concerning you at any time by connecting to your Personal Space, if you have one, and visiting the account setup section where you can manage your personal information. You can also contact us to request access, rectify or delete any personal information that you have provided. You can request that your Personal Data be changed or added to if they are incorrect.
- **Right to erasure:** You have the right to delete or request our help to delete your Personal Data that we have collected. On certain grounds, you can have your Personal Data deleted by OID.
- **Right to object:** At any time, on grounds relating to a particular situation, you can object to the processing of your Personal Data in the public or legitimate interest of OID.
- **Right to data portability:** You can obtain the Personal Data that you provided to OID.

## 6.2. How can you exercise your rights?

To exercise these rights or for any questions on the processing of your data in this package, please contact our Data Protection Officer (DPO).

- By email: [contact-R4RE@o-immobilierdurable.fr](mailto:contact-R4RE@o-immobilierdurable.fr)
- By post: Observatoire de l'Immobilier Durable, 12 rue Vivienne, 75002 Paris, France.