

# PRIVACY POLICY – PINAULT COLLECTION

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In this personal data protection policy, Pinault Collection explains how your personal data is collected, managed and processed by Pinault Collection when you visit the [www.pinaultcollection.com](http://www.pinaultcollection.com) website and the Bourse de Commerce.

Other websites linked to the Pinault Collection, in particular the bookshop website ([bookshop.pinaultcollection.com](http://bookshop.pinaultcollection.com)), the Halle aux grains restaurant website (<https://www.halleauxgrains.bras.en>) or the Palazzo Grassi - Punta Della Dogana website are managed by other independent data controllers, within the meaning of the GDPR, with their own data protection policies, which you should consult directly on the pages of the concerned websites.

## Summary

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### 1. Who is the data controller?

Your personal data is processed by Pinault Collection, 12, rue François 1er, Paris 8e, SASU with capital of €1,630,060,740, registered with the Paris Trade and Companies Registry under number RCS Paris 807 902 036 ("Pinault Collection"). Pinault Collection acts as data controller for the processing operations described in this policy.

### 2. What categories of personal data are processed by Pinault Collection?

Pinault Collection collects and processes the following categories of personal data:

- data relating to your identity (e.g. surname, first name, email address);
- data relating to tickets and membership cards (e.g. purchases, admissions, attendance);
- data relating to your professional situation (e.g. job title, professional contacts, resume);
- connection data (e.g. IP address, connection logs);
- data relating to the settlement and payment of transactions;
- data relating to your preferences and interests;
- usage data relating to our emails (delivery, opening, clicks).

Only personal data that is strictly necessary for the purposes described below is collected.

### 3. When is your personal data collected?

Personal data is obtained directly from you, or as a result of your use of the website, or through emails sent to you, or your visit to the Bourse de Commerce. If your personal data is collected by means of a form, you will be informed of the compulsory nature of the information to be provided by an asterisk (\*) or any other indication near the fields concerned. If you do not reply, we will not be able to process your request.

### 4. For what purposes is your personal data processed, on what legal grounds and for how long is it kept?

Pinault Collection processes your personal data for the purposes described in the table below. The lawful basis for such processing and the associated retention periods are also set out in this table.

| PURPOSES                                                                                                                                            | LEGAL BASES                                                                                     | RETENTION PERIOD                                                                                                                                                                                        |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>For the sale of tickets and membership cards</b>                                                                                                 |                                                                                                 |                                                                                                                                                                                                         |
| Creation and management of an online customer account                                                                                               | Consent                                                                                         | 3 years from the end of the business relationship (last account login or date of last purchase), or earlier in the event of withdrawal of consent                                                       |
| Management and follow-up of sales and orders for tickets and membership cards, and exchanges following the modification or cancellation of an event | Performance of a contract                                                                       | 5 years from completion of the order                                                                                                                                                                    |
| Retention of the bank card number for future purchases                                                                                              | Consent                                                                                         | Retention by the payment service provider for 60 months after the purchase                                                                                                                              |
| Issuing invoices and monitoring payments                                                                                                            | Performance of a contract                                                                       | 10 years                                                                                                                                                                                                |
| <b>For visits</b>                                                                                                                                   |                                                                                                 |                                                                                                                                                                                                         |
| Management and control of access to the Bourse de Commerce (including for membership card holders)                                                  | Performance of a contract                                                                       | 5 years from completion of the order                                                                                                                                                                    |
| Management of guided tours and scheduling of visits                                                                                                 | Performance of a contract                                                                       | 5 years from completion of the service                                                                                                                                                                  |
| Preparation of sales and attendance statistics                                                                                                      | Pinault Collection's legitimate interests (improving offers and better understanding customers) | For customers and prospects, the data is deleted or anonymised 3 years from the last contact from the prospect or customer, or from the date of the last purchase or the expiry date of the membership. |
| Conducting satisfaction surveys                                                                                                                     | Pinault Collection's legitimate interests (improving offers and better understanding customers) | For customers and prospects, the data is deleted or anonymised 3 years from the last contact from the prospect or customer, or from the date of the last purchase or the expiry date of the membership. |
| <b>For the management and optimisation of the pinaultcollection.com website</b>                                                                     |                                                                                                 |                                                                                                                                                                                                         |
| Monitoring the operation of the website, audience statistics and users' browsing via cookies                                                        | Legitimate interests (improving offers and better understanding customers) and consent          | Details are provided in the cookie policy                                                                                                                                                               |
| <b>For the implementation of marketing operations</b>                                                                                               |                                                                                                 |                                                                                                                                                                                                         |
| Sending emails to newsletter subscribers with information about Pinault Collection news and promotional offers                                      | Consent                                                                                         | Until the unsubscribe request, or in the case of a customer account, until the account is deleted                                                                                                       |
| Use of tracking pixels to improve email performance by adapting the sending frequency and personalising content                                     | Consent                                                                                         | 25 months from collection                                                                                                                                                                               |
| Use of tracking pixels to analyse email deliverability in order to verify that emails are properly received                                         | Legitimate interest                                                                             | 25 months from collection                                                                                                                                                                               |

| PURPOSES                                                                                                                                                     | LEGAL BASES                               | RETENTION PERIOD                                                                                                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| Organisation of events and sending invitations and information about Pinault Collection news by post or email to professional customers/prospects            | Pinault Collection's legitimate interests | For customers and prospects, the data is deleted or anonymised 3 years from the last contact from the prospect or customer |
| <b>For the handling of information requests</b>                                                                                                              |                                           |                                                                                                                            |
| Communication and exchange of information following requests sent to dedicated email addresses                                                               | Pinault Collection's legitimate interests | 3 years from the handling of the request                                                                                   |
| <b>For the handling of requests to exercise rights by visitors and customers</b>                                                                             |                                           |                                                                                                                            |
| Management of requests by individuals to exercise their rights in relation to the processing of their personal data (right of access, right to object, etc.) | Legal obligations                         | 6 years from the request to exercise a right                                                                               |
| <b>For recruitment operations</b>                                                                                                                            |                                           |                                                                                                                            |
| Processing of job applications                                                                                                                               | Pre-contractual measures                  | Throughout the recruitment process                                                                                         |

## 5. Who are the recipients of your personal data?

Your personal data may be communicated to the following recipients, depending on their responsibilities and the purposes for which they are to be used:

- Pinault Collection staff working in the marketing, publicity, administration, IT and legal departments;
- staff responsible for control (audit, compliance, DPO) within Pinault Collection;
- Palazzo Grassi and Punta della Dogana (to control access to the museums for holders of membership cards);
- subcontractors involved in the processing of personal data (e.g. reception service provider, online payment service provider, guided tour service provider, ticketing software publisher, digital marketing agency);
- employees of companies involved in financial or legal transactions concerning Pinault Collection.

## 6. Is your personal data transferred outside the European Union?

To provide its ticketing software, Pinault Collection uses subcontractors located in Switzerland and Vietnam. For these subcontractors, and in accordance with the applicable data protection provisions, data flows to these countries are governed by agreements drawn up on the basis of the standard contractual clauses proposed in Switzerland by the Swiss Federal Data Protection and Information Commissioner (FDPIC) and by the European Commission, in compliance with the provisions of Article 46 of the GDPR.

## 7. What are your rights regarding your personal data and how can you exercise them?

Under data protection law you have the following rights regarding your personal data: right of access, rights to rectification, right to object to processing, right to erasure, right to withdrawal of consent, right to restriction of processing, right to portability and right to define directives relating to the retention, deletion and communication of your personal data after your death.

These rights may be exercised by contacting our Data Protection Officer (or DPO) by email:

[dpo@pinaultcollection.com](mailto:dpo@pinaultcollection.com), or by post: Pinault - Collection - DPO - 48 rue Montmartre, 75002 Paris. Proof of identity may be requested.

You can also send a complaint to the CNIL at the following address: 3 place de Fontenoy - TSA 80715 - 75334 Paris Cedex 07 or via its website <https://www.cnil.fr/fr/plaintes>.

Download our personal data protection policy