

PRIVACY POLICY



At TIP TOP NETTOYAGE (LUXTOP 360), we attach particular importance to your personal data, because if you entrust it to us, we must take the utmost care and above all explain to you transparently how we collect and Use it.

This Privacy Policy is aimed at you, as a user, customer or owner, who has access to the Platform via the website www.luxtop360.com

The purpose of this document is to inform you of how your personal data can be collected and processed by TIP TOP NETTOYAGE (LUXTOP 360).

What is personal data?

"Personal data" is any information about you that identifies you directly or indirectly. For example, your first and last name or photo may allow you to be identified directly. Your email address allows you to identify you indirectly..

What is treatment?

The word "processing" refers to any operation, or set of operations, involving personal data, regardless of the process used (collection, recording, organization, conservation, adaptation, modification, extraction, consultation, use, communication by transmission or any other form of provision, reconciliation or interconnection, locking, erasure or destruction...)

Respect for your privacy and personal data is a priority for us and we are committed to treating your data in the strictest respect of the Computer and Freedoms Act of January 6, 1978 ('Computer and Freedoms Act') General Data Protection Regulation (EU) of 27 April 2016 ('RGPD').

In any event, we are committed to respecting the following two essential principles:

- You remain in control of your personal data.
- Your data is handled in a transparent, confidential and secure manner.

WHO IS RESPONSIBLE FOR PROTECTING YOUR DATA?

The person responsible for processing your data is TIP TOP NETTOYAGE (Siren: 798 495 313) with its head office at 21 rue Guillaume Apollinaire 93200 Saint-Denis.

[Find out more and our contact information](#)

Legal reminder: The person responsible for the treatment is, within the meaning of the Computer Science and Freedoms Act, the person who determines the means and purposes of the treatment. When two or more treatment managers jointly determine the purposes and means of treatment, they are **jointly responsible for the treatment** (or co-responsible). The **subcontractor** is a person dealing with personal data on behalf of the person in charge of the processing, acting under the authority of the person in charge of the processing and on the instruction of the latter.

TIP TOP NETTOYAGE is a limited liability company with a single partner, registered in the Bobigny Register of Trade and Companies under the number 798 495 313, headquartered at 21 rue Guillaume Apollinaire 93200 Saint-Denis.

TIP TOP NETTOYAGE is represented by Ms Natacha Jovanovic

If you have any questions about the management and use of your personal data, please contact us:

- Either by email, to notice@luxtop360.com
- Or by mail, at TIP TOP NETTOYAGE (LUXTOP 360) - 21 rue Guillaume Apollinaire 93200 Saint-Denis.

HOW DO WE COLLECT YOUR DATA?

All personal data about You is collected directly from You, either during your Registration on the Platform or during exchanges with our services.

In addition, data about your navigation on the Platform can be used to target your needs and interests and to target our commercial and advertising offerings based on it.

WHY AND ON WHAT BASIS DOES TIP TOP CLEANING TREAT YOUR DATA?

Your different data is likely to be collected by TIP TOP NETTOYAGE for:

- **Access to the Platform and the provision of services;**

Legal basis :

-Contractual, treatment is necessary for the execution of a contract or pre-contract measures

- **Managing and tracking your Service Reservations, delivering benefits and billing**

Legal basis:

-Contractual, treatment is necessary for the execution of a contract or pre-contract measures

- **Respond to your enquiries**

Legal basis:

-Your consent

- **Send you our newsletter**

Legal basis:

-Your consent

- **Offer you commercial offers for our services and those of our partners**

Legal basis:

-Your consent

- **Manage and respond to your requests for "Computer Freedoms" rights**

Legal basis:

-Legal obligation (RGPD and Computer Law - Freedoms)

- **Ensure the smooth operation and continuous improvement of our Platform and its features**

Legal basis:

- Our legitimate interest in ensuring the best level of operation and quality of our Platform thanks in particular to the visitor statistics of the latter.

-Your consent when it is required.

TIP TOP NETTOYAGE will also be allowed to use this data for the purpose of fulfilling a legal or regulatory obligation.

In any event, and for each defined purpose, TIP TOP NETTOYAGE will make all means in its possession to ensure the security and confidentiality of the personal data entrusted to it, in accordance with the laws and regulations in force.

WHAT IS THE DATA TREATED?

The mandatory or optional nature of the requested personal data and the possible consequences of a failure to respond to you are specified when they are collected.

You can view the details of the personal data we may have with you by clicking here: [details of the data:](#)

For access to the Platform and the provision of services	<ul style="list-style-type: none"> - Name, Firstname - E-mail address - Phone
For the management and monitoring of your Reservations, the execution of services and billing	<ul style="list-style-type: none"> - Name, Firstname - Phone - E-mail address - Phone - Postal address - Billing postal address - Data on means of payment: credit card number, expiry date, cryptogram, RIB. These items are requested by Stripe. - Photo ID - Face photo
To respond to your enquiries	<ul style="list-style-type: none"> - First name, name - E-mail address - Phone
To send our newsletter	<ul style="list-style-type: none"> - Name, first name - E-mail address
For sending commercial offers for our services and for those of our partners	<ul style="list-style-type: none"> - Name, first name - E-mail address

For the management and your requests to exercise "Computer and Freedoms" rights	<ul style="list-style-type: none"> - Name, first name, - E-mail address
To ensure the smooth operation and continuous improvement of our Platform and its functionality	<ul style="list-style-type: none"> - <i>Data about your browsing on our Platform via Cookies</i>

WHO ARE THE RECIPIENTS OF YOUR INFORMATION?

Within their respective responsibilities and for the purposes noted above, the main people who will likely be able to have access to your data are:

- The qualified staff of tip TOP NETTOYAGE's various departments (administrative services, accounting, marketing, sales, logistics and IT);
- The companies responsible for managing the Platform.
- Owners (they will be able to see the name, email, photo and exchange messages with guests from the platform with an integrated messaging system);
- The authorized staff of our subcontractors (if there are subcontractors) such as banking partners.
- If necessary, the relevant courts, mediators, accountants, auditors, lawyers, bailiffs, collection companies, police or gendarmerie authorities in case of theft or judicial requisition, relief.
- Third parties who may drop cookies on your devices (computers, tablets, mobile phones, etc.) when you consent.

More details on our providers list:

Concierge agency for services,
Self-employed for household/check-in, check out
Stripe for payment

Your data is not shared, exchanged, sold or rented to anyone other than the above.

HOW LONG IS YOUR DATAT KEPT?

We only keep your data for the time it takes for the purposes, as described above, and synthesize in the table presented when you click more detail

For access to the Platform and the provision of services	For the duration of the relationship and for 3 years from the end of the business relationship
For the management and monitoring of your Reservations, the execution of benefits and billing	For the duration of the relationship and for 3 years from the end of the business relationship
To respond to your enquiries	3 years from the end of the business relationship Or 3 years from the day of your last contact with TIP TOP NETTOYAGE
To send our newsletter	3 years from the end of the business relationship Or 3 years from the day of your last contact with TIP TOP NETTOYAGE
For sending commercial offers for our services and for those of our partners	3 years from the end of the business relationship Or 3 years from the day of your last contact with TIP TOP NETTOYAGE
For the management and your requests to exercise "Computer and Freedoms" rights	1 year in case of exercise of the right of access or rectification 3 years in case of exercise of the right of opposition

<p>To ensure the smooth operation and continuous improvement of our Platform and its functionality</p>	<p>13 months. Beyond this time, the raw attendance data associated with an identifier is either deleted or anonymized.</p>
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DETAILS ON THE SERVICE PAYMENT PROVIDER

What are the purposes of the treatment?

Customers wishing to book a service must use payment services.

The payment services required for the Platform are provided by the payment service provider, which has mandated TIP TOP NETTOYAGE to carry out its payment services on its behalf.

The payment service provider, to provide payment services, is legally required to carry out anti-money laundering, anti-terrorism and anti-fraud controls.

As a result, the payment service provider, the Owner and TIP TOP NETTOYAGE process Customer data to:

- **The provision of payment services**

Legal basis :

-Contractual: the processing is necessary to carry out pre-contract measures taken at your request, for the provision of payment services.

- **Implementation of control procedures.**

Legal basis :

-Legal obligation: processing the data necessary to combat fraud, terrorist financing and money laundering following a legal obligation that the PSP has as a payment service provider.

What is the status of the stakeholders?

Data processing for the implementation of control procedures

The payment service provider is legally required to process the data necessary to implement the control procedures. In this regard, the payment service provider must be considered to be responsible for processing data processing as part of the implementation of control procedures.

Payment data processing

The payment service provider must be considered to be responsible for processing data processing related to the management of payment of Benefit Reservations.

TIP TOP NETTOYAGE has been mandated by the payment service provider as its Agent to provide payment services. In this regard, TIP TOP NETTOYAGE, which acts on the instructions of the PSP, must be considered as the subcontractor of the payment service provider.

*The Owner, who processes certain Customer data in connection with the provision of payment services, must also be considered **co-responsible for the PAYMENT SERVICES SERVICE PRESTATAIRE.***

More details :

The Provider of Payment Services is Stripe [<https://stripe.com/fr/legal>], which is subject to all legal and regulatory obligations applicable to Payment Institutions under French jurisdiction.

For any questions about the management and use of your personal data, you can contact the PSP / TIP TOP NETTOYAGE:

- Either by email, to notice@luxtop360.com
- Or by mail, at 21 rue Guillaume Apollinaire, 93200
- Or by phone at (0)9 73 50 37 71

Legal reminder: The person responsible for the treatment is, within the meaning of the Computer Science and Freedoms Act, the person who determines the means and purposes of the treatment. When two or more treatment managers jointly determine the purposes and means of treatment, they **are jointly responsible for the treatment** (or co-responsible). The **subcontractor** is a person dealing with personal data on behalf of the person in charge of the processing, acting under the authority of the person in charge of the processing and on the instruction of the latter.

Regarding the collection and processing of bank data

As part of the operation of the Platform, TIP TOP NETTOYAGE is likely to collect personal data relating to your payment data. This data is processed in accordance with the intended purposes of the collection.

The mandatory or optional nature of the requested personal data and the possible consequences of a failure to respond to you are specified when they are collected.

You can view the details of the personal data we may have with you by clicking here:

<p>For the provision of payment services and the completion of control procedures</p>	<p>The data that can be processed are:</p> <ul style="list-style-type: none"> - Payment data: postal or bank ID statement, cheque number, credit card number, credit card expiry date, visual cryptogram, name of person holding bank account - Transaction data such as transaction number, purchase details; - Account settlement data: settlement terms, rebates, receipts, balances and outstandings
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This data is collected by the payment service provider, via the software solution put in place on the Platform, during the booking process. They are then stored on the secure servers of the PSP and for some, transmitted to the Owners.

It is expressly accepted that TIP TOP NETTOYAGE, the payment service provider and other data processing stakeholders:

- Will not process data that would be inconsistent with the defined purposes
- Will take all technical and organizational measures to ensure the security and confidentiality of the Customer's personal data.

Consent

The processing of the Customer's personal data is necessary to make the payment of the Benefits. The Customer having chosen to reserve the Benefits, TIP TOP NETTOYAGE and the payment service provider do not have to require his consent, which is necessary for the performance of the service contract and the provision of the associated payment services.

In addition, the PSP processes customer data necessary to combat fraud, terrorist financing and money laundering after a legal obligation as an approved payment institution.

How long payment data is stored

With the exception of the provisions in the following paragraphs, bank details will cease to be retained as soon as the transaction has been made by the payment service provider, i.e. as soon as the full payment, for the reservation, was received by the Owner.

It should be noted that for payments made by bank cards, such data may be retained as evidence if the transaction is challenged, within temporary files, for a period of **thirteen (13) months (or fifteen (15) month if payment is deferred)** from the date the debit is made. In all cases, the visual cryptogram is not affected by this retention, and bank details are deleted at the expiration of the date shown above.

WHAT ARE YOUR RIGHTS?

In accordance with the Computer and Freedoms Act and the RGPD, you have the following rights:

- Right to access ([article 15 RGPD](#)), rectification ([article 16 RGPD](#)), update, completeness of your data ([read more](#))
- Right to lock or delete your personal data ([article 17 RGPD](#)), where it is inaccurate, incomplete, equivocal, out of date, or where collection, use, communication or retention is prohibited ([read more](#))
- Right to withdraw your consent at any time ([article 13-2c RGPD](#))
- Right to limit the processing of your data ([article 18 RGPD](#))
- Right to object to the processing of your data ([article 21 RGPD](#)) ([read more](#))

- Right to portability of the data you have provided to us, when your data is processed automatically based on your consent or contract ([Article 20 RGPD](#))
- The right to define the fate of your data after your death and to choose whether or not we share your data with a third party you have previously designated ([read more](#)).

In the event of death and in the absence of instructions from you, we undertake to destroy your data, except its retention is necessary for probatory purposes or to meet a legal obligation.

These rights can be exercised by simple e-mail to notice@luxtop360.com or by mail at 21 rue Guillaume Apollinaire 93200 Saint-Denis.

Finally, you can also file a complaint with the supervisory authorities and in particular the CNIL (<https://www.cnil.fr/fr/plaintes>).

WHAT ABOUT LOGINS AND COOKIES?

TIP TOP NETTOYAGE makes use of login data (date, time, Internet address, visitor's computer protocol, page viewed) and cookies (small files stored on your computer) to identify you, improve the fight against payment fraud, and benefit from the Platform's audience measurements and statistics, including the pages viewed.

For audience measurement, we use GOOGLE ANALYTICS, a service offered by GOOGLE LLC. The data collected by this service provider has been configured to be anonymized (there is therefore no reference to personal data). The cookies present on your computer to operate the service are not kept for more than 13 months.

If you still wish to remove statistics cookies, check the corresponding box at the following address:
<https://luxtop360.com/en/legal>.

The other cookies used on luxtop360.com are essential for the proper functioning of the website. They allow you to maintain your connection or to invalidate page caching and are useful for the payment system (STRIPE).

[Find out more](#)

To learn more about cookies (how to manage, delete, identify them), you can visit the CNIL website: <http://www.cnil.fr/vos-droits/vos-traces/les-cookies/#c5554>

IS YOUR DATA TRANSFERRED OUTSIDE THE EUROPEAN UNION?

As a principle, TIP TOP NETTOYAGE processes your data within the European Union.

However, given the nature of its activity, and subject to informing you beforehand, TIP TOP NETTOYAGE may be required to carry out transfers of your data outside the European Union. In this case, TIP TOP NETTOYAGE will tell you what steps are being taken to control this transfer and to ensure compliance.

WHAT SECURITY MEASURES ARE IN PLACE TO PROTECT YOUR CUSTOMERS?

TIP TOP NETTOYAGE and its potential subcontractors are committed to implementing all technical and organisational measures to ensure the security of our personal data processing and the confidentiality of your data, in application Computer Law and Freedoms and the RGPD.

As such, TIP TOP NETTOYAGE takes the necessary precautions, in view of the nature of your data and the risks presented by our processing, to preserve the security of the data and, in particular, to prevent it from being distorted, damaged, or that of third parties. unauthorized access to it (physical protection of premises, authentication of our customers with personal and secure access via confidential identifiers and passwords, logged of connections, encryption of certain data,...).