

- PRIVACY POLICY -

Purpose

This Policy reflects the Data Controller's desire to act transparently, in compliance with national provisions such as Law No. 2018-493 of 20 June 2018, enacted on 21 June 2018, amending the Data Protection Act in order to bring national law in line with the European legal framework, and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the "General Data Protection Regulation").

The data controller places particular importance on protecting the privacy of its users and therefore undertakes to take reasonable precautions to protect the personal data it collects against loss, theft, disclosure or unauthorised use.

"Personal data" is defined as all personal data relating to the user, i.e. any information that directly or indirectly identifies the user as a natural person.

If a user wishes to react to any of the practices described below, they may contact the data controller at the postal address or email address specified in the "contact data" section of this Policy.

What data do we collect?

The data controller collects and processes the following personal data in accordance with the methods and principles described below:

- domain (automatically detected by the controller's server), including dynamic IP address ;
- email address if the user has previously disclosed it, for example by sending messages or questions on the website, communicating with the data controller by email, participating in discussion forums, or accessing restricted parts of the website using login details;
- all information concerning the pages that the user has visited on the website;
- any information that the user has given voluntarily, for example in surveys and/or registrations on the website, or by accessing restricted parts of the website using login details.

The data controller may also be required to collect non-personal data. These data are called non-personal data because they do not directly or indirectly identify a specific person. They may therefore be used for any purpose, for example to improve the website, the products and services offered or the advertising of the data controller.

If non-personal data are combined with personal data in such a way that allows identification of the data subjects, the non-personal data shall be treated as personal data until such time as it is not possible to link them to a specific person.

Collection methods

The data controller collects personal data in the following ways:

- Contact form

Purposes of the processing

Personal data are collected and processed only for the purposes mentioned below:

- managing and controlling the services offered
- sending and following up orders and invoices
- sending promotional information on the data controller's products and services
- sending promotional material
- answering the user's questions
- producing statistics
- improving the quality of the website and the products and/or services offered by the controller
- sending information on new products and/or services of the data controller
- sales prospecting
- enabling better identification of the user's areas of interest.

We also collect and process personal data for the following purposes:

- Passing on information about you to our partners

The data controller may be required to process data in ways that are not yet described in this Policy. In this case, it will contact the user before re-using any personal data, in order to explain the changes and give the chance, if applicable, to object to this re-use.

Legitimate interests

Some of the processing operations carried out by the data controller are based on the legal ground of its legitimate interests. These legitimate interests are proportionate to respect for the user's rights and freedoms. If the user wishes more information about the purposes founded on legitimate interests, they should contact the data controller (see "contact data").

Storage period

In general, the data controller shall only keep personal data for as long as is reasonably necessary for the purposes for which it is to be used and in accordance with legal and regulatory requirements.

Client personal data is kept for a maximum of 10 years after the end of the contractual relationship between the client and the controller.

At the end of the storage period, the data controller shall make every effort to ensure that the personal data has been made unavailable and inaccessible.

Exercise of rights

For all rights listed below, the data controller reserves the right to verify the identity of any user wishing to exercise the rights listed below.

This request for additional information shall be made within one month of the user's request.

Data access and copies

The user may obtain a written description or copy of their personal data, free of charge.

The data controller may charge a reasonable fee based on administrative costs for any additional copies requested by the user.

If the user makes a request electronically, the information shall be provided in a commonly-used digital format, unless the user requests otherwise.

Unless otherwise provided for in the General Data Protection Regulation, the user will be provided with a copy of their data within one month of receiving the request.

Right of rectification

The user may request, free of charge, as soon as possible and at the latest within one month, the rectification of any personal data that are inaccurate, incomplete or irrelevant, or complete them if they are incomplete.

Unless otherwise provided for by the General Data Protection Regulation, requests to exercise the right to rectification shall be processed within one month.

Right to object to processing

The user shall have the right to object, free of charge, at any time and on grounds relating to their particular situation, to the processing of their personal data, if:

- the data are needed for the performance of a task carried out in the public interest or in the exercise of an official authority vested in the controller;
- the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, unless there are overriding interests or fundamental rights and freedoms of the data subject which require the personal data to be protected (in particular where the data subject is a child).

The data controller may refuse to grant the user's right of objection if it establishes the existence of compelling and legitimate grounds for the processing which override the interests, rights and freedoms of the user, or for the establishment, exercise or defence of

legal claims. In the event of a dispute, the user may lodge a complaint in accordance with the "Complaints" section of this Policy.

The user may also, at any time, without justification and free of charge, object to the processing of their personal data if that data is collected for marketing purposes (including profiling).

If personal data are processed for scientific or historical research or statistical purposes in accordance with the General Data Protection Regulation, the user has the right to object, on grounds relating to their particular situation, to the processing of their personal data, unless the processing is necessary for the performance of a task carried out in the public interest.

Unless otherwise provided for by the General Data Protection Regulation, the controller is obliged to respond to the user's request as soon as possible and at the latest within one month and to give reasons for its response if it intends not to grant the request.

Right to restriction of processing

Users shall have the right to obtain from the controller restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by the user, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- for the time necessary to examine the merits of an objection request made by the user, in other words for the time needed for the data controller to check the balance between the legitimate interests of the data controller and those of the user.

The data controller will inform the user when the restriction on processing is lifted.

Right to erasure (right to be forgotten)

The user may request the deletion of their personal data if one of the following reasons applies:

- the data are no longer necessary for the purposes of the processing;
- the user has withdrawn their consent to the processing of their data and there is no other legal ground for the processing;
- the user objects to the processing and there are no overriding legitimate grounds for the processing and/or the user exercises their specific right to object in relation to direct

marketing (including profiling);

- the personal data have been processed unlawfully;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the data controller is subject;
- the personal data have been collected in relation to the offer of information society services to children. However, data may not be deleted in the following cases:
 - the data is being used to exercise the right of freedom of expression and information;
 - the data is being used to comply with a legal obligation under an EU or Member State law to which the controller is subject, or to perform a task that is being carried out in the public interest or when exercising the data controller's official authority;
 - The data is necessary for public health purposes and serves in the public interest;
 - The data represents important information that serves the public interest, scientific research, historical research, or statistical purposes and where erasure of the data would likely to impair or halt progress towards the achievement that was the goal of the processing;
 - The data is being used for the establishment of a legal defence or in the exercise of other legal claims.

Unless otherwise provided for by the General Data Protection Regulation, the data controller is obliged to respond to the user's request as soon as possible and at the latest within one month, and to give reasons for its response if it intends not to grant the request.

Right to data portability

The user may at any time, free of charge, ask to receive their personal data in a structured, commonly used and machine-readable format, in particular with a view to transferring them to another data controller, if:

- the processing is carried out by automated means; and
- the processing is based on the user's consent or on a contract between the user and the controller.

Under the same conditions and in the same way, the user shall have the right to have their personal data transmitted directly from one controller to another, where technically feasible.

The right to data portability shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Data recipients and disclosure to third parties

The recipients of the collected and processed data are, in addition to the data controller itself, its employees or other subcontractors, its carefully selected commercial partners, located in France or in the European Union, and who collaborate with the data controller in the context of marketing products or providing services.

In the event that data is disclosed to third parties for direct marketing or commercial prospecting purposes, the user will be informed in advance so that they can choose to accept the transfer of their data to third parties.

As long as this transfer is based on the user's consent, the user can withdraw consent for this specific purpose at any time.

The data controller complies with all applicable laws and regulations and will ensure in all cases that its partners, employees, subcontractors or other third parties with access to this personal data comply with this Policy.

The data controller shall disclose the user's personal data if required to do so by a law, court or an order from a public authority.

The data controller shall not transfer any personal data outside the European Union.

Security

The controller shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risks presented by the processing and the nature of the data to be protected. It shall take into account the state of the art, the costs of implementation and the nature, scope, context and purposes of the processing operation as well as the risks to the rights and freedoms of users.

The data controller always uses encryption technologies that are recognised as industry standards within the IT sector when transferring or receiving data on the website.

The data controller has put in place appropriate security measures to protect and prevent the loss, misuse or alteration of information received on the website.

In the event that personal data under the control of the controller is compromised, the controller shall act promptly to identify the cause of the breach and take appropriate remedial action.

The controller shall inform the user of such a situation, if required to do so by law.

Amendments

The controller reserves the right to change the provisions of this Policy at any time. The changes will be published directly on the controller's website.

Applicable law and jurisdiction

This Policy is governed by the national law of the controller's principal place of business.

Any dispute relating to the interpretation or execution of this Policy shall be subject to the jurisdiction of this national law.