

## Protection of personal data - REGILAIT Personal Data Policy

### REGILAIT

The processing of personal data, which is sometimes of a sensitive nature, and respecting your right to privacy are our top priority.

Their protection is one of our major concerns, and every effort is made to ensure their security.

REGILAIT undertakes to comply with the applicable legislation on the protection of privacy and personal data and, in particular, the European General Data Protection Regulation (hereinafter "GDPR").

Respecting the use of your personal data is a priority for Régilait. This informs the company's behaviour as follows.

- We do not sell your data
- We protect your data and handle it in a confidential manner
- We only collect the necessary data
- We have appointed a personal data protection officer

(referred to as the DPO)

- We keep our processing records up-to-date
- We educate our employees about the GDPR
- We update our contracts with clients, suppliers and sub-contractors

The purpose of this privacy policy (hereinafter referred to as the "Privacy Policy") is therefore:

- to allow you to communicate your personal information in an unfettered spirit of trust and confidentiality
- to inform you of the purposes of processing the data collected by Régilait and, in general, to let you know your rights regarding personal data

### Personal data terms and definitions

Personal data refers to any information relating to an identified or identifiable natural person. An 'identifiable natural person' is a natural person who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online username, or one or more elements specific to their physical, physiological, genetic, psychological, economic, cultural or social identity.

### The data controller

Your personal data is collected and processed by a legal entity. The latter is called the 'data controller' when it is the body that determines the purposes and means of processing.

## **The Data Protection Officer**

The Data Protection Office (DPO) is your main contact should you wish to exercise your rights or for any issue relating to the protection of personal data.

## **The French Data Protection Authority (CNIL)**

CNIL, created in 1978, is the administrative authority responsible for the protection of personal data. It helps companies to ensure compliance and private individuals to manage their personal data and exercise their rights.

## **The right to access data**

You can ask the organisation in question to disclose any data concerning you that it may hold. This right also enables you to verify the accuracy of your data and, if necessary, to have it rectified or deleted.

## **The right to rectification**

You may request the rectification of inaccurate or incomplete information concerning you.

## **The right to object**

You may object to the use of your data for certain processing purposes. The exercise of this right depends on the purpose and legal basis of the processing and will be subject to a case-by-case assessment.

## **The right to data portability**

You may request retrieval of your personal data in an open and machine-readable format. You may also ask the organisation processing your personal data to transmit it to another organisation. This right only applies to processing based on consent or on fulfilment of a contract.

## **The right to deletion or the right to be forgotten**

You may request that your personal data be deleted. The exercise of this right is subject to a case-by-case assessment.

## **The right to restriction of processing**

You may request the temporary interruption of all processing until such time as the organisation concerned examines your request regarding one of the rights previously mentioned. The organisation will then be required to stop using your data but will continue to store it.

## **The post-mortem right**

You can define instructions regarding the storage, deletion and disclosure of your personal data following your death. The exercise of this right is subject to a case-by-case assessment.

## **1. About us**

This website (hereinafter referred to as “the Website”) is published by REGILAIT, a simplified joint-stock company with capital of €13,650,090, which has its head office at RN6 – 71118 Saint Martin Belle Roche, and is enrolled in the Macon Trade & Companies Register under number D 349 113 662 (hereinafter referred to as “REGILAIT”).

REGILAIT is responsible for the processing and hosting of personal data which may have been collected from you.

REGILAIT has appointed a Data Protection Officer, who can be contacted via the following postal address:

RÉGILAIT  
For the attention of the Data Protection Officer (DPO) RN6  
71118 SAINT MARTIN BELLE ROCHE FRANCE  
France

Or by email addressed to:

[dpo@regilait.fr](mailto:dpo@regilait.fr)

## **2. When do we collect personal data?**

We collect your personal data mainly for the following purposes:

- creating your account/personal area or allowing you to log in to it
- facilitating your browsing on our Website
- allowing you to fill out a form on our Website or to leave a comment
- allowing you to sign up for our newsletter
- allowing you to receive information on our products and services and/or those of our partners
- allowing you to subscribe to a product or service
- allowing you to communicate with us by telephone, email, social media, forums or any other means
- allowing you to take part in games and competitions, promotional offers and surveys,
- allowing you to apply for a job or internship
- allowing you to report a problem or request assistance

Failure to provide the personal data required in any form may result in inability to access all the services or products concerned.

Furthermore, the information requested is necessary in order to provide the appropriate response to your request. In the event of a missing response, a warning will appear on the screen.

If you are a minor and have transmitted personal data that concerns you, you hereby certify that you have obtained prior consent from your legal guardian(s). REGILAIT cannot be held liable in the event that such consent has not been obtained. All parents and guardians are encouraged to advise minors to behave responsibly and prudently when disclosing their personal data.

### **3. What personal data do we collect?**

In the course of our activities, REGILAIT may collect the following personal or anonymous data from you:

Identifying data	<ul style="list-style-type: none"><li>• title/surname/first name</li><li>• country/date of birth</li><li>• email address (email)</li><li>• postal address, postcode, town</li></ul>
Private and/or professional life	<ul style="list-style-type: none"><li>• number of children in the home</li><li>• telephone number</li><li>• career path (curriculum vitae)</li></ul>
Connection data	<ul style="list-style-type: none"><li>• IP address, browsing history, click path, operating system, information on the devices you use to visit the Website, etc.</li></ul>
Location data	<ul style="list-style-type: none"><li>• geographical position</li></ul>

REGILAIT may be required, in strict compliance with the purpose of its activities, to process this data concerning you for several reasons.

### **4. For what purposes is this personal data collected?**

The legal grounds on which REGILAIT processes personal data include processing operations which:

- are required in order to perform actions you have requested, such as:
  - o Handling your requests to create or connect to your personal account
  - o Enabling delivery of our newsletter and, where applicable, that of our partners
  - o Allowing you to take part in games and competitions or customer surveys and tests
  - o Obtaining discount vouchers
  - o Ensuring follow-up on your contact requests
  - o Ensuring follow-up on your replies to our job or internship offers
  - o Responding to your various requests and applications
- are necessary in order to comply with REGILAIT's legal and regulatory obligations, such as combatting money laundering, social and tax declarations, and accounting requirements
- are necessary in pursuit of our legitimate interests, such as development of REGILAIT's activities, improvement of products and services, research into new products and services, administration, maintenance and improvement of our Websites, and the prevention of fraud
- and which are based on your prior, active and informed consent (which may be withdrawn at any time via the unsubscribe links contained in emails, through the privacy settings on our Website, or upon request) allowing us to communicate with you regarding our products and services and to send you marketing information

## **5. How is your personal data protected?**

REGILAIT is committed to ensuring the security of the data you transmit to us. In order to prevent any unauthorised access, use, modification, destruction, loss, damage or disclosure, appropriate technical and organisational measures have been taken to protect the data collected.

In particular, the security of your data is ensured:

- thanks to username and password protection of your personal account - by limiting access to your data to authorised and fully informed persons only

(for example, it will only be accessible to members of REGILAIT or their employees who need to access it for the purposes indicated above)

In the event of a breach of your personal data, REGILAIT is required to notify the competent supervisory authority and to inform you, as quickly as possible, of any breach of personal data which may pose a significant risk to your rights and freedoms, so that you may take appropriate action.

## **6. To whom is your personal data communicated?**

Personal information collected by REGILAIT is not sold to third parties. We may however share personal data collected with other entities, namely:

- authorised members of REGILAIT, for the completion of assignments resulting from the purposes identified above
- service providers carrying out certain tasks on our behalf
- subject to your informed, active, explicit and prior consent, we may share your personal data with other entities of REGILAIT or with partners, so that they may contact you for the purposes of commercial prospecting
- advertising agencies which require data in order to select and deliver, to you and to others, relevant ads for REGILAIT products and services

We may also disclose your personal data to any potential buyer in the event of the transfer of REGILAIT or its assets.

We reserve the right to disclose your personal data to other parties where required or permitted to do so by law, a regulatory provision in effect, a court order or a regulation, or where such disclosure is necessary in the course of an investigation or proceedings within or outside national borders.

In addition to the aforementioned scenarios, we may disclose data of a non-personal nature to third parties, such as aggregated, anonymous statistical data.

Where possible, we host your personal data in France.

However, your personal data is transferred outside the European Union to the technical service provider responsible for distributing our newsletters.

## **7. For how long is your personal data stored?**

Data may only be stored for a limited period. This period is determined according to the purpose of the processing and rules derived from the recommendations of the French data protection authority (CNIL) or according to regulatory requirements.

As such, data used for the purposes of prospecting and marketing information is stored for three years following the last contact initiated by the customer/consumer.

## **8. What are your rights?**

You have the right to access your personal data, to rectify or delete it, to be forgotten by REGILAIT, to restrict the use of your data, to receive your personal data provided to REGILAIT in a structured, commonly used and machine-readable format, and to object to the processing of your personal data. Where you have given your consent for the data processing, you also have the right to withdraw it.

These rights may be exercised at any time:

- Either by post to:

RÉGILAIT  
Attention: Data Protection Officer (DPO) 102 RD 906  
SAINT-MARTIN-BELLE ROCHE  
CS 20309  
71009 MACON  
France

- Or by email to: [dpo@regilait.fr](mailto:dpo@regilait.fr)

Postage costs related to your postal request will be reimbursed based on the second-class postage rate in effect in France for letters of up to 20 g, provided a written request for reimbursement is made at the same time, in order to ensure this right can be exercised

free of charge. Costs related to the photocopying of any supporting documents to be provided will be reimbursed at a rate of €0.15 per page, including taxes.

Given that in the current service and technology market most internet service providers offer a free or flat-rate internet connection to users, it is explicitly agreed that any access to the Website or to your email account carried out on a free or flat-rate basis may not lead to any reimbursement, since your subscription to the service provider is contractually agreed in this case for your general internet use and connecting to the Website or to your email account to exercise your rights does not entail any additional fees or expenses on your part. Therefore, reimbursement will only be provided in relation to costs incurred by connections for the purpose of exercising your rights carried out via an internet service provider which bills access based on time spent (i.e. connections using a modem and via a telephone line billed on a pro rata basis of time spent on the call or per call).

Subscriptions to internet service providers or telephone operators and IT or telephone equipment, e.g. computers, tablets, smartphones, connected devices of any kind (non-exhaustive list) may not be reimbursed, given that you have subscribed and/or purchased these for your own general personal use.

You also have the right to lodge a complaint with the French data protection authority (CNIL) or a data protection authority of a European Union member state and to define post-mortem instructions.

With regard to processing carried out to ensure appropriate monitoring of the risks of money laundering and terrorist financing pursuant to Article L.561-45 of the French Monetary and Financial Code, your requests for access to these files must be addressed to:

Commission Nationale Informatique et Libertés 3 place de Fontenoy  
75007 Paris  
France

In relation to commercial prospecting, you may choose at any time to no longer receive commercial prospecting by using the unsubscribe link found in each message sent to you by email.

In the event of unwanted telephone solicitation for the purpose of commercial prospecting, you can sign up free of charge for the do-not-call list (BLOCTEL). For further information, please see the website [www.bloctel.gouv.fr](http://www.bloctel.gouv.fr)

## **9. Profiling**

REGILAIT may use profiling processes based on analysis of your data. Profiling involves the automated processing of personal data which consists of using this data to assess certain personal factors that may influence, for example, your browsing behaviour on our Website.

As such, profiling enables us to suggest offers and services better suited to your needs.

An example of profiling processing:

Information on your title, where you live or your age may be taken into account to create a profile and guide you towards more suitable offers and services

## **10. Cookies**

When you visit our Website, cookies may be stored on your computer, tablet, smartphone or any other connected device used to connect to our Website (non-exhaustive list), subject to your prior, specific and explicit consent.

By using the Website, you agree to the use of cookies in accordance with this Privacy Policy. If you do not agree to the use of cookies or other similar tools, you may refuse to accept cookies or choose to be notified when cookies are stored on your hard drive via your browser settings. For further information concerning this feature, refer to your browser's terms of use.

Cookies store information related to your use of the Website (pages visited, date and time of visit, etc.) thereby enabling us to compile traffic statistics, improve the Website's architecture, make visits more user-friendly, identify your preferences, and respond more closely to your expectations and needs.

As with most websites, our Website uses cookies which can be classified into four categories:

Type of cookies	Purposes	Retention times
<b>Strictly required</b>	These cookies are essential to allow you to browse our Website and use its features. The information collected by these cookies is related to the operation of our Website, such as the site's script language and security tokens, which allow us to ensure the security of areas of our Website.	Between 30 minutes and 1 year
<b>Performance/Analytics</b>	These cookies collect anonymous data concerning your use of our Website, such as which pages you visit most often, if you receive error messages, and how you arrived on our Website. The information collected by these cookies is only used to improve your user experience on our site and never to identify you. Sometimes, these cookies are stored by third-party providers of web traffic analysis services, such as Google Analytics.	Between 30 minutes and 1 year
<b>Features</b>	In order to improve your experience on our site and make your visit more personal and enjoyable, these cookies remember the choices you make, such as the country from which you visit our website, your language, and any changes you may make to the text size or other customisable parts of the web pages. The information these cookies collect can be made anonymous and cannot be used to track your browsing activities on other Websites.	Between 10 minutes and 1 year
<b>Social media</b>	These cookies allow you to share your activity on our site with social media companies such as Facebook and Twitter. We have no control over these cookies. Please consult the privacy policies of these companies for further information on how their cookies work.	Currently no cookies on our website

### Your choices concerning cookies

When you first visit the Website, a banner informs you of the presence of cookies and asks you to either accept them or leave the site.

We would like to remind you that refusing cookies may prevent you from accessing certain features of the Website. Where the systematic disabling of cookies in your browser prevents you from using certain services or features provided by REGILAIT, this lack of functionality shall under no circumstances be deemed to constitute damage entitling you to compensation as a result.

### **11. Social media and other third-parties which provide content, ads or features through our services – links to third-party websites**

Certain content, advertising and features present on the site may be provided by third-parties with which REGILAIT is not affiliated. For example, you can connect to the site by using connection services such as Facebook Connect or an OpenID provider. These services verify your identity and ask you to share certain personal data with REGILAIT. Services such as Facebook Connect allow you to post information about your activities on this Website to your profile page in order to share them with other users within your network.

REGILAIT's Website, newsletters and other communications may contain hyperlinks to and from the websites of its network of partners, advertisers and affiliated companies. If you click on a hyperlink



for any of these websites, please be advised that these websites have their own privacy policies and that we cannot be held liable with regard to these policies.

### **12. Changes to the Privacy Policy**

REGILAIT reserves the right to modify or more generally update the current Privacy Policy at any time and without prior notice. Any substantial changes will be communicated on the Website and/or, where applicable, by email. We encourage you to regularly consult this page to stay informed of any changes made to the Privacy Policy.

### **13. Contacting Régilait**

For all comments or queries regarding this document, you can write to us:

- Either by post to:

RÉGILAIT  
Attention: Data Protection Officer (DPO) 102 RD 906  
SAINT-MARTIN-BELLE ROCHE  
CS 20309  
71009 MACON  
France

- Or by email to:

[dpo@regilait.fr](mailto:dpo@regilait.fr)