



PRIVACY POLICY

English version. 19 July 2018.

EUROGERM and its subsidiaries are committed to a privacy policy aimed at protecting personal data processed as part of their trades and activities.

We greatly value honesty and transparency and are eager to build strong, durable relationships based on trust and mutual interest with our clients, suppliers, employees, vendors, students, etc. In line with this philosophy, we are very concerned with protecting your personal data. This Privacy Policy was drawn up to inform you about how we collect and process these data.

This Privacy Policy defines and informs how EUROGERM uses and protects the information you submit to us through our website, which is accessible from the following URL: <http://www.eurogerm.com> (hereinafter, the "Website").

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1) General and principled preliminary commitment

EUROGERM commits to processing all collected data in line with applicable regulations on data protection (Law no. 78-17 of 6 January 1978 as amended, General Regulation on Data Protection (EU) 2016/679 of 27 April 2016 on data protection, hereinafter collectively, the “Regulations”).

<https://www.cnil.fr/fr/reglement-europeen-protection-donnees>

This Privacy Policy is issued to the attention of all the following parties:

- EUROGERM’s existing and prospective clients, individuals;
- EUROGERM’s suppliers and vendors;
- EUROGERM’s professional partners;
- EUROGERM’s shareholders, employees, interns and temporary employees;
- EUROGERM’s prospective employees;
- EUROGERM’s website users.

2) To ensure good understanding of the provisions of this general policy, the terms used herein are defined as follows:

- **Personal data processing** means any operation or set of operations which is performed on personal data, such as collection, structuring, storage, modification, disclosure, etc.).
- **Personal data** means any information relating to a human being (a natural person) who can be identified directly (by their first/last name) or indirectly (by their telephone number, contract number, online identifier).
- **Data subject** means the individual who can be identified by the data that are used in the context of personal data processing.
- **Data controller** means the natural or legal person who determines how the processing of personal data is to be implemented, notably the purposes of such processing and the means used for these purposes.
- **Processor** means the natural or legal person who performs data operations on behalf of the data controller. A contract is signed between the processor and the data controller where the latter entrusts the former with certain tasks and ensures that the former has the technical and organisational capabilities to process the personal data in accordance with the Regulations.
- **Recipient** means the natural or legal person who is authorised to receive personal data.



3) Personal data

As part of our professional activities, we are required to collect a high amount of personal data, such as:

- Civil registry (date and place of birth, etc.), identity (first and last name, contact details, e-mail address, etc.), biometric data (photographs, clothing size, user name, etc.);
- Professional background (CV, education, job title, etc.);
- Economic and financial data (income, bank details, billing address, tax status, etc.);
- Among others.

4) Data controller

As part of its business and as the data controller, EUROGERM is accountable for data processing and, in this capacity, takes the following commitments:

- Personal data are only used for explicit, legitimate and specific purposes (objectives) in relation with EUROGERM's different trades. Such purposes are mentioned each time said data are collected, in accordance with Article 29 of the EU Regulation.
- The minimisation principle requires that only personal data that are strictly useful be collected and processed.
- Data are not stored beyond the period of time necessary for the transactions they were collected for, taking account of the nature of the transactions and of the legal requirements (see: legal requirements).
- We neither disclose nor transfer personal data to third parties, except to recipients with strict authorisation to serve the purposes set forth in advance and specified during data collection.
- We entrust personal data to processors we are selected on the basis of appropriate technical and organisation capabilities in order to ensure the protection of the data submitted to them as per EUROGERM's instructions.
- Any time the Regulations so require, the data subject is asked to provide explicit, informed, active and unambiguous consent to the processing of their personal data.
- Appropriate safety measures on the logical, technical, organisational and legal levels have been defined, based on an analysis of the risks involved by different approaches in processing the personal data, and are implemented by EUROGERM, its support services and contract-hired processors, in order to ensure the protection of personal data.
- Any time the risks involved by a certain type of processing so require, EUROGERM carries out an analysis on how this impacts on the data subjects' privacy and the protection of their personal data, in order to adopt measures that are adapted to these risks.



All of EUROGERM's employees and intervening parties are informed or in the process of being informed on the data protection principles contained the Regulations through regular training sessions that are scheduled and adapted to their activities and responsibilities.

5) Purposes of processing

EUROGERM may process your personal data for the following purposes:

- Providing you with information or services you have asked for, and/or
- Being able to contact you regarding an order, request for quote, employment offer, training, contest, etc., and/or
- Being able to issue a quote, a bill, etc., and deliver goods to you, and/or
- Being able to manage your online client account, and/or
- Being able to register you at events, training sessions, information meetings, and/or
- Being able to send emails to you.

6) The information we share

We may disclose your personal information to the following recipients:

- Our affiliates, our third-party vendors and our partners who provide data processing services or otherwise manage personal information for the purposes that are laid out in this Privacy Policy or are notified to you when your personal data are collected;
- Any relevant body responsible for law enforcement, any government body, regulating agency, any court or any other third parties we think it is necessary to disclose personal information to, as per applicable legal or regulatory requirements in order to exercise, establish or advocate our legal rights or to protect your vital interest or those of another person;
- As part of any offering pertaining to the purchase, merger, streamlining, acquisition, dissolution or winding up of all or part of our company, to the relevant third party and in so far as we inform such third party that they must use your personal information for the sole purposes laid out in this Privacy Policy;
- Any other person you have authorised us to disclose information to.

7) How we protect your personal information

Protecting personal data and privacy is something we highly value. We maintain organisational, technical and physical data protection systems in order to protect personal information against accidental, unauthorised or illegal destruction, loss,



alteration, access, disclosure or use. Since submitting information through the internet is never entirely safe, we cannot guarantee the safety of the information you submit to us online, and you submit this information in this way at your own risk.

8) Data storage

EUROGERM has laid down specific rules on how long personal data belonging to the data subjects may be stored in order to restrain such storage to the strictly necessary period of time.

At the end of the established period, personal data are subject to one of the following measures, in accordance with the applicable Regulations:

- Erasure
- Archiving

9) Your rights and options

Every data subject has the following rights:

- Accessing your data (access right): the data subject may enquire directly with EUROGERM about whether the company holds any data on them, and ask for the list of such data to be disclosed;
- Request rectification of their data (rectification right): the data subject may request the rectification of any inaccurate personal data; the right to rectify complements the right to access;
- to request the erasure of their data (right to be forgotten): the Data subject may request the erasure of their personal data for a reason set forth in the Regulations;
- to request the restriction of the processing of their data (right to restrict processing): the data subject may request the restriction of the processing of their personal data for a reason set forth in the Regulations;
- to request the portability of their data (right to portability): the data subject may request to receive the data he or she submitted to EUROGERM or to ask EUROGERM to transmit these data to another data controller for a reason set forth in the Regulations;
- to set anticipated guidelines on the outcome of their data upon their death.

The data subject may also oppose, for legitimate reasons, the processing, dissemination, transmission, conversion or hosting of their personal data.

In order to exercise these rights, the data subject may contact EUROGERM as follows:

- By e-mail: <mailto:rgpd@eurogerm.com>
- By post:



EUROGERM
Délégué à la Protection des Données
Parc d'activités Bois Guillaume
2, rue champ doré
21850 Saint-Apollinaire

In order to facilitate these steps and accelerate the processing, EUROGERM recommends that every data subject do the following when sending a request to exercise these rights:

- Mention the right(s) they wish to exercise;
- Clearly mention their first/last names/contact details to be used in the reply;
- Attach a copy of an identity document.

10) Browsing data

As long as you browse our website to find information, i.e. you do not register on it, we only collect the personal data transmitted from your browser to our server. These data are essential technical elements that enable us to display our website on your browser and ensure stability and safety. Article 6 (1)(1)(f) of the GDPR (legitimate interest) is the legal foundation for each of the following types of data:

- Date and time the URL was visited by the web user;
- URL the web user visited just before;
- IP address and domain from which the web user accessed the website;
- Web browser used;
- Operation system used;
- Technical information on the visit (http method, http version, http status code, size of data transmitted).

11) Cookies policy

Cookies are data stored in a web user's terminal equipment and used by a website to send information to the web user's browser, and permitting that browser to send information back to the original site (e.g. log-in identifier, a language or other). Every time you visit our websites, you are informed that cookies may be installed on your web browser. For more information on cookies, including on how to manage and block them, please click on this link: <https://www.cnil.fr/fr/cookies-les-outils-pour-les-maitriser>.



12) EUROGERM's social media presence

You can also find us on different social networks, currently YouTube, LinkedIn, Facebook and Viadeo.

You may consult the purposes and scope of data collection, as well as the provisions governing how your data are used by the relevant network in its operator's section on data protection.

- YouTube (Google): <https://policies.google.com/privacy?hl=fr-CA>
- Facebook: <https://fr-fr.facebook.com/policy.php>
- LinkedIn: https://www.linkedin.com/legal/privacy-policy?l=fr_FR
- Viadeo: <https://www.viadeo.com/fr/politique-de-confidentialite>

13) Your right to file claims with the French supervisory authority

Every data subject has the right to file a claim with the data protection supervisory authority.

In France, this authority is called the CNIL (National Commission for Information Technology and Civil Liberties). Its contact details are:

- Website: <https://www.cnil.fr>
- Telephone: +33 (0)1 53 73 22 22
- Mailing address:

CNIL (Commission Nationale de l'Informatique et des Libertés)
3 Place de Fontenoy
TSA 80715
75334 PARIS CEDEX 07

14) Privacy Policy Updates

Please note that this Privacy Policy may be updated with changes or additions by EUROGERM at any time, including for the purpose of complying with any development in legislation, regulations, case law or technology. If such an update is performed, the date thereof will be clearly identified at the beginning of this Policy. These updates are binding for users as soon as they are published online. Therefore, users should regularly consult this Privacy Policy and Cookies Policy in order to stay up-to-date with any changes thereto.