PERSONAL DATA PROTECTION POLICY

1. INTRODUCTION

This policy explains how we use your personal information. ELCIA is a French société par actions simplifiée (simplified joint stock company), registered under number 421 596 016. Our registered office is at 256, avenue Marcel Mérieux, Brignais (69530), France. Under the European General Data Protection Regulation (EU GDPR) we are the personal data controller and we undertake to process your information in accordance with these obligations.

This policy applies to our current and prospective customers, as well as to the visitors who browse our website.

If you fall into one of these three categories, it's important that you read this policy carefully. It tells you how and why we process your data and what your rights are.

ELCIA undertakes to comply with the following laws and regulations on data protection and privacy (hereinafter *"Laws and Regulations on Data Protection and Privacy"*):

- The French Act No. 78-17, of January 7, 1978 on information technology, data files and civil liberties (the Data Protection Act),
- The EU General Data Protection Regulation 2016/679 of 27 April 2016 (GDPR).

2. WHAT PERSONAL DATA DO WE COLLECT AND PROCESS?

ELCIA collects personal information on our customers, prospective customers and/or users when they subscribe to or access ELCIA's applications and/or when they browse or actively use our applications, including our ELCIAONLINE platform

The personal information we collect may include:

- *Data on how you access the ELCIA platform*
- Cookies
- The type of browsers you use, your IP address, the pages you visit, how long you spend and the link you used to access the ELCIA site
- The date you created your account
- The date of your most recent connection and/or visit
- Google Analytics data: content browsed, browsing history, etc.

As well as cookies, we also use "web tags" to track when the emails we send you are received and read.

- *Data collected when you signed up for or subscribed to an ELCIA application.*

When you create your account, we collect the following information about you:

- Email
- French SIREN number (Company registration number)
- First name
- Last name
- Telephone number
- Payment information

- *When you use ELCIA's Services, we collect the following information:*
- Supplier Price-list requests
- Information on your quotes (date, quote number, products, etc.)
- Information about your orders (dates, order number and products ordered)

3. HOW DOES ELCIA PROCESS YOUR PERSONAL DATA?

The legal grounds for processing your personal data are:

- **Performing a contract** when we process your personal information to provide you with services (such as providing a service on the platform, updating and enhancing the security of the IT environment, software maintenance, providing help to users, preventing and detecting fraud, tracking malware, managing security incidents, and more), to manage and monitor customer files, manage quote requests, manage purchase requests on the site and billing.

- **Our legitimate interests** when we use your personal data for canvassing and promotion, managing relations with existing and potential customers, organizing events, sending Newsletters, and providing your with information on what's new in our applications, providing help and assistance to users and advice on running the app, evaluating services to improve the user experience, and sending information emails on current and upcoming services.

- **Meeting our obligations under laws and regulations** : (billing, accounting, preventing money laundering and terrorist financing, preventing corruption, etc.).

- **Consent** : we only place cookies on users' devices if you first give us your express permission (you have a number of options, depending on your browser: accept, reject or delete all cookies). We use cookies to improve your experience as a user, to compile statistics, to carry out research and to make sure the services we offer are as tailored to your needs as possible.

We also use Google Analytics to:

- find out how our site is used and how well it performs,
- compile statistics, analyze traffic volume and how the different aspects of the site are used (content viewed, user path),
- help us improve the content you're most interested in (most popular pages or sections, top articles, etc.).

4. WHAT PRECAUTIONS DOES ELCIA TAKE TO PROTECT YOUR DATA AND STORE IT SECURELY ?

ELCIA will make sure the proper safeguards are in place to protect your data and keep it confidential. We will prevent your information from being distorted, damaged or being accessed by unauthorized third parties.

To do this, we take appropriate organizational steps to make sure your information is secure. These include a robust password policy for creating and managing accounts and encryption of our users' passwords when they are recorded in the database.

5. WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

We share the data we collect with the controller (ELCIA), as well as the individuals authorized to handle personal information to provide their services, such as payment services (SEPA mandate). We will never sell or transfer your information to third parties.

6. WHERE MIGHT YOUR PERSONAL INFORMATION BE TRANSFERRED TO?

We will never transfer your personal data to countries outside the European Union. If we are required to transfer data to a third country or to an international organization, we will inform you beforehand.

7. HOW LONG DO WE KEEP YOUR DATA?

We keep your personal data only as long as needed to manage our business relationship.

We'll keep:

- Customer information for the duration of the contract and for 3 years beyond the expiry of the contract for promotion and canvassing purposes, without prejudice to data retention rules or the statute of limitations. Accounting information is kept for 10 years after the end of the fiscal year.
- Data on prospective customers for 3 years.
- Cookies for 13 months.

8. WHAT ARE YOUR PERSONAL RIGHTS?

You have certain rights under the Laws and Regulations on Data Protection and Privacy. You can access the information we hold about you at any time. You can ask us to limit, correct or delete your personal data. You can also request cross-border portability. This means you can ask for any of your information that is inaccurate, incomplete, misleading or out-of-date or whose collection, use, communication or storage is prohibited, to be corrected, completed, clarified, updated or deleted.

You have the right to object to the processing of your personal information on the legal grounds of our legitimate interests in certain circumstances. You also have the right to object to canvassing.

In addition, you can define the general guidelines and specific instructions for what happens to your data protection rights after you die.

You can exercise your rights and ask for a copy of the information we hold about you by contacting ELCIA's Data Protection Officer at: logiciel@elcia.com.

We'll deal with your request as promptly as possible.

You also have the right to send a complaint to the data protection regulator if ELCIA fails to comply with its obligations.

9. HOW DO WE USE COOKIES AND GOOGLE ANALYTICS?

We use cookies on our website. Cookies allow us to collect different types of information, including the pages you visit.

You can enable or disable cookies at any time, according to the conditions as explained below.

WHAT ARE COOKIES?

Cookies are small information files sent to your browser when you use an online service.

The website that transfers the cookie uses the file to identify your device for as long as the cookie is valid and remains on your device.

THE COOKIES WE USE

Here are the types of cookies we use and why.

- **Cookies that are strictly necessary for the operation of our website**

These are only the cookies placed on your browser by ELCIA that are essential for our website to function. They make it possible for you to use the main functions of the website—such as signing in to your account—and providing a secure connection.

- **Audience measurement cookies and advertising cookies**

These cookies are used to show you ads or information in line with your searches. They are used to limit the number of times users see an ad and to measure the effectiveness of an ad campaign.

- **Analytical and performance cookies**

These cookies help us to understand how our site is used and how well it performs so we can improve your browsing experience (for example, the pages you visit the most, your searches, etc.). We analyze the usage statistics from these cookies to improve the performance of our website. In some cases, these cookies speed up users' searches and queries, and also remember the preferences you select. We use cookies to deliver content and messages tailored to your interests, to compile statistics on site visits, to store the information you send us and to make your browsing experience as smooth as possible.

USER-EXPERIENCE ANALYSES

- **Audience measurement cookies, advertising cookies and analytical cookies**

ELCIA uses cookies to compile audience statistics, as well as Google Analytics. Google Analytics uses cookies to track information about all visitors to the platform, which gives us information on how you use our site and the volume of traffic.

- **Hotjar**

We use Hotjar in order to better understand our users' needs and to optimize this service and user's experience on ElciaOnLine platform. Hotjar is a technology service that helps us better understand our users' experience (favorites features, the most clicked links, the usual web browsing, etc.). This enables us to improve our applications and services.

Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices. This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our website.

Hotjar stores this information on our behalf in a pseudonymized user profile. Neither Hotjar nor ELCIA will ever use this information to identify individual users or to associate it with other data about an individual user. For further details, please see the Hotjar Privacy Policy.

You may refuse creation of user profile, Hotjar's storage of data about your use of our site and Hotjar's use of tracking cookies on other websites by clicking on this opt-out link.

HOW TO MANAGE YOUR SETTINGS TO ACCEPT, REJECT OR DELETE COOKIES

If you accept cookies in your web browser, the content you search for may be temporarily stored in a dedicated space on your device.

You can disable cookies at any time by going to your browser settings and choosing the options to disable cookies.

If you decline the use of cookies on the site, or if you delete the stored cookies, your browsing and experience of the site may be more limited. In this case, ELCIA declines all responsibility for the consequences related to the degraded operation of our website and any services offered.

You can change your selection at any time. To do this, go to the Help menu or to your browser's cookie settings.

For example:

- Internet ExplorerTM : https://support.microsoft.com/fr-fr/help/17442/windows-internet-explorer-delete-manage-cookies
- Safari TM : https://support.apple.com/fr-fr/guide/safari/sfri11471/mac
- FirefoxTM : https://support.mozilla.org/fr/kb/autoriser-bloquer-cookies-preferences-sites

For more information, see the French data protection authority's recommendations (in French) here: https://www.cnil.fr/fr/cookies-les-outils-pour-les-maitriser

10. HOW DO WE UPDATE OUR DATA PROTECTION AND PRIVACY POLICY?

We may update this data protection and privacy policy at any time, especially to reflect changes in technology, legislation and case law, or when we offer new services. We will notify you of the new policy in writing, providing 30 days notice before it comes into effect.

If the legal basis for processing your information is consent, you will be asked for your permission again.