

# **Privacy policy**

Pursuant to article 13 of Regulation (EU) 2016/679 of 27 April 2016 on the Protection of Personal Data, SOFRALAB® undertakes, within the framework of its activities, to ensure the protection, confidentiality and security of the personal data of the users of its services, as well as to respect their privacy.

This policy is applicable in particular to customers and users of offers and services, and to visitors to the SOFRALAB® group's websites.

This policy informs you about:

- The identity of the data controller
- The nature of the personal data collected and the way in which SOFRALAB® collects such data
- Collection and use of such personal data
- Processing and communication of personal data
- The website's cookies policy
- The rights of users concerning this personal data

This privacy policy complements the general conditions of sale available on request or on our website.

# 1) The data controller

The controller responsible for processing personal data is SOFRALAB®, at 79 avenue A.A. Thévenet - CS 11031 - 51530 MAGENTA - France.

The controller may be contacted via e-mail at <a href="mailto:com/compta-clients@sofralab.com">compta-clients@sofralab.com</a>.

#### 2) Data collected

The personal data that may be collected and stored on the site by SOFRALAB® is the followina:

- Identification data: surname, first name, identifier, SIREN/company ID, etc.
- Contact data: postal address, email, telephone number and other personal data provided spontaneously by the interested party through the "Contacts" page of the websites
- Economic and financial data: payment methods, payment history, etc.
- Products and services purchased or used
- Profiles to enable customer segmentation

Pursuant to Article 8 of the above-mentioned Regulation, SOFRALAB® cannot agree to collect or store data from persons under the age of 16.

Such personal data may be collected when the user fills in a contact request form or when placing an order.





# 3) The collection and use of the data collected

SOFRALAB® processes personal data only for specific, explicit and legitimate purposes.

#### The purposes intended by SOFRALAB® are the following:

- Management and authentication of customer or user identity
- Order management
- Delivery and invoicing
- Handling complaints
- Communications in the context of customer management (e.g. mailings, event organisation, invitations, etc.)
- Management of incoming mail
- Collecting payments, recovering overdue payments and managing litigation

The data is kept as long as necessary to fulfil the purposes mentioned above, i.e. you can unsubscribe at any time.

# SOFRALAB® also processes your data to comply with legal or regulatory obligations.

To this end, the purposes intended by SOFRALAB® are as follows:

- To keep the data required to be able to meet legal obligations
- To handle data disclosure to authorities entitled to request such disclosure
- o To ensure full traceability in the event of product recall

Your data may be kept as long as necessary to enable SOFRALAB® to comply with its legal obligations.

SOFRALAB® will only process a piece or category of data if it is strictly necessary for the intended purpose.

## 4) Data processing and communication

SOFRALAB® ensures that your personal data is treated securely and confidentially. To this end, the appropriate technical and organisational measures to prevent the loss, misuse, alteration or deletion of your personal data are in place. These measures are adapted according to the level of sensitivity of the data processed and according to the risk level of processing or implementation.

The data collected is intended for SOFRALAB®'s internal services.

The processed data may also be relayed to the competent authorities, at their request, in the context of requests for information from the authorities or in order to comply with other legal obligations.

The data collected is not likely to be processed outside the European Union.





The information collected may possibly be communicated to third parties linked to the company by contract for the execution of sub-contracted tasks necessary to manage orders, without the customer's authorisation being required. It is hereby specified that, in the context of carrying out their services, third parties have only limited access to the data and have a contractual obligation to use it in accordance with the provisions of the applicable legislation on the protection of personal data. Apart from the cases set out above, the Supplier undertakes not to sell, rent, transfer or give third parties access to the data without the prior consent of the customer, unless it is obliged to do so for a legitimate reason (legal obligation, to combat fraud or abuse, etc.).

# 5) Use of Cookies

A cookie is a small file, stored by the website on the user's hard drive, containing information about the user's browsing habits.

This website uses Google Analytics to collect information about the user's browsing habits.

To view Google's privacy policy on the Google Analytics service, please visit: https://support.google.com/analytics/answer/7318509?hl=en

To view Google's privacy policy, please visit: <a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>

The user can disable Google Analytics cookies by downloading a plug-in available from https://tools.google.com/dlpage/gaoptout

Users may prevent cookies from being registered by configuring their browser (Internet Explorer, Mozilla Firefox, Opera, Safari, etc.). If users decide to disable cookies, they will be able to continue browsing the website. However, any malfunction of the website caused by such manipulation cannot be considered to be due to the site editor.

## 6) Users' rights

In accordance with the regulations concerning the processing of personal data, users have the right to access, rectify and delete data concerning them. They also have the right to object to the processing of their data, and to ask for it to be limited.

Users may withdraw their consent at any time by clicking on the unsubscribe links located at the bottom of our e-mails or by a request sent to marketing@sofralab.com





Their request will be replied to within one month of receipt.

If SOFRALAB® does not reply, or if users wish to contest a decision, or if they believe that one of their rights listed above has been infringed, they are entitled to refer the matter to the CNIL (Commission Nationale de l'Informatique et des Libertés), i.e., the French Data Protection Authority, or any competent judge.

This personal data protection policy may be subject to change.

Last updated on 10/03/2020

