

Eram Group Privacy Policy

Aware of the need to protect its customers' and prospects' personal data, the Eram Group undertakes to comply with the provisions of French Act No. 78-17 of 6 January 1978 as amended, covering data privacy, as well as those of Regulation (EU) No. 2016/679 of 27 April 2016.

This Privacy Policy informs you of the conditions in which ERAM SAS, as data controller, collects and uses your personal data which may be collected on this website

This policy applies to data that may be collected on our website.

Who is the data controller for your personal data?

ERAM SAS with an equity capital of 73,600,000 euros, of which the registered office is located at Saint-Pierre-Montlimart Montrevault-sur-Evre (49111), registered at the Angers Trade and Companies Register under number 388.583.239, hereinafter referred to as "Eram Group".

What personal data do we collect?

The following data is collected by the Eram Group:

Personal data	Identity-related data	Title, surname*, first name*, address,
	Contact data	Email address*
Technical data	Identification data	Statistics on the geographical area of origin of the requests
	Acceptance data	Clicks

**Compulsory data*

The Eram Group undertakes not to collect personal data for any person under the age of 16.

The Eram Group also undertakes to respect the data minimisation principle and the limitation of uses, which consists of only collecting only the data necessary for its processing. The collected data must not be reused at a later date in a way that is incompatible with the purpose for which it was collected.

How is this data collected?

The data may be collected when one of our departments is contacted or when using our website.

Information marked with an asterisk must be provided. This is information that is needed to provide a service.

Why is this data being collected?

Your personal data is collected, used and processed to:

- Manage customer relations and prospects ("**Purpose 1**");

- Navigate on the Site and consult our services ("**Purpose 2**");
- Answer questions ("**Purpose 3**");
- Carry out statistical analyses and research to personalise, assess and improve services and content ("**Purpose 4**");

On what legal basis?

Personal Data are only used to the extent that it is strictly necessary for fulfilment of the Purposes.

The processing does not meet any regulatory requirement and is based, depending on the Purposes, on the legal bases detailed below:

- Processing necessary for the pursuit of the legitimate interests of the Group: Purposes 1 and 2
- **Processing based on prior and express consent when creating the Personal Account and/or subscribing to the Services:** Purposes 3 and 4

Where processing is based on consent, the user may withdraw it at any time.

The same treatment can be based on several legal grounds. All the information collected by the Group on the said site is necessary, according to the Purposes, to enable you to browse the Site and to subscribe to Services. Failure to respond or the inaccuracy of the information may result in the suspension of access to the Site as well as the non-performance or poor performance of the Services and other benefits. The Personal Data must therefore be transmitted to the Data Controller, unless they are indicated as optional.

Who will receive your data?

The Eram Group may communicate some Personal Data:

- (i) To the Eram Group's internal departments, strictly authorised as part of their missions;
- (II) to our service providers, and in particular to:
 - IT outsourcing and cloud solution providers.

(III) to the tax authorities when required by the tax obligations applicable to the Eram Group.

Subcontractors and service providers are required to respect the confidentiality and security of Personal Data that may be communicated to them and to use them only in the context of the execution of their subcontracting or service provision mission.

The Eram Group guarantees that the user's Personal Data will not be disclosed to any unauthorised third party without their consent.

The Eram Group does not sell or rent user Data to third parties.

In exceptional circumstances, the Eram Group may be required to share Personal Data with they are required by the legal authorities.

What are your rights and how do you exercise them?

In accordance with the regulations in force concerning the protection of personal data, you have the following rights:

- A right of access, i.e. to obtain from the Data Controller confirmation as to whether or not Personal Data concerning you are being processed and, when they are, access to the said Personal Data, as well as various information including the purposes of the processing, the category of Personal Data concerning you, the recipient(s) of the Data etc.;
- A right to rectify, as soon as possible, Personal Data concerning you that are inaccurate, incomplete, outdated or equivocal, or whose collection and processing are prohibited;
- A right to object to the processing of Personal Data by the controller or to a transfer of Personal Data, unless there are compelling legitimate reasons which override the interests of the user.
- A right to have Personal Data concerning you deleted for the following reasons:
 - o Personal Data are no longer necessary for the purposes for which they were collected or processed;
 - o You have withdrawn your consent on which the processing was based, and there are no other legal grounds for processing the Personal Data;
 - o You have objected to the processing of the Personal Data and there is no overriding interest to justify the processing;
 - o Your Personal Data have been processed illegally;
 - o Your Personal Data must be deleted in order to comply with the legal obligation that the Group may be subjected to;
 - o Your Personal Data were collected with the person concerned was a minor aged under 16.
- A right to organise in advance and during your lifetime the conditions under which you wish the Personal Data that the Eram Group has collected and processed to be kept and communicated after your death
- A right to portability and retrieval of Personal Data allowing you to receive the Personal Data you have provided in a structured, commonly used and machine-readable format, and to transmit this Data to another controller, without the controller to whom the Personal Data was originally provided being able to object;
- A right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or which significantly affects you

in a similar way;

- The right to lodge a complaint with the CNIL, if you consider that the processing of Personal Data concerning you constitutes a violation of the legislation and regulations in force.

If you wish to exercise any of the above rights, you may send your request to either:

*by email to the following address: dpo@groupe-eram.com

*by letter to the following address: Groupe Eram – Service Communication, 49 111 Saint-Pierre-Montlimart Montrevault-sur-Evre Cedex.

In the event that you exercise any of these rights electronically, the Personal Data will be provided electronically where possible, unless you have specifically requested otherwise.

How long will your data be kept?

The Personal Data are kept for a period which does not exceed the time strictly necessary to achieve the purposes for which they were collected and, in any case, may not be kept longer than the period indicated in the table below:

Processing purposes	Possible sub-purposes	Storage duration
Customer relations and prospects management	Management and processing of requests, request tracking, informative monitoring	The time needed to process the request and then 3 years from the end of the relationship
Prevention and fight against fraud		For as long as is strictly necessary for the fulfilment of this purpose
Management of the exercise of rights		The fate of your data after your death, Management of requests to exercise of rights
Accounting management		10 years from completion of the exercise

At the end of the storage period that has defined, the data is either deleted or anonymised for statistical purposes. Intermediate archive data can be used for litigation or pre-litigation cases.

Once data is deleted or anonymised, it cannot be retrieved.

Is your data processed outside the EU? / Transfer of data outside the EU

Your personal data are stored in France. Insofar as possible, the Eram Group makes every effort to ensure that personal data transferred to partners or subcontractors is done so within the European Union, or in countries considered "suitable" by the CNIL.

In the event that the Eram Group communicates personal data outside the European Union, measures are taken to ensure that such data will benefit from the same level of protection as that imposed by the European Union in terms of data protection.

In this respect, the Eram Group will ensure that processing is carried out in accordance with this policy and that it is governed by the European Commission's standard contractual clauses, which make it possible to guarantee an adequate level of protection for the privacy and fundamental rights of individuals.

Is your data shared with other companies?

The Eram Group undertakes not to sell your personal data to partner brands for commercial purposes.

Your personal data may be shared with some of our partners or subcontractors in order to:

- improve customer knowledge from a statistical and geo-marketing point of view,
- improve website navigation.

How do we secure your personal data?

In its capacity as Data Controller, the Eram Group undertakes to implement and maintain, at its own expense, appropriate technical and organisational measures for the processing and security of personal data, in accordance with Articles 32 to 34 of the GDPR.

The Eram Group adopts sufficient, appropriate and relevant security measures to preserve the security of Personal Data and, in particular, to prevent it from being distorted, damaged or accessed by unauthorised parties:

The measures include in particular the implementation of procedures for:

- Identification;
- Authentication with password strength test,
- Management of Administrators' rights: use of rights limited to the strict requirements of the account,
- Tests and Audits,
- Anonymisation of Personal Data,
- Encryption of Personal Data via SSL protocol;
- Security Assurance Plan

As a reminder, the Eram Group will never ask you to send your bank details by email. If you receive a request of this kind from us, do not reply and destroy the email immediately.

Personal Data Protection Officer

The Eram Group has a Data Protection Officer, "DPO", who can be contacted at the following address: dpo@groupe-eram.com

Right to lodge a complaint with the CNIL

Any user has the right to lodge a complaint with the competent authority.

If, after contacting our company, you find that your "Data Privacy" rights are not respected, you can send a complaint to the French "Commission Nationale de l'Informatique et des Libertés", or CNIL, at 3 Place de Fontenoy, 75007 Paris.

Data breaches

The Eram Group undertakes to notify the CNIL of any breaches of personal data in the conditions defined by the regulations on the subject.

Customers/prospects will be informed of all data breaches that could have a significant impact on them, e.g. infringing their rights or involving a risk to them or their close circle.

How do we use cookies?

Browsing data (cookies) are small computer files that are sent to the browser and stored on the hard disk of the site User's computer, tablet, smartphone, etc.

Cookies only store the identification code and do not contain any other personal information about the User. This means that Cookies placed on a hard disk as part of the use of the Website do not make it possible to identify the User personally, but record information relating to the navigation of the terminal within the Website (pages consulted, dates and times of consultation etc.).

Cookies are kept for a maximum of thirteen (13) months from when they are first placed in the User's terminal.

There are several types of Cookies that can be placed in the User's browser by the ERAM GROUP to collect information.

Cookies record and/or read files in order to obtain information relating to your interaction with the Site, and in particular your navigation and behaviour: statistics on the geographical area of origin of requests, the pages visited, etc.

We only use the following categories of cookies:

- Some so-called "technical/functional cookies" are automatically deposited because they are necessary for the provision of the service and therefore essential for navigation. These cookies are not subject to any prior consent, as they allow the site to display and function properly.
- The performance analysis cookies via the Matomo tool ([more information](#)) make it possible to measure and analyse the audience and visits to the site, to establish statistics and volume of

visits and use of the elements making up the site (sections, content visited, route, date and time of consultation, for example) in order to optimise the services and improve the ergonomics of the site. These cookies do not require prior consent, because:

- Their purpose is strictly limited to measuring the site's audience (measuring performance, detecting browsing problems, optimising technical performance or ergonomics, estimating the power of the servers required, analysing the content consulted), for the exclusive use of the ERAM GROUP.
- They are used to produce anonymous statistical data only.

Modifications and updates to our policy

This policy is available on our website and accessible to everyone.

It may be modified or completed by us at all times according to changes in the legal framework, case law, or recommendations made by the CNIL.

The most important updates may be the subject of a notice on the Eram Group's corporate website at the latest at the time of entry into force of the said changes.

Which jurisdiction does the website fall under? Which courts have jurisdiction?

The privacy policy is governed by French law.

Any dispute concerning it shall be brought before the competent French courts.