

## Personal Data Protection Policy

Aldes places great importance on respect for privacy and transparency. In accordance with EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the "GDPR"), which repealed Directive 95/46/EC, Aldes has drafted its Privacy Policy to clearly inform data subjects about the personal data it collects.

Aldes, whose registered office is located at 20 Boulevard Joliot Curie in Vénissieux in the Rhône administrative division of France, is Data Controller as defined in the GDPR.

### Personal Data

Personal Data is information directly or indirectly allowing a natural person to be identified, such as the person's name, telephone number, email address, IP Address, fingerprint, etc.

### Data Collection and the Purposes of the Processing

Aldes collects personal data about anyone who browses, views, or places orders using the digital tools that it makes available.

This data collection takes place when a person present on an Aldes (EU) website:

- Browses and/or registers on a website or application
- Uses the features proposed: account creation, account modification, registration for alerts, etc.
- Orders a product or asks to return a product
- Contacts Aldes Customer Service
- Writes a comment on a product, service, etc.
- Fills out a form or questionnaire for Aldes, etc.
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The data collected is necessary for the following processing purposes:

- Managing and following up on sales relations
- Sending information on products, services, events
- Sales prospecting
- Personalising the data subject's experience
- Collecting statistics and performing marketing studies
- Sharing information with our partners
- Preventing and combating fraud
- Instant messaging
- etc.

Data collection uses information that is:

- Optional: Aldes collects this information to allow it to better get to know the individuals accessing its websites. *On forms, it is not marked with an asterisk.*
- Mandatory: The Data Subject's response to the information is mandatory. Failure to respond results in the termination of data processing. Aldes will not follow up on requests from the data subject without this information. *On forms, it is marked with an asterisk.*

Mailing addresses, email addresses, and landline or mobile telephone numbers constitute data that is required for handling the commercial relationship between the data subject and Aldes.

### **The Right of Access, Rectification, and Deletion**

The data subject has the right to access, modify, and delete information that concerns him or her. He or she can expressly object to the processing of his or her personal data. To do so, he or she can send a letter by mail to Aldes' GDPR committee at the address below, or by email to [gdpr@aldes.com](mailto:gdpr@aldes.com).

After verifying the requester's information, Aldes has 2 months to respond, following receipt of the data subject's request.

### **Personal Data Recipients**

By voluntarily providing his or her personal data, the data subject grants Aldes consent to use it in accordance with the terms of the Privacy Policy. If the data subject provides personal data, it acknowledges and accepts that Aldes can transfer this data to authorised third parties.

Aldes, like many companies, sometimes hires other companies to perform some internal operational tasks, such as sending mail, updating databases, etc. When it does so, Aldes only provides information the other company with the information needed to perform the task for which it has been hired, and this information will only be used to conduct Aldes business.

### **Transferring Personal Data Outside of the European Union**

For the purposes of managing the Aldes Group's commercial relations, personal data can be exchanged between any of the group's subsidiaries, anywhere in the world.

### **Time Period for Storage of the Data**

The personal data is deleted or anonymised after a period whose length is determined by the purpose for which the data is processed. This period begins to run on the date on which the relationship between Aldes and the data subject ends.

Personal data that provides proof of a right, a contract, or a legal obligation is archived in accordance with applicable law.

Aldes reserves the right to conserve data for a longer period of time if it informs the data subject and obtains his or her consent.

### **Comments**

Comments must not be defamatory, insulting, infringing, offensive, libellous, racist toward other individuals or legal entities, and must not encourage discrimination, cause harm to anyone's reputation, be violent or pornographic in nature, or, more generally, violate applicable law. As



such, Aldes reserves the right to delete any comments that do not comply with the above requirements.

## **Cookies**

A cookie is a data file placed or stored on your device (computer, tablet, or mobile device) when someone uses it to access a website or application. Cookies allow the data subject to be recognised, allow assistance with browsing the website, and provide secure connections. They cause no damage to your device whatsoever.

Aldes uses cookies to recognise the data subject when he or she connects to an Aldes website or application. A message is sent at least at the time of the first connection.

Data subjects can deactivate the cookies saved on their devices at any time. To do so, they adjust the appropriate settings in their browser.

However, deactivating these cookies will prevent access to some customisation features on a website or proposed service.

## **Web Beacons**

Aldes uses web beacons on some pages of its websites to count the number of visitors accessing them. These web beacons can be used with some of our commercial partners to measure and improve the effectiveness of certain advertisements. Information collected using these web beacons is anonymous, and simply allows Aldes to know how much traffic there is to a given page on the Website in order to better serve the Users of the websites.

## **Social Media**

Aldes is not in control of the data collected by Social Networks, Facebook, Twitter, LinkedIn. Data subjects must read the data protection policy of the Social Networks in question to learn the conditions of the processing and use of the data they collect and the settings that can be used to protect their privacy. If the data subject does not wish for the Social Network to link the information collected by Aldes to his or Social Network user account, he or she must disconnect from the Social Network before visiting the Aldes site in question.

## **Security Measures Implemented to Protect Personal Data**

Aldes uses industry-standard technical measures and practices to ensure the integrity, security, and confidentiality of the data, and particularly to prevent it from being altered, damaged, or accessed by unauthorised third parties.

## **Preventing and Combating Fraud**

The data collected is also used within the context of the fight against fraud, particularly credit and debit card fraud. Aldes reserves the right to verify the personal data provided by the data subject when placing an order and to take any measure deemed necessary to verify that the person whose bank account is debited is actually the person who placed the order, in order to avoid the occurrence of any fraudulent payment. This verification might include requesting proof of identity and/or residence.

If the data subject refuses, Aldes reserves the right to cancel the User's order.

## **Hiring and Job Applications**



Recruitment software is used to manage applications and follow up on them. The data collected is intended for use by Aldes and is kept for a period of 2 years after the last time contact is made with the applicant.

Applicants have the right to access, modify, correct, or delete any of their personal data. Applicants can object to the disclosure of their contact information. They must provide their first and last name and address. This request must be signed and must specify the address to which the response should be sent. A response will be sent within 2 months of receipt of the request, as proven by the postmark.

*Aldes would like you to know that it will do everything possible to protect the privacy of its Users when they visit its Websites or use its Applications.*

*Information is available on the website of France's data protection authority, the CNIL:  
<https://www.cnil.fr/en/>*

*This Personal Data Protection Policy has been drafted in accordance with applicable law and can only be modified by Aldes.*