

PERSONAL DATA PROTECTION POLICY

The **privacy** of its customers is important to FRERY.

This is why, in compliance with the regulations in force on the protection of personal data, in particular the General Data Protection Regulation (RGPD), we have appointed a Data Protection Officer and are doing our utmost to apply the recommendations of the CNIL.

We process the data of our users, customers or prospects with the following characteristics:

1. Data collected

The following personal data are collected on this site:

Opening an account: when the user's account is created, his/her surname, first name and e-mail address are recorded. **Connection:** when the user connects to the site, the user's surname, first name, connection data, usage data and location data are recorded.

Profile: when you use the services provided on the site, you can fill in a profile, which may include a address and telephone number.

Payment: as part of the payment process for products and services offered on the site, the site records the following data

financial data relating to the user's bank account or credit card.

Cookies: cookies are used when using the site. Users have the option of deactivating cookies when they log on for the first time and subsequently via their browser settings. Cookies are essential for the site to function properly and enable users to improve their experience of the site.

navigation, to use certain sharing functionalities on social networks and to have access to content and advertising based on its centres of interest.

Some cookies are essential to the operation of the site and are installed automatically. When connecting to the site for the first time, users can accept or refuse the installation of cookies that are not essential for which consent is required. Users can modify their cookie preferences at any time by clicking on the "manage consent" link, which appears at the bottom of the page on most of our sites.

2. Purpose of processing

The personal data collected from users is used to provide and improve the site's services and to maintain a secure environment. More specifically, it is used for the following purposes

- Access to and use of the site by the user.
- Management of site operations and optimisation.
- Verification, identification and authentication of data transmitted by the user.
- Implementation of user support.
- Personalisation of services by displaying advertisements based on the user's browsing history according to the user's preferences.
- Fraud prevention and detection, malicious software and risk management security incidents.
- Management of any disputes with users.
- Sending commercial and advertising information based on the user's preferences.

3. Shelf life

Personal data is kept for a limited period which does not exceed the duration of the contract. necessary for the purposes of collection.

4. Legal basis

The legal basis for the processing operations listed below is :

- **Managing prospects:** legitimate interest
- **Newsletter registration and management:** consent
- **Analysis of purchasing behaviour:** legitimate interest
- **Managing a holiday** (booking, invoicing): necessary for the performance of a contract
- **Customer satisfaction:** legitimate interest

5. Sharing personal data with third parties

Personal data may be shared with third-party companies in the following cases:

- When the user uses the payment services, for the implementation of these services, the site is in relationship with third-party banking and financial companies with which it has contracts.
- When the user publishes information in the free comment areas of the site that is accessible to the public.
- When the user authorises a third party's website to access their data.
- When the site uses the services of service providers to provide user assistance, advertising and payment services. These service providers have limited access to the user's data for the purposes of providing these services, and are contractually obliged to use it in accordance with the provisions of the applicable regulations on the protection of personal data.
- If required by law, the site may transmit data to follow up complaints presented against the site and comply with administrative and legal procedures.
- If the site is involved in a merger, acquisition, sale of assets or receivership, it may be required to sell or share all or part of its assets, including personal data.

In this case, users will be informed before any personal data is transferred to a third party.

6. Transfer of personal data

The data collected on this site is not transmitted outside the European Union.

FRERY informs you that it implements the same level of protection of personal data anywhere in the world, whatever the regulatory framework.

7. Security and confidentiality

The site implements organisational, technical, software and physical digital security measures to protect personal data against alteration, destruction and unauthorised access. However, it should be noted that the Internet is not a completely secure environment and the site cannot guarantee the security of the transmission or storage of information on the Internet.

8. Implementing the rights of data subjects

You have a number of rights under the law in relation to your personal data. You can obtain further information and advice on your rights from the following authority

your country's data protection authority (in France, the Commission Nationale Informatique et Libertés (CNIL: <https://www.cnil.fr/>).

1- The right to information - You have the right to receive clear, transparent and easily understandable information about how we use your data, and about your rights. This is why we are providing you with this information through this privacy policy.

2- The right of access - You have the right to obtain access to your information (if we process it), and to certain other information (such as that provided here). This is so that you are aware and can check that we are using your information in accordance with data protection laws.

3- The right of rectification - You have the right to have your information corrected if it is inaccurate or incomplete.

4- The right to erasure - This right is also known as the "right to be forgotten" and, in simple terms, it allows you to request the erasure or deletion of your data when there is no reason to do so. for us to continue to use them. However, this does not mean that we have a general right to erasure. and there are exceptions.

5- The right to restrict processing - You have the right to "block" or delete any further use of your information. Where processing is restricted, we may store your data, but will not be able to continue to use it. We keep a list of people who have requested that further use of their data be blocked, to ensure that the restriction is complied with.

6- The right to data portability - You have the right to obtain and re-use your personal data for your own purposes and in other services. This allows you to easily move, copy or transfer them between our computer systems and third parties in complete security, without affecting their ability to be used.

7- The right to object - You have the right to object to certain types of processing, including the following processing for direct marketing purposes (which is only possible with your consent).

8- The right to complain - You have the right to complain about the way we process or manage your personal data to the relevant national authority (in France, the Commission Nationale Informatique et Libertés (CNIL: <https://www.cnil.fr/>).

9- The right to withdraw your consent - If you have given your consent to the processing or use of your personal data, you may withdraw it at any time (although, if you do so, this does not mean that everything we have done with your consent up to that point has been unlawful). This includes your right to withdraw consent to the use of your personal data for commercial purposes.

We respond to requests and provide information free of charge; however, we may charge a reasonable fee to cover our administrative costs for repeated requests.

We may also have the right to refuse a request. Please judge your request responsibly before making it. We will respond as soon as possible, usually within one month of receipt, but if the request takes longer to process, we will let you know.

To contact us about the protection of personal data:

By e-mail to the following address: contact@frery.fr

By post: FRERY, Attn: Délégué à la Protection des Données Personnelles, 26 RUE SCHWOB 36000 CHATEAUROUX.

9. Changes to this policy

FRERY SASU reserves the right to make any changes to this policy on the protection of personal data at any time. If a change is made to this policy on the protection of personal data, FRERY SASU undertakes to publish the new version on its website.