

## PRIVACY POLICY SAFIC-ALCAN

### Article 1. Introduction

The present Privacy Policy is intended to inform you, in complete transparency, how SAFIC-ALCAN (SAS) (hereinafter the "**Company**", "**SAFIC-ALCAN**" or "**we**") collects, uses and discloses the Personal Data that it may be required to collect and process for its commercial activity, and the rights that you have to your Personal Data. It enters into force on 28 September 2018.

The updates to this version of the Privacy Policy reflect the changes made by the General Data Protection Regulation (EU) 2016/679 from the European Parliament and Council dated 27 April 2016 (hereafter the "**GDPR**").

Compliance with the regulations and laws on the protection of privacy and Personal Data is a priority for SAFIC-ALCAN.

By using SAFIC-ALCAN's services and website (accessible on: [www.safic-alcan.com](http://www.safic-alcan.com), hereinafter the "**Website**"), you accept the terms of this Privacy Policy and the collection, analysis and sharing of Personal Data for the purposes stated below.

If you do not approve the terms of this Privacy Policy, please refrain from using SAFIC-ALCAN's Website and services.

### Article 2. Data collected

**Data**, as a general term, may include all kinds of personal information such as your name, email address, postal address or information on the hardware that you use to access our Websites (such as your operating system or browser).

#### 2.1. Data collected during subscription to our products or services

We do not collect any Personal Data (name, address, telephone number or email address) other than those which you have voluntarily provided, for example when subscribing to our products or services for yourself or for the company that you represent.

The following Data may be collected:

- Title, surname, first name,
- Company, department, position, job title on your business card
- Postal address, telephone number and email address.

## **2.2. Data collected via the contact form on our Website**

When you use the contact form accessible on our Website, we will collect the following Personal Data:

- Surname, first name,
- Company,
- Position,
- Email address,
- Telephone number.

We do not collect any Personal Data other than those you have voluntarily provided and we only use your Data to reply to your request or comment.

## **2.3. Data collected via our Website**

We may collect information about you when you browse our Website.

You can visit our Website without being obliged to provide information about yourself. However, please note that our web servers temporarily record traffic data provided by the device that you use to visit our Website (including the host name (IP address)), date, time and duration of your visit, data concerning your browser and operating system, and the name of your access provider and the Website from which you were redirected to our Website (called the referring URL). This information is stored in a log file until it is automatically deleted.

These data are collected and processed to facilitate use of our Website (establish the login), ensure the security and stability of our systems and provide technical administration of the network infrastructure.

## **2.4. Contact data when creating a user account on our Website to access the "Privilege" area**

As part of our services, we collect contact Data to create a user account to enable you to log in to the "Privilege" area of our Website and take advantage of our services.

For that purpose, we collect and process the following data:

- Title, surname, first name, company,
- Username and password to log in to the "Privilege" area.

## **Article 3. Use of Data**

We only collect and process your Personal Data when we have a legal basis to do so. Legal bases include your consent (if you have given your consent), the contract (if processing of Data is necessary for performance of a contract concluded between SAFIC-ALCAN and yourself, for example, to provide you with the products and services that you have requested), our "legitimate interests", and compliance with our legal obligations.

If your consent is required to process your Personal Data, you have the right to withhold your consent or to withdraw your consent at any time, and to object to the processing of your Personal Data. If you have questions concerning the legal basis for the collection and use of your Personal Data, please contact us at the address indicated at the end of this Privacy Policy.

The Data we collect are used solely for the purposes for which you transmitted them, or for any other purpose stated at the time of collection or in this Privacy Policy. These are mainly the following purposes:

- If you (or the company that you represent) subscribe to our products or services: your Data are used to enable us to provide you with the aforesaid products or services, provide commercial management of our business relationship, and send you messages about our products, services and news.
- If you use the online contact form: your Data are used to reply to your request or comment.

- If you create an online user account: your Data are used to enable you to access the content and services of the "Privilege" area of our Website.
- If you give your consent, the Data processed by the Cookies present on our Website may be used for audience measurement and analysis.

### **3.1. Contact data when creating a user account on our Website to access the "Privilege" area**

In addition to the purposes for which you provided your Personal Data, you can also (via a checkbox or in another way) allow your Data to be used for an activity or service different from the initial activity or service that you are requesting. If you decide to receive these additional services, SAFIC-ALCAN will process your Data to supply them to you.

Lastly, we may use your Data if this is necessary to comply with a legal or statutory obligation.

## **Article 4. Data retention**

We retain the Data for the period that is strictly required to achieve the purposes for which they were collected.

We may nevertheless retain some of your Data for a longer period, for the sole purpose of complying with any legal obligation, or to deal with any questions or complaints sent to us after the termination of the contractual relationship with you or with the company that you represent.

## **Article 5. Sharing and disclosure of Data**

SAFIC-ALCAN undertakes to consider all Personal Data to which it has access as confidential. SAFIC-ALCAN undertakes to obtain the same confidentiality undertakings from its employees and agents who have access to them when carrying out their duties.

We only share the Data with our partners who, in any case, only receive the personal data required to supply the products or carry out the services concerned, and who are on no account authorised to use these Personal Data for any purpose other than that of the services in question, or for purposes other than those for which the Data were collected.

We may nevertheless send your Data to our service providers, but only if we have appointed them by contract to process the Data in our name, and if the service providers meet all of the requirements of the regulations on Data protection and security. We ensure that the Data are stored in the European Union or the European Economic Area.

We may also pass on the Personal Data when the law requires us to do so or if we consider in good faith that this is reasonably necessary to comply with judicial procedures, reply to any complaints or protect the security or rights of SAFIC-ALCAN, its subsidiaries or the public. We undertake, however, to inform you of this under the conditions specified by the legislation in force.

## **Article 6. Transfer of Data abroad**

If necessary, and as stated in this Privacy Policy, we will transfer your Data outside the European Economic Area (EEA) in connection with our activities.

Indeed, we may make use of technical service providers located outside the EEA in connection with the aforementioned Data processing, and in particular to enable us to send you messages about our products, services and news. In that case, we rely on contractual mechanisms and binding legal processes to legally transfer the Data outside the EEA and secure these Data flows.

In any event, we make sure that all transfers are legal and that there are appropriate security measures. All contracts with processors located outside the EEA guarantee appropriate and adequate protection measures.

## **Article 7. Data security**

We take Data security very seriously and we endeavour to protect all Data collected to prevent it being lost, garbled, damaged or accessed by unauthorised third parties.

For example, we have established protection measures to ensure the confidentiality, security and integrity of your Personal Data. We ensure, for example, that we restrict access to Data to those of our employees who have been trained to comply with confidentiality rules. We also ensure that we store your Data in secure operating environments. These measures take into account the sensitivity of the Data that we collect, process and store and the current state of the technology.

However, no method of transmission via the Internet or any method of electronic storage is 100% safe. As a result, even though we make every effort to protect your Data, we do not control the risks linked to the functioning of the Internet and we draw your attention to possible risks of occasional loss of Data or breaches of the confidentiality of Data transmitted via this network. In any case, we undertake to notify you as soon as possible and, if possible, within 72 hours of its discovery, of any Personal Data breaches, under the conditions specified in Articles 33 and 34 of the GDPR.

## **Article 8. Right to access and control your Data**

In accordance with the legislation in force, and in particular the French Data Protection Act No. 78/17 of 6 January 1978 and the GDPR, you have the right to access, rectify and erase your Data, as well as the right to restriction of processing and portability of your Data.

You also have the right to object, on legitimate grounds, to the processing of your Data by SAFIC-ALCAN, the right to determine the use of your data after your death, and the right to lodge a complaint to the French Data Protection Authority (CNIL).

You can exercise your legal rights at any time by contacting us by email at [rgpd@safic-alcan.fr](mailto:rgpd@safic-alcan.fr) or by sending a letter to SAFIC-ALCAN, 13 Cours Valmy, 92977 Paris La Défense Cedex, France.

While complying with the applicable legislation on the protection of privacy, we will delete your Data without any action by you if retention of your Data is no longer necessary for the purposes pursued, or if there is no longer a legal basis to retain them. We may restrict processing instead of deleting your Data if we have legal obligations to retain your Personal Data.

In each marketing email that is sent to you, SAFIC-ALCAN gives you the option to no longer receive any further messages (i.e. to unsubscribe). Simply follow the procedure to unsubscribe or the instructions given in the email.

## **Article 9. Cookies and other technologies**

Provided you have given your consent if it is required by law, we use tracking files, i.e. cookies and similar technologies (hereinafter “**Cookies**”), to collect certain information, in particular your click path through the Website, number of pages visited, operating system and type of browser used, in order to generate traffic statistics to better understand how visitors use the Website and consequently improve the use and functionality of the Website.

### **9.1. Why do we use cookies?**

Cookies are small files placed on your device, which have various functions, and which in particular enable you to browse between pages efficiently, remember your preferences, and generally improve your experience. The use of Cookies on the Website gives you a smoother browsing experience and assesses your browsing of the Website more accurately.

We use Cookies to facilitate and improve browsing of the Website (for example by remembering users' preferences) and to adapt our Website to your interests and needs.

We also use Cookies to collect overall statistics that enable us to understand how users browse our Website and to analyse and measure the audience of our Website and of the services we offer on it, in particular the performance of our Webinars.

If the Cookies we use process your personal data, it is only processed with your consent and in accordance with the regulations applicable to the protection of personal data.

## 9.2. What are the different types of cookies that we use?

The Website uses different types of Cookies that require your consent before the Cookie is sent to your device, apart from technical Cookies. Below is a list of the different types of Cookies that we use on our Website.

### a. Technical or functional Cookies

Technical cookies are necessary for the smooth functioning of our Website and use of its functions. Without these Cookies, our Website would not function as efficiently as we would like, and we may not be able to make the Website available to you, or provide certain functions or services requested. For example, they make it possible to remember the user's choice about whether to accept Cookies, or are intended for authentication for a service, or to ensure the security of the authentication mechanism, or to bill the user, if necessary, for the product(s) and/or service(s) bought. Your consent is not required to send them.

### b. Preference Cookies

We also use preference Cookies that enable our Website to remember your choices (such as your language or country) for the purpose of personalization. These Cookies do not require your consent.

### c. Analysis Cookies

Our Website uses audience measurement and analysis Cookies. These Cookies collect information about the way you use and browse our Website. For example, they will remember the pages that are the most visited, the landing/output page, the timestamp and the click path. We use this information to analyse trends, manage the Website, monitor the click path of users and measure the performance of the content published on our Website and of the services that we offer, in particular participation in Webinars.

### d. Advertising/third party Cookies

With your consent, Cookies may be sent to your browser by our partners acting in the capacity of controllers, in order to offer their services. These third parties place Cookies on your device when you visit our Website in particular for the purposes of targeted advertising or when including certain modules and functions such as social network buttons. You will find more information about Cookies in the privacy policy of these third parties.

A list of these partners is provided below, and you can control how their Cookies are sent to your browser: [where appropriate add a list of partners who send third party cookies].

Below is a detailed list of the different types of Cookies present on the Website:

Cookie name	Cookie type (Functional, Analysis, Advertising)	Purposes	Retention period
Functional Cookies		Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.	From 1 Day to a Year
Marketing Cookies	Google Tag Manager Google Ads Facebook Ads LinkedIn	Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the	1 year

	HubSpot Selligent YouTube	individual user and thereby more valuable for publishers and third party advertisers.	
Necessary Cookies		Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.	

### 9.3. How long are cookies stored for?

Cookies are stored for a maximum of thirteen (13) months after they are first placed on the user's device, as required by applicable law.

### 9.4. How do you control the cookies on our website?

When you visit our Website, a consent management module informs you of the presence of Cookies and asks you to indicate your choices and to accept/reject each type of Cookie. Cookies are only sent if you accept them, except for functional Cookies that are needed for the Website to function.

You can also manage, block and allow Cookies directly in your browser by changing your browser settings.

## Article 10. Links and interactions with third party websites

SAFIC-ALCAN's Website may allow you to interact with third party websites or may include links to other websites, mobile applications and services of third parties which are not owned or controlled by SAFIC-ALCAN (SAS) (each of which is a "**Third-Party Service**"). SAFIC-ALCAN is not responsible for the privacy practices or content of Third-Party Services. Please note that these Third-Party Services may collect information about you. Consequently, SAFIC-ALCAN asks you to read the general terms and privacy policies of each Third-Party Service with which you choose to interact.

## Article 11. Modification of the Privacy Policy

SAFIC-ALCAN reserves the right to change this Privacy Policy at any time. The changes will come into force twenty-four (24) hours after they have been put online.

You acknowledge that if you continue to use SAFIC-ALCAN's services and Website after the publication of the changes made to this Privacy Policy, this means that the collection, use and sharing of your Data is subject to the updated version of the Privacy Policy.

## Article 12. Contact SAFIC-ALCAN

If you have any questions or complaints concerning this Privacy Policy, you can contact us by email at [rgpd@safic-alcan.fr](mailto:rgpd@safic-alcan.fr) or by sending a letter to SAFIC-ALCAN, 13 Cours Valmy, 92977 Paris La Défense Cedex, France.