

SUPPLIER PRIVACY POLICY

This privacy policy (the "**Policy**") covers the use of personal data concerning end users ("**you**", "**your**") by (i) SERB SAS, whose registered office is located at 40 avenue George V, 75008 Paris, France, or (ii) SERB SA, whose registered office is located at avenue Louise 480, 1050 Brussels, Belgium (both hereinafter referred to as the "**Company**", "**we**", "**us**", "**our**"), each acting as an autonomous data controller for the products it places on the market.

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1. **WHAT ARE OUR DATA PROTECTION COMMITMENTS?**

- 1.1 The Company is committed to making data protection and privacy a key value.
- 1.2 The Company undertakes to use its best efforts to comply with applicable data protection legislation, including Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, when processing personal data, and repealing Directive 95/46/EC (the "General Data Protection Regulation") (the "**GDPR**") and Law No. 78-17 of 6 January 1978 relating to information technology, files and freedoms (together, the "**Applicable Data Protection Legislation**").
- 1.3 In particular, your personal data is kept by the Company for periods not exceeding those necessary for the purposes for which it is processed, taking into account the sensitive nature of the data processed, the applicable statute of limitations and the legal or regulatory obligations imposed on the Company. The retention periods are specified in Articles 3.4 and 4.4.

2. WHAT PROCESSINGS DO WE PERFORM?

(a) Categories of data processed

2.1 The Company processes the following personal data for the purposes described below:

- Your personal identification data (surname, first name);
- Your professional identification data (title, function, company or entity);
- Your contact data (postal address, telephone, e-mail address, fax).

(b) Purposes of processing

2.2 The Company processes your personal data for the following purposes:

- Supplier management;
- Order management;
- Management of the register of transparency of benefits granted by the Company;
- Management of relations with all financial and legal partners;
- Management and monitoring of external growth operations or organisation of databases in the event of disposal.

2.3 The collection and processing of your personal data is based on the legitimate interests pursued by the Company and on the legal obligations incumbent on the Company. When they are based on our legitimate interests, these interests do not appear to us to take precedence over your interests and fundamental rights and freedoms.

2.4 The processing of your personal data can be summarised as follows:

Treatment activity	Collected data	Legal basis	Shelf life
Supplier management	Your personal identification data Your professional identification data Your contact details	Legitimate supplier management interest	5 years from the end of the contractual relationship with the supplier
Management of orders placed	Your personal identification data Your professional identification data Your contact details	Legitimate interest in order management	5 years from the end of the contractual relationship with the supplier

Management of the register of transparency of benefits granted by the Company	Your personal identification data Your professional identification data Your contact details	Legal obligation	10 years from the date of the benefit granted
Management of relations with all financial and legal partners	Your personal identification data Your professional identification data Your contact details	Legitimate management interest of service providers	1 year from the last active contact
Management and monitoring of external growth operations or organisation of databases in the event of a disposal	Your personal identification data Your professional identification data Your contact details	Legitimate interest in the acquisition of new companies / group structuring	Immediate cancellation if the operation is not carried out In the event of completion of the transaction: duration of the liability guarantee, i.e. 3 years as from the transaction; if applicable, duration of the dispute.

3. **HOW DO WE COLLECT YOUR DATA?**

3.1 We collect your personal data:

- Directly to you through our authorised staff or our website, or
- Indirectly through our counterparties.

4. **WITH WHOM DO WE SHARE YOUR DATA?**

4.1 If necessary, we may pass on your personal data to the following recipients:

- Our technical service providers for hosting and archiving;

- Our legal advisers and/or attorneys and those of potential purchasers in the context of restructuring operations, disposals, mergers and acquisitions or litigation;
 - Government entities and administrations authorised to access and/or obtain your personal data;
 - The courts and tribunals in the event of a dispute involving you;
 - The law enforcement authorities in the event of the observation or suspicion of the occurrence of an offence involving you in accordance with or as required by the applicable law.
- 4.2 In the event of a restructuring, disposal or merger (including reorganisation), we may transfer your personal data to a third party involved in the transaction (for example, a purchaser) in accordance with Applicable Data Protection Legislation.

5. **HOW IS THE OUTSOURCING OF YOUR DATA MANAGED?**

- 5.1 We take appropriate steps to ensure that our contractors process your personal data in accordance with Applicable Data Protection Legislation.
- 5.2 These measures include the signing of a data processing agreement which requires the subcontractors, among other things, to process your personal data only on our instructions, not to engage a second-tier subcontractor without our consent, to take the appropriate technical and organisational measures to guarantee the security of your personal data, to ensure that the persons authorised to access the data are subject to confidentiality obligations, to return and/or destroy your personal data at the end of their assignment or contract, to undergo audits and to provide us with assistance in following up on your requests to exercise your rights in relation to your personal data.

6. **ARE YOUR DATA TRANSFERRED OUTSIDE THE EUROPEAN ECONOMIC AREA?**

- 6.1 It is not our intention to transfer your data outside the European Economic Area. If this is the case, we will inform you of this and obtain your prior consent to do so, and will enter into any appropriate contractual arrangements in accordance with Applicable Data Protection Legislation.

7. **WHAT ARE YOUR RIGHTS?**

- 7.1 In accordance with Applicable Data Protection Legislation, you have the right to access, rectify and delete your personal data, the right to object to or limit the processing of your personal data, the right to portability of personal data and the right to set guidelines as to the fate of your personal data after your death.

Law	What does this mean?
<i>The right of access</i>	You have the right to obtain a copy of your personal data.
<i>The right of rectification</i>	You have the right to obtain the rectification of your personal data if they are inaccurate or incomplete.
<i>The right to erasure (the "right to forget")</i>	You have the right to obtain the deletion of your personal data. However, the right to erasure (or the "right to forget") is not absolute and is subject to specific conditions. We may retain your personal data to the extent permitted by applicable law, and in particular where processing is necessary to comply with a legal obligation to which the Company is subject or to establish, exercise or defend a legal claim.
<i>The right to limitation of processing</i>	You have the right to obtain the limitation of the processing in certain circumstances (e.g. when the Company no longer needs your personal data but they are still necessary for the establishment, exercise or defence of a legal claim).
<i>The right to the portability of personal data</i>	You have the right, in certain circumstances, to receive the personal data concerning you that you have provided to the Company in a structured, commonly used and machine-readable format and to pass it on to another controller.
<i>The right to object to processing</i>	You have the right to object to certain types of processing (e.g. when the processing is based on the legitimate interests of the Company).
<i>The right to withdraw consent</i>	If you have given your consent to the Company's processing of your personal data, you have the right to withdraw it at any time.
<i>The right to set guidelines on the use of your data after your death</i>	You can define guidelines for the storage, deletion and disclosure of your personal data after your death. These guidelines may be general or specific. General guidelines are registered with a trusted third party. Special guidelines are stored with the Company.

- 7.2 Please send us any request concerning your rights in relation to your personal data by email to dpo@serb.eu. We will deal with your request as soon as possible and always within the time limits provided for by the Applicable Data Protection Legislation. Please note that we may retain your personal data for certain purposes where required or permitted by law.

8. HOW DO WE GUARANTEE THE SECURITY OF YOUR DATA?

- 8.1 We take appropriate technical and organisational measures to ensure a level of security appropriate to the risks associated with your personal data. We follow industry best practices to ensure that personal data is not accidentally or unlawfully destroyed, lost, altered, unauthorised disclosure or unauthorised access.

9. QUESTIONS AND COMPLAINTS

- 9.1 If you have any questions or complaints regarding the processing of your personal data by the Company, please send an email to dpo@serb.eu.
- 9.2 You have the right to submit a complaint to the competent supervisory authority:

*Commission nationale de l'informatique et des libertés
3 Place de Fontenoy - TSA 80715 - 75334 Paris CEDEX 07
Tel: 01 53 73 22 22*

10. MISCELLANEOUS

- 10.1 The Company reserves the right to update this Policy at any time. If we make changes to this Policy, we will notify you so that you are always aware of how we treat your personal data.