

## **CONFIDENTIALITY POLICY AND COOKIES POLICY**

### **I) Confidentiality policy**

The processing of personal data covered by this confidentiality policy is subject to French law, and in particular the amended French Data Protection Act of 6 January 1978 and Regulation (EU) 2016/679 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 (GDPR), hereafter referred to as the "Data Protection Regulation".

#### **1. Data controller**

HighCo, with head office at 365 avenue Archimède, 13799 Aix-en-Provence cedex 3, France  
Trade and Companies Register Number: 353 113 566  
Hereafter referred to as "HighCo"

#### **2. Who is this Data protection policy for?**

This policy applies to all visitors to the [www.highco.fr](http://www.highco.fr) or [www.highco.com](http://www.highco.com) web site (hereafter referred to as "our web site"), our registered subscribers and any person who requests information from us.

The term "personal data" (hereafter referred to as "Data") has the meaning set out in the Data Protection Regulation.

So that you can browse our web site in complete confidence, we undertake to process your Data in accordance with the Data Protection Regulation. This confidentiality policy aims to provide a transparent explanation of how and why your Data are processed. The term "Data processing" is used herein to denote the collection and processing of the Data.

#### **3. Categories of Data processed**

We are likely to process the following Data:

##### **The Data that we collect:**

- Surname
- First name
- Company
- Job title
- Email address
- Message

##### **Data concerning minors**

Our web site and/or our themed promotional campaigns are not aimed at minors. If, however, you find that a minor for whom you are responsible has registered on our web site and you object to this, please contact us and we will remove their Data from our databases immediately.

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#### **4. Uses of your Data and legal bases**

##### **Processing of your Data on the basis of consent from the data subject (GDPR Article 6a)**

We process your Data, provided that you consent to this, for the following purposes:

- To send you our communications;
- To answer questions asked via our web site or any other communication channel.

You can withdraw your consent at any time under the conditions described in Article 8 below.

##### **Use of your Data on the basis of compliance with our legal obligations (GDPR Article 6c)**

In order to comply with the legal obligations to which we are subject in certain cases, requiring the processing and/or transfer of certain Data to authorities or institutions established by law (for example, the police, the tax authorities, etc.).

##### **Use of your Data on the basis of our legitimate interests (GDPR Article 6f)**

When we have a legitimate interest, either in the context of our marketing activities or the concrete performance of our economic activities, we collect and process Data for the following purposes:

- To perform surveys, tests and analyses (including customer or market surveys) with a view to improving our solutions, internal procedures and/or overall service,
- To perform statistical or trend analyses for financial management, marketing or reporting purposes,
- To prevent and combat potential fraud and abuses.

Data

#### **5. Transfer of your Data to third parties**

Your Data may be communicated to third parties in the following cases:

- To certain of our subcontractors performing services on our behalf (for example, marketing agencies, hosting service providers, etc.) and only in accordance with our instructions,
- To certain of our commercial partners, provided that we have obtained your prior consent.

##### *Transfer of Data outside the European Union*

Your Data are not transferred outside the European Union. In the event that we change our policy, we will ensure that such transfer takes place to countries recognised as providing an adequate level of protection of your Data or, at the very least, on the basis of the suitable safeguards set out by law.

#### **6. Period for which your Data will be stored**

Your Data are stored for a period strictly necessary for the purposes pursued. The storage period may vary depending on the purpose of the processing.

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Categories of Personal data	Periods of storage in an active database
Data relating to specific requests	Three years from the last contact received from the data subject.
Newsletter data	Data stored until the data subject unsubscribes (using the unsubscribe link included in the newsletters).
Cookies	Maximum of 13 months. Cf. Cookies policy, point II.
Data likely to be the subject of a court order (login data, identity, contact details, data relating to transactions)	12 months from collection.

Your Data may also be stored for longer for other purposes, and particularly for compliance with our legal obligations (for example, accounting and tax obligations). Access to archived Data is restricted.

## 7. Security of your Data

HighCo attaches particular importance to the security of Personal data.

HighCo has introduced physical, software, administrative or organisational measures appropriate to the degree of sensitivity of the Data, in order to ensure the integrity and confidentiality of the Data and protect them from any malicious intrusion, loss, damage or disclosure to unauthorised third parties.

When it uses a service provider, HighCo only communicates Data to it after verifying that it complies with these security guidelines.

HighCo may perform audits in order to verify the satisfactory operational application of the rules relating to Data security.

## 8. Your rights

### Exercising your rights

You must **send** us a written request, accompanied by **proof of your identity** (identity card, passport, driving licence), so that we don't disclose your Data to other persons.

You can send us your request at the following address, quoting "HighCo" in the subject line:

[delegue-protection-donnees@highco.com](mailto:delegue-protection-donnees@highco.com)

or

HighCo, à l'attention du DPO/Service juridique, 365 avenue Archimède, 13799 Aix-en-Provence, France.

If you request this information from us in electronic format, unless you state otherwise, we will answer electronically.

*Please note that your request is linked to the email address that you give us to identify yourself. If you have created several accounts by registering several different email addresses, you must give us all of the email addresses to which your request relates.*

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In accordance with the Data Protection Regulation, your request will be processed within thirty days from the time when we are in possession of all of the information necessary to process it. If your request is complex, this period may be extended by a maximum of two months, but we will inform you of this in advance.

#### ***Your right to access and rectification***

In accordance with the Data Protection Regulation, you have the right to obtain confirmation that your Data are processed (or not) and the right to access them, if applicable, and request a copy of them.

You also have the right to ask us to complete and/or rectify the information concerning you.

#### ***Your right to object and erasure of your Data***

This is your right to object at any time, without justification, to the processing of your Data by HighCo. However, HighCo may refuse to grant your request if there are legitimate, compelling grounds for this.

You may obtain from HighCo the erasure of your Data from our databases, on the conditions set out by the Data Protection Regulation, without prejudice to our legal storage obligations.

#### ***Your right to restriction of processing***

In the event that you contest the processing of your Data, you may request that the processing of your Data be suspended while the dispute is investigated. In this case, we will not use your Data until the dispute has been resolved.

You may exercise this right when you object to processing, you contest the accuracy of your Data, you believe that the processing of your Data is unlawful or you need your Data for the establishment, exercise or defence of legal claims.

#### ***Your right to Data portability***

You may request that we transfer the Data that you have given us to another data controller in a structured, commonly used and machine-readable format, within the limits set out by the Data Protection Regulation. In such an event, we will transfer them to the recipient of your choosing.

#### **Your right not to be subject to a decision based solely on automated processing**

In the context of our activities, we are likely to set up automated processing of your Data. You have the right not to be subject to a decision based solely on automated processing which produces legal effects concerning you or similarly significantly affecting you, unless this decision is necessary for the entering into, or performance of, a contract, or is authorised by law.

#### **Your right to bring an action before the CNIL**

You may bring your complaint before the French supervisory authority, the CNIL (Commission Nationale de l'Informatique et des Libertés) by bringing an action.

#### **Your right to give instructions in the event of death**

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You have the right to give instructions about what happens to your Data after your death.

## 9. Data Protection Officer

For further information about our Data protection policy, or for any complaints regarding your privacy, please contact the Data Protection Officer (hereafter referred to as the "DPO") by email at the following address: [delegue-protection-donnees@highco.com](mailto:delegue-protection-donnees@highco.com) or by letter sent to HighCo's head office (à l'attention du DPO/Service juridique, 365 avenue Archimède, 13799 Aix-en-Provence, France), quoting "HighCo" in the subject line.

## II) Cookies Policy

This web site and its third party partners provide various services on their web sites and mobile applications by using cookies. We place cookies on your device to provide enhanced, personalised access to essential services and to provide you with other services with the aim of making your visit more relevant.

### 1. What is a cookie?

Cookies are small text files placed on the hard drive of your device (computer, tablet or mobile phone), by a web site publisher or a mobile application, through your browser software. The cookie allocates a unique identifier to your device. However, it does not store your Data and does not therefore recognise you as an individual. It only recognises the device that you are using.

The cookie helps with moving between pages on a web site, adapting the content of our services, providing secure connections and remembering your browser preferences.

### 2. The cookies used on our web site

The services provided through the use of cookies include: user login, management of your baskets, protection and security. They are essential to the smooth operation of the site.

Types of cookie (Purposes)	Objectives	Examples	Storage period
<u>functional or personalisation cookies</u>	These cookies contribute to the smooth operation of the site from a technical point of view, and personalise the browsing experience.	Access to your personal area. Remembering login data: username/password/language/login info/last product ordered. Remembering site preferences: display/acceptance or refusal of	13 months

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Types of cookie (Purposes)	Objectives	Examples	Storage period
	They are used to store information in order to browse the site. They do not collect any personal information and cannot be used for commercial purposes.	cookies/language. Pre-filling certain fields on our forms.	
<u>performance or analytical cookies (audience analysis)</u>	These are used to produce anonymous statistics about visits to the site to improve its content. They cannot be used for commercial purposes. They help us to measure the effectiveness of a communication campaign.	Calculating the number of clicks, error messages, sections and content visited, Internet user's click stream. Measuring the return on campaigns.	13 months

### 3. Your choices in relation to cookies

We invite you to express your choices in relation to cookies or change them as described below.

#### Managing cookies via your web browser

The "Help" section of a web browser tells you how to change your settings and, in particular, how to refuse new cookies, obtain a notification message telling you that they have been received, or disable them.

To make it easier for you, below are links to the "Help" sections of the most commonly used browsers:

- Internet Explorer™: <http://windows.microsoft.com/fr-FR/windows-vista/Block-or-allow-cookies> ,
- Safari™: [https://support.apple.com/kb/PH21411?viewlocale=fr\\_FR&locale=fr\\_FR](https://support.apple.com/kb/PH21411?viewlocale=fr_FR&locale=fr_FR),
- Chrome™: <http://support.google.com/chrome/bin/answer.py?hl=fr&hlrm=en&answer=95647> ,
- Firefox™: <http://support.mozilla.org/fr/kb/Activer%20et%20d%C3%A9sactiver%20les%20cookies> ,
- Opera™: <http://help.opera.com/Windows/10.20/fr/cookies.html> .

For further information about how cookies and targeted advertising work, please see the [www.youronlinechoices.eu](http://www.youronlinechoices.eu) and [www.allaboutcookies.org](http://www.allaboutcookies.org) web sites. These settings only apply to the browser you are using at the moment.

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#### **4. Our commitment on cookies**

We are committed to protecting your privacy and complying with the following two principles:

- We do not link your cookies to any information that could be used to identify you personally. Cookies do not under any circumstances make it possible to find out your address, date of birth, telephone number or any other information that could be used to identify you.
- We do not provide any personal information to advertisers or third party web sites that display our advertisements based on your interests. If your device is used by several people, or has several web browsers installed, the content displayed to other users might reflect your preferences.

If you wish, you can change the settings on your web browser by following the instructions in the "Managing cookies via your web browser" section above.