

CONFIDENTIALITY POLICY SAFIC-ALCAN

Article 1. Preamble

The present Privacy Policy is intended to transparently inform you of how SAFIC-ALCAN NECARBO (hereafter the "**Company**", "**SAFIC-ALCAN**" or "**us**") collects, uses and discloses the personal data that it may have to collect and process for its commercial activity, and the rights that you have over the data concerning you. It comes into force on November 21st 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.nl / www.safic-alcan.ae / safic-alcan.com.my, hereafter the "**Website**"), you accept the terms of this Privacy Policy and the collection, analysis and sharing of personal data for the purposes explained below.

If you do not approve the conditions of the present Privacy Policy, please refrain from using SAFIC-ALCAN's website and services.

Article 2. Data collected

"**Data**", as a general term, can include all kinds of personal information such as your name, your email address, your postal details or information on the hardware that you use to access our website (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 that which you have voluntarily provided, for example when subscribing to our products or services for yourself or for the company that you represent.

The Data that may be collected is as follows:

- Title, last name, first name,
- Company, service, function, 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 have to collect the following personal Data:

- Last name, first name,
- Company
- Email address,
- Telephone number.

We do not collect any personal Data other than what you have voluntarily provided and we only use your Data to respond to your request or comment.

2.3. Data collected via our Website

When you browse our Website, we may have to collect information concerning you.

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

The collection and processing of this data is done with the aim of facilitating the use of our Website (establishment of the connection) and to ensure the security and stability of our systems and the technical administration of the network infrastructure.

2.4. Contact data when creating a user account on our Site for accessing the "Privilege" area

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

To this end, we collect and process the following data:

- Title, last name, first name, company,
- Identifier and password for connection to the "privileged" area.

Article 3. Use of Data

We collect and process only Data concerning you for which we have a legal basis. The legal basis includes your consent (when you have given your consent), the contract (when the processing of Data is necessary to the performance of a contract concluded between SAFIC-ALCAN and you, for example, to provide you with the products and services that you have requested), and "legitimate interests".

When the processing of your personal Data is subject to your consent, you have the right not to consent or to withdraw your consent at any time; when the processing of your personal Data is relative to legitimate interests, you have the right to object to it. If you have questions concerning the legal basis of our collection and use of your personal Data, please contact us at the contact details mentioned at the end of the present Privacy Policy.

As a general rule, all of the Data collected is used only for the purposes for which you have sent it, or for any other purpose stated at the time of its collection or in the present Privacy Policy. These purposes are mainly the following:

- When you (or the company that you represent) subscribe to our products or services: your Data is used to enable us to provide you with the said products or services, for the commercial management of our business relationship and to send you communications relative to our products, our services and our news.
- When you use the online contact form: your Data is used to respond to your request or comment.
- When you create an online user account: your Data is used to enable you to access the content and services of the "Privilege" area of our Website.

3.1. Contact data when creating a user account on our Site for accessing the "Privilege" area

Other than the purposes for which you have communicated your personal Data, you also have the option (through a check-box or in some other way) of authorising the use of your Data for an activity or a service which differs from the initial activity or service that you are requesting. If you decide to receive these additional services, SAFIC-ALCAN will use your Data to provide them to you.

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

Article 4. Data retention

We retain the Data for the period that is strictly necessary to the purposes for which it was collected and as long as you have not requested its deletion.

We may nevertheless retain some of your Data for a longer duration, for the sole purpose of complying with any legal obligation, or to respond to any questions or complaints relating to it after the cessation 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 undertakings for confidentiality from its personnel and agents who would, or could, have access to it when exercising their functions.

We only share the Data with our partners who, in any case, receive only the personal information necessary to supply the products or provide the services concerned and who are under no circumstances authorised to use this personal Data in a context other than that of the services in question or for purposes other than those for which the Data was collected.

We may nevertheless send your Data to our subcontracted service providers, but only if we have contractually mandated them to process the Data in our name and the subcontracted service providers fulfil all requirements of the regulations relative to the protection and securing of Data. We make sure that the Data is stored in the European Union or the European Economic Area.

We may also communicate personal Data when the law requires us to do so or if we judge in good faith that such an action is reasonably necessary to comply with judicial

procedures, respond 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

We take care to only process the Data on the territory of the European Union.

However, we may make use of technical service providers located abroad in the context of processing the aforementioned data, particularly to enable us to send you communications about our products, our services and our news. We then rely on contractual mechanisms and restrictive legal processes to legally transfer the Data beyond the frontiers of the European Union and secure these flows of Data.

Article 7. Data security

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

For example, we have established protective measures to ensure the confidentiality, security and integrity of Data concerning you. We take care, for example, to restrict access to Data to certain of our employees who have been trained in the observation of confidentiality rules. We also take care to store your Data in secured 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 nor any method of electronic storage is 100% safe. Thus, even though we make every effort to protect your Data, we do not control the risks related to the functioning of the Internet and we draw your attention to possible risks in terms of occasional losses of Data or breaches of the confidentiality of Data transiting via this network. In any case, we undertake to give notification, as soon as possible and, if possible, no later than 72 hours after becoming aware of any breach of personal Data, under the conditions fixed 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 the GDPR, you have the right to access, rectify and delete your Data, and you have a right to limit the processing and portability of your Data.

You also have the right to object, for legitimate reasons, to the processing of your Data by SAFIC-ALCAN NECARBO and you have the right to make a complaint to the Dutch data-protection authority (Autoriteit Persoonsgegevens).

You may exercise your statutory rights at any time by contacting us by email at info@safic-alcan.nl or by letter at SAFIC-ALCAN NECARBO B.V., Noorderkade 28, 1948 NR Beverwijk, the Netherlands.

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

In each commercial prospecting email which is sent to you, SAFIC-ALCAN gives you the option to no longer receive any further communications (meaning to unsubscribe).

You just need to follow the procedure to unsubscribe or the instructions given in the email.

Article 9. Cookies and other technologies

We use monitoring trackers, namely cookies and similar technologies, to collect certain information, notably your click path through the Website, the number of pages read, the operating system and the type of browser used, etc., in order to generate traffic statistics to better understand how visitors use the Website and therefore improve the use and functionality of the Website.

Cookies are small files installed on your device, which fulfil various functions, and notably enable you to browse between pages efficiently, remembering your preferences and, generally, improving your experience. The use of cookies on the Website gives you a smoother browsing experience and evaluates your movements on the Website with great precision.

Below is a list of the various types of cookies that we use on the Website:

Google Analytics (ga.js): This cookie helps to generate website statistics useful for the improvement of the website.

You can control the cookies through your preferences in your browser and other tools. To deactivate these cookies, we invite you to see our dedicated page: <http://www.safic-alcan.fr/fr/mentions-legales.html>

Article 10. Links and interactions with third-party sites

SAFIC-ALCAN's Website may let you interact with third party sites or may contain links to other sites, mobile applications and services from third parties which are neither held nor controlled by SAFIC-ALCAN (each being a "**Third-Party Service**"). SAFIC-ALCAN is not responsible for the privacy practices or content of Third-Party Services. Please note that the Third-Party Service may collect information about you. Therefore, SAFIC-ALCAN invites you to read the general conditions and privacy policies of each Third-Party Service with which you choose to interact.

Article 11. Modification of the present Privacy Policy

SAFIC-ALCAN reserves the option to modify the present Privacy Policy at any time. The modifications will come into force twenty-four (24) hours after putting these modifications online.

You recognise that if you continue to use SAFIC-ALCAN's services and Website after the publication of the modifications made to the present 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 may contact us by email at info@safic-alcan.nl or by letter at SAFIC-ALCAN NECARBO B.V., Noorderkade 28, 1948 NR Beverwijk, the Netherlands.