

## **PRIVACY POLICY AND PERSONAL DATA PROCESSING POLICY**

ALBON is firmly committed to respecting your privacy and to protecting any personal data you provide. We undertake to comply with applicable legislation in terms of personal data privacy and protection, in particular the European General Data Protection Regulation. The purpose of this data privacy policy (hereinafter "Privacy policy") is to:

- enable you to provide personal data in full confidence and privacy when you use our websites and/or mobile applications,
- inform you of the conditions of processing the data we collect via our websites and/or mobile applications,
- inform you of the measures we take to ensure the privacy and protection of your personal data,
- provide guidance on your applicable rights.

### **ARTICLE 1 – DATA COLLECTION**

ALBON, whose head office is located at 1 rue du Rhône 26140 Saint Rambert d'Albon - France, has a website:

- Corporate brand website: <http://www.albon.net>

In the following cases, ALBON must therefore collect and process your personal data, namely information that enables your direct or indirect identification:

- If you browse the Websites,
- If you create a personal account and/or login to this account,
- If you make a purchase,
- If you contact us, notably via our contact forms, by telephone, e-mail or any electronic process,
- If you submit an application for a job or internship,
- If you subscribe to a mailing list.

Certain personal data we request from you are mandatory. The mandatory nature of the data collected is indicated by an asterisk. The other information is optional. A refusal to provide mandatory personal data will, where applicable, make it impossible to access all the services of the Website in question.

If these data are required by law or to execute the contract binding us and they are not provided, this impairs our ability to honour the contract. In which case, we may cancel your commitment after duly informing you.

### **ARTICLE 2 – DATA CATEGORIES**

Depending on the processing performed, we are likely to collect and process the following personal data:

Identification data	<ul style="list-style-type: none"> <li>• Civil status / Last name / First name</li> <li>• E-mail address</li> <li>• Postal address</li> <li>• Country</li> <li>• Telephone</li> <li>• Password used to access online account</li> <li>• Login / Username</li> </ul>
Economic data	<ul style="list-style-type: none"> <li>• Bank details</li> </ul>
Professional life	<ul style="list-style-type: none"> <li>• Job title</li> <li>• Company</li> </ul>
Connection data	<ul style="list-style-type: none"> <li>• Timestamps, IP address, browsing history, site visit pathway, operating system, information on devices used to access the Website and/or the application</li> </ul>

### ARTICLE 3 – PURPOSES AND LEGAL BASIS OF PROCESSING, CONSERVATION PERIOD

Below are the purposes and legal bases on which we justify our personal data processing operations:

Purpose of processing	Legal basis of processing	Personal data processed	Conservation period
Customer and lead account management (opening account, order tracking, delivery management)	Contract or depending on the case the legitimate interest of ALBON to manage customer accounts and leads to support the development of the company and its entities	<ul style="list-style-type: none"> <li>• Identification data</li> <li>• Economic and financial data</li> </ul>	Duration of contractual agreement and maximum 5 years after termination in intermediate storage
Campaign management and communications to customer and lead accounts (loyalty, promotions, catalogue management, miscellaneous information)	Legitimate interest of ALBON to develop its activity and that of its sister companies	<ul style="list-style-type: none"> <li>• Identification data</li> <li>• Connection data</li> </ul>	Duration of contractual agreement and maximum 5 years after termination for customers or 3 years from last contact for leads
Management of incoming requests from professionals (customers and leads)	Consent of person in question	<ul style="list-style-type: none"> <li>• Identification data</li> <li>• Professional life</li> </ul>	For customers: Duration of contractual agreement and

			<p>maximum 5 years after termination or until withdrawal of consent</p> <p>For leads: Until withdrawal of consent or 3 years from the last contact</p>
Management of incoming requests from individuals (customers and leads)	Consent of person in question	<ul style="list-style-type: none"> <li>• Identification data</li> </ul>	Until withdrawal of consent or 3 years from the last contact
Management of registration on our email marketing lists	Consent of person in question	<ul style="list-style-type: none"> <li>• Identification data</li> </ul>	Until withdrawal of consent or 3 years from the last contact
Production of statistics	Legitimate interest	<ul style="list-style-type: none"> <li>• Identification data</li> <li>• Connection data</li> </ul>	10 years from date of last purchase
Improve the services offered, develop our services, ensure the operation and security of Websites	Legitimate interest	<ul style="list-style-type: none"> <li>• Identification data</li> <li>• Connection data</li> <li>• Location data</li> </ul>	10 years from date of last purchase
Management of invoicing and accounting	Obligation to comply with legal requirements	<ul style="list-style-type: none"> <li>• Identification data</li> <li>• Economic and financial data</li> </ul>	10 years from end of financial year
Management of personal rights	Obligation to comply with legal requirements	<ul style="list-style-type: none"> <li>• Identification data</li> </ul>	10 years from date of registration in our systems
Management and monitoring of our staff recruitment process	Consent of person in question	<ul style="list-style-type: none"> <li>• Identification data</li> <li>• Professional life</li> </ul>	Until withdrawal of consent or 2 years from the last contact
Forward data of customers or leads who opened accounts to other companies of the	Legitimate interest of the Group	<ul style="list-style-type: none"> <li>• Identification data</li> <li>• Professional life</li> </ul>	For customers: Duration of contractual agreement and maximum 5 years

Nextpool Group (see list below)		<ul style="list-style-type: none"> <li>Economic and financial data</li> </ul>	<p>after termination or until withdrawal of consent</p> <p>For leads: 3 years from the last contact</p>
Forward contact details of customers, end users and/or leads contacting ALBON and its sister companies to local distributors in order to handle their request	Consent of person in question	<ul style="list-style-type: none"> <li>Identification data</li> </ul>	<p>Until withdrawal of consent or 3 years from the last contact</p>

#### ARTICLE 4 – DATA RECIPIENTS

The personal data collected by ALBON Services are not sold to third parties. Nonetheless, ALBON may share personal data it collects with other entities, namely:

- Approved members of customer services (Sales administration, After-sales) in companies of the Nextpool Group (ALBIGES, ALBON, ASPOOL , POOL TECHNOLOGIE, NEXTPOOL Services, NEXTPOOL Capital, NPI,NPP et NEXTPOOL Deutschland) as well as certain Nextpool Group support departments (marketing, IT, sales) receive personal data in the course of their missions resulting from the purposes identified in article 3.
- The new owner of ALBON in the event of acquisition.
- Its subcontractors and service providers responsible for certain functions on its behalf (hosting, maintenance, marketing mailing, after-sales service operations, etc.).
- Court officers, ministerial officers, government departments, court authorities, administrative authorities when required, to establish, execute and defend legal proceedings.
- The other companies making up the Nextpool Group, namely:
  - ALBIGES : Parc d'activité Millau Viaduc, avenue des Fialets 12100 Millau - FRANCE
  - ASPOOL : ZAC Rouvellière 72700 Spay – FRANCE
  - PBK : 10 Rue Vaucanson 38230 Tignieu-Jamezieu - FRANCE
  - POOL TECHNOLOGIE : 115 Rue de l'Oliveraie 34130 Valergues - FRANCE
  - NEXTPOOL SERVICES : 300 route nationale 6 immeuble le bois des cotes bâtiment A, 69760 Limonest – FRANCE
  - NEXTPOOL CAPITAL : 12, Avenue des Saules 69600 OULLINS - FRANCE

- NEXTPOOL IBERICA : C/ papiro 3-5, - poligono industrial "la cantueña" (Fuenlabrada) – SPAIN
- NEXTPOOL PORTUGAL : Rua Alfredo Henriques Nº 140- Zona Industrial de Mosteirô- 4520-409 Santa Maria da Feira- PORTUGAL
- NEXTPOOL DEUTSCHLAND : Röntgenstraße 1A, 63110 Rodgau Weiskirchen- DEUTSCHLAND

ALBON reserves the right to disclose your personal details to other parties in the event that the law, an applicable regulatory requirement, a legal decision or a regulation imposes or authorises it to do so, or if such disclosure is necessary as part of an investigation or proceedings in France or another country.

On principle, personal data collected are not intended to be transferred outside the European Union. Such transfers are nonetheless compliant with applicable regulations and we have verified that they are carried out in accordance with the transfer mechanisms permitted by the GDPR. Below is the list of applications and subcontractors (outside the EU) whose services we use to deliver our services to you:

<b>Name of service provider</b>	<b>Reason for transfer</b>	<b>Country of origin of provider</b>
Salesforce Pardot CRM	Customer relationship management, mass and/or automated email marketing	USA, Privacy Shield Certification
Hubspot CRM	Customer relationship management	USA, Privacy Shield Certification
Zapier	Data automation	USA, Privacy Shield Certification
Google services: Analytics, Search Console	Website audience and operation measurement	USA, Privacy Shield Certification

## **ARTICLE 5 – SECURITY**

To protect your personal data, ALBON takes reasonable precautions and applies industry-wide best practices to ensure they are not lost, stolen, viewed, disclosed, altered or destroyed inappropriately.

In case of disclosure of personal data presenting a risk for the rights and freedoms of the data subjects, please be aware that ALBON is obliged to inform the competent supervisory authority and to inform you as rapidly as possible of any violation of your personal data likely to generate a serious risk for your rights and freedoms, so that you can take all useful measures.

## **ARTICLE 6 – COOKIES**

We use cookies and trace files to deliver our services and to measure the use of our Websites. All information on how we use cookies and your options to oppose this use are provided on the page concerning our cookie policy.

## **ARTICLE 7 – YOUR RIGHTS**

If you no longer wish to receive communications from ALBON (exercising your right to oppose or withdraw consent provided previously), you can inform us by using the unsubscribe link provided on each email, by configuring your registration preferences, or by sending us an email to the following address: [contactrgpd@nextpool.com](mailto:contactrgpd@nextpool.com).

Similarly, if after having provided your consent for your data to be transferred to companies of the Nextpool Group, you wish to change your mind and no longer receive communications from them, you may withdraw your consent by sending us an email to the following address: [contactrgpd@nextpool.com](mailto:contactrgpd@nextpool.com). We also provide an incident declaration form that you may use: <https://nextpool.lpages.co/incident-rgpd/>.

Also, you may access and rectify your personal data, or request that they be erased. In certain circumstances, you also have other rights, including data portability, limitation or opposition of the processing of your data, the right to be forgotten and the right to define how your data is handled after your death (please visit the website of the French Data Protection Authority (CNIL) at <https://www.cnil.fr/en/home> for more information about your rights). If the processing is founded on your consent you are also entitled to withdraw your consent.

To exercise your rights or for any questions concerning the processing of your data through these arrangements, you may contact our Data Protection Officer using any of the means at your disposal:

- by electronic means to the following address: [contactrgpd@nextpool.com](mailto:contactrgpd@nextpool.com) or using the form available at this address: <https://nextpool.lpages.co/incident-rgpd/>
- by post, to the following address:
  - DPO Protection des Données Personnelles – Nextpool Services – 300 route nationale 6 immeuble le bois des cotes bâtiment A, 69760 Limonest – France

To enable ALBON address. Except in specific cases, we will respond within one month of receiving your request.

If after contacting ALBON, you consider that your data privacy rights have not been respected, you may send a complaint online to CNIL.

## **ARTICLE 8 – MODIFICATIONS TO THE PRIVACY POLICY**

ALBON reserves the right to modify or in general update this Privacy policy at any time and without notice. All substantial modifications will be notified on the Website and/or by email

if necessary. We invite you to regularly consult this page to remain informed of any changes made to this Privacy policy.