

PERSONAL DATA PROTECTION POLICY

At Sodeco Valves, respecting privacy represents a significant challenge and we undertake to protect it. Through this policy, Sodeco Valves undertakes to comply with European Regulation No. 2016/679 of the European Parliament and Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of said data (hereinafter referred to as the "GDPR") and with French laws on personal data protection.

I. NAME AND CONTACT DETAILS OF THE DATA CONTROLLER

Thermador Group is comprised of several independent entities, including Sodeco Valves. In the context of your relations with one of the companies in our Group, the "controller" of your personal data will be the company which decides on the "whys" and "wherefores" of this data processing, namely, Sodeco Valves, located at Morettestraat 5, B-1740 Ternat, Belgium, hereinafter referred to as "Sodeco Valves" or "we".

II. CONTACT DETAILS OF THE DATA PROTECTION OFFICER

The DPO (Data Protection Officer) at Sodeco Valves is the DPO of the Thermador Group: Adeline Porcher. The DPO can be contacted by e-mail at privacy@thermador-groupe.fr or by post at the following address: Thermador Group, Délégué à la protection des données (Data Protection Officer), 80 Rue du Ruisseau, Parc d'Activités de Chesnes, 38297 Saint Quentin Fallavier.

III. SOURCES

We may collect or obtain personal data about you in the following ways:

- Directly from you, for example when you contact us or hand us your business card.
- In the course of our business relations, for example when we supply a product or a service to you or your employer.
- When you make your personal data public, for example on your website, the website of your group or on social networks.
- When you browse on our website, for example by entering your personal data in our contact forms, or when you enable cookies.

IV. CATEGORIES OF PERSONAL DATA

"Personal data" means any information which can be used to identify you directly (for example, your name) or indirectly (for example, pseudonymised data such as a unique identifier). We may collect data relating to:

- Your identity: for example, your surname, first name, e-mail address, telephone number.
- Your professional life: for example, your profession or function, telephone number, e-mail address, work address, delivery address or information about your employer.
- Your orders or quotations: for example, your purchase history or the contact details of individuals to whom deliveries have been made.
- Your financial details: for example, your bank details, required for payment purposes.

We do not collect what is known as "sensitive" personal data about you. If we were to need to do so for legitimate reasons, we would do so with your consent and in accordance with the applicable laws.

V. PROCESSING YOUR DATA

Data processing category	Purposes	Legal basis	Data subjects	Personal data category	Recipients
Managing the customer database	<p>Supplying products and services</p> <p>Establishing direct contact</p> <p>Personalising our offer</p> <p>Checking the accuracy of customer data</p> <p>Analysing business activity</p>	<p>Consent</p> <p>Legal obligation</p>	Customers	<p>Identity</p> <p>Professional life</p>	IT service providers
Managing orders and customer services	<p>Replying to your requests</p> <p>Monitoring your orders, deliveries, invoices and payments</p> <p>Handling complaints</p>	<p>Legal obligation</p> <p>Performance of the agreement</p>	Customers	<p>Professional life</p> <p>Economic and financial data</p>	<p>Subcontractors specialising in transport, after-sales service (repair centres)</p> <p>IT service providers</p>
Managing online orders	<p>Creating online customer access</p>	<p>Legal obligation</p> <p>Performance of the agreement</p>	Customers	<p>Identity</p> <p>Professional life</p> <p>Connection data</p> <p>Financial data</p>	IT service providers
Managing the internet user database	<p>Making browsing on the website more user-friendly</p> <p>Coordinating the forum</p> <p>Carrying out audience analysis and statistics</p>	<p>Consent</p>	Customers and prospective customers	<p>Identity</p> <p>Professional life</p>	IT service providers
External communication and new business development	<p>Informing you about news and events</p> <p>Drawing up a list of persons interested in our products and services</p>	<p>As applicable: your consent or legitimate business interest</p>	Customers and prospective customers	<p>Identity</p> <p>Professional life</p>	<p>Communications agency, dispatching service provider</p> <p>IT service providers</p>
Managing recruitment	<p>Selecting candidates and contacting them</p>	<p>Consent</p>	Candidates	<p>Identity</p> <p>Professional life</p>	<p>Subcontractors specialising in recruitment</p> <p>IT service providers</p>

VI. TRANSFERS OF PERSONAL DATA OUTSIDE THE EU

In general, your personal data is securely stored in electronic format on our servers and in paper format at our premises, which are located in the European Union. However, for some specific services, we may transfer certain data to subcontractors outside the EU. In this case, in accordance with the applicable regulations, we demand that the subcontractors in question provide the guarantees required as regards supervision and the provision of security for said transfers, including, inter alia, the European Commission's adequacy decision relating to certain countries, the Privacy Shield to the USA or the standard contractual clauses adopted by the European Commission.

VII. PERSONAL DATA RETENTION PERIOD

We take all reasonable measures to ensure that your personal data is stored for a period which does not go beyond what is necessary in view of the purposes set out in point V.

We store your personal data, throughout our business relations, on the basis of our legal and contractual obligations and our legitimate business interests.

At the end of our business relations, we store your data for the duration of the period prescribed by the statute of limitations in accordance with the applicable law, i.e., the legal period during which a person may take legal action against you in relation to your personal data, or during which your personal data may be relevant. In the event that legal action is taken, we can continue to process your personal data for an additional period required for said legal action.

At the end of these periods, we will delete, physically destroy or anonymise your personal data.

VIII. YOUR RIGHTS

RIGHT TO BE INFORMED

This Personal Data Protection Policy contains all the information about the personal data we collect, the processing we perform and the individuals authorised to access said data.

RIGHT TO ACCESS AND RIGHT OF RECTIFICATION

You may ask us whether we are storing personal data about you and request a copy of said data. You may also ask to have any personal data about you that is inaccurate rectified. In view of the purpose of the processing, you have the right to have incomplete data completed.

RIGHT TO BE FORGOTTEN

You may also exercise your right to be forgotten and ask us to delete your personal data if you withdraw your consent or if said data is not required in order to comply with a legal or contractual obligation.

RIGHT TO RESTRICT PROCESSING

The GDPR also allows you to ask for the processing of your personal data to be restricted, if you dispute the accuracy of any data or if the processing is unlawful but you do not wish to delete your data in order to exercise your legal rights.

RIGHT TO DATA PORTABILITY

You also have the right to receive your personal data in a structured, commonly used and machine-readable format, for the purpose of transferring it to another controller.

RIGHT TO OBJECT

The right to object allows you to object at any time to the processing of your personal data, where it is no longer necessary for the performance of a legal or contractual obligation.

This right to object relates in particular to processing that is associated with new business development.

RIGHT TO WITHDRAW CONSENT

When we process your personal data with your consent, you have the right to withdraw said consent at any time. The withdrawing of your consent does not affect the lawfulness of any processing carried out prior to the date on which we receive notice that you have withdrawn your consent. The withdrawal of consent does not prevent processing that is based on other legal grounds.

EXERCISING YOUR RIGHTS AND MAKING COMPLAINTS TO THE SUPERVISORY AUTHORITY

To exercise one or more of these rights, raise any question with us about said rights or about any other clause in this policy, or ask us about the processing of your personal data, please contact your DPO, whose contact details are shown in point II.

We may request proof of your identity before acceding to your request.

In accordance with the GDPR, we reserve the right to:

- Charge a reasonable fee which takes into account the administrative costs of providing the information or communication or taking the action requested.
- Refuse to act on said requests by demonstrating that they are manifestly unfounded or excessive.

We also wish to inform you that you may make a complaint at any time to the competent supervisory authority. In France, the Commission Nationale de l'Informatique et des Libertés (CNIL) [French Data Protection Authority] is the competent supervisory authority www.cnil.fr.

IX. AMENDMENTS TO THIS POLICY

This policy may be amended from time to time. You can check this page in order to view the most recent version on our website.