

## **CHARTER RELATED TO PROTECTION OF PERSONAL DATA AND MANAGEMENT OF COOKIES**

This charter for protection of personal data and management of cookies describes the policy of LOOK Cycle International -- a simplified stock corporation with registered capital of € 2 515 440, which has its head office at 27 rue du Docteur Léveillé - 58000 NEVERS, registered at the NEVERS Trade & Companies Registry under number 419 513 262 (hereinafter « **the Company** ») -- regarding protection of privacy, collection of personal data, and cookies.

This charter applies to data collected on the [shop.lookcycle.com](http://shop.lookcycle.com) and [exaktpower.com](http://exaktpower.com) websites (hereinafter « **the Site or Sites** »).

In order to facilitate access to this charter, we make it available on our home page and at any other location where personal information is requested.

The purpose of this charter is to inform you regarding:

- the means we implement to collect your personal data, in strict compliance with your rights,
- data that might be collected on our Site,
- the use of collected data and your rights in said data.

The Company specifies herein, and/or whenever you are requested to provide personal data, the purposes of processing them and the means of any such operation (collection, registration, modification, etc. ).

The Company commits to:

- ensure compliance with the principles applicable to personal data protection ;
- inform individuals of the existence of their rights of access, rectification and opposition;
- carry out the legal and/ regulatory formalities .

We inform you that, in the collection and management of your personal data, we comply with Act n° 78-17 of 6 January 1978 regarding computerized data processing and individual rights, as amended and in its applicable version, and with the general regulations regarding data protection adopted by the European Parliament on 27 April 2016, and with the laws and regulations resulting therefrom.

## **I. DATA PROTECTION**

### **1) Definition and nature of personal data**

When you use our internet Site, or navigate through it, we may have good reason to collect personal data, particularly when they are transmitted in the following contexts :

- & Information forms
- & Subscription to the newsletter
- & Subscription to our guarantee
- & Recruitment space
- & Creation of a customer account
- & Processing of orders
- & Subscription to a loyalty programme...

The term « personal data » designates all of the data that enable us to directly or indirectly identify you (through the gathering of information) such as surname, given names, pseudonym, date of birth, photograph, postal and email addresses, telephone numbers, data related to your transactions on the site, description of your purchases, subscriptions, bank identification statement, etc.

### **2) Rights of access, rectification, deletion and opposition to processing**

In accordance with Act n°78-17 of 6 January 1978 regarding « computerized data processing and individual rights», and the provisions of the General Regulations applicable to Data Protection, which were adopted by the European Parliament on 27 April 2016, you have the right to access, rectify, delete and oppose the processing of your personal data. You also have the right to oppose the processing of your data for prospecting purposes, particularly commercial purposes.

You may exercise your right of access to your data and have them rectified by contacting : [contact@lookcycle.fr](mailto:contact@lookcycle.fr)

To that end, please send us a letter by post or email, signed by the author of the request, along with proof of identity (national identity card or passport) signed by the person who is exercising his right.

### **3) Management of personal data by the Company**

#### ***3.1 Means of collecting data***

When you surf on the Site, we may have good reason to collect your personal data to enable us to offer you the services displayed thereon .

Before each collection of personal data, we ask for your consent via a form to be filled out and a box to be ticked off after reading this data protection Charter.

### ***3.2 Purpose of collecting data***

Your personal data are collected for one or more of the following purposes :

- Creation of your customer account for registration of your online orders; management and processing of your orders; issuance of invoices; management and processing of delivery.
- Monitoring of the customer relations, particularly the management of your complaints and requests.
- Management of the after-sale service; and warranty of customer products.
- Management of your requests for exercise of the right to access, rectify or oppose the use of your data.
- Retention of your data in legal documents, in compliance with the accounting standards, for a period specified by law, in order to be able to respond to any requests by the tax authorities and social agencies.
- Transmission to you of newsletters, informational letters and promotional offers to keep you informed of new products and developments;
- Management of your subscription to, or cancellation of, our newsletters and satisfaction enquiries.
- Preparation of reports, sales statistics, market and behavioural studies, especially for improvement of our products and for satisfaction of your expectations in the best possible way by offering you products adapted to your needs.

We commit to collect your data only to the extent that is strictly necessary for the processing that is envisaged, to enable us to process your requests and offer you the services displayed on our internet Site.

### ***3.3 Retention of data***

Your personal data that we collect are retained for a period that does not exceed the time necessary to perform the tasks for which they are collected, and, in any event, for a maximum period of:

Three (3) years, commencing to run as of the end of the commercial relationships for partners or customers, and three (3) months from the date of collection of the data or the last contact for prospects, and, in either case, only for commercial prospecting.

Thereafter, since the collected data are no longer necessary for execution of the tasks for which they were collected:

- we commit to contact you again to know whether or not you intend to continue receiving commercial solicitations;
- otherwise, the data will be archived, rendered anonymous or destroyed.

You may oppose the processing of your personal data at any time since you have the aforesaid right of access, rectification, deletion and opposition.

### ***3.4 Addressee of data***

The personal data that we collect from you are intended for the Company and, if applicable, for SRM GmbH, SCHOBERER ENGINEERING GmbH (Rudolf-Schulten-Str. 6 52428 Jülich Germany), a company governed by German law operating the [exaktpower.com](http://exaktpower.com) website, as well as all of this company's subsidiaries.

For the processing of your data that are collected in the aforesaid contexts, we have good reason to share them with employees who are duly authorized for that purpose, in our internal departments and those of the aforesaid company, SRM GmbH, namely:

- After-sale Service ;
- Accounting & Financial Department ;
- Sales & Commercial Department;
- Communication Department ;
- IT Department.

The data that we collect from you are not meant to be transferred outside of the European Union. However, in the eventuality that your data are transferred abroad, particularly outside of the European Union, we guarantee that we will take all appropriate measures to sufficiently protect your data, such as:

- Orient operations toward countries called « safe » -- i.e. those offering significant protection of your data ;
- Request the necessary authorizations from the Monitoring Authority before any collection of data, if that authority so requires, depending on the countries involved;
- Obtain guarantees of security and confidentiality from subcontractors, for example, by imposing strict contractual provisions, reserving the right to regularly monitor them, and conducting audits.

#### **4) Security and confidentiality of collected personal data**

The security and confidentiality of your personal data is a top priority for us.

Indeed, we ensure that all useful technical and organizational measures are taken vis-à-vis the personal data you transmit to us, taking into account the particular nature thereof and the risks involved in their processing.

Such measures are designed to keep your personal data secure and protected from distortion, destruction or damage, as well as to prevent unauthorized third parties from having access thereto.

To that end, we have implemented technical measures such as the protection of data during accesses and, in the long run, strengthened management of the rights of access; increased complexity of the password policy; installation of tools for the prevention of exterior intrusions into our networks and protection of your data via secured flows; and organizational measures such as data cartography, review of contacts with subcontractors, partners and employees, enhanced awareness among professional and IT (Information Technology) teams, etc .

The security and confidentiality of personal data also depends on good practices by everyone involved. Hence, we recommend that you refrain from communicating your identifier and password to third parties; that you systematically disconnect from your profile and your customer account (particularly in the case of linked accounts); that you close the window of your browser at the end of your session, especially if you connect to the internet from a computer you share with other persons; and that you refrain from registering your identifier and password in your browser. Such precautions will prevent other users from accessing your personal information.

## **II. COOKIE MANAGEMENT POLICY**

The term « cookies » encompasses all of the tracers filed during the visit to a website, the reading of an email, and particularly the use of a software or mobile application. A cookie is a text file that the site you visit records on your hard disk or your browser's memory. It enables your computer to store various technical data enabling general monitoring of the public's access to our sites (number of visits, frequency of exposure to an advertising banner, connection to other sites, etc. ) or the individualization of pages that are displayed for future interactions with this site.

When you surf on our Site, information regarding your navigation might be recorded in «Cookies » files installed in your computer, tablet or smartphone.

Cookies are important for proper operation of a site. They are used to retain information, provide a secured connection, collect statistics for optimization of the Site's functions, and adapt the content to your areas of interests.

Hence, when you visit our Site for the first time and cookies may be installed in your terminal, we inform you that cookies are used by the Site, via a window opening on the visited page. After you get this information, you may access this Charter and accept or refuse the cookies.

We call your attention to the fact that, by continuing to surf on the Site during the display of this window, you agree to the use of cookies on our Site. However, you may change the settings related to the cookies at any time, as explained below.

### **1) Types of cookies**

There are several types of cookies that give you access, if you accept them, to a certain number of functions.

#### **➤ Cookies emitted by the Company on its Site :**

These are cookies that the Company installs on your computer, tablet or smartphone, especially for navigation on our Site.

When you navigate on our Site, your computer dialogues with a server, which provides it with all the resources it request, by automatically recording each operation in a specific file in which your computer is identified by its IP address. Your browser automatically transmits certain standard data to us: In addition to your IP address, the type of browser you use and its functions, the type of operating system you use, the identification of third party sites (Facebook, Twitter, etc.) to which you may be connected, and the dates and hours of access to our sites.

Those data, and particularly your IP address, do not permit us to identify you by name.

The cookies that we place enable us to:

- monitor our Site's general activity, identify errors, and ensure that our Site has the appropriate material resources;
- establish the statistics and volumes of visits and the use of various elements comprising our Site ;
- adapt our Site's presentation to your terminal's preferred display (language used, operating system, etc);

- facilitate your visits to our Site, by avoiding need to provide the same information on each new visit, or by individualizing their content as a function of the preferences or areas of interest you may have communicated ;
- improve the browsing ergonomics, and identify the surfers' overall areas of interest.

You are free to accept or refuse these cookies. To refuse cookies or to be informed of the installation of a cookie on your computer, you simply modify certain settings of your computer.

You can also delete cookies stored on your computer in order to definitively remove the information that they contain.

➤ Cookies placed by third parties on our Site:

The placement and use of cookies by third parties are subject to their privacy protection policy. We inform you of the purpose of cookies of which we are aware, and the means you have at your disposal to make choices vis-à-vis these cookies.

➤ Cookies for assessment of visitors :

We use Google Analytics to collect information regarding your use of our Site, in order to :

- help us assessing and analysing the effectiveness of our Site's content;
- monitor the analytical data on our Site and the use of our Sites;
- improve our Sites' services .

Google Analytics collects information regarding the pages you visit and the time you spend thereon. We do not collect personal information.

We do not authorize the sharing or use of these data.

You may indicate in the settings that you do not want to send information to the Google Analytics service.

## **2) Duration of cookies' life**

In accordance with the applicable regulations, cookies collected on our internet Site have a maximum life of 13 months.

### **3) Management of cookie preferences**

Various means are at your disposal for managing cookies. Your browser may also be set in such a way that it advises you of cookies placed on your computer, tablet or smartphone, and asks you if you want to accept or refuse them.

You may accept or refuse cookies case by case, or may systematically refuse them. However, we call your attention to the fact that changes of your setting might affect your navigation on the internet, and the conditions for access to certain services may require the use of cookies. Therefore, an alteration of cookies might block your access to certain functions of the Site. You may change your desires regarding cookies at any time, by following the procedure indicated below.

Each browser has a different configuration. It is described in the assistance menu of your browser, which will tell you how to modify you desires regarding cookies.

You may deactivate or set the parameters of cookies with your browser's settings.

It should be noted that certain cookies are useful for access to the Site's functions. If you refuse them, you may not have access to certain functions or rubrics of the Site.

#### **On Google Chrome**

- Go to the « Individualize and control Google Chrome » menu in the browser's tool bar, and select « Settings ».
- At the bottom of the page, click on « Advanced setting ».
- In the « Confidentiality and security » section, click on the « Content settings » button, and then on « Cookies ». You may then set the cookies on your Google Chrome browser.

#### **On Firefox**

- Open the browser's menu and click on « Options ».
- Go to the « Privacy and security » tab.
- In the « Cookies and site data» section, select how you want to set the cookies' parameters.

#### **On Internet Explorer**

- Go to the « Settings and more » menu in the browser's tool bar, and select « Settings».
- Click on « Display the advanced settings » in the « Advanced settings» section.
- In the « Cookies » section, you may select « Block all cookies », « Block only third party cookies » or « Do not block cookies ».

### **III. UPDATING OF THE CHARTER**

We reserve the right to modify all or any part of this Charter at any time as a function of the modifications and changes of our internal practices and procedures. We will ensure that such practices and procedures continuously comply with any possible amendments to the French and European legislation and regulations.

We recommend that you regularly consult this Charter before any collection of your data so that you have a better knowledge and comprehension of the use of your personal data. We may have good cause to regularly ask you to confirm your knowledge of this Charter.

Date of the most recent updating of this Charter: 21 May 2018