

# Privacy Policy

*English version*

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## 1. Preamble

At Winoa (including Elastikos (France) S.A.S, Winoa S.A. and their subsidiaries; collectively “Winoa”, “us”, “we” or the “Company”), your privacy is as important to us as it is to you. We have developed this policy, which is a public document available to anyone, because we want you to feel confident about the privacy and security of your personal information. This Privacy Policy provides information on how we collect, use and protect personal information.

“Personal information” means information about individuals, and from which individuals could be identified, directly or indirectly, including information which may be protected under the privacy or data protection laws of their country.

This Privacy Policy applies to anyone who interacts with us, in any way (for example, by email, through our website, by phone, by post, or through a Winoa app, social media, face to face or any other form). Concerning employee personal information, please refer to our internal Employee Privacy notice.

This Privacy Policy is without prejudice to specific local data protection requirements and additional local privacy policies that may be posted on our websites, which may be included in our contracts or that may be notified to any third parties (customers, suppliers, etc.) from time to time in relation with our operations. If there is a conflict between the requirements under our Privacy Policy and local laws, you should comply with the most stringent requirement. Please check if there are any Annexes to this Privacy Policy applicable to your location available on our website.

We reserve the right to review this Privacy Policy at any time. We encourage you to periodically review this Privacy Policy to stay informed about our personal information practices. The Privacy Policy was last reviewed and updated by the date referenced at the top of the document and is effective as of that date.

Winoa, as data controller, takes the privacy of your personal information seriously and ask that you read this Privacy Policy (and any applicable Annexes) carefully as it contains important information on:

- The key points you need to know about how we collect and use your personal information;
- What personal information we collect about you;
- Why and with whom we share your personal information, and in which cases your personal information may be transferred abroad;
- How we protect the security and confidentiality of your personal information;
- The choices and rights available to you regarding our use of your personal information;
- How you can contact us about our privacy practices and to exercise your rights.

We collect and process the personal information necessary to conduct our activities and to develop or maintain business and contractual relationship in a business-to-business environment. It is Winoa's policy to:

- Process personal information fairly, in a transparent manner and in accordance with applicable laws and tell you (either directly or in written policies) about how Winoa will use your personal information;
- Collect personal information for specified, explicit and legitimate purposes;
- Ensure that your personal information is adequate, relevant and limited to what is necessary in relation to the purpose for which it has been collected and processed;
- Not keep your personal information for longer than needed for the purposes for which it is processed;
- Keep your personal information secure, and limit the people who can access it;
- Take reasonable steps to ensure that the personal information we process is accurate and where necessary, is kept up to date;
- Ensure that you know how to access your personal information and exercise your rights in relation to it, and
- Ensure that any third party Winoa shares your personal information will take appropriate technical and organizational measures to protect it and ensure an appropriate level of security.

## **2. What personal information does Winoa collect from and about you?**

### **Personal information that you provide us**

Personal information we collect may include data pertaining to our employees, candidates, customers, suppliers, vendors or other business partners including their employees, contact people, or authorized users. In particular, we may collect and process the following personal information, if authorized by local legislation:

- Full name, gender, address, and contact details (such as telephone, mobile and fax numbers, email address), passport or other identification document number;
- Function, position, job title, workplace;
- IP address;
- Online account details including username, password and other credentials used to access Winoa's products, services, including apps and websites;
- Financial and payment information such as banking details, financial situation, payment history, invoices and payment terms as well as any personal information for fulfilling our legitimate processing billing information;
- Complaints and enquiries;
- Business profile, sanction lists, tax identification or any other registration number allowing us to ensure existence, accuracy and safety of the business relationship;
- Responses provided in response to surveys; and
- Any other information that is relevant to fulfil the valid purpose for which it was collected.

## Personal information collected by automated means

We may also collect personal information by automated means - for example, when you use one of our applications, apps or visit our website - using technologies such as cookies, web server logs, IT logs, web beacons, and similar technologies as described below, without you actively submitting such information.

The types of personal information that we may collect through such automated means, to the extent permitted under applicable law and, where required, subject to your express consent, are:

- The date and time of visit, referring address (location from which a visitor comes to the websites);
- Type of Internet browser, OS and device details;
- Visitor's IP address (a unique number that is assigned to any computer that connects to the Internet for identification purposes);
- Images and motions (CCTV);
- Traffic data for calls or Internet session when you use our phone or Internet services, including called numbers, identification of the phone, duration of the call, date, duration and data volume of the Internet session;
- As the case may arise location data generated during calls or Internet sessions; and/or
- History of the contact you have had with our customer service.

## Personal information collected by third parties

Winoa may also receive personal information from other sources, including third parties from whom we have purchased data, and combine this information with personal information we already have collected. This helps us to update, expand and analyze our data, identify new business partner or new opportunities, and create more tailored products and services that may be of interest to you.

### 3. How does Winoa use your personal information (purpose)?

Winoa uses, transfers and otherwise processes personal information for the following purposes, as described in this Privacy Policy or as otherwise permitted under applicable law, and in accordance with the legal basis set out below for a variety of purposes, including:

PURPOSES	LEGAL BASIS
<p><b>Managing human resources:</b> Personal information about prospective employees and applicants is collected for human resources purposes when they apply for a job at Winoa via the Website, the application or any other forms. This includes identity and contact curriculum vitae (CV), your motivation letter if it was attached, the content of the</p>	<p>Our legitimate interest to evaluate your skills and ability for the proposed job, and the need to take the necessary measures prior to entering into the employment contract.</p>

PURPOSES	LEGAL BASIS
<p>message you sent us and our answer on whether your application may be suitable for available position.</p>	<p>Our legitimate interest to mobilize and develop human resources to support the company's strategy.</p> <p>Your consent (e.g. when you voluntarily provide us with data that we do not ask for, such as your picture).</p> <p>The need to comply with our legal obligations.</p>
<p><b>Managing shareholder relationships:</b> Personal information from shareholders is collected for purposes related to their shareholding in Winoa, including for the purposes of issuing or transacting in shares, paying dividends, regulatory reporting and shareholder communications. This personal information may include a shareholder's name, nationality, address, shareholding details, passport number, identification card number, tax file number, and bank account details.</p>	<p>The need to comply with our legal obligations.</p> <p>Our legitimate interest to develop the relationship with the managing shareholders.</p> <p>The necessity to execute a contract.</p>
<p><b>Managing all aspects of our business relationships with customers, suppliers and other external third parties:</b> Personal information about individuals within such external organizations is collected for business purposes such as supplying goods and services – including through e-commerce websites - or purchasing goods and services, making or receiving payments, entering into and fulfilling contracts, communicating about our products, services and events, administering and improving our products and services, managing your enquiries, claims or complaints, responding to requests from authorities and complying with our contractual and legal obligations, and for other legitimate business purposes. Subject to individual consent where required by law, we may use your personal information to conduct marketing, promotional and informational activities to show you information that is of interest to you and to perform business analytics, satisfaction surveys or market research and conduct direct marketing.</p>	<p>The need to comply with our legal obligations.</p> <p>Our legitimate interest to develop and maintain our relationship with you, to improve the quality of our products and services and to better communicate with you concerning our services and products.</p> <p>The necessity to execute a contract.</p> <p>Your consent when required by law.</p>
<p><b>Creating new business relationships with potential customers and suppliers or any other third party, for</b></p>	<p>Our legitimate interest to develop and maintain our relationship with</p>

PURPOSES	LEGAL BASIS
<p>example when you express an interest in obtaining additional information about our products and services, or answer to a request for quotation or a tender, or register to use our website(s), or register for an event, you provide us with personal information. To proceed with your request to register to use our website and to perform our obligations related to your use of our website.</p>	<p>you, to improve the quality of our products and services and to better communicate with you concerning our services and products.</p> <p>Our legitimate interest to answer your questions and to develop and maintain our relationship with you.</p> <p>The necessity to prepare a contract to which you will be party.</p>
<p><b>Managing safety, security and other administrative, accounting, tax, or legal obligations:</b> Personal information is collected from visitors to our sites for safety and security purposes. We also collect personal information to exercise our rights, to defend ourselves from claims and to respect laws and regulations that apply to us and the third parties we work with (for example, to meet obligations under trade sanctions and export-control legislation and whistleblowing legislation), to administer our accounting and taxes obligations, to respond to requests from administrative or judicial authorities, to prevent and detect fraud or other crime.</p>	<p>The need to comply with our legal obligations.</p> <p>Our legitimate interest to protect the company, its employees, and its assets.</p>
<p><b>Managing our websites and community relationships:</b> Personal information can also be collected from members of communities for the purposes of engaging and interacting with communities linked with WinoA's activity or with WinoA's community. We also collect personal information to administer, operate, maintain, and improve our websites, apps and any other services we offer, enforce or apply our website terms of use, our policy terms and conditions or other contracts, or to protect our (or our customers' or other people's) rights, property or safety.</p>	<p>Our legitimate interest to develop and maintain our relationship with you, and to protect our (or our customers' or other people's) rights, property, or safety.</p> <p>The necessity to execute a contract.</p> <p>The need to comply with our legal obligations.</p>
<p>Taking part in, or being the subject of, any sale, purchase, merger or takeover of all or part of the WinoA business.</p>	<p>The need to comply with our legal obligations.</p> <p>Our legitimate interest to develop our business.</p>

In the view to offer the best and most adapted experience to our customers or potential customers, we may use personal information to conduct marketing, promotional and informational activities and to perform business analytics, satisfaction surveys or market research and direct marketing purposes in general, including sending notifications about updates to the websites, information on our services we think may be of interest to you, initiatives or events by mail, e-mail, phone, fax, SMS, MMS or other electronic means. However, we will only do so in accordance with GDPR or local data protection law requirements. If you no longer wish to receive marketing information, you will always be able to use the UNSUBSCRIBE option available in all our communication.

#### **4. Who has access to your personal information? Why and with whom do we share your personal information?**

Our policy is to not give, sell or otherwise distribute personal information we collect to third parties outside of Winoa.

As we operate internationally, we may need to make your personal information available to other Winoa entities and to external third parties, when necessary and in accordance with applicable law or with your express consent if required, or when there is other legal basis e.g. contract or other legal instrument to such transfer or when we believe disclosure is necessary or appropriate for our legitimate interests (or those of the third party to whom we disclose your data), provided that they are not overridden by the your interests or fundamental rights and freedoms, in accordance with applicable laws, or when the disclosure/transfer is permitted by applicable law.

Winoa will comply with applicable laws and regulations in disclosing your personal information to third parties. In particular, when Winoa outsources the processing of your personal information to third parties or provide your personal information to third party service providers, Winoa prohibits them from using it for their own purposes or from disclosing it to others.

In line with this, we share personal information with the recipients listed below:

- **Within Winoa.** Your personal information can be accessed by relevant Winoa departments but only to the extent necessary to fulfil their respective tasks.  
Without prior written authorization of Winoa, employees and independent contractors of Winoa shall not, directly or indirectly, access, use for any purpose, disclose to anyone, publish, exploit, take, copy, alter, destroy, or remove from the offices of Winoa, nor solicit, allow or assist another person or entity to access, use, disclose, publish, exploit, take, copy, alter, destroy or remove from the offices of Winoa, any of your personal information or part thereof except: (1) as permitted in the proper performance of their duties for Winoa; (2) as permitted in the ordinary course of Winoa's business for legitimate business purposes; or (3) as otherwise required by applicable laws and/or regulations.
- **Other companies of Winoa group, for legitimate business purposes.** We may share your personal information with other companies of the Winoa Group for legitimate business purpose and in particular with our French companies where are located our corporate shared services.

- **Third party service providers.** Your personal information may be disclosed to third party services providers, acting on our behalf, in connection with managing services, data analytics, finance, and accounting or other administrative services and information technology support. Our third party service providers will have access to – and process – personal information only on our behalf and under our instructions and will be held to appropriate security obligations. These third party service providers are located in Europe, the United Kingdom and the United States.

Please note that when you order goods and services from Winoa, we may make enquiries about you for credit reference purposes and your situation related to trade sanctions. These enquiries include searching your records held by a credit reference agency or trade sanction lists.

- **Winoa's business partners** such as sales agents to allow us to provide the best offer to our customers.
- **Other data recipients.** For the above purposes or where otherwise required by law, we may also need to make personal information available to third parties such as advisors, banks and financial institutions, professionals, independent consultants, potential or existing investors and/or acquirers (in connection with a merger, acquisition, or sale involving Winoa or its affiliates or as part of a corporate reorganization, stock or asset sale, or other change in corporate control) or for the purposes of paying dividends or mailing shareholder communications.
- **Regulatory, legal and/or administrative authorities, agency or entity, courts, police authorities or other government bodies and authorities as required by applicable laws and regulations.** Winoa may provide information, in response to properly made requests, for the purposes of the prevention and detection of crime, and the apprehension or prosecution of offenders, when required to do so by law, for example under a court order, or in response to properly made court or administrative demands. Winoa may also provide information for the purpose of safeguarding national security. In either case, Winoa will act in accordance with applicable data protection law.

## 5. Will your personal information be transferred abroad?

We may need to transfer your personal information to other companies of Winoa Group, business partners or other recipients identified in the "Why and with whom do we share your personal information?" previous section that are located inside and outside the European Economic Area ("EEA") or inside and outside your jurisdiction, including in countries that do not provide the same level of protection for personal information as in the EEA or your jurisdiction. In any case, we will only transfer personal information to recipients that provide an adequate level of data protection or as permitted by applicable data protection laws by implementing appropriate safeguards, including, but not limited to, relevant data transfer agreements when needed.

In some jurisdictions, you have the right to refuse consent to such collection and transfer; in such case however, we may not be able to provide you with our products and services.



## **6. How is your personal information protected?**

Winoa has appropriate policies and technical and organizational measures in place to safeguard and protect your personal information against unlawful or unauthorized access, accidental loss or destruction, damage, unlawful or unauthorized use and disclosure. We will also take all reasonable precautions to ensure that our staff and employees who have access to personal information about you have received adequate training.

In addition, Winoa has adequate safeguards in place for the proper disposal of files and documents containing personal information, including, without limitation, the requirement that physical files and documents containing personal information be shredded or placed in the secured shredding containers at its facilities for proper disposal.

When Winoa uses third party organizations to process information on its behalf, they shall demonstrate their compliance with Winoa's security requirements, and with relevant data protection legislation throughout the time they work for Winoa.

In the event of a data breach, Winoa will notify local relevant authorities and the persons concerned, when required, in accordance with applicable laws and regulations.

## **7. How long do we keep your personal information?**

Winoa will keep your personal information in a secure environment for the time necessary to achieve the purposes for which it was collected or during the minimum retention period provided by the applicable legislation including civil, criminal and commercial law.

Winoa will delete personal information in electronic files permanently so that it cannot be restored and will shred or incinerate paper documents containing personal information.

To the extent permitted by applicable data protection laws, Winoa may, instead of destroying or erasing your personal information, make it anonymous such that it cannot be associated with or tracked back to you.

## **8. What happens when you provide us with personal information about third parties?**

If you provide us with personal information about third parties, you warrant, represent, and undertake that you have complied with applicable data protection laws including informing and obtaining all necessary consents and approvals for the provision of such personal information to Winoa, if necessary, and the processing by Winoa of this personal information as described in this Privacy Policy.

## 9. What happens if you visit a linked website?

The information obtained by third party websites accessed via Winoa's website is not covered by this Privacy Policy and is governed by the terms applicable to your relationship with that third party, and Winoa accepts no responsibility or liability in respect of third-party websites.

## 10. What are your data protection rights?

Under the General Data Protection Regulation ("GDPR") and applicable data protection laws you have a number of rights with regard to your personal information. Those rights, depending on the applicable data protection laws, are as follows:

- **Right to Access** – You can ask to see and obtain a copy of the personal information Winoa holds about you. In connection with a request, Winoa may request specific information about you to enable us to confirm your identity and right of access, as well as search for and provide you with the personal information Winoa holds about you. Winoa may, in limited circumstances, where permitted by applicable law, charge you a fee to access your personal information. However, we will advise you of a fee in advance. There can be instances where applicable law or regulatory requirements allow or require Winoa to refuse to provide some or all of the personal information we hold about you. In addition, personal information may have been destroyed, erased or made anonymous. In the event we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.
- **Correction or Deletion of Personal Information** – Winoa works to ensure that personal information in its possession is accurate, current, and complete. If you believe that the personal information Winoa holds on you is incorrect, inaccurate, incomplete, or outdated, you may request the revision or correction of that information. If it is determined that personal information is inaccurate, incomplete or outdated, we will revise it and, unless it proves impossible or involves disproportionate efforts, inform other third parties, which were provided with inaccurate information, so records in their possession may be corrected or updated. You are also entitled to have your personal information deleted, destroyed or de-identified.
- **Withdrawal of Consent** – If you have provided consent for the processing of your data, you have the right (in certain instances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.
- **Objection to processing and direct marketing** – You have the possibility to object, on grounds relating to your particular situation, at any time to the processing of your personal information (in certain instances), including profiling. When profiling is related to direct marketing you always have a right to object and to object to receiving direct marketing.
- **Limitation to processing** – You have the right to obtain from us restriction of processing in certain instances as provided by data protection law.
- **Right to data portability** – You have the right to receive the personal information, which you have provided to us, in a structured, commonly used and machine-readable format when the

processing is based on your consent or on a contract. You also have the right to ask us to transmit it to another data controller of your choice.

- **Complaints** - You have the right to lodge a complaint to the competent Data Protection Authority in your jurisdiction, if you believe that Winoa has not complied with the requirements of the applicable data protection legislation with regard to your personal information.

In case you wish to exercise any such rights, please send a request to Winoa as described under the "How can you contact us?" section below. Winoa will aim to respond within a reasonable period after the request is made or from when information required to process the request is received or otherwise as required under applicable data protection laws.

## 11. How to contact us?

If you have any questions, comments, complaints or suggestions in relation with this policy, or if you wish to exercise your rights under applicable data protection laws, Winoa has designated a function for responding to user inquiries regarding personal information and resolving related complaints. Please feel free to contact us, through our website or write to us at:

WINOA  
Winoa Group Security Officer  
528 avenue de Savoie - BP3  
38570 LE CHEYLAS  
FRANCE

You can also use the contact form on our website: <https://www.winoa.com/contact-us/>.

In the countries where appointing a Data Protection Officer or equivalent is a legal requirement, the legal representative of the company shall be considered as the Data Protection Officer. If such case, he will be involved as required each time you contact us using the above contacts.

Please note that Winoa may ask you questions or documents such as identity document to confirm your identity. From a country to another, the nature of the questions and / or requested document may vary in accordance with applicable law.