



Cousin TRESTEC

POLICY TO PROTECT YOUR PERSONAL DATA

November 2019

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Our philosophy and our commitments

Cousin Trestec is committed to the protection of your personal data and is committed to ensuring a high level of protection of your personal data in accordance with the European Regulation 2016/679 and the Data Protection Act 78-17.

As such, you will find below our policy of protection of your personal data explaining to you in particular what we collect as personal data, the treatment that is made and on what basis, their conservation and your personal rights. We invite you to read it.

Our Privacy Officer is at your disposal to answer all your questions, you can contact him at the following address: rgpd@cousin-group.com

You can find the text of the applicable European Regulation here: [https://eur-lex.europa.eu/legal-content/EN/TXT/? uri = CELEX% 3A32016R0679](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016R0679) or query / enter the regulatory authority (CNIL) via its website www.CNIL.fr.

This version of the policy of personal data may be modified by us if necessary and you will be informed

Your treatment manager

Cousin Trestec is the controller of your personal data and you will find hereunder details: 8 Rue de l'Abbé Bonpain 59 117 Wervicq-Sud; it is referred to by its name or "We" herein.

Your personal data and their collection by Cousin Trestec

Your personal data can be collected during:

- Your visit on our website,
- Your exchanges,
- Your prospecting actions, training or execution of our contract.

We do not collect any data not necessary for the purpose of treatment mentioned during the collection or data prohibited by law or regulation.

The collection of certain data may be mandatory or optional and you are informed of the mandatory information. Your personal data may be collected by third party providers or partners, who undertake to comply with European and national regulations on personal data.

Our policy is not to transfer your data outside the European Union; if by exception we proceed to do so, this transfer may only be made to a country or an organization falling under a decision of adequacy (art.45 GDPR) or presenting sufficient appropriate safeguards (art.46 GDPR) .

We do not make any automated decisions.

Our treatments of your personal data

We process your personal data by inserting them into the databases; they are stored, stored and, if necessary, rectified, deleted, archived, anonymized or pseudonymised, transferred to trusted third parties.

We are required to process your personal data for the purposes of the following treatments or for the purposes specified to you during the collection:

- **Your information on our commercial (products, services ...) and promotional offers – Communicate with you**

We may use your personal data for commercial prospecting purposes, and in particular to send you information about our products / services, our commercial and promotional offers, quotes and other pre-contractual documents, our news by email, mail or telephone.

- **Execution of your current contracts and customer follow-up**

We use your personal data to ensure the execution of current contracts according to your requests. We may also send you any information about your order or current contracts, their performance, your invoices and contractual documents, advice, the performance of our warranties if applicable and our legal obligations. We still use your personal data to manage our customer relationship, your claims or claims, if any disputes and track your customer history.

- **Improving the use of our services and improving our offers**

We process your personal data to enable you to make the best use of our services, improve our offers and products / services, and to track your user journey, conduct satisfaction surveys, surveys and anonymous statistics.

- **Your payments**

Your bank details can be collected either directly by us or by a dedicated and selected provider, which guarantees the complete confidentiality of your bank details and these details are kept only for the time necessary for the duration of the contractual relationship or in the legal limits.

- **Protection against fraudulent initiatives**

Personal data collected can be used to fight against fraud including payments or withdrawals. As such, our payment security providers can be returned to this data.

- **Ensuring respect for the law and court decisions**

Your Datas can be used for :

- respond to a request from an administrative or judicial authority, a representative of the law, an auxiliary of justice or comply with a court order;
- ensure compliance with our general sales / service conditions;
- protect our rights and / or obtain compensation for any damage we may suffer or limit its consequences
- to prevent any act contrary to the laws in force, in particular in the framework of the prevention of the risks of fraud

We may still have to process your personal data for the following purposes:

- trade relations

- Sending marketing campaigns by email, post or phone (including via a provider)

Security

- Protection of property and people and video surveillance security

The basis of the processing of your personal data

In accordance with the regulations, the processing of your personal data by us is justified if it is based on one of the following bases:

- Your consent to the processing of your data by us: you agree to the processing of your personal data by express consent. You may withdraw this consent at any time from our DPO; or
- The existence of a contract between you and us: the processing of the data is then justified by the needs of the execution of the contract; or
- Our legitimate interest in the processing of your personal data as long as this proportionate interest respects your fundamental rights and your private life; or
- The law or the regulations in force when it requires us to process and store your personal data.

Terms and lengths of storage of your personal data

We manage your personal data in three phases:

- an active phase where the data are kept for the time indicated below in "active" database: your personal data are then accessible only by the people with an operational need to access it in order to carry out authorized treatments
- an archiving phase (for additional time for "active" storage) when a legitimate reason justifies it: your personal data are then archived with restricted access and for a limited time
- A phase of deletion or anonymisation: at the end of the additional archiving within the deadlines below, your personal data are deleted or anonymized (so that they can no longer constitute personal data identifying you).

Your personal data are kept for the time necessary for the needs of their treatment, our customer relationship where applicable and the execution of contracts and within the limits specifically laid down by law; we may store your personal data in archive for the purposes of keeping accounting, tax or evidentiary supporting evidence for the time of the applicable requirements. As an example, here are the storage times for the following treatments (subject to the regulation requiring a differentiated shelf life):

Purpose of the treatment	Basis of treatment	Retention of personal data in the "active" database	Additional archiving
prospection	Your consent	3 years if you have not responded actively to any solicitation. The deadline runs again in case of active solicitation on your part	X
Execution of our contractual obligations to you / services	Contract	The time required for the execution of the contract and 3 years from the end of the business relationship (last activity (such as completion of contract (purchase, service ...), connection to the site as a registered user)	5 years at the end of the contractual relationship
Trade relations	Contract	3 years from the end of the business relationship (last activity on your part with us)	5 years at the end of the contractual relationship

Withdrawing your consent to the collection or processing of your personal data

Your consent to the collection of your personal data may be withdrawn by writing to our DPO by email or by mail to the addresses on the header, mentioning your surname, first name, e-mail and address with the exact nature and purpose of your your withdrawal request.

You can also send us any comments about your personal data to :

Cousin Trestec
8 Rue de l'Abbé Bonpain 59 117 Wervicq-Sud

Exercising your rights over your personal data

You have :

- A right of access, which allows you to obtain:
 - Confirmation that data about you is or is not being processed;
 - The communication of a copy of all personal data held by the controller.
- **A right to request** the portability of certain data: it allows you to recover your data in a structured format, commonly used and machine readable.
- **A right of opposition** : it allows you to no longer be the subject of commercial prospection from us or our partners, or, for reasons related to your particular situation, to stop the processing of your data to research and development, anti-fraud and prevention purposes.

- **A right of rectification** : it allows you to rectify information about you when it is obsolete or erroneous. It also allows you to complete incomplete information about you.
- **A right of cancellation** : it allows you to obtain the erasure of your personal data subject to legal retention periods. In particular, it may apply if your data is no longer needed for processing.
- **A right of limitation** : It allows you to limit the processing of your data in the following cases:
 - In case of illegal use of your data ;
 - If you dispute accuracy of yours ;
 - If you need to have data to see, exercise or defend your rights.

They will no longer be actively processed and cannot be modified during the exercise of this right.

- From a right to human intervention: Processors can use automated decision making for the underwriting or management of your contract. In this case, you can ask what were the decisive criteria for the decision with the Data Protection Officer

You can exercise these rights by email: rgpd@cousin-group.com or by letter to the following address: 8 Rue de l'Abbé Bonpain 59 117 Wervik-Sud by indicating your name, first name, residence and e-mail (where applicable your customer references) and the subject of your request in clear and legible terms. Cousin Trestec undertakes to respond to your verified request within one month of receiving it.

In case of difficulty, you can contact directly our privacy representative directly by email: rgpd@cousin-group.com or seize the National Commission for Computing and Freedoms (CNIL).

Our subcontractors and partners

Cousin Trestec may transmit your personal data to subcontractors performing services involving the processing of your data and for the purposes specified herein; these subcontractors must give your personal data the same level of confidentiality as Cousin Trestec and have committed to be in full compliance with the regulations on personal data, in particular with the GDPR.

We do not trade in your personal data; if you wish to know more and know specifically the identity of the service providers or partners to whom your personal data have been transmitted, you can contact our DPO at the following address: rgpd@cousin-group.com

Providers or partners likely to access your personal data may be:

- providers who may be managing outsourced services for the execution of our services and contracts;
- Providers helping us to improve our services, conduct data analysis and optimize our offerings, conduct surveys and statistics;
- auditors, accountants, consultants, lawyers, audit firms, IT and outsourcing providers, security providers;

- investors and buyers.

We may also have to transmit your personal data to the French authorities, administrations and courts, particularly in the context of a legal action or legal formalities requiring this communication.

Cookie policy

What is a Cookie ?

A cookie is a file deposited on your terminal (computer, tablet for example) by Cousin Trestec during your use of the website and depending on your browser. This file will allow during its registration period to identify your computer during your next visits to the site, allowing us to keep your visit and navigation data.

Cousin Trestec may use various systems for the collection of personal data, in particular through cookies on our website for which your consent is sought; are potentially concerned the following cookies:

- cookies required: optimized use of the site (identification, shopping cart)
- performance cookies: (allowing to establish anonymous statistics and level of traffic on the site) and monitoring and personalization collecting information on your use of the site and allowing individualization of our offers,
- analytical cookies: allowing us to understand and analyze your browsing on our site.

Cousin Trestec may also issue third party cookies allowing the sharing of the contents of our site with third parties or tools to express your appreciation (ex: "I like", from social networks); you are then potentially identified by the social network which will be able to follow your navigation. It is your responsibility to inform you of its privacy and cookie management policy, as our company is not involved in these tools.

Cookies are subject to your acceptance on our website during your first visit. The period of validity of the consent to the deposit of cookies and tracers is 13 months maximum, from their first deposit in your terminal following the expression of your consent.

You can manage your acceptance or refusal of cookies directly from your browser settings.

You can either accept all cookies, or be notified when a cookie is placed, or refuse all cookies. If you refuse all or part of the cookies, some features of the Site may be compromised or some pages inaccessible.

To disable cookies:

If you are using Internet Explorer 8. and later:

1. Go to "Tools" in the menu bar and click on "Internet Options"
2. Click on the "Privacy" tab at the top
3. Drag the cursor up to the "Block all cookies" setting to block all cookies, or down to the "Accept all cookies" setting to accept all cookies.

For more information, visit <http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies>

If you are using Firefox 30.0 and later:

1. Click the "menu" button and select "Options"
2. Select the "Privacy" panel.
3. In the History area, for the "Retention rules" option, select "Use custom settings for history."
4. Check the "Accept cookies" box to enable cookies, or uncheck it to disable them. If you have problems with cookies, make sure the "Accept third-party cookies" option is not set to Never.
5. Choose how long cookies can be kept. Keep them until: "Their expiration": Each cookie will be deleted on its expiry date, date fixed by the site issuing the cookie. Keep them until: "Firefox Shutdown": Cookies saved on your computer will be deleted when you close Firefox. Keep them until: "Ask Me Every Time": A warning appears each time a website wants to send a cookie, asking you whether you agree to save the cookie or not.
6. Click OK to close the "Options" window

For more information, see <https://support.mozilla.org/en/products/firefox/privacy-and-security/cookies>

If you use Google Chrome

1. Go to the "Tools" menu
2. Click "Settings"
3. Click "Advanced Settings"
4. Click "Privacy / Content Settings"
5. "Cookies" should be selected. Then select "Block cookies and data from third party sites"

For more information, see <https://support.google.com/chrome/answer/95647?hl=en>

If you are using Safari 5.0 :

1. Choose Safari> Preferences and click on "Security".
2. In the "Accept cookies" section, indicate if and when Safari must accept cookies from websites. To see an explanation of the options, click the Help button (looks like a question mark). If you have set Safari to block cookies, you may need to temporarily accept cookies to open a page. Repeat the above steps, selecting "Always". When you are done with the page, disable the cookies again and delete the cookies from the page.

For more information, see http://support.apple.com/kb/ht1677?viewlocale=en_US

If you have a different browser type or version, you are invited to consult the "Help" menu of your browser