

## Data Privacy Policy

---

Aware of the need to protect its customers' and prospects' personal data, BOCAGE undertakes to comply with the provisions of French Act No. 78-17 of 6 January 1978 as amended, covering data privacy, as well as those of Regulation (EU) No. 2016/679 of 27 April 2016.

This Data Privacy Policy informs you of the conditions in which BOCAGE, as data controller, collects and uses your personal data.

This policy applies to data that may be collected in-store, by letter, by email, by telephone and on our website, or indirectly. In the latter case, the data may, for example, come from Bocage partners who have themselves received an agreement for the data to be transferred to us in order to receive our newsletters or other information.

### Who is the data controller for your personal data?

BOCAGE, a simplified joint-stock company (SAS) with a capital of €17,944,830.00, whose registered office is located at Route de Chaudron en Mauges, SAINT PIERRE MONTLIMART 49111 MONTREVAULT-SUR-EVRE, registered in the Angers Trade and Companies Register under number 689 800 225, hereinafter referred to as "BOCAGE".

### What personal data do we collect?

The following data is collected by BOCAGE:

<b>Non-technical data</b>	Identity-related data	Title*, surname*, first name*, address, date of birth
	Contact data	Delivery and billing address*, telephone number, email address
	Commercial data	customer number, purchase history, customer and loyalty account information, product reviews, customer segments, website activity
	Personal preference data	Wish list, marketing preferences
	Financial data	Means of payment-related information
<b>Technical data</b>	Identification data	IP address
	Connection data	Logins and passwords
	Acceptance data	Clicks
	Geolocation data	
	Cookies	List of cookies available here

**\*Mandatory data**

BOCAGE undertakes not to create a customer account for a person under the age of 16, either in-store or on the website.

BOCAGE also undertakes to respect the data minimisation principle and the limitation of uses, which consists of only collecting only the data necessary for its processing. The collected data must not be reused at a later date in a way that is incompatible with the purpose for which it was collected.

**How is this data collected?**

The data may be collected through in-store purchases, registration to our loyalty program, customer account creation on our website, placement of online orders, newsletter registration, contacting our customer service department, browsing the Internet, participation in prize draws, posts on social media, or when using our website.

Information marked with an asterisk must be provided. This is information that is needed to provide a service or to conclude a contract. For example, your postal address is required to deliver your orders.

**Why is this data being collected?**

Your personal data is collected, used and processed:

- To send advertising ("Purpose 1");
- To conduct market research ("Purpose 2");
- To enable the drawing up of an estimate ("Purpose 3");
- To create a Personal Account on the Site ("Purpose 4");
- To manage orders ("Purpose 5");
- To manage customer and prospect relationships ("Purpose 6");
- To make a sale (purchase a product) ("Purpose 7");
- To browse the Site and consult products ("Purpose 8");
- To provide after-sales service ("Purpose 9");

- To carry out statistics and studies in order to personalise, evaluate and improve services and content ("Purpose 10");
- To inform Users about our services and those of our partner companies, through targeted marketing and/or promotional offers, with their consent ("Purpose 11");
- To participate in a lottery or competition ("Purpose 12");
- To enable secure authentication ("Purpose 13");

### **On what legal basis?**

Personal Data is only used to the extent that it is strictly necessary for the Purposes.

The processing does not meet any regulatory requirement and is based, according to the Purposes, on the legal bases detailed below:

- Processing based on the execution of pre-contractual/contractual measures and Services to which the User has subscribed: Purposes 3, 5, 7, 9
- Processing necessary for the pursuit of the legitimate interests of the Company: Purposes 2, 4, 6, 8, 12, 13
- Processing based on prior and express consent when creating a Personal Account and/or subscribing to the Services: Purposes 1, 10 and 11

Where processing is based on consent, the User may withdraw it at any time.

The same processing can be based on several legal grounds.

All the information collected by Bocage is necessary, according to the Purposes, to allow you to browse the Site and to subscribe to Services. Failure to respond or inaccuracy in their content may result in the suspension of access to the Site as well as the non-performance or poor performance of the Services and other services. The Personal Data must therefore be transmitted to the Data Controller, unless indicated as optional.

### **Who will receive your data?**

Bocage may need to communicate some of the Personal Data:

(i) to the internal departments of the Company strictly authorised within the framework of their missions;

(ii) to advertising platforms and business partners, with your consent where applicable;

(iii) to our service providers, namely:

- delivery, transport and payment providers;
- digital marketing providers;
- e-commerce platforms;
- IT outsourcing providers and cloud solution providers.

(iv) to the tax authorities where required by the tax obligations applicable to the Company.

Subcontractors and service providers are required to respect the confidentiality and security of Personal Data that may be communicated to them and to use them only in the context of the execution of their subcontracting or service provision mission.

Bocage guarantees that the Customer's Personal Data will not be disclosed to any unauthorised third party without their consent.

Bocage does not sell or lease User Data to third parties.

On the other hand, Personal Data may be transferred to commercial companies for statistical studies and the development of profiles, provided that the User or Customer has given their consent.

Under special circumstances, Bocage may be required to disclose Personal Data when required by the legal authorities.

### **What are your rights and how do you exercise them?**

In accordance with the regulations in force concerning the protection of personal data, you have the rights listed below:

- a right of access, i.e. to obtain from the Data Controller confirmation as to whether or not Personal Data concerning you is being processed and, where it is, access to said Personal Data, as well as various information including the purposes of the processing, the category of Personal Data concerning you, the recipient(s) of the Data, etc.;
- a right to rectify, as soon as possible, Personal Data concerning you that is inaccurate, incomplete, outdated or equivocal, or whose collection and processing are prohibited;

- a right to object to the processing of Personal Data by the data controller or to a transfer of Personal Data, unless there are compelling legitimate reasons which override the interests of the User.

- a right to the deletion of your Personal Data for the following reasons:

- o The Personal Data is no longer necessary for the purposes for which it was collected or processed;
- o You have withdrawn your consent on which the processing was based, and there is no other lawful ground for processing the Personal Data;
- o You have objected to the processing of Personal Data and there is no overriding interest justifying the processing;
- o Your Personal Data has been processed unlawfully;
- o Your Personal Data must be deleted in order to comply with any legal obligation to which Bocage may be subject;
- o Your Personal Data was collected when the data subject was under the age of 16.

- a right to organise, in advance and during your lifetime, the conditions under which you wish the Personal Data that Bocage has collected and processed to be kept and communicated after your death,

- a right to the portability and recovery of Personal Data allowing you to receive the Personal Data you have transmitted to Bocage in a structured, commonly used and machine-readable format, and to transmit it to another controller, without Bocage, to whom the Personal Data was initially communicated, being able to prevent this;

- the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or which significantly affects you in a similar way;

- the right to lodge a complaint with the CNIL, if you consider that the processing of Personal Data concerning you constitutes a violation of the legislation and regulations in force.

If you wish to exercise any of the above rights, you may send your request:

\*by email to the following address: [dpo@bocage.fr](mailto:dpo@bocage.fr)

\*by letter to the following address: BOCAGE, Service Clients, Route de chaudron en mauges, Saint Pierre Montlimart, 49111 Montrevault-sur-Evre

In the event that you exercise any of these rights electronically, the Personal Data will be provided electronically by Bocage, where possible, unless you have specifically requested otherwise.

## How long will your data be kept?

Personal Data is kept by Bocage for a period that does not exceed the time strictly necessary to achieve the purposes for which it was collected and, in any event, cannot be kept longer than the period indicated in the table below:

<b>Processing purposes</b>	<b>Possible sub-purposes</b>	<b>Retention period</b>
Sending targeted advertising		For the duration of the contractual relationship and for 3 years thereafter
Order management	Follow-up of validated orders	3 years from the last order on the website or in-store purchase
Creating a Customer Account on the Site		3 years from the last login to the customer or loyalty account
Customer and prospect relationship management	Management and processing of requests, follow-up of requests, informative follow-up	The time needed to process the request and then 3 years from the end of the relationship
Commercial prospecting	Sending targeted and non-targeted commercial communications, game management, satisfaction surveys	3 years from the end of the relationship
Customisation of services	Customisation of offers and products, targeted advertising, determining your favourite store, etc.	For the duration of the contractual relationship and for 3 years thereafter
	Providing after-sales service	48 hours from the resolution of the non-payment and 3 years from the occurrence of the claim (if not resolved)

Management of complaints, unpaid bills, disputes	Management of product returns and refunds	
Prevention and fight against fraud		For the time strictly necessary for the fulfilment of this purpose
Management of the exercise of rights		The fate of your data after your death, Management of requests to exercise rights
Accounting management		10 years from the end of the financial year
Commercial prospecting by partners		Upon unsubscribing or withdrawing consent
Proper functioning and continuous improvement of the site	Commercial statistics, analysis, improvement of navigation, etc.	See information on "Managing our cookies"

At the end of the retention period that Bocage has defined, the data is either deleted or anonymised for statistical purposes. Intermediate archive data can be used for litigation or pre-litigation cases.

Once data is deleted or anonymised, Bocage is unable to retrieve it.



### **Will you receive commercial offers?**

You will only receive commercial offers if you have accepted them.  
No communications or request will be sent to you without your consent.

### **Is your data processed outside the EU? Data transfers outside the EU**

Your personal data is hosted in France. Insofar as possible, Bocage makes every effort to ensure that personal data transferred to partners or subcontractors is done so within the European Union, or in countries considered "adequate" by the CNIL.

In the event that Bocage communicates personal data outside the European Union, measures are taken to ensure that such data will benefit from the same level of protection as that imposed by the European Union in terms of data protection.

In this respect, Bocage will ensure that the processing is carried out in accordance with this policy and that it is governed by the European Commission's standard contractual clauses, which make it possible to guarantee an adequate level of protection for the privacy and fundamental rights of individuals.

### **Is your data shared with other companies?**

BOCAGE undertakes not to sell your personal data to partner brands for commercial purposes.

Your personal data may be shared with some of our partners and subcontractors in order to:

- carry out advertising campaigns (send campaigns, optimise emailing, improve campaign targets, etc.),
- improve customer knowledge from a statistical and geo-marketing point of view,
- conduct satisfaction surveys,
- improve website browsing if you accept the use of cookies,
- invite you to events,

### **How do we secure your personal data?**

In its capacity as Data Controller, Bocage undertakes to implement and maintain, at its own expense, appropriate technical and organisational measures for the processing and security of personal data, in accordance with Articles 32 to 34 of the GDPR.

Bocage adopts sufficient, appropriate and relevant security measures to preserve the security of Personal Data and in particular to prevent it from being distorted, damaged or accessed by unauthorised third parties:

These measures include the establishment of the following procedures:

- identification;
- authentication with password strength check,
- management of authorisations: use of rights limited to the strict needs of the account,
- Tests and Audits,
- Anonymisation of Personal Data,
- Encryption of Personal Data via an SSL protocol;
- PAS Security

Bocage would like to draw your attention to the creation of an online customer account.

Customer accounts can only be created by entering a personal login and password. However, you must protect your account password and not share it with anyone. We advise you to create a strong password (minimum 12 characters with 4 types of characters: upper case, lower case, numbers, punctuation). It is best not to reuse the same password for multiple sites. Please remember, Bocage will never ask you for your login, your password or your bank details by email. If you receive such a request from us, please do not reply and delete the email immediately.

### **Data Protection Officer**

Bocage has a Data Protection Officer (DPO) who can be contacted at the following address: [dpo@bocage.fr](mailto:dpo@bocage.fr)

### **Right to lodge a complaint with the CNIL**

Any customer or prospect has the right to lodge a complaint with the competent authority.

If, after contacting our company, you find that your "Data Privacy" rights are not respected, you can send a complaint to the French Data Protection Authority (*Commission Nationale de l'Informatique et des Libertés "CNIL"*), at 3 Place de Fontenoy, 75007 Paris.

### **Data breaches**

BOCAGE undertakes to notify the CNIL of any breaches of personal data in the conditions defined by the regulations on the subject.

Customers/prospects will be informed of all data breaches that could have a significant impact on them, e.g. infringing their rights or involving a risk to them or their close circle.

### **How do we use cookies?**

Browsing data (cookies) are small computer files that are sent to the browser and stored on the hard disk of the customer's or prospect's computer, tablet, smartphone, etc.

Cookies only store the identification code and do not contain any other personal information about the User. Thus, the deposit of cookies during the use of the Website does not allow the User to be identified personally, but it records information relating to the User's browsing of the Website (pages consulted, dates and times of consultation, etc.) which BOCAGE may read during the User's subsequent visits and send services and offers adapted to the User's terminal and interests.

Cookies are kept for a maximum of thirteen (13) months from the time they are first placed on the User's terminal.

There are several types of Cookies that can be implemented in the User's browser by BOCAGE to collect information.

Cookies record and/or read files in order to obtain information relating to your interaction with the Site, and in particular to your browsing and behaviour: your IP address, the pages visited, the brands you are interested in, the purchases made, etc.

Thus, depending on the settings chosen and/or subject to consent:

- Some so-called "technical/functional cookies" are automatically deposited because they are necessary for the provision of the service and therefore essential for browsing. These cookies are not subject to any prior consent, as they allow the site to display and function properly. In particular, they are used to store customer account data, to record shopping baskets, and to ensure the security of accounts or shopping baskets;
- Advertising cookies which allow the display of advertisements and targeted content based on the interests and products selected or viewed;
- Performance analysis and personalisation cookies make it possible to measure and analyse the audience and visits to the site, to establish statistics and volumes of visits and use of the elements making up the site (sections, content visited, route, date and time of consultation, for example) in order to optimise services, improve the ergonomics of the site and/or improve customer knowledge;
- Social network cookies that allow the sharing of site content with other people (the "like" or "share" application button - over which the company has no control and for which the User is invited to consult the privacy policies of these social networks).

These cookies also allow:

- to record all information relating to your navigation within the Site, such as, in particular, all information relating to the pages consulted and the dates and times of consultation on the Site;
- to improve navigation within the Site in order to be able to use its various functions, and in particular the identification and access of the User to the Personal Account;
- to recognise the browser of any User as a previous registered visitor, to remember any preferences that may be sent when using the Site by their browser;
- to adapt the presentation of the Site to the display preferences of the User's terminal or any Internet user (language used, display resolution, operating system used, etc.) during their visits, according to the hardware and software for viewing or reading that their terminal has.

### **Setting cookies**

In this respect, and for Cookies that are not exclusively intended to allow or facilitate browsing or that are not strictly necessary to benefit from the Services, an information banner is displayed when the User/Visitor connects to the Website or when an Internet user visits, in order to inform them, prior to the deposit of these Cookies, (1) of their presence and (2) to allow them, if necessary, to oppose their deposit on their terminal by expressing their refusal in the same way as they are able to express their acceptance.

Thus, if the User/Visitor does not wish to have data collected on their navigation, they may choose to disable all Cookies that are not essential to browse the Site via the configuration tool made available to them. This choice will be recorded in the terminal via a Cookie whose purpose is to disable the deposit of cookies, which will last for thirteen (13) months.

Furthermore, the User/Visitor may withdraw their consent at any time by configuring the preferences of their computer browser or other tools used to browse the Site.

However, this may result in the deletion of all cookies used by the Internet browser, including those used by other websites, and thus make Internet browsing complex or even impossible.

For the management of Cookies and their choices, the configuration of each browser is different. It is described in the help menu of the User/Visitor's browser, which will allow them to know how to change their wishes regarding cookies.

### **Changes and updates to our policy**

This policy is available on our website and is accessible to everyone.

It may be modified or completed by us at all times according to changes in the legal framework, case law, or recommendations made by the CNIL.

The most important updates may be the subject of a notice on Bocage's corporate website at the latest at the time of entry into force of said modifications.

**What is the applicable law? Which courts have jurisdiction?**

The privacy policy is governed by French law.

Any dispute concerning it shall be brought before the competent French courts.