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Privacy policy for commercial contacts

ROBATEL INDUSTRIES undertakes to comply with the obligations set out in the General Data Protection Regulation (RGPD) and the amended law of 6 January 1978 "relating to data processing, data files and individual liberties" (*loi "Informatique et Libertés"*).

The **commercial contacts Privacy Policy** ("Policy") describes what categories of personal data ROBATEL INDUSTRIES collects, why it is collected and under what conditions ROBATEL INDUSTRIES, as the data controller, processes your personal data, following its collection in the course of our commercial activity.

This Policy is intended to fulfil our legal obligation to inform you about the processing of personal data by us as a data controller and your rights.

ROBATEL INDUSTRIES recommends that you read this Policy in its entirety.

General principles

"**Personal Data**" means information relating to an identified or identifiable natural person.

ROBATEL INDUSTRIES ensures the processing of your personal data. In this context, "**processing**" means, among other things, any collection, use, retention, disclosure or destruction of your personal data.

1) Who is this Policy for?

This Policy applies primarily to all ROBATEL INDUSTRIES commercial contacts (customers, suppliers, subcontractors, commercial partners (co-contractors, agents/sales representatives, etc.) and prospects) with whom ROBATEL INDUSTRIES interacts in the course and scope of its commercial activities.

2) What personal data is processed by ROBATEL INDUSTRIES?

In order to minimize the amount of personal data processed, ROBATEL INDUSTRIES ensures that it only collects and uses data that is relevant and necessary for the management of its own commercial activities.

Thus, ROBATEL INDUSTRIES collects, stores and uses your personal data which includes:

- **Information about your civil status:** last name, first name, title;
- **Information about your professional life:** professional contact information (e-mail address, telephone number, company mailing address), current and/or previous job title and description of your activities, reporting line.

- Any other personal data that you decide to communicate to ROBATEL INDUSTRIES within the framework of your commercial relationship.

3) What are the sources of your personal data?

The personal data processed by ROBATEL INDUSTRIES concerning you are mainly communicated by yourself, within the framework of calls for tender or consultations or during trade shows and networking events.

It is possible that ROBATEL INDUSTRIES collects your personal data via your company's websites, online databases (B2B directory), or on professional social networks such as LinkedIn.

4) Is the communication of your personal data necessary?

The communication of your personal data in accordance with the purposes set out in point 5) below is **necessary** for the purposes of the commercial relationship between your company and ROBATEL INDUSTRIES.

Refusal to provide the requested data or providing inaccurate data may jeopardize the initiation or continuation of a contractual relationship with your company.

However, you are not obliged to provide your personal data.

5) What are the purposes (reasons) for processing your personal data?

Your personal data will be processed for several commercial purposes in compliance with applicable regulations. These purposes are the following:

- (a) to assess whether ROBATEL INDUSTRIES is able to enter into a commercial/contractual relationship with your company;
- (b) to maintain commercial relations with you and your company;
- (c) to manage contractual relations with your company (performance or termination of a contract);
- (d) to ensure compliance of products or services;
- (e) to evaluate the satisfaction of your company or ROBATEL INDUSTRIES;

6) On what legal grounds is your personal data processed?

The purposes associated with the processing of your personal data are based on specific legal grounds.

The legal bases and justifications for the processing of personal data carried out by ROBATEL INDUSTRIES are the following:

- **for purposes (a), (b), (d) and (e):** the legitimate interest of ROBATEL INDUSTRIES to enter into a contract with your company and/or to ensure the continuity of the commercial relationship;
- **for purpose (a):** your consent in case you have spontaneously provided us with your personal data;
- **for purpose (c):** for the purpose of performing the contract (including managing any pre-litigation and litigation issues) and complying with accounting and administrative obligations.

7) How and where is your personal data processed and stored?

Your personal data will be processed in accordance with the principles of accuracy, legality and transparency.

ROBATEL INDUSTRIES ensures that appropriate technical and organizational security measures are in place to provide a high level of security against the risk of unauthorized access, accidental or unlawful destruction, loss, alteration and unauthorized disclosure of personal data transmitted, stored or otherwise processed.

Your personal data will be processed manually or electronically, using automated tools that ensure data security and confidentiality.

The processed data are stored in our premises or, if necessary, at the service providers entrusted by ROBATEL INDUSTRIES to process your personal data.

8) How long will the data be kept?

Your personal data will be stored for the duration of the contractual relationship with your company and for 5 years thereafter. At the end of the specified period, your personal data will be deleted.

9) To which recipients are your personal data communicated?

Your personal data will only be disclosed to the extent necessary for ROBATEL INDUSTRIES to fulfill its obligations under the law or regulations and/or to fulfill its obligations arising from the contractual relationship with your company.

Your personal data may be shared with ROBATEL INDUSTRIES' affiliates, external audit and certification providers, banks, law firms, insurance companies. These entities or individuals will act as data controllers.

Within the framework of a contractual relationship, your personal data are recorded and monitored in

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the ERP ("Enterprise Resource Planning") of ROBATEL INDUSTRIES.

10) What are your rights regarding information, access, rectification and updating of your data, limitation and opposition to processing?

You have the right to be informed of the existence or not of personal data concerning you in possession of ROBATEL INDUSTRIES.

You also have the right to be informed of the following:

- origin of personal data;
- the purposes and methods of data processing;
- how the data will be processed;
- the identity of the controller and its processors;
- the identity of the persons or categories of persons to whom your personal data may be transmitted or to whom your data may be communicated as persons authorized to process your data

You also have the right to :

- (a) obtain the update, correction and rectification of the data provided ;
- (b) limit the processing to the purpose for which you have given your consent by accepting this Policy;
- (c) to have illegally processed data deleted, anonymized or made inaccessible.
- (d) require a declaration that the third parties to whom ROBATEL INDUSTRIES communicates or disseminates your data have been notified and that all the operations referred to in (a) and (b) above have been carried out, unless this proves impossible or involves a manifestly disproportionate effort in relation to your right to protection;
- (e) obtain, in a structured, commonly used and electronically readable format, the personal data you provide to ROBATEL INDUSTRIES, and transmit it, directly or through ROBATEL INDUSTRIES, to another personal data controller (known as the right to data portability).

You also have the right to object, in whole or in part:

- the processing, for legitimate reasons, of your personal data, including data relating to the purposes for which they were collected.

To exercise your rights, please contact rgpd@robatel.fr.




If you believe that ROBATEL INDUSTRIES or a third party to whom ROBATEL INDUSTRIES has disclosed your data has violated your rights, you may file a complaint with the **CNIL**, 3 Place de Fontenoy, 75007 Paris, France.

This Policy is not in the nature of a commercial contract. It does not give you any contractual rights or imply any contractual obligations on the part of ROBATEL INDUSTRIES.

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This Policy is available on the ROBATEL INDUSTRIES website.

ROBATEL INDUSTRIES may update or modify this Policy at any time.

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Review	Editor	Auditor	Approver	Date