

# PRIVACY POLICY

The TRIGO Group takes the security and privacy of their contacts about which they hold information extremely seriously and in compliance with the applicable regulations, in particular the GDPR (General Data Protection Regulation). The purpose of this policy is to describe the information we may hold about you, explain what we use it for, and explain your rights in relation to it.

By visiting our website, you are accepting the practices described in this Privacy Policy.

You can access and consult any TRIGO website without disclosing or revealing any personal information about yourself.

## 1. Which data are collected by TRIGO ?

TRIGO website may collect from you either “Personally Identifiable Information” and/or “Non-Personally Identifiable Information”.

**Non-Personally Identifiable Information** refers to information that is statistical in nature only and that does not, by itself, identify a specific individual or entity, and which depends upon the visiting you do on the TRIGO Group company website. For example, this information may include the domain from which you access the Internet, the date and time you access any TRIGO Group company website, and the Internet address of the website from which you linked directly to any TRIGO Group company website. This information is used in an aggregate form to make the TRIGO Group company websites more useful and attractive to its users.

**Personally Identifiable Information** refers to information that lets us know the specifics of who you are: these kind of information are also known as “**Personal Data**”. Personal information is requested when you order a service, register for an account and send us feedback. For example, this information might include your name, email address, industry and product details. Such information may be held on our contacts and administration databases either because of the work we have done with you or are currently engaged in, or because we believe you might be interested in receiving material from us

about our business and services via our newsletter. This allows us to manage our relationship with you efficiently, improve our Website and the services which we offer to you and to target items of interest we may send to you.

## **2. Use and disclosure of Personal Data, Purpose Specification and duration of archiving**

### **1. For which purposes TRIGO collects Personal Data ?**

By using the Website, TRIGO will collect and process your Personal Data in accordance with this Policy. Your Personal Data may be used for the following purposes:

- *Website Browsers / Administration.*

We use your Personal Data for administrative purposes, including to help us better understand how our customers access and use our websites and applications.

- *Marketing.*

Into the limits fixed by law, we may use your Personal Data for marketing and promotional purposes, including communications through email or by other means. For example, we use your Personal Data, such as your email address, to send news and newsletters, special offers, or to contact you about services or information we think will interest you.

- *Satisfaction survey.*

Because your feedback is very important for us, we may send you satisfaction survey.

- *Communication.*

We use your Personal Data to communicate with you, including responding to requests for assistance.

- *Customer service.*

We use your Personal Data for customer service purposes, including providing services to you, for technical support or other similar purposes and to establish and maintain customer accounts.

- *Legal compliance.*

We use your Personal Data to comply with applicable legal obligations, including responding to an authority or court order or discovery request.

- *To protect us and others.*

2. For how long will your Personal Data be stored?

We process and store your Personal Data as long as it is required to meet our contractual and statutory obligations. If your Personal Data is no longer required for the performance of the contractual or statutory obligations, these will be erased on a regular basis unless further processing is necessary, for instance, for preserving particular evidence under the applicable Data Protection Laws and Regulations, or in the context of legal statutes of limitation.

### **3. Does TRIGO share the information it receives?**

Information about our clients is an important part of our business nevertheless TRIGO is not in the business of selling personal data to others. We share personally identifiable information only as set forth below:

1. By transfer to other TRIGO Group companies where it is necessary to meet the purpose for which you have submitted the information. By submitting data on any TRIGO Group company website, you are providing explicit consent to trans-border transmission of data collected on that website.
2. By transfer to third party agents and subcontractors which perform certain functions on behalf of TRIGO, such as picking up and delivering samples, fulfilling inspection orders, sending email, removing repetitive information from client lists, analyzing data and processing credit card payments. These parties only have access to such information as necessary to perform their functions and may not use it for any other purpose and they commit to comply

with the applicable laws and regulations as provided in our standard purchasing terms and conditions.

3. For any reason if, in TRIGO's sole discretion, TRIGO believes it is reasonable to do so, including: to satisfy any laws, regulations, or governmental or legal requests for such information; to disclose information that is necessary to identify, contact or bring legal action against someone who may be violating our Terms of Accessor other terms and conditions; or to otherwise protect the TRIGO Group of companies.

The access to your personal data is allowed to employees, agencies, retailers, supplier who needs this access in order to manage it under our control. These are obliged by strict non-disclosure agreement and compliance to the GDPR as provided in our standard terms and conditions of purchase, and would be subject to sanctions in any case of breaches of said agreement.

#### **4. How does TRIGO protect your information?**

We follow strict security procedures in the storage and disclosure of information which you have given us in order to prevent unauthorized access. However, the TRIGO site contains links to other websites. TRIGO does not control and is not responsible for the privacy practices or the content of these other websites.

TRIGO implements appropriate technical and organizational measures to protect personal information against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access, in particular where processing involves transmission of personal information over a network, and against all other unlawful forms of processing.

To do so, TRIGO develops specific tools in accordance to “Privacy by design” procedure. “Privacy by design” could be defined as the integrated protection of private life from the conception. The purpose of this principle is to ensure the protection of privacy by integrating it into the standards of design of technologies, internal practices and physical infrastructures.

TRIGO will inform users of the breach if this violation is likely to create a high risks for the rights and freedoms of a person, such as discrimination, identity theft or financial loss.

## 5. Your rights

You are entitled to exercise your rights any time and under conditions described below by contacting [privacy@trigo-group.com](mailto:privacy@trigo-group.com).

### 1) Access and modification to your personal data

According to the GDPR you have the right to be informed of any processing of your personal data. You also have the right to access and rectify your processed personal data as well as the right to object on legitimate grounds. You also may request us to amend any inaccuracies, or notify us that you do not consent to our continued use of this information by contacting us in the manner set out below.

### 2) Erasure of your personal data

If you wish to delete your information at any time, please contact us at [privacy@trigo-group.com](mailto:privacy@trigo-group.com). An e-mail will be sent to you to confirm that your information has been deleted.

Please keep in mind the erasure of your personal data may prevent you from accessing our services.

### 3) Right to portability

Regarding the information held about you by TRIGO, you may request us to provide you with a list and a description of data collected by TRIGO under specific conditions.

You are aware that only data subjects who gave the consent of data collection are entitled to exercise this right.

Moreover, you must consider that this right applies only to data for which your consent has been required and collected; if TRIGO collected information according to exemptions specified by the GDPR, TRIGO is entitled to refuse providing this list.

This right applies for data which has been collected through automatic means (i.e. by electronic means). Therefore, any information collected in writing and on a material support would not be subject to portability.

Users are also informed that in case of excessive demand, TRIGO is entitled to refuse the request.

We also welcome questions and your comments about our data protection policy.

## **6. Cookies**

For a user-friendly website experience and to tailor our web application's operations to your needs, some areas of our website may use cookies.

A cookie is a small file that is stored locally on your computer when you visit a website. The cookies we are using are so called "analytical" cookies, i.e.

Information stored by cookies, for a limited time, is anonymous and can refer to pages visited and time spent on each, your navigation equipment (operating system, internet browser, screen resolution and so forth), search queries, IP address in order to gather approximate geographic information. They do not include any personal information and cannot identify you on third-party websites – including those of analytics providers.

You can accept or decline cookies – including those used for website tracking – by selecting the appropriate settings of your browser. You can set your browser to notify you when you receive a new cookie, or to decline cookies altogether. However, if you choose to decline cookies you may not be able to use all features of our website (e.g. for orders).

Your browser also offers you the option to delete cookies (e.g. via the Clear Browsing History function). For further information, please refer to the user help function under Settings in your web browser.

For more information, please refer to

- **Google Analytics Cookie Usage on Websites** (<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>),
- **What cookies does HubSpot set in a visitor's browser?** ([https://knowledge.hubspot.com/articles/kcs\\_article/reports/what-cookies-does-hubspot-set-in-a-visitor-s-browser](https://knowledge.hubspot.com/articles/kcs_article/reports/what-cookies-does-hubspot-set-in-a-visitor-s-browser)),
- **Hotjar Cookies** (<https://docs.hotjar.com/docs/hotjar-cookies>).

To learn more about cookies, you can refer to

- the CNIL website, section "Les cookies": <http://www.cnil.fr/vos-droits/vos-traces/les-cookies/> (in French),
- the ICO website, section "global/cookies": <https://ico.org.uk/> (in English),
- the European commission website: [http://ec.europa.eu/ipg/basics/legal/cookies/index\\_en.htm](http://ec.europa.eu/ipg/basics/legal/cookies/index_en.htm) (in English).

## 7. How to contact us

At any time using one of the methods below:

1. By emailing us: [marketing@trigo-group.com](mailto:marketing@trigo-group.com)
2. By writing to us: TRIGO Group 4 avenue Pablo Picasso, CS 70134, 92024 Nanterre Cedex, France
3. By calling us: +33 (0)1 41 44 05 85

TRIGO continually strives to improve its service to its customers and to its potential customers.