#### Personal Data Protection Policy



#### Introduction

Responsibility and Ethics are values that form a cornerstone of BIC's business. We also recognize that building long-term trust with our stakeholders is essential as we deepen our focus on consumer-led innovation. That is why we implemented the necessary technical and organizational measures to protect any personal data we process and will continue to update them as needed.

At BIC, we are committed to maintain high standards of personal data protection and comply with pertinent privacy legislations.

This policy presents BIC's commitments to protecting the personal data processes after collected from consumers, team members customers, suppliers, service providers and other business partners ("data subjects").

## Loyal and transparent collection

For the sake of transparency, we carefully inform data subjects of all the processing activities that concern them.

The BIC Data Protection Officer can be contacted at <u>data-protection@bicworld.com with</u> any questions or for more information concerning our personal data protection policy.

Personal data are only collected to be used for the purposes and during the time period the data subjects agreed to.

# Lawful and proportionate data processing

We process data at BIC for specific purposes: all data processing carried out by BIC has a legitimate, determined and explicit purpose.

Respectful of the right to be forgotten, we ensure that identification of data subjects is only possible for as long as is necessary for the purposes for which the data was collected.

## Processing of accurate and minimized data

For all processing implemented by BIC, we only collect and use data that are adequate, relevant and limited to what is necessary to the purposes for which they are processed.

At BIC, we ensure that data are kept up to date where necessary and take every reasonable step to ensure that any inaccurate personal data are erased or rectified.

#### Data protection commitment

At BIC, we recognize the importance of the security of personal data.

Appropriate technical and organizational measures are implemented to ensure that data are processed in a manner that ensures their protection against accidental loss, destruction or damage which could affect their confidentiality or integrity.

During design and development, or when selecting and using the various tools necessary to process personal data, we ensure, and check with the publishers of such tools where applicable, that they ensure an optimal level of protection of the data processed.

Therefore, BIC takes measures complying with the principles of protection by design and by default of the processed data. In this regard, we use techniques of data pseudonymization or encryption whenever possible and/or necessary.

#### Supervised access to data

We apply security clearance policies at BIC to ensure that the data we process are only transferred to individuals authorized to access them.

When BIC needs to transfer data internationally, we only do so within the framework of specific contractual provisions complying with applicable regulatory requirements.

## Respect for data subjects' rights

At BIC, we are particularly aware of the need to respect the rights of data subjects whose data we process and recognize the following rights:

- right of information;
- right of access;
- right to rectification;
- right to erasure ("right to be forgotten");
- right to restriction of processing;
- right to data portability;
- right to object;
- right to define directives concerning the post-mortem storage, erasure and communication of personal data (in accordance with certain local legal provisions).

#### Facilitated contact

We are able to respond to requests received from data subjects to exercise their rights throughout the processing period, in the manner and within the times required by applicable regulations.

Unless specifically indicated otherwise, data subjects may send requests to exercise their rights by email to: <u>data-protection@bicworld.com</u>.

Data subjects may also exercise their rights by writing to: BIC Group, Data Protection Officer, Service Juridique, Société BIC, 14 rue Jeanne d'Asnières, 92611 Clichy Cedex, France.

The data subject should clearly indicate their full name, enclose a copy of an identification document and indicate the address to which the reply is to be sent.

In compliance with the local legislation, we will inform any data subjects wishing to exercise their rights in the event that we are unable to act in accordance to their request, for example if the request is disproportionate or unreasonable of if there are legal restrictions. In all cases, any data subject has the right to file a complaint with our Data Protection Officer or with the competent Data Protection Authority.