

# PRIVACY NOTICE

By using the Site, you consent to this online Privacy Notice. The data controller is Société BIC, having its registered office 14 rue Jeanne d'Asnières - 92611 Clichy Cedex - France.

## 1. Privacy statement

BIC Group (meaning Société BIC and its affiliated companies and subsidiaries, including BIC Services Sofia, and referred to herein as "BIC", "we" or "us") is committed to protecting your online privacy when visiting our [www.bic.services](http://www.bic.services) website (the "Site"). The purpose of this privacy notice ("Privacy Notice") is to inform you about the types of information we gather about you when you visit and use the Site, how we use that information, whether we disclose it to anyone, and the choices you have regarding our use of the information.

The Site does not require personal information from visitors in order to access the public part of our Site. With the exception of Site usage information and cookies, no personal information is automatically collected from visitors to the Site. Any other personal information you may see in use as a registered user of the Site will be retrieved from BIC Group tools according to pre-existing legal basis such as performance of a contract or will be given on a voluntary basis.

You may at any time withdraw or change your consent to our use or disclosure of your personal information, or request that we delete it from BIC's files, subject to legal and contractual restrictions. However, if you do not provide personal information required for us to supply you with a service offered on the Site, we may not be able to provide that service to you.

## 2. Categories of personal information which we may collect and how we use it

When visiting the Site, we may collect data from you, including your use of the Site, and the device used by you to access the Site.

We may collect data you provided directly to us or use data retrieved from BIC Group tools accordingly to pre-existing legal basis for collection and processing.

Collected and used data:

Purpose and/or activity	Type of data	Legal basis for processing
To answer your requests.	Contact Data Identity Data	Following your express consent when submitting your request through the Site. The data you provide will be used by BIC and/or our selected business partner working on BIC's behalf for the purposes of answering your requests placed through the Site.
To send you institutional emails.	Contact Data Identity Data	Necessary to execute the contractual relationship between our companies.
To notify you about changes to our Site terms or privacy notice; and asking you to leave feedback	Contact Data Identity Data Profile Data	Necessary to comply with a legal or regulatory obligation
To manage and protect our business and this Site, including improving data security, troubleshooting data and systems, system maintenance and testing, data hosting and reporting	Contact Data Identity Data Profile Data Technical Data Usage Data	Necessary for our legitimate interests: to ensure that you have the most up-to-date terms regarding the use of our Site and to ensure that the Site is functioning as intended and if this can be improved.
To deliver relevant Site content to you and measure or understand the effectiveness of the content we serve to you	Contact Data Identity Data Profile Data Technical Data Usage Data	Necessary to comply with a legal or regulatory obligation

To make suggestions and recommendations to you about services or content that may be of interest to you	Contact Data Identity Data Marketing and Communications Data Profile Data Technical Data Usage Data	Necessary for our legitimate interests: ensuring the efficient and secure running of the Site, including through maintaining information technology services, network and data security and improving
To use data analytics to improve our Site, our services, marketing, customer relationships and experiences	Technical Data Usage Data	Necessary for our legitimate interests: reviewing how clients use and what they think of our Site, improving our Site and identifying ways to grow our business

Detail regarding “type of data”:

- “Contact Data”: including your work address, email address and/or telephone number;
- “Identity Data”: including your first name, last name, username or similar identifier, title;
- “Marketing and Communications Data”: including your marketing and communication/notification preferences. We also track when you receive and read marketing communications from us, which information we use to improve our marketing services, provide you with more relevant information and improve the quality of our marketing materials. Additional information about the personal data we process in connection with marketing is included with the marketing communications we send you;
- “Profile Data”: including information collected progressively when you visit our site including your referral website, pages you visit, actions you take, patterns of page visits and information from forms you fill in;
- “Technical Data”: includes information collected when you access our Site, your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you are using; and
- “Usage Data”: information about how you use our Site.

We may also use your personal information for other purposes which are disclosed to you and to which you consent in advance, or for such other purposes as permitted or required by applicable law.

### Children online privacy

We do not knowingly collect or store any personal data from or market to children under 13 or as defined by local legal requirements.

Should we decide otherwise, we will obtain consent from a legal representative before we collect personal data of children where it is required by applicable laws and regulations (the age at which consent from a legal representative is necessary varies from country to country).

### 3. Links to or from other websites

The Site may integrate third party platforms, such as Facebook’s and Twitter’s “Like” and “Share” function. We can collect technical information using cookies and other technologies on our own behalf and using third-party platforms, such as those named in this paragraph. Technical information may include your IP address, browsing path in the Site, operating system, and other information. When you interact with the third-party platforms, such as using the Facebook “like” or “share” feature, that platform may record your interaction with the Site. The third-party platforms have their own privacy policies, which govern the use of any personal or non-personal information they collect.

### 4. How our Site uses cookies

Like many other commercial sites, our Site may utilize a standard technology called a "cookie" to collect information about how our Site is used. Please see our Cookie Notice for details.

### 5. Do not track

We do not use information obtained from this Site to participate in activities commonly known as behavioural advertising and we, by default, do not track your activity on any other site than our own. Some browsers have a "do not track" feature that lets you select specific websites that you do not want to track

your online activities. These features are not yet standardized, and our Site is able to respond to some, but not to all of those signals.

## 6. Disclosure to third parties

Except as specified herein or permitted or required by applicable law, we do not share personal information about you with any third party without your permission and we do not allow third parties to collect personally identifiable information from users on this Site. This does not include trusted third parties who assist us in operating the Site, conducting our business or serving you, so long as those parties agree to keep this information secure and confidential. Third party providers maintain the information they need to perform their designated functions and we do not authorize such parties to use or disclose personal information for their own marketing or other purposes.

We may release your personal information when this release is permitted by or appropriate to comply with the law (for example, in response to a legally valid inquiry or order or otherwise required or permitted by applicable law), to enforce our Site policies, to exercise or defend legal claims or to protect our rights, property, or safety or those of our partners. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

If we become involved in a transaction to sell all or parts of our business or assets or merge with another business, as personal information may be part of such transactions, we may use or disclose such information to other parties involved in the transaction.

Please note that your personal information may be maintained and processed by our service providers located in foreign jurisdictions, whose data protection laws may differ from the jurisdiction in which you live.

## 7. Your privacy rights

Under certain circumstances, you have rights under pertinent data protection laws in relation to your personal data. BIC is committed to respect your rights and will act promptly and in accordance with any applicable law, rule or regulation relating to the processing of your personal data.

This section describes your privacy rights and explains how to exercise those rights.

**Right to be informed:** you have the right to be informed about how your personal data is used and shared. BIC will provide you this explanation in a concise, transparent, intelligible, and easily accessible format and will use clear language.

**Right to access:** you have the right to obtain confirmation of whether BIC is processing your personal data, has access to your personal data and to obtain information on how your personal data is being used by us.

**Right to rectification:** you have the right to have any inaccurate or incomplete personal data rectified and/or completed upon your demand. If BIC has disclosed the relevant personal data to any third parties, we will take reasonable steps to inform those third parties of the rectification where possible.

**Right to have personal data erased:** you have the right, in certain circumstances, to request that your personal data held by BIC is erased. This is also known as the right to be forgotten. This is not an unconditional right to have all personal data deleted. BIC will consider each request in accordance with the requirements of any laws related to the processing of your personal data.

**Right to restrict processing of personal data:** you have the right to avoid the processing of your personal data in certain circumstances. This right arises if you are disputing the accuracy of data, if you have raised an objection to processing, if processing of personal data is unlawful and you oppose erasure and request restriction instead or if the personal data is no longer required by BIC but you require the personal data to be retained to establish, exercise or defend a legal claim.

**Right to data portability:** in certain circumstances you can request to receive a copy of your personal data (or the data to be transferred to a third party) in a commonly used electronic format. This right only applies to personal data that you have provided to BIC and if the processing is based on your consent or if the personal data must be processed for the performance of a contract and the processing is carried out by electronically.

**Right to object:** in certain circumstances, you have the right to object to processing being carried out by BIC if (i) data is processed based on legitimate interests or for the performance of a task in the public interest (including profiling), (ii) data is used for direct marketing purposes, or (iii) if data is processed for scientific or historical research or statistical purposes. You will be informed that you have a right to object at the point of data collection and the right to object will be explicitly highlighted and be presented clearly and separately from any other information.

**Right not to be subject to automated decisions:** where the automated decision produces a legal effect or a similar effect, you have the right not to be subject to a decision which is based on automated processing only.

You can exercise your rights by contacting our Data Protection Officer: [privacy@bicworld.com](mailto:privacy@bicworld.com).

## 8. Security of your personal information

We have policies and procedures in place to protect your personal information from loss, unauthorized access, modification or disclosure. In addition, we have implemented technological safeguards including security software, passwords and firewalls intended to prevent unauthorized computer access. No claim is made as to the impenetrability of the system under unusual circumstances or its resilience to future attacks.

## 9. Transfer and storage of information. data retention period

Your personal information is stored at secure locations and on servers located in the European Economic Area. We or our service providers may use servers located in the United States for back up and emergency storage. Any electronic records generated by us or our service providers during the course of your interactions with us may be maintained on those servers. As such, your personal information may be disclosed, processed and stored outside your country of residence, and therefore may be available to government authorities under lawful orders and laws applicable where the information is stored. You may address questions about the practices relating to handling of your personal information by contacting us at [privacy@bicworld.com](mailto:privacy@bicworld.com).

We retain your personal information as long as required for the purposes identified when you provided the personal information and for any new purposes that you identified and consented to, and for an appropriate time thereafter.

This includes, for example, the purposes of satisfying any legal, regulatory, accounting, reporting requirements, to carry out legal work, for the establishment or defence of legal claims.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## 10. Contacting us regarding this notice or your personal information

Questions regarding this Privacy Notice, the collection or the accuracy of your personal data, the use or disclosing of the information may be directed to our Data Protection Officer: [privacy@bicworld.com](mailto:privacy@bicworld.com) or to the following postal address: BIC Group, Data Protection Officer, Service Juridique, Société BIC, 14 rue Jeanne d'Asnières, 92611 Clichy Cedex, France.

You may also have a right to lodge a complaint with your local data protection authority however we recommend you contact us before doing so as we may be able to resolve any issues with you directly in a more efficient manner.

## 11. Modifications

This Privacy Notice is subject to change at our discretion. You should periodically check this Site for changes to this Privacy Notice. All changes will be posted as soon as they enter into effect. Your continued access to and/or use of the Site after any such changes constitutes your acceptance of, and agreement to, this Privacy Notice, as revised.