



Vencorex Data Protection Policy

This policy is part of the Vencorex Governance





Vencorex Holding and its subsidiaries ("we", "our", "us") are committed to respect your privacy and personal data ; we therefore invite you to read the following carefully.

With this data protection policy (hereinafter referred to as the "**Policy**"), Vencorex informs you of the personal data collected:

- (i) when you use the different entries of our website <https://www.vencorex.com/> (hereinafter referred to as the "**Website**"),
- (ii) when you interact with us.

Vencorex collects and uses your personal data in accordance with applicable data protection laws, including the General Data Protection Regulation EU 2016/679 ("**GDPR**"), hereinafter referred to as the "**Data Protection Laws**".

In the following, we inform you about the type, scope, and purposes of the collection and use of personal data. It notably includes a description of your data protection rights, including a right to object to some of the processing which Vencorex carries out.

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Who collects your personal data?

Your personal data is collected by Vencorex France whose contact details are the following:

Headquarters' address: 196 Allée Alexandre Borodine, 69800 Saint-Priest (France)

Email address: compliance@vencorex.com

What personal data do we collect, use and store?

Vencorex collects and processes the following information about you:

- identification information that you communicate to us, including information you provide when you use our online contact form (e.g. first name, last name, company name, address, telephone number, country and/or geographical area, occupation, service, etc.);
- information contained in or relating to any communications that you send to us, share with us, or send through our Website (including the communication content and meta data associated with the communication);
- information that you provide to us for the purpose of subscribing to direct marketing;
- business relationship information;
- information that you send to us, share with us, or send through our Website for the purpose of applying for a job at Vencorex, including identification information, information on personal life (e.g. marital status, date of birth, etc.) and information on professional life (e.g. work experience, diplomas, and other information included in your curriculum vitae);

If it is mandatory for you to provide personal data, we will make this clear at the time and will also explain what will happen if you do not provide the information.

You are responsible for ensuring that the personal data you provide is truthful, correct, non-ambiguous and up-to date.

How do we use your personal data?

Vencorex uses your personal data for the following purposes (hereinafter referred to as the "**Purposes**"):

- **Answering your questions and requests**

We use your personal data that you send to us, share with us, or send through our Website to answer your questions or requests for documentation.

- **Direct marketing**

To the extent permitted by law we also use your personal data to carry out direct marketing operations. We may use your personal data that you send to us or send through our Website, such as your e-mail address to send you newsletters, commercial documentation or to contact you about services or information we think will interest you/the company you represent.

- **Prospect and customer management**

We use your personal data that you send to us, share with us, or send through our Website to carry out operations relating to prospect and customer management regarding contracts, orders, deliveries, invoices, accounting as well as customer account management and customer relationship





management such as satisfaction surveys, complaints management, customer feedback on products and services and customer care.

- **Supplier management**

We use your personal data that you send to us, share with us, or send through our Website to carry out operations relating to supplier management regarding contracts, orders, deliveries, invoices, accounting as well as supplier account management and supplier relationship management such as complaints management.

- **Talent acquisition and recruitment management**

We use your personal data that you send to us or send through our Website to supply the CV-library of our human resources' department, and to deal with applications we receive and the recruitment of new talents.

- **Compliance with legal, administrative and regulatory obligations**

We use your personal data to comply with applicable legal, administrative and regulatory obligations.

- **Legal basis under which your personal data are processed**

The following table provides you with the legal basis under which we process your personal data for each of the Purposes:

Purposes	Legal basis
Answering your questions and requests	Legitimate interest <i>To develop and maintain our relationship with the company you represent</i>
Direct marketing	Legitimate interest <i>To provide you with offers and services that meet the specific needs of the company you represent</i>
Customer management	Legitimate interest <i>To allow us to manage the business relationship with the company you represent</i>
Supplier management	Legitimate interest <i>To allow us to manage the business relationship with the company you represent</i>
Talent acquisition and recruitment management	Legitimate interest <i>To identify new talents, anticipate future hiring needs and manages ongoing recruitment processes for jobs that are currently available.</i>
Compliance with legal, administrative and regulatory obligations	Legal obligation





To whom do we communicate your personal data?

We only communicate your personal data when strictly necessary and only to the following entities:

- Authorized employees of Vencorex when necessary for carrying out the Purposes,
- Our service providers acting as data processors which notably provide us with the platform and other services such as hosting services or Website maintenance/administration services,
- Law enforcement or government authorities where necessary to comply with applicable law.

Is your personal data transferred outside the European Economic Area (EEA)?

To provide you with the best services, we share a centralized customer relationship management system. This implies transfers of your personal data to Vencorex entities located outside of the EEA i.e. to the United States of America, China, Thailand, Brazil and Mexico.

We also transfer your personal data to our service providers located in *insert list of locations: USA*.

For transfers to Vencorex entities and service providers outside the EEA, we use standard contractual clauses approved by the European Commission or rely on a service provider's Privacy Shield certification or a service provider's (EU data protection authority approved) binding corporate rules that are in place to protect your personal data.

You have a right to ask us for a copy of the standard contractual clauses or a copy of the other methods used by contacting us at the following address: compliance@vencorex.com.

How do we protect your personal data?

We use technical and organizational security measures in order to protect the personal data we have under our control against accidental or intentional manipulation, loss, destruction and against access by unauthorized persons. Our security measures are improved as new technologies become available.

For how long will your personal data be stored?

We retain your personal information for no longer than is necessary for the Purposes stated in this Policy, unless otherwise extending the retention period is required or permitted by law. The data retention period varies. When your personal data is no longer required, it will be erased.

To obtain more information about data retention periods, please contact us at compliance@vencorex.com.

What are your rights and how can you use them?

You may at any time exercise your data protection rights pursuant to the Data Protection Laws:

- **Right of access:** you have the right to obtain confirmation as to whether or not your personal data is being processed by Vencorex and if so, what data is being processed. You also have a right to obtain a copy of the personal data undergoing processing.
- **Right to rectify:** you have the right to ask for the rectification of any inaccurate or incomplete personal data concerning you.
- **Right to be forgotten:** you have the right to ask for the erasure of your personal data under the conditions provided for in Article 17 of the GDPR. It is possible, for instance, when the personal data is no longer necessary in relation to the Purpose(s) for which they were collected.



- **Right to restriction of processing:** you have the right to block the processing of your personal data under the conditions provided for in Article 18 of the GDPR.
- **Right to object:** you may at any time object to the processing of your personal data, in particular when used for purposes of direct marketing under the conditions provided for in Article 21 of the GDPR.
- **Right to withdraw consent:** you have the right to withdraw consent given for a data processing based on this legal basis. This withdrawal shall not affect the lawfulness of the processing based on consent before its withdrawal.
- **Right to portability:** you have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format and transmit your personal data to another data controller under the conditions provided for in Article 16 of the GDPR.

Note for French users: you also have a right to set down instructions on the management of your personal data after death.

To protect your privacy, Vencorex will take reasonable steps to verify your identity when dealing with requests.

Vencorex employs means to keep personal data accurate, complete and up-to-date, as needed for the Purposes for which it was collected.

If you have any queries, comments or requests in relation to your personal data or this Policy, you can email us at compliance@vencorex.com or contact us by post at: 196 Allée Alexandre Borodine, 69800 Saint-Priest (France).

We hope that we can satisfy queries you may have about the way we process your personal data. However, if you have unresolved concerns you also have the right to complain to data protection authorities. You can bring the complaint in your member state of residence, place of work or where an alleged infringement of Data Protection Law occurred.

Updates to this Policy

Vencorex reserves the right to change this Policy at any time. Changes to this Policy will be posted on the Website.

This Policy was last updated in October 2020.

Recording:

Level	Version	Date	Writer	Approver
L1	V 1.0	20201013	Legal Dept	Governance & Compliance Committee