

PRIVACY POLICY

The data controller is Societe 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, and referred to herein as "BIC" or "We" or "us") is committed to protecting your privacy when visiting our website, www.mybicflex.com, (the "Site"). The purpose of this privacy policy ("Privacy Policy") is to inform you about the types of data we gather about you when you visit the Site, how we use that data, whether we disclose it to anyone, and the choices you have regarding our use of your data. If you would prefer your personal data is not used in the manner described in this Policy you should not use our Site.

Except for information relating to your use of the Site, (see Section 4 of this Privacy Policy), no personal data is automatically collected about you when you visit the Site. Any other personal data we collect will have been provided by you for a particular purpose, for example, where you have entered your name and address so we can manage your subscription and deliver products you have ordered via the Site.

In some cases, if you do not provide personal data we may not be able to provide you a service offered via the Site. We will indicate where the data must be provided in order for us to provide a service to you.

If we collect personal data from you, you may have the right to (i) access your personal data, (ii) ask that your personal data be corrected, completed, updated, locked, deleted, and (iii) ask us to send you a copy of your personal data in a commonly used and machine-readable format. We will consider such requests in accordance with applicable law and may also require verification of your identity in order to process such requests.

Any such request should be directed to our Data Protection Officer: data-protection@bicworld.com.

2. Use of personal data we collect from you

We may collect personal data you provide directly to us, such as when you place an order via the Site, when you subscribe to a newsletter, when you contact us via the "Contact Us" section of our Site, or otherwise communicate with us. This personal data may include: title, name, surname, email, postal address, telephone number and any other information you choose to provide.

- The information you provide to us to subscribe to the newsletter will be used by BIC and/or an agency working on BIC's behalf to inform you of our Site news and offers. Each email received will include an unsubscribe option.
- The information you provide to us via the "Contact Us" page will be used by BIC and/or an agency working on BIC's behalf to respond to your comments, questions or requests for information. Aside from replying to an e-mail sent by you, it is not our intention to contact you unless you request particular information. Although we will retain your contact information in our database, we will use it only to respond to your requests.

The personal data described above, as well as any other personal data you provide to us (for instance, for promotional operation (games), survey), will be processed only for the apparent purpose for which it was collected (your participation) and/or as communicated to you upon the collection of your personal data.

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

3. What is our legal basis for processing your personal data?

We will only process your personal data where we have a legal basis to do so. Depending on the purposes for which we are processing your personal data (as explained in section 2 above), the legal basis will be one of the following:

- **Performance of a contract:** for example, where it is necessary for us to process your personal data to fulfill an order or subscription you have placed via our Site.
- **Your consent:** for example, if you have given us your consent to provide your personal data to us or third parties for marketing purposes.
- **For our or our third parties' legitimate business interests:** for example, where it is necessary for BIC to process personal data for the purposes of preventing fraud.
- **Compliance with law:** for example, where BIC is subject to a legal or regulatory obligation and needs to use your personal data in order to comply.

4. Retention period of the personal data we collect

We take steps to ensure that the personal data that you provide is retained for only as long as it is necessary considering the purpose for which it was collected.

Where we have collected your personal data based on your consent and we have no other lawful basis to continue with the processing, you may at any time withdraw or change your consent to our use or disclosure of your personal data subject to legal restrictions. The revocation of your consent will be valid for the future and will not affect the legality of the processing that was done based on your initial consent.

5. Use of cookies and similar technologies

Like many other web sites, our Site may use a standard technology called a "cookie", or technology which is similar to a cookie, to collect and record information about your usage of the Site. Cookies are designed notably to help us recognize you as a previous user of the Site and thus offer you a service tailored and personalised to your profile and improve your user experience when you visit our Site again.

Cookies that we may issue cannot retrieve any other information from your hard drive or pass on a computer virus.

We may issue cookies that allow us to:

- compile statistics and traffic volume and measure the use of the various sections of our Site (headings and content visited, click streams) which helps us improve the value and usability of our services; to do so, we may use Google Analytics or other third party analytic tools. The information we collect is aggregated and not directly identifiable. We can share such information with developers or other service providers working with us on the Site. To learn more about Google Analytics, please visit: <http://www.google.com/analytics/learn/privacy.html>.
- customize the presentation of our Site to the display settings of your data terminal (language, screen resolution, operating system, etc.) during your visit on our Site, based on your data terminal's hardware, viewing software and video software;

- customize the advertising content displayed in our advertising space on your data terminal based on previous information that you have provided;
- implement security measures, such as when you are asked to log in again to contents or a service after a certain period of time;
- identify which parts of our Site you have been visited or keep track of your preferences, track a path through our web pages;
- send you marketing communications, ads, offers and other information which may be of interest to you;

We only use cookies to gather the information indicated in this policy and do not use cookies to gather personal identifying information about you without your consent.

In any case, you can decide to allow or block cookies. There are several ways to manage cookies, as described below. However, some difficulties to navigate on our Site might occur.

- You can configure your browser to allow cookies to be stored on your data terminal, to reject them automatically or to reject them from certain issuers. You can also configure your browser so that you are promptly asked to accept or reject cookies before a cookie is saved to your data terminal. Each browser has a different way of managing cookies and cookie settings. The configuration of your browser is described in its help menu which will inform you of how to change your cookie settings.

Your navigation on our Site can lead to the installation of cookies issued by third parties partners (for example communication agencies, web and audience analytics agencies, social media, YouTube, ...) for statistical purposes or to be able to propose you offers on their platforms which may interest you. The issue and use of cookies by third parties are subject to the privacy policies of those third parties.

Finally, you can also connect to www.youronlinechoices.com, a website proposed by digital advertising professionals, in order to help you control, accept or reject some cookies placed in your browser.

6. Links to or from Other Websites

The Site may contain links to other websites. BIC has no control over and assumes no responsibility or liability for the privacy practices of these websites. You should review the privacy policies of each website you visit.

7. Disclosure to Third Parties

We don't sell your personal data to other companies.

We may disclose your personal data to trusted third parties who assist us in operating the Site and conducting our business (like statistical studies institutes, advertising agencies or online commerce platforms). 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 data for their own marketing or other purposes. We ask our service providers a high level of security and confidentiality, no less than the guaranties described in this policy.

If we become involved in a transaction to sell all, or any parts, of our business or assets or merge with another business we may use or disclose personal data to other parties involved in the transaction, for example, the prospective seller or buyer and our professional advisers.

We may also disclose your personal data where we are required to do so to comply with a legal obligation or in order to enforce our terms of use and other agreements; or to protect the rights, property, or safety of BIC, our customers or other individuals.

8. Security of your Personal Data

We have policies and procedures in place to protect your personal data 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 circumstance or its resilience to future attacks.

9. Transfer and Storage of your Personal Data

Your personal data collected on our Site is stored at secure locations and on servers located in the European Union. You may obtain information and address questions about the privacy policies and practices relating to the processing of your personal data by contacting us.

10. Children's 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).

11. Contacting Us Regarding this Privacy Policy or Your Personal Data

Questions regarding this Privacy Policy, the collection or the accuracy of your personal data, the use or disclosing of the information, or requests to correct, amend and request deletion of your personal data may be directed to our Data Protection Officer: data-protection@bicworld.com.

This Privacy Policy is subject to change at our discretion. You should periodically check this Site for changes to this Privacy Policy. All changes will be posted as soon as they go into effect.

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.