DATA PROTECTION POLICY

In compliance with French law 78-17, of 6 January 1978, relating to information, files and freedoms, and the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (**GRDP**), this Data Protection Policy defines the policies employed by ROCTOOL so as to protect personal data susceptible to being collected on its website www.roctool.com

1. Collecting personal data via the website

User's personal data are collected when the user fills out a form (« Get in Touch »¹, « Contact Us ») and when he subscribes to the « Newsletter ».

2. Use of personal data

Responsible for processing personal data and the purposes for which these data are collected

ROCTOOL is the data controller responsible for processing data collected *via* the website.

ROCTOOL uses the personal data to give the visitor access to some services available on the website (sending newsletter, answering visitor's questions), for the management of the platform and to enable the website to be browsed.

There is also a « segmentation » of data made by ROCTOOL to allow the sending of targeted commercial offers.

Recipients of the collected and transferred data

The personal data are destined for ROCTOOL.

Under no circumstances may the personal data collected in relation to the website be transferred to third parties by ROCTOOL.

Nevertheless, personal data collected in relation to the website could be transferred to the salesmen of ROCTOOL.

These salesmen will have communication of the following data:

- First name
- Last name
- Email
- Phone
- Job title
- Company
- Country

¹ http://www.roctool.com/connect/get-in-touch

The transmission of this data is intended:

- For Roctool's salespeople
- be added to the customer database / supply of goods and services to the customer
- For the realization of marketing campaigns

Data transfer outside the European Union

The collected data may be transferred to salesmen of ROCTOOL outside the European Union, and in particular to the following recipients:

- The ROCTOOL's salesmen based in the USA
- The ROCTOOL's salesmen based in China.

These recipients will have the following data:

- First name
- Last name
- Email
- Phone
- Job title
- Company
- Country

The transmission of this personal data to recipients outside the European Union is intended to:

- be added to the customer database / supply of goods and services to the customer
- The realization of marketing campaigns

The following guarantees have been taken to ensure a sufficient level of protection of personal data:

- The ROCTOOL's salesmen based in the USA: the receiving country offers an adequate level of data protection and the ROCTOOL's salesmen are listed in the « Privacy Shield Register ».
- The ROCTOOL's salesmen based in China : the transfer is governed by « Standard Contractual Clauses ».

3. Period of time the personal data will be stored

The personal data are stored by ROCTOOL for a period of 1 ONE month following the deregistration of the user.

4. Rights of the user relating to their personal data

In accordance with French Law 78-17, of 6 January 1978, and the GRDP, the user has the right of information, access, rectification, deletion, limitation and transferability of their personal data.

The user, likewise, has the right of opposition to the processing of their personal data for a lawful reason.

These rights can be exercised online by emailing <u>virginia.lapierre@roctool.com</u> or by writing to:

ROCTOOL Website Administration Savoie Technolac Modul R BP 80341 73370 Le Bourget du Lac FRANCE

The user should state in which service their personal data were filled in.

5. Cookies

Function of cookies

ROCTOOL may use cookies in the following situations:

* to facilitate the functioning of the website,

* to measure and analyse the activity carried out on the website, as well as the use of the services available through the website and, in addition, to ensure good progress of the user's activity and to improve its services in accordance with parameters such as the pages visited, the functions and uses of the content of the services that have been of the greatest interest to the visitors and the way in which the services function on a technical level (the frequency of technical problems). ROCTOOL, or any supplier of measuring equipment or analytical services, may transfer non-personally identifiable information to third parties.

Management, blocking and suppression of cookies

Generally, Internet browsers contain cookie management settings. These settings allow the User to suppress cookies, as well as to accept, or reject, certain cookie types. The user may be able to manage other (non-cookie) tracking technologies through the websites of the companies that provide these technologies or through the operating system on their mobile. ROCTOOL invites the user to consult the "help" section on their browser, or the website of their hardware, software or operating system supplier for further information. To find out more about cookies, the user can also visit http://www.cnil.fr/vos-droits/vos-traces/les-cookies/, which contains ancillary information relating to cookies, and ways to block them, depending on the browser the user uses. If the user rejects, or suppresses, the cookies, the characteristics and functions associated with the website may not be available and the regular use thereof may be compromised.

6. Amendments to this data protection statement

ROCTOOL may regularly amend this data protection policy.

ROCTOOL will issue notification of any major change to its data protection policy at least thirty (30) days in advance of the change taking effect.