

## SIBLU - TRANSPARENCY POLICY

### For the attention of customers & prospective clients

We are fully aware of the importance of ensuring the confidentiality of your data and are therefore committed to protecting your personal data in compliance with the regulations in force in Europe and in France.

Following entry into force of EU Regulation 2016-679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter the "GDPR"), we are implementing our transparency policy to ensure that you are fully informed about the way in which we collect your data and subsequently use such data. Please read this document to see the details of the policy currently in force.

The aim of the policy is to provide you with a general understanding and information on the commitments and practical measures taken by our Company to ensure that your personal data are respected.

#### 1 – DEFINITIONS

"We" or "our Company" or "Siblu" refer to:

The Company **Siblu France SAS**

With capital of € **3 113 288**

Registered with the **Bordeaux** Trade and Companies Register

Under number **321 737 736**

Whose registered office is located at **Europarc, 10 avenue Léonard de Vinci, 33600 Pessac, France**

"You": refers to our current, former and potential clients;

"Personal data": means any information relating to an identified or identifiable natural person, directly or indirectly. Also refers to images concerning a natural person when our Company is equipped with a video surveillance system.

#### 2 – WHO IS THE DATA CONTROLLER?

Your personal data are processed by our Company as the data controller. The Data Protection Officer appointed within our Company can be contacted at the following email address: [dpo@siblu.fr](mailto:dpo@siblu.fr)

#### 3 – WHAT IS THE PURPOSE OF EACH DATA PROCESSING OPERATION?

We process data for the purpose of managing business activities with our customers and prospective clients.

#### 4 – FOR WHAT PURPOSES DO WE COLLECT AND USE YOUR PERSONAL DATA?

PURPOSES	LEGAL BASIS
<p>If you are a customer who has purchased a mobile leisure residence or light leisure accommodation from Siblu and/or who rents a pitch year-round to install a mobile leisure residence or light leisure accommodation, our Company carries out management processing concerning you for the following purposes:</p>	
<ul style="list-style-type: none"> <li>Contract management: sale of mobile homes and related administration (management of the order, delivery, etc.), year-round pitch rental and related administration (management of the payment of rent, sub-letting income, etc.)</li> </ul>	<p>This processing is justified by the existing contractual relationship between you and our Company.</p>
<ul style="list-style-type: none"> <li>Keeping general accounts and any subsidiary accounts that may be attached thereto;</li> </ul>	<p>This processing is based on a legal obligation.</p>
<ul style="list-style-type: none"> <li>Conducting customer satisfaction surveys and studies;</li> <li>Carrying out business development and marketing activities.</li> </ul>	<p>These purposes are based on your prior consent.</p> <p><b>On that basis, we remind you that you have the right to object at any time to such processing, at no cost to you, by contacting Siblu either in writing at the postal address indicated hereinabove or by sending an email to <a href="mailto:dpo@siblu.fr">dpo@siblu.fr</a></b></p>
<ul style="list-style-type: none"> <li>Establishing financial statistics</li> <li>Managing loyalty programmes</li> <li>Managing unpaid bills and disputes</li> <li>Managing complaints, after-sales service and guarantees</li> </ul>	<p>This purpose is based on our legitimate interest in improving our quality of service as well as our offer of products and services.</p>
<p>If you are a customer who has booked a holiday stay with Siblu, our Company carries out management processing concerning you for the following purposes:</p>	
<ul style="list-style-type: none"> <li>Contract management (management of your booking)</li> </ul>	<p>This processing is justified by the existing contractual relationship between you and our Company.</p>
<ul style="list-style-type: none"> <li>Keeping general accounts and any subsidiary accounts that may be attached thereto;</li> </ul>	<p>This processing is based on a legal obligation.</p>
<ul style="list-style-type: none"> <li>Monitoring of customer relations such as conducting customer satisfaction surveys and studies,</li> <li>Carrying out business development and marketing activities</li> <li>Establishing financial statistics</li> <li>Managing loyalty programmes</li> <li>Managing unpaid bills and disputes</li> <li>Managing complaints, after-sales service and guarantees</li> </ul>	<p>This purpose is based on our legitimate interest in improving our quality of service as well as our offer of products and services.</p>

If you are a customer who has booked a holiday stay with an individual owner of a mobile home, our Company carries out management processing concerning you for the following purposes:	
<p>Your reservation must be declared to Siblu by the individual owner who is renting you accommodation (name, contact details, email address, period of occupancy) for the following purposes:</p> <ul style="list-style-type: none"> <li>• Allowing Siblu to comply with its safety obligations, in particular:               <ul style="list-style-type: none"> <li>- article R. 611-42 of the Code on the Entry and Residence of Foreign Citizens and the Right of Asylum, which requires formalisation and retention of a police record for foreign visitors,</li> <li>- article R331-10 Article R331-10 of the Tourism Code relating to the manager's authorisation for visitors to enter the site,</li> <li>- article D331-7 of the Tourism Code regarding implementation of information, warning and evacuation requirements to ensure the safety of visitors</li> <li>- article D331-1-1 and order of 17 February 2014 requiring campsite managers to ensure that the campsite is kept in good working order and that the site regulations are adhered to.</li> </ul> </li> </ul>	<p>This processing is based on the existence of legal obligations</p>
<ul style="list-style-type: none"> <li>• Your reservation must be declared to Siblu by the individual owner who is renting you accommodation (name, telephone information, email address, vehicle registration, occupancy period, number of children and adults) for the following purposes:               <ul style="list-style-type: none"> <li>- Organising your visit to the Siblu village concerned</li> <li>- Informing you of reception conditions in the village, useful information for your stay (in particular concerning the "Fun Pass" giving you access to leisure infrastructures) and site regulations</li> </ul> </li> </ul> <p>The owner renting to you is required to inform you that you can be contacted by Siblu to receive useful information for your stay.</p>	<p>This processing is based on our legitimate interest in affording the best possible welcome to holidaymakers at the Siblu village and ensuring that they are properly informed of operating terms.</p>
<ul style="list-style-type: none"> <li>• Our company conducts a customer satisfaction survey in order to improve its services in the village where you stayed.</li> </ul>	<p>This purpose is based on our legitimate interest in improving our quality of service.</p> <p><b>On that basis, we remind you that you have the right to object at any time to such processing, at no cost to you, by contacting Siblu either in writing at the postal address indicated hereinabove or by sending an email to <a href="mailto:dpo@siblu.fr">dpo@siblu.fr</a></b></p>
<ul style="list-style-type: none"> <li>• Carrying out operations related to management of holidaymakers for the following purposes:               <ul style="list-style-type: none"> <li>- Management of contracts (in particular Fun Passes, linen and other options)</li> <li>- Your orders (in particular Fun Passes, linen and other options)</li> <li>- Keeping general accounts and any subsidiary accounts that may be attached thereto</li> <li>- Management of claims related to leisure activities</li> <li>- Invoices (in particular Fun Passes, linen and other options)</li> </ul> </li> </ul>	<p>This processing is justified by the existing contractual relationship between you and our Company.</p>
If you are not a Siblu customer but are the subject of direct marketing action, we implement management processing for the following purposes:	
<ul style="list-style-type: none"> <li>- Managing technical marketing operations;</li> <li>- Selecting persons for loyalty-building, canvassing, studies, surveys, product tests and promotions.</li> <li>- Undertaking commercial canvassing and marketing actions (sending advertising messages, sponsorship, promotional surveys)</li> <li>- Telephone canvassing if you request a call back or e-mail contact (according to your request)</li> <li>- Organising competitions, lotteries or any promotional operation, excluding online gambling games subject to approval by the Online Gaming Regulatory Authority;</li> <li>- Managing people's opinions on products, services or content;</li> </ul>	<p>These purposes are based on your prior consent.</p> <p><b>On that basis, we remind you that you have the right to object at any time to such processing, at no cost to you, by contacting Siblu either in writing at the postal address indicated hereinabove or by sending an email to <a href="mailto:dpo@siblu.fr">dpo@siblu.fr</a></b></p>
<ul style="list-style-type: none"> <li>• Preparation of sales statistics (anonymised);</li> </ul>	<p>This purpose is based on our legitimate interest in improving our quality of service as well as our offer of products and services.</p>
Siblu undertakes other processing of personal data that could concern you:	
<p><b>Recording of telephone conversations:</b> If you call our Company, the call may be recorded, unless you object, for the following purposes: to train our employees, to improve our quality of service, to assess our employees and for evidentiary purposes to establish a contract or transaction</p>	<p>This processing is based on our legitimate interest in training our employees, improving our quality of service, assessing our employees and for evidentiary purposes to establish a contract or transaction.</p>
<p><b>External communication:</b> Our Company undertakes processing of data concerning external communication management for the following purposes:</p> <ul style="list-style-type: none"> <li>• Publishing information intended for customers and for marketing purposes (Brochures, flyers, rental guide, owner's guide, etc.);</li> <li>• Promotion of sales activities (digital media - websites, social media, emailing, etc. - and paper - brochures, flyers, etc.);</li> <li>• Record of events and entertainment activities organised by Siblu;</li> </ul>	<p>This processing is based on your prior consent. For commercial use of your image, we ensure that we obtain your consent through a transfer of image rights.</p> <p><b>Apart from the transfer of image rights subject to a specific agreement, in particular regarding the duration of use, we remind you that you have the right at any time to oppose processing, at no cost to you, simply by contacting Siblu either in writing at the address indicated hereinabove or by sending an email to <a href="mailto:dpo@siblu.fr">dpo@siblu.fr</a></b></p>

<ul style="list-style-type: none"> <li>• <b>Photos on Fun Passes:</b> In some villages, Fun Passes may include a photo of you for monitoring purposes.</li> </ul>	Processing concerning Fun Passes is based on our legitimate interest in preventing fraudulent use.
<ul style="list-style-type: none"> <li>• <b>Accident management:</b> we undertake processing aimed at ensuring management of accidents occurring in our villages for the following purposes: <ul style="list-style-type: none"> <li>- To ensure receipt and recording of any information that may be useful for the processing of accident declarations</li> <li>- To manage the relationship with insurers, by postal or electronic mail, by telephone messages, by telephone or physical reception and by teleservice</li> <li>- To process equitable relief claims and litigation</li> </ul> </li> </ul>	This processing is justified by the existing contractual relationship between you and our Company.
<ul style="list-style-type: none"> <li>• <b>Producing anonymised statistics based on accident-related data.</b> The data is anonymised beforehand for the purpose of steering and implementing risk management and prevention policies, assessing the quality of the monitoring and prevention service provided to customers.</li> </ul>	Compiling statistics is based on our legitimate interest in improving our safety, control and prevention measures.
<ul style="list-style-type: none"> <li>• <b>Exercising of rights related to data protection:</b> Managing requests concerning the right of access, the right of rectification and the right to object.</li> </ul>	This processing is based on our legal obligations.
<ul style="list-style-type: none"> <li>• <b>Kids Club:</b> If you leave your child with a kids club at a Siblu village, your child's registration will be subject to non-computerised personal data processing for the purpose of managing children's registrations and follow-up.</li> </ul>	This processing is justified by the existing contractual relationship between you and our Company.
<ul style="list-style-type: none"> <li>• <b>Video protection:</b> At some Siblu Villages, our Company implements video protection measures to ensure the safety and protection of property and persons. If video protection measures are in place at your Siblu Village, you will be informed by means of posters or displays.</li> </ul>	This processing is based on our legitimate interest in ensuring the safety and protection of property and persons ( <i>unless the interests or fundamental rights and freedoms of the data subjects prevail</i> ).
<b>Our Company is a data processor (within the meaning of Article 4.8 of the General Data Protection Regulation) for the following processing operations:</b>	
<ul style="list-style-type: none"> <li>• Taking out insurance cover or guarantees for the following purposes: <ul style="list-style-type: none"> <li>• Either in the framework of rental of a pitch year-round in order to cover inherent risks</li> <li>• Or in the framework of booking a holiday stay</li> </ul> </li> </ul>	This processing is justified by the existing contractual or precontractual relationship between you and our Company.
<ul style="list-style-type: none"> <li>• Preparation of a loan application, where our Company acts as an intermediary in banking and payment services for the following purposes: presentation, proposal, assistance in concluding the financing operations proposed by the financing institution.</li> </ul>	This processing is justified by our legitimate interest.

## 5 – WHAT CATEGORIES OF PERSONAL DATA DO WE COLLECT?

In our capacity as data controller, we collect personal data about you exclusively in connection with the purposes described hereinabove.

As such, it is important that you inform us immediately of any changes concerning your personal data so that we can update such data, failing which we may be unable to provide some of our services.

You will find details concerning the categories of personal data we collect or may collect for specific purposes below (it being specified that the data collected for a given purpose may be found under several headings):

CATEGORIES OF PERSONAL DATA COLLECTED	Clients renting a pitch for the year	Holidaymakers	Prospective clients
Data concerning civil status, identity, identification data (such as title, surname, given name, date of birth, etc.).	X	X	X
Data concerning your vehicle (registration in the framework of automatic identification allowing access to and departure from the Siblu village).	X	X	
Data concerning means of payment and transactions (bank details, transaction number, etc.).	X	X	
Data concerning your private life (such as number of family members in the home, age, etc.).	X	X	X
Data concerning a loan application (such as professional status, economic and financial information, amount, term, rate etc.).	X		X
Data concerning monitoring of the business relationship (such as purchasing history and services provided, exchange of information, etc.).	X	X	
Specific data needed to book a holiday stay (such as the contract number, booking number, etc.).		X	
Specific data needed to rent a pitch year-round (such as rent amount, pitch number, etc.).	X		
Specific data needed to implement insurance cover or guarantees you take out.	X	X	

Data concerning the mobile home (such as the make, the type of mobile home, the year it was built, etc.).	X		
Data concerning invoice payments (payment terms, discounts granted, etc.).	X	X	
Data needed for customer loyalty programmes, direct marketing, studies, surveys, product tests and promotions.	X	X	X
Data needed for accident management.	X	X	
Data concerning organisation and implementation of competitions, lotteries and all promotional operations.	X	X	X
Data concerning contributions of persons making comments on products, services or content.	X	X	X
Website navigation, login, and Internet data (such as cookies).	X	X	X
Data concerning customer photos and videos.	X	X	
If applicable, video protection images (depending on Siblu villages)	X	X	X
Data concerning dispute management	X	X	X
Data concerning recording of telephone conversations	X	X	X

## 6 – WHAT IS THE SOURCE OF THE DATA?

Our Company collects your personal data based on the data provided directly by you.

In the framework of its direct marketing activities, our Company may collect data indirectly through business partners. The persons concerned by the said data must have given their prior consent for such communication and use.

## 7 – IS COLLECTION OF SUCH DATA MANDATORY AND WHAT ARE THE CONSEQUENCES IF SUCH DATA ARE NOT PROVIDED?

Collection of data concerning recorded telephone conversations and external communication is optional. You may object to collection of such data without that preventing you from benefiting from our services.

The data collected for various other purposes are collected on a mandatory basis except - in the case of direct collection - explicitly indicated indication to the contrary, to be able to benefit from the service you have chosen. If all the necessary data are not provided, the application cannot be processed.

## 8 – IS THERE ANY AUTOMATED DECISION-MAKING?

The various data processing operations undertaken in our capacity as data controller do not involve automated decisions.

## 9 – WHO ARE THE DATA SUBJECTS CONCERNED BY DATA PROCESSING?

Data processing concerns:

- clients who have purchased a mobile leisure residence or light leisure accommodation;
- clients renting a pitch year-round with a view to placing a mobile leisure residence or light leisure accommodation on the pitch, for leisure purposes;
- clients who have booked a holiday stay with our Company;
- clients who have booked a holiday stay with other individuals;
- prospective clients.

## 10 – HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

The data retention period concerning your personal data varies depending on the purpose for which the data were collected. This table summarises the main data retention periods we apply:

Data retention periods		
CATEGORIES OF PERSONAL DATA COLLECTED	Active database	Intermediate archiving
Data concerning civil status, identity, identification data (such as title, surname, given name, date of birth, etc.).	For the duration of the business relationship	5 years from the end of the business relationship for evidentiary purposes (article 2224 of the French Civil Code)
Data concerning means of payment and transactions (bank details, transaction number, etc.).	Bank details are used only in the framework of the transaction	Bank documents (bank details, cheque stubs, etc.) are kept for 5 years (art L110-4 of the French Commercial Code). Bank card data may be kept by the technical intermediary in

		intermediate archiving for evidentiary purposes in the event of a possible dispute concerning the transaction for a period of 13 months (Article L133-24 of the French Monetary and Financial Code) and 15 months in order to take into account the possibility of using deferred debit payment cards
Data concerning your private life (such as number of family members in the home, age, etc.).	For the duration of the business relationship	5 years from the end of the business relationship for evidentiary purposes (article 2224 of the French Civil Code)
Data concerning a loan application (such as professional status, economic and financial information, amount, term, rate etc.).	Siblu retains only “vendor” loan offers, other data collected on behalf of the financing institution are destroyed	Siblu retains “vendor” loan offers for a period corresponding to that of the contractual relationship, plus a period of 5 years for evidentiary purposes (exhaustion of legal remedies) (article 2224 of the French Civil Code)
Data concerning monitoring of the business relationship (such as purchasing history and services provided, exchange of information, etc.).	For the duration of the business relationship	5 years from the end of the business relationship for evidentiary purposes (article 2224 of the French Civil Code)
Specific data needed to book a holiday stay (such as the contract number, booking number, etc.).	For the duration of the business relationship	5 years from the end of the business relationship for evidentiary purposes (article 2224 of the French Civil Code)
Specific data needed to rent a pitch year-round (such as rent amount, pitch number, etc.).	For the duration of the business relationship	5 years from the end of the business relationship for evidentiary purposes (article 2224 of the French Civil Code)
Specific data needed to implement insurance cover or guarantees you take out.	Data are kept for the duration needed to implement the contract	2 years after the end of the contract (L114-1 et seq. of the French Insurance Code)
Data concerning the mobile home (such as the make, the type of mobile home, the year it was built, etc.).	For the duration of the business relationship	5 years from the end of the business relationship for evidentiary purposes (article 2224 of the French Civil Code)
Data concerning invoice payments (payment terms, discounts granted, etc.).	For the duration of the business relationship	10 years after the end of the financial year (L123-22 of the French Commercial Code)
Data needed for customer loyalty programmes, direct marketing, studies, surveys, product tests and promotions.	For the duration of the business relationship	- For a customer: 3 years following the end of the business relationship. - For a prospective client: Personal data relating to a prospective client who is not yet a customer may also be kept for a period of three years from the date of collection by the data controller or the last contact from the prospective client.
Data needed for accident management.	For the duration of the business relationship	10 years after the end of the business relationship (article 2226 of the French Civil Code)
Data concerning organisation and implementation of competitions, lotteries and all promotional operations.	Data are not kept	Data are not kept
Data concerning contributions of persons making comments on products, services or content.	Your comment remains online until you delete it	Your comment remains online until you delete it
Website navigation, login, and Internet data (such as cookies).	/	The period of validity of consent to the deposit of cookies is a maximum of 13 months from the date of the first visit
Data concerning customer photos and videos.	The time corresponding to the transfer of rights (10 years from the date of signature)	The time corresponding to the transfer of rights (10 years from the date of signature)
If applicable, video protection images (depending on Siblu villages)	/	Maximum of 30 days (article L. 252-3 of the French Interior Security Code)
Data concerning dispute management	For the duration of the business relationship	- Pre-litigation: data are deleted as soon as the corresponding legal action is time-barred - Litigation: data are deleted when the ordinary and extraordinary remedies against the decision are no longer available.
Data concerning recording of telephone conversations	/	Maximum of 12 months for evidentiary purposes (fulfilment of a contract or completion of a transaction)

<b>Data concerning your vehicle (registration in the framework of automatic identification allowing access to and departure from the Siblu village).</b>	For the duration of the business relationship	5 years from the end of the business relationship for evidentiary purposes (article 2224 of the French Civil Code)
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At the end of these periods, the data shall be deleted or made irreversibly anonymous.

However, your personal data may be kept beyond the periods indicated in the following cases:

- to comply with a legal or regulatory obligation, for the time required to fulfil the obligation in question,
- to be able to respond to any legal action, for the duration of the statute of limitations provided by the applicable legislation.

## 11 – WHO HAS ACCESS TO YOUR DATA? WHO ARE THE RECIPIENTS OF YOUR PERSONAL DATA?

Only our staff authorised to have such access in the framework of their duties, as the case may be, in the marketing department, the sales department, the departments tasked with customer relations and marketing, the administrative departments, the logistics and IT departments, the human resources department, the accounting department, the financial department, the legal department, the control and security departments, as well as their line supervisors, have access to your personal data within our Company.

Moreover, your personal data may be provided to the following recipients:

The manufacturers of the mobile homes that we sell and/or install, in particular in the context of fulfilment of orders and exercise of warranty and safety obligations for the products sold and after-sales service, or third parties to whom the distributor(s) and/or manufacturer(s) may convey the data (insurance company, expert, supplier, etc.) in the context of these purposes;

Mobile home experts

Our financial partners with a view to financing your purchase of a mobile home (Cetelem, Viaxel, Financo, Cofidis)

Our insurance partners with a view to insuring or guaranteeing the products you purchase, rent or borrow from us (Tolède Groupe et associés/Allianz Iard, Gritchen, tolède et associés/Groupe Allianz),

Our service providers tasked with managing the video protection system,

Our IT service providers, working on our software and websites,

Our technical service providers tasked with managing online payments,

Our commercial partners for certain specific services to which you may subscribe (management of online comments, processing of deposits, etc.)

Our subcontractors/data processors who are subject to the rules applicable in that regard,

Judicial and legal officers in the framework of their advisory, debt collection or representation role

Authorised third parties (labour inspectors, etc.)

The competent law enforcement or judicial authorities (images provided as required in the event of an incident or offence).

Exclusively with your consent, some of your personal data (i.e. your identity, your postal address, your e-mail address, your telephone number and your family, economic and financial status) may also be provided to our business partners and to companies within the group or network we are a part of, if applicable, for the purpose of direct marketing.

We strictly require our service providers and subcontractors/data processors to use your personal data only to administer the services we ask them to provide. We also require the said service providers and processors to comply at all times with the applicable data protection laws and to pay particular attention to the privacy and security of your data.

We may also disclose your personal data to third parties in order to comply with an order from the legal authorities.

## 12 – CAN YOUR PERSONAL DATA BE TRANSFERRED OUTSIDE THE EUROPEAN UNION?

As a matter of principle, we aim to keep your personal data within the European Union.

However, your data may be transferred occasionally to subcontractors/data processors or business partners located in other countries provided that they offer an adequate level of protection recognised by the European Union.

In the event of a transfer of your data to a country whose level of protection of your data has not been recognised as adequate by the European Commission, we put in place Standard Contractual Clauses approved by the European Commission which allow us to guarantee an adequate level of protection of the privacy and fundamental rights of individuals.

For any questions on this topic, please send us a written request by email to: [dpo@siblu.fr](mailto:dpo@siblu.fr) or by post to: Europarc - 10 avenue Léonard de Vinci - 33600 Pessac (France).

## 13 – HOW ARE YOUR PERSONAL DATA STORED?

Your personal data are stored either in our databases or in those of the recipients referred to in Article 6 hereinabove.

We store your personal data securely for the time required to achieve the purpose of the processing. To that end, we take appropriate physical, technical and organisational measures to prevent any alteration, loss of or unauthorised access to your data.

## 14 – WHAT SECURITY MEASURES ARE IMPLEMENTED TO PROTECT YOUR PERSONAL DATA?

Our Company has an Information System Security Plan.

Our Company implements appropriate measures to prevent accidental or unlawful destruction, loss, alteration or unauthorised disclosure of data.



These measures include:

- ✓ Implementation of an IT Charter;
- ✓ Implementation of a General Policy for the protection of personal data;
- ✓ Raising staff awareness;
- ✓ Securing workstations;
- ✓ Management of authorisations for access to data;
- ✓ Regular and systematic backup of data stored on the server;
- ✓ Restricted and secure access to physical data.

## 15 – WHAT ARE YOUR RIGHTS REGARDING PROCESSING OF YOUR PERSONAL DATA?

In compliance with the provisions of the GDPR, you have the following rights:

- **right of access** to your personal data contained in our databases,
- **right to rectify** or erase your data, it being specified that this right may be limited in light of our contractual and/or legal obligations,
- **right to restrict** processing of your personal data in the cases stipulated by regulations and in particular by Article 18 of the GDPR. This is a right that complements your other rights (rectification, objection, etc.). If you dispute the accuracy of the data used by our Company or if you object to your data being processed, the law allows our Company to proceed with a verification or examination of your request during a given time frame. During this period, it is possible for you to ask our Company to freeze the use of your data.
- **right to portability** of your data, which allows you to request the retrieval of the data you have provided, either for your own use or for transmission to a third party of your choice,
- **right to object** to the collection and processing of your data. At any time, you have the right to object to the use of your data for direct marketing purposes by our Company, in particular by means of a box to be ticked or of a link on the medium used for marketing, or by contacting us at the address indicated below,
- **right to erasure** of your personal data if your data are used for direct marketing purposes; if the data are not or are no longer necessary for the purposes for which they were originally collected or processed; if you withdraw your consent to the use of your data; or if you assert your right to object and our Company has no legitimate or compelling reason not to comply with this request. If the personal data have been unlawfully processed, or if the personal data must be deleted to comply with a legal obligation (see Article 17 of the GDPR).
- **right to withdraw** your consent at any time, for the processing operations for which we have obtained your consent,

You may exercise these rights, at no cost to you, by sending us a request along with evidence of your identity (*depending on your choice*):

- by email to: [dpo@siblu.fr](mailto:dpo@siblu.fr)
- or by letter to: 10 avenue Léonard de Vinci 33600 Pessac (France)

You also have the right to lodge a complaint with the French Data Protection Authority (CNIL). Should any difficulties arise, we are naturally at your disposal in order to find an amicable solution.

You may also give general or specific instructions to a trusted third party certified by the CNIL or our company, concerning the retention, deletion and communication of your personal data after your death. You may appoint a person to carry out these instructions and change them at any time. In the absence of instructions given during your lifetime, your heirs will be able to exercise certain rights, in particular the right of access.

For more information about exercising your rights, use this link: <https://www.cnil.fr/fr/les-droits-pour-maitriser-vos-donnees-personnelles>

## 16 – DOES SIBLU USE PHONE MARKETING?

As a matter of principle, it is forbidden for a professional, either directly or through a third party acting on their behalf, to phone a consumer registered on this list. In that regard, you have the right to register on the BLOCTEL anti-telephone marketing list using the following url <https://conso.bloctel.fr>, pursuant to article L.223-2 of the French Consumer Code.

This legal text does not, however, apply in the following cases:

- In the event of a pre-existing contractual relationship between the professional and the consumer
- If you have asked to be called

In the framework of its phone marketing operations, our Company applies these two exceptions.

## 17 – WHAT PERSONAL DATA ARE COLLECTED SPECIFICALLY WHEN YOU VISIT OUR WEBSITE? (COOKIES)

When you visit our website, cookies are placed on your computer, mobile phone or tablet if you give your consent using the banner provided.

Below you will find information to help you understand how cookies work and how to use the current tools to set them.

Cookies are small text files that websites place on your computer hard drive when you visit a website or view an advertisement. In particular, their purpose is to collect information relating to your browsing and to enable certain functions. Other cookies help us to know what information you like, so that we can offer you more content that might interest you.

In your computer, tablet or smartphone, cookies are managed by your internet browser and are specific to our Company.

### • Purpose of cookies

Different types of cookies are used on our website for different purposes. Some are necessary for your use of our website.

#### - Cookies strictly necessary for use of the website

These cookies allow you to use the main features of the Website normally (e.g. access to your account).

#### - Functional cookies

These cookies allow us to remember your connection data, secure your connection to our website, and personalise your experience on the site. They also allow you to benefit from our personalised advice and promotional offers based on your browsing origin. They may also be used to provide you with features that you have requested.

#### - Advertising cookies

To personalise your browsing experience according to your interests, we use the cookies described below. This technology allows us to adapt the advertising during your navigation according to the subjects that interest you.

#### o Accepting or refusing cookies

There are several different ways of managing cookies.

#### - Internet browser settings

You can choose to disable these cookies at any time. Your browser can also be set to notify you when cookies are placed on your computer and to ask you if you accept them or not. You can accept or refuse cookies on a case-by-case basis or systematically refuse them once and for all.

We remind you that the settings may modify your access conditions to our services requiring the use of cookies.

If your browser is set to refuse all cookies, you will not be able to make use of certain functions on our website, such as receiving personalised recommendations. To manage cookies in a way that best suits your needs, we suggest that you set your browser according to the purpose of the cookies as mentioned above.

#### - Cookie management banner:

We have set up a banner allowing you to manage your cookies very simply. When you visit our website for the first time, a banner will appear offering you the following options:

- Either you accept the deposit and use of cookies on a case-by-case basis or globally, including from third-party partners, for dissemination of targeted advertising, content relevant to your interests, compilation of statistics to improve the site and sharing of content on social networks;
- Or you refuse (you may also refuse cookies on a case-by-case basis);
- The banner gives you the possibility of obtaining more information on cookies.

#### You can also disable cookies by following these instructions:

You can choose cookie management settings using the help menu of your browser software. We suggest that you take note of the link corresponding to the navigation software you are using:

- [Internet Explorer](#) (click)
- [Safari](#) (click)
- [Chrome](#) (click)
- [Firefox](#) (click)
- [Opera](#) (click)

For mobile devices, use the following links:

- [Chrome](#) (click)
- [Safari](#) (click)
- [Windows Phone](#) (click)
- [Blackberry](#) (click)

#### - Settings on a cookie management platform

For better understanding and control of cookies from all sources, and not only those for our site, we suggest that you visit the Youronlinechoices website published by the Interactive Advertising Bureau France (IAB), in particular the [cookie control](#) tab.

You can manage your cookies by visiting cookie management platforms offered by advertising professionals.

To find out more about cookies and their management, visit the CNIL website <https://www.cnil.fr/fr/cookies-les-outils-pour-les-maitriser> or click on the "Help" option in your browser menu.

## 18 – ACCESSIBILITY OF OUR TRANSPARENCY POLICY

This transparency policy is accessible free of charge:

- On our website accessible at the following address: <http://www.siblu.fr/>
- By request to the following email address: [dpo@siblu.fr](mailto:dpo@siblu.fr) or postal address: 10 avenue Léonard de Vinci - 33600 Pessac (France)

## 19 – UPDATING OF OUR TRANSPARENCY POLICY





We may occasionally amend or modify our transparency policy to update it in line with developments in our business.

We therefore recommend that you consult it regularly, in particular each time you visit our website or our premises, to take cognizance of the latest version. However, we will ensure that you are informed of any substantial changes in the use of your personal data by our Company and/or seek your consent as required.

Last updated on: 01/02/2023