

## PERSONAL DATA PROTECTION POLICY

With a view to protecting the privacy and data of its contacts (users of its website, contacts made at professional meetings, or through records, projects, partnerships, services, job applications, etc.), NEOCHIMIE has implemented a data processing policy pursuant to prevailing legislation.

To this end, NEOCHIMIE abides by applicable European law on personal data protection and, specifically, the General Data Protection Regulation (EU) 2016/679 of 27 April 2016 (“GDPR”), and all rules under French law for implementing the aforementioned Regulation.

The purpose of this Personal Data Protection Policy (hereinafter, the “Policy”) is to provide clear, simple and comprehensive information to the persons concerned regarding how NEOCHIMIE collects and uses your personal data (hereinafter, “personal data”) and on the methods available to you for controlling such use and exercising your rights in this regard.

### 1. In what situations are your personal data collected?

NEOCHIMIE may need to collect your personal data as a result of professional meetings, or for records, partnerships, job applications, your visits to our premises or your visits to our website.

Declared personal data are data that you provide when filling in forms, whether on the website, in hard copy or in reply to questions we ask.

NEOCHIMIE takes into account the principles of data minimisation, data protection by design and data protection by default. Therefore, the data collected are relevant, sufficient and limited to what is strictly necessary for the purposes for which they are processed.

### 2. On what basis are your data collected?

Your personal data are processed by NEOCHIMIE in the situations permitted by applicable legislation, and specifically in the following conditions:

- you have given your free, informed and unequivocal consent for your personal data to be processed for a specific purpose (e.g. : subscribing to thematic information, signing up for an event, etc.);
- when it is necessary for executing a contract or pre-contractual steps taken at your request (e.g. : job application, managing records, etc.);
- when NEOCHIMIE is called upon to fulfil legal or regulatory obligations (e.g. combatting fraud);
- when the legitimate interests of NEOCHIMIE may justify such processing (e.g. : IT security measures).

### 3. Why are your personal data collected?

Your personal data are collected for specific, explicit and legitimate purposes. Depending on the case, your personal data may be used for:

- contacting you as a result of records, projects, partnerships, etc.
- participation in satisfaction surveys, analyses and statistics aimed at improving our products and services, and for finding out about customers and potential customers;
- requesting, obtaining or receiving information about NEOCHIMIE, or about the products and services offered by the company or its partners;
- subscribing to and receiving thematic information (documentation, invitations, activity reports, etc.);
- processing your job application;
- improving your customer experience.

NEOCHIMIE may also use your personal data for administrative purposes, or for any other objective permitted under prevailing legislation.

### 4. Who receives your personal data?

Given the confidential nature of your personal data, only persons duly authorised by NEOCHIMIE may access them, without prejudice to their possible disclosure to control or inspection authorities pursuant to applicable legislation.

All persons who have access to your personal data are bound to keep them confidential.

These persons are duly authorised NEOCHIMIE staff. Our providers may also need to process the personal data strictly necessary for the tasks we outsource to them.

In the event of using providers located outside the European Union, NEOCHIMIE undertakes to check that the appropriate measures have been implemented for ensuring that your personal data are correctly protected.

### 5. How are your personal data kept secure?

NEOCHIMIE protects and secures your personal data in order to ensure that they remain confidential and are not deformed, damaged, destroyed or disclosed to unauthorised third parties.

When data disclosure to third parties is necessary and authorised, NEOCHIMIE ensures that these third parties afford the data concerned the same level of protection as NEOCHIMIE does, and requests binding contractual agreements from them that the data are processed solely for the purposes that you have given your consent for beforehand, and are treated with the required confidentiality and security.

NEOCHIMIE implements technical and organisational measures to ensure that personal data are retained securely for the time necessary for the purposes envisaged under applicable law.

However, although NEOCHIMIE takes all reasonable measures to protect your personal data, no data transmission or storage technology is 100% fail-safe.

Pursuant to applicable EU legislation, in the event of proven compromise of personal data which may place the rights and freedoms of the persons concerned at serious risk, NEOCHIMIE undertakes to notify the relevant control authority of such violation and, when so required under the aforementioned legislation, to inform the persons concerned (individually or as a group, depending on the circumstances).

Notwithstanding the foregoing, you yourself should exercise caution in order to prevent any unauthorised access to your personal data or devices (computer, smartphone, etc.).

Furthermore, NEOCHIMIE's website may contain links to third party websites that may be of interest to you. NEOCHIMIE has no control over the content of these third party websites, or of their measures for protecting any personal data they collect. NEOCHIMIE therefore accepts no responsibility whatsoever for how such third parties process your personal data, not covered under this Policy. It is your responsibility to find out about the personal data protection policies implemented by these third parties.

## 6. How long are your personal data retained for?

NEOCHIMIE retains your personal data for as long as required for the purpose intended, subject to the legal provisions regarding filing, retention obligations for certain data, and/or anonymisation.

Specifically, we apply the retention periods described below for the following main categories of personal data:

- personal data of customers / potential customers / business partners: as long as the user remains active and, at the most, 3 years after last contact with this user;
- personal data for connection (data rooms): 1 year after the last connection
- job applicant personal data (recruitment): for the time required for the application to be processed and, in the event of a non-successful application, 3 years after last contact (unless the applicant agrees to their data being retained for a longer period).

## 7. What are your personal data rights and how can you exercise them?

### 7.1 Your rights

To the extent provided for by prevailing law, you have the following rights regarding your personal data:

#### **The right to information on how your personal data is processed**

NEOCHIMIE does its utmost to provide you with concise, clear and comprehensible information that is easy to access and that uses clear and simple language to explain how your personal data are processed.

#### **Rights of access, correction and deletion (the “right to oblivion”) for your personal data**

Your right of access enables you to obtain confirmation from NEOCHIMIE of whether or not your personal

data have been processed and the conditions of such processing, and to receive a copy of same in electronic format (for all additional copies, NEOCHIMIE is entitled to request payment for any expenses reasonably incurred by administrative costs).

You are also entitled to request NEOCHIMIE to correct mistakes in your personal data in a timely manner (and by default, within 30 days of receiving your request).

Lastly, subject to the exceptions provided for by applicable law (e.g. retention required by a legal obligation), you are entitled to request NEOCHIMIE to delete your personal data in a timely manner when one of the following situations pertains:

- your personal data are no longer necessary for the purpose for which they were collected or otherwise processed;
- you wish to revoke the consent you gave for your personal data to be processed, and there is no additional justification for processing them;
- you believe and can provide evidence that your personal data have been processed illegally;
- your personal data must be deleted due to a legal obligation.

### **The right to limitation of personal data processing**

Applicable law provides for this right to be exercised in certain cases, and specifically in those listed below:

- when you have doubts regarding the accuracy of your personal data;
- when you believe and can provide evidence that your personal data have been processed illegally, but do not wish your personal data to be deleted, but rather for their processing to be limited;
- when NEOCHIMIE no longer needs your personal data, but you still need them for the establishment, exercise or defence of legal claims;
- when you oppose processing performed pursuant to a legitimate interest by the data controller, pending verification of whether the legitimate reasons stated by the data controller prevail over those of the person concerned.

### **The right to personal data portability**

When processing is done pursuant to your consent or a contract, this right enables you to receive the personal data you have supplied to NEOCHIMIE in a structured and commonly used format, and to pass these personal data on to another data controller with no hindrance from NEOCHIMIE.

### **The right to revoke your consent for personal data processing**

When NEOCHIMIE processes your personal data with your consent, you may revoke this consent at any time by using the means available to you for this purpose (the procedure described in point 7.2 of this Policy). However, pursuant to applicable law, you can only revoke your consent for future processing, and therefore,

the legitimacy of any processing performed before revocation cannot be called into question.

### **The right to lodge a complaint with a control authority**

If, in spite of NEOCHIMIE's efforts to keep your personal data confidential, you consider that your rights have not been respected, you may lodge a complaint with a control authority. A list of control authorities is available for consultation on the [European Commission website](#).

### **The right to decide what becomes of your personal data after your death**

Lastly, you are entitled to stipulate what becomes of your personal data post-mortem by issuing general or specific instructions. NEOCHIMIE undertakes to respect these instructions. In the absence of any instructions, NEOCHIMIE acknowledges that inheritors may exercise certain rights, specifically the right of access, should this be necessary for settlement of the deceased's estate; and the right of opposition for the purpose of closing the deceased's user accounts and opposing the continued processing of their data.

## **7.2 How to exercise your rights**

If you have any questions regarding this Policy, and/or wish to exercise the rights described above, you may contact NEOCHIMIE by email or in writing, sending a letter with a copy of your identity document enclosed, to: [gdpr@neochimie.com](mailto:gdpr@neochimie.com)

or

NEOCHIMIE  
GDPR Officer

Parc d'Activités du Vert Galant - 5, rue Antoine Balard  
CS 17115 – Saint Ouen l'Aumône  
95054 CERGY-PONTOISE CEDEX

NEOCHIMIE undertakes to reply to you in a timely manner, and in all events within one month of receiving your request.

This period may be extended to two months should the complexity and number of requests to NEOCHIMIE make this necessary. In this event, you will be notified of the extension and the reasons for the delay.



If you make your request by email, the information will be sent to you by email if this is possible, unless you specifically request otherwise.

Should NEOCHIMIE refuse to comply with your request, it will inform you of the reasons for doing so and you may lodge a complaint with a control authority, and/or institute court proceedings.

## **8. Governing law and forum**

This Policy is subject to French law. In the event of a dispute and if no amicable agreement can be reached, the relevant courts shall be those under the jurisdiction of the Paris Court of Appeal, notwithstanding multiple defendants or third-party appeals.