



INFORMATION NOTE

ON THE PROTECTION OF PERSONAL DATA

General provisions

STREIT Groupe is a Société Anonyme (PLC) governed by French law. The head offices are located at 1486 Route de Soye, 25340 Pays de Clerval. The Siret registration number is 41074304100023 and it is listed on the official French register of businesses and companies.

STREIT Groupe is based in Eastern France, in the heart of Europe, in an industrial region centred mainly around the automotive industry. It is here that for many years STREIT Groupe has built up its main branch of activity, i.e. machining. After years of working with car manufacturers and auto-parts suppliers, the group has gradually moved into co-designing and assembly and has expanded into Eastern Europe.

www.groupe-streit.com

STREIT Groupe lays great importance on the safe, transparent and confidential gathering and processing of your personal data. In particular, we wish to protect data belonging to our employees, customers, subcontractors and suppliers, notably against loss, errors, leaks, unauthorized access or unlawful processing.

In this information note on the protection of data, we wish to inform you about the gathering and processing of your personal data.

Please read this information note on the protection of data carefully, as it contains important information on how and why we process your personal data, as well as on the use of cookies. By submitting your personal data, notably when completing input fields on the website, or when requesting information, you explicitly confirm that you are aware of this information note on the protection of data and of its terms and limits, and explicitly accept its contents and their processing.

This information note may be updated at any moment. Therefore, please read it regularly.

1. Responsibility for the processing of your personal data

Your personal data is processed by STREIT Groupe

Contact details:

Address: 1486 Route de Soye, 25340 Pays de Clerval

Mail: communication@groupe-streit.com

Whenever we gather and process your personal data, we comply with the French regulations on the protection of personal data, as well as the General Data Protection Regulation («GDPR») as from its entry into force on 25 May 2018.

2. Field of application

This Data Protection Information Note covers all the services provided by us and more generally all the activities we perform. This note will apply to our existing, future and prospective customers, or any people who are interested in working for us.

3. What personal data do we process?

Depending on your activities and your relationship with our company, you will submit the following data:

Personal data of natural persons

Last (or family) name, first name, title, postal address, address for delivery, landline telephone number and/or mobile number, email address, bank account details...

For the processing of personal data concerning hiring and selecting employees, the following will also be processed: gender, native language, date of birth, driving license, names and identity details of family members, training and, where appropriate, professional experience and/or skills, in addition to any data you submit to us via, for example, a CV.

To comply with certain legal obligations (URSSAF social security declarations, occupational health services, training, visa applications, life insurance...) you may be requested to supply further data.

Company data

In addition to a company's name, address, VAT number and banking details, certain data concerning your contact person or other employees will be processed: last (or family) name, first name, title or gender, native language, date of birth, address, landline telephone number and/or mobile number, email address.

We would like to point out that it is your responsibility to ensure that all the data you submit to us is complete and correct. Submitting a false identity, incorrect or incomplete data or submitting data which belongs to a third party without their permission may lead to us suspending your access to the website, either temporarily or permanently. If your data is no longer up to date, please inform us immediately.

In order to access the site, you are not obliged to submit your personal data, but please be aware that we will not be able to provide certain services or to work together if you refuse to allow us to gather or process certain data.

4. Reasons for gathering and processing personal data and legal groundings

Customer's data

Within the framework of our services and activities, we gather and process data concerning the identity and contact details of our customers and their principals, of their staff and employees or representatives, and any other persons whose details may be of use.

This processing is necessary in order to implement agreements made with customers, to manage our business with them, to fulfil accounting and fiscal obligations, to carry out direct marketing campaigns, (such as sending out promotional or commercial mails or letters), to answer your enquiries or to exchange information. The data is processed at your request, in order to fulfil a contract, to comply with legal and statutory obligations and/or to safeguard our legitimate interests.

Data concerning suppliers, subcontractors and service providers.

We gather and process data concerning the identity and contact details of our suppliers, subcontractors and other service providers as well as, where appropriate, their own subcontractors or contractors, in addition to that of their staff and employees or representatives, and any other persons whose details may be of use.

This processing is necessary in order to implement agreements, to manage business with our suppliers /subcontractors, to fulfil accounting and fiscal obligations, direct marketing campaigns, (such as sending out promotional or commercial mails or letters), to answer your enquiries or to exchange information.

The legal bases are: to perform a contract, to comply with legal and statutory obligations and/or to safeguard our legitimate interests (such as direct marketing or exchanging information).

Personal and applicants' data

Within the framework of our management of personnel and the payroll activities, we gather and process data concerning our employees, independent service providers, temporary workers, trainees and/or students and, where appropriate, data relating to members of their families.

Within the framework of our personnel management activities, we also process data that applicants or students voluntarily submit to us (e.g., at a job fair): identification and contact data, gender, native language, date of birth, training and, where appropriate, professional experience and qualifications, selection process details, in addition to any data submitted to us via, for example, a CV. Data will be processed on the basis of your consent in order to perform a contract or to safeguard our legitimate interests.

Other data

In addition to data relating to customers, suppliers /subcontractors, service providers, personnel, independent workers, temporary workers, trainees, students and applicants we also process personal data relating to other persons, such as new customers / prospects, useful contacts within our sector, experts, etc.

We may also conserve and process any replies or feedback that you submit to us (e.g. within the framework of a satisfaction or market survey), and also any complaints concerning the goods purchased/ work provided.

The data will be processed on the basis of your consent, in order to perform a contract or to safeguard our legitimate interests. We process your personal data to enhance the technical and functional management of the website, to make it more relevant to your interests and more user-friendly.

Furthermore, we may process data such as your IP address, the pages you access, the browser you use, the sites you visited beforehand, your geographical data, your language preferences, the times and durations of your visits. To do this, we use cookies (cf Cookies below).

The data will be processed on the basis of our legitimate interests in improving our website and safeguarding it against cyber-attacks. STREIT Groupe will in no way be held responsible for your data being used by third parties after accessing our site. The site may notably contain links to third-party sites or third-party advertisements or announcements, through which personal data may be gathered.

5. Cookies

About cookies

We use different cookies on the site to make it more customer-friendly and improve the services it provides.

What is a «cookie»? A «cookie» is a small file, consisting of letters and numbers, sent by the internet server to the cookie file on your computer's hard disk.

Audience measurement cookies

In order to adapt the site to our visitors' demands, we measure the number of visits, the number of pages accessed as well as visitors' browsing history and the frequency of their visits.

PIWIK, the analytics software program used by STREIT Groupe, generates the following cookies:

Cookie name	Purpose	Retention time
Pk session	PWIK Statistics	1/2 hour
Pk id	PWIK Statistics	13 months
Piwik ignore	Cookie informing PIWIK that you do not want to be tracked	13 months

We also record your IP address in order to know where you are when accessing the site. This is anonymised as soon as you leave. STREIT Groupe cannot therefore use this data to reference a natural person. Personal data which are gathered (cookie ID) will be retained by STREIT Groupe for a period of 13 months. The data will neither be transferred to third parties nor will they be used for any other purposes.

You may choose to refuse cookies and the statistical analysis of your browsing history.

Technically necessary cookies

These cookies enable the site to function properly and efficiently.

Cookie name	Purpose	Retention time
tarteaucitron	Saving cookie consent settings	12 months

You may refuse and delete cookies by changing the settings on your browser, however this will probably mean that your experience of browsing the site will be adversely affected.

You may choose NOT to allow your computer to be tracked via cookies which attribute unique visitor identification numbers.

Our web analysing tool will not record the browsing history of your computer.

6. Retention period

Personal data are stored and processed by us for as long as is deemed necessary. This will depend on both the purpose for processing and on the nature of the relations (either contractual or not) between you and our company.

STREIT Groupe will retain data only for as long as it is deemed necessary for the proper operating of the site.

7. Access to and transfer of personal data

In order for your personal data to be processed, our workers, employees and representatives will be granted access to them. They are bound to treat this data as strictly confidential and may only use them for the purposes for which they have been provided.

STREIT Groupe is entitled to share your data with other companies linked to STREIT Groupe. Indeed, STREIT Groupe has recourse to third parties to carry out some of the processing, for example: suppliers, IT providers, accountants, inspectors, cloud providers...

Your data will not be transferred to parties outside the European Union.

The workers, managers and/or representatives of service providers or institutions mentioned above as well as the specialised service providers that the latter may have recourse to, are bound to respect the confidential nature of your personal data and may only use them for the purposes for which they have been provided.

If necessary, personal data may be passed on to other third parties. This would be in the event of a partial or total reorganisation of our activity, should our activities be transferred or should our company file for bankruptcy. Similarly, personal data may have to be transferred in order to comply with a court injunction or a particular legal obligation. Should this be the case, we will do our utmost to give you prior notice. You must however recognise and understand that this may not always be technically, commercially or legally feasible.

Under no circumstances will we sell your personal data, nor will we make them available to direct marketing companies or similar service providers without your prior consent.

8. Security

Your personal data are treated as strictly confidential. STREIT Groupe will ensure that the appropriate technical or organisational measures are taken in order to safeguard personal data from destruction, loss, falsification, unauthorized access or unintentional notification to third parties, as well as any unauthorized processing of data. These measures include, notably, using firewalls, securing servers, recording back-ups... and implementing a security policy as regards employees (access limitation and procedures).

Data that you submit to us via this website are not stored on internet but can be stored on STREIT Groupe servers. You hereby recognise and accept that the transfer of data via internet can never be totally risk-free and that the responsibility for any direct or indirect damage or inconvenience that you may be subject to as a result of illegal use of your data by third parties cannot therefore be attributed to STREIT Groupe.

9. Your rights of access, of rectification, to be informed, of erasure, to data portability, and to object

In compliance with and according to the terms of French law relative to the protection of data and the provisions of the general data protection regulation, we hereby inform you that you have a legal right to demand free access to your data which are processed by STREIT Groupe in order to check, rectify or complete them.

You also have a right to be forgotten in the cases provided for in the general data protection regulation (right to erasure and right to restrict processing). We can refuse to erase or restrict processing should it be required in order to comply with a legal obligation, to perform a work or any other form of contract, or to safeguard our legitimate interests, as long as the data are necessary for the purposes for which they were processed. In the event of dispute concerning the processing of your personal data, you are legally entitled to have the processing restricted until the dispute has been settled.

Finally, you have the right to data portability: you are legally entitled to receive the personal data which you provided us, and which concern you, in a structured, commonly-used and machine-readable format. You have the right to transfer this data to another processor.

You have the right to object to the processing of your personal data for compelling and legitimate reasons. You may not however object to our processing data which we need in order to comply with a legal obligation or to perform a contract. You have the right at any moment to object to the processing of your personal data either for the purpose of direct marketing or for customer profiling for direct marketing based on your personal data. You also have the right to object to the transfer of your data to third parties for the same marketing purposes.

If the processing of your personal data is based on prior consent, you have the right to withdraw your consent. Henceforth, this personal data will be processed only if we are able to invoke another legal basis. You may exercise the above-mentioned rights by contacting our DPO:

Email address: dpo@groupe-streit.com

Postal address:

**Data Protection Officer
STREIT Groupe,
1486 Route de Soye
25340, Pays-De-Clerval, France**

STREIT Groupe will need proof of your identity in order to process your request.

We do our utmost to ensure personal data is processed carefully, fairly and in accordance with current legislation. Should you feel that your rights have not been upheld and that your concerns have not been taken seriously enough by our company, you are entitled to lodge a complaint, either online or by post, with the CNIL.