

PRIVACY AND DATA PROTECTION CHARTER

FOREWORD



LIM GROUP attaches particular importance to the processing, confidentiality and security of your Personal Data (hereinafter the “Data”). We are committed to providing you with effective, personalised services while respecting your privacy and personal choices.

The aim of this Privacy and Data Protection Charter (hereinafter the “Charter”) is to communicate to you, in a clear, simple and precise manner, LIM GROUP’s policy and practices regarding the collection, use and disclosure of information about you, in accordance with applicable data protection laws, including Regulation (EU) 2016/679 of the European Parliament and of the Council 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”).

WHO ARE WE?

LIM GROUP (hereinafter “LIM” or “Us”) is a French *société par actions simplifiée* (simplified joint-stock company), which was founded in 2008. It is located at Chemin Fontaine de Fanny in Nontron (24300), France, and is specialised in the saddlery and equestrian activities sector. It is registered in the Périgueux Trade and Companies Register under number 503 706 459.

Lim is an acronym for *Leather In Motion*. Our group is a universe which is in constant movement and focuses on leather.

WHAT CATEGORIES OF DATA DO WE COLLECT AND HOW ARE THEY COLLECTED?

Personal data (the “Data”) refers to any information relating to a natural person who can be identified, either directly or indirectly, in particular by reference to an identifier, such as a surname, an ID number, a username, or to one or more factors specific to their physical, physiological, genetic, psychological, economic, cultural or social identity.

How do We collect your Data?

We collect your Data in the following ways:

- Directly from you: when you use our Website and services or when you purchase products directly from our sales representatives;
- Automatically: when you access or use the Website (technical data, IP address, cookies, navigation information, etc.).



In particular, when You:

- Interact with Us through the contact forms;
- Register to receive our newsletters or institutional communication;
- Answer job offers.

The categories of Data We collect include:

- Your identity and contact information, such as your last name, first name, address, telephone number, email address, etc. This Data is collected when You choose to communicate it, for example, in order to participate in an event, make a purchase, or when you fill out a customer information form with our sales representatives;
- Your payment information, such as an imprint of your credit card number, bank account number, or any other payment information necessary to pay for the products or services you have ordered from Us.
- Demographic information about you, such as your gender or date of birth.
- Your photo and photos of your horses if you provide photos for any of our services.
- Information that you share publicly on our social networks or on our Websites, for example if you give your opinion on our services and products;
- Information about your purchases, such as the type, quantity and price;
- If you use our Website, information about your browser and browsing behaviour;
- If you use our connected Objects, We collect information about how you use them, for example, the features you use most (see the Terms and Conditions for each connected device).

By submitting your data, you expressly agree to LIM Group's ownership and use of your data for the purposes described below.

HOW DO WE USE YOUR DATA?

We collect and use your Data on the following legal grounds:

- We have obtained your prior consent, which you may revoke at any time (see below);



- Processing of the data is necessary in the context of a contract between LIM and you;
- We have a legitimate interest in carrying out this processing, provided that your interests or fundamental rights and freedoms are not over-ridden;
- We must process your Data in order to comply with applicable laws and regulations.

Whether you are a customer or prospect of LIM, if you apply for a job with us, or otherwise interact with LIM, We may use your Data for the following processing purposes (hereinafter the “Purposes”):

- To provide you with the products or services you have requested;
- To send you marketing communication, with your prior consent;
- To provide you with an after-sales service;
- To manage requests for refunds;
- To respond to your questions, suggestions and requests, including requests to exercise your rights;
- To manage events, such as competitions, that you have registered for and/or participated in;
- To detect, prevent and combat any fraudulent or illegal activity, including protecting your transactions from payment fraud, counterfeiting and the resale of our products in violation of our terms and conditions and/or distribution network;
- To carry out statistical analyses, in particular to improve and adapt our products and services;
- For communication to third parties linked to the company, free of charge or for a fee, when the Client’s authorisation is not required.
- To comply with our legal obligations, including providing information to regulatory bodies where required by law.

HOW LONG DO WE KEEP YOUR DATA?

Your Data will be kept for as long as is necessary for the purpose for which it was collected and, in any event, will be destroyed at the end of this period.

- **General data:** In addition to providing you with the best possible products and services, We believe that you should receive personalised treatment and an effective after-sales service,

which, for some products, may last for a substantial period of time. For the purposes of these services, we may retain your Data for as long as necessary.

- **Data on job applicants:** We welcome job applications. Subject to your consent, We may retain your Data in our files for a maximum period of two (2) years after your last contact with LIM. We may contact you if another suitable opportunity arises in the event that your previous application in the “Careers” section of our Website was unsuccessful. If you choose not to be contacted for future opportunities, your Data will be retained for a maximum period of six (6) months after the application process has ended.

HOW DO WE USE COOKIES?

What is a cookie?

We may collect certain information via cookies, Web beacons and other tracking devices.

A cookie is a small text file saved on your computer, tablet or mobile phone that enables us to record and track data about your use of the Website. For example, the Website uses cookies to identify you. Cookies are managed by your Internet browser. By continuing to use the Website, you agree to our cookie settings and acknowledge that you understand the terms of our cookie policy.

We comply with the applicable law on cookies. We use cookies only with your permission, where required by applicable law. You can change your preferences at any time by clicking on “How do I manage my cookies?” below. However, please note that if you refuse cookies, certain features, parts or functionalities of our Website may cease to function or may prevent you from taking full advantage of our online services.

How long are cookies stored?

The cookies stored on your computer have a maximum life span of twelve (12) months. At the end of the storage period, the personal data collected through cookies will be deleted.

How to manage your cookies

You can easily deactivate and/or delete cookies from your computer, tablet or mobile phone by managing your browser settings. In order to manage cookies in a way that best suits your needs, please configure your browser according to the purpose of the cookies.

Please find instructions below on how to manage and disable cookies, depending on the browser:

- **Internet Explorer:**
 - Click on the **Tools** button, then **Internet Options**.
 - Click on **Privacy**, then click on **Advanced**.

- In the **Cookies** window, select your preferences.
- **Google Chrome:**
 - Click on the **Menu** button, then **Settings**.
 - Click on the **Show advanced settings** link.
 - In the **Privacy** section, click on the **Content Settings** button.
 - Then in the **Cookies** section, select your preferences.
- **Mozilla Firefox:**
 - Click on the **Menu** button, then select **Options / Preferences**.
 - Select **Privacy**.
 - In the **History** area, for the **Retention Rules** option, select use **custom settings for history**.
 - Check or uncheck the **Accept cookies** box, then select your preferences.
- **Safari:**
 - Click on the **Safari** menu, then click on **Preferences**.
 - Click on the **Security** tab.
 - In the **Block Cookies** section, select your preferences.
- **Opera:**
 - Choose the **File** menu, then **Preferences**.
 - Click on the **Privacy** icon.
 - Select your preferences.

If your device is used by more than one person, or if your device uses several browsers, we cannot ensure that the services and adverts that are supposed to correspond to your use of the device correspond to your own use and not to that of another user of that device.

WITH WHOM DO WE SHARE YOUR DATA?

We will only disclose or share your Data in the following circumstances:

- With **companies within LIM GROUP**: only authorised staff whose activity justifies access to the information, notably for the purposes of internal audits, administrative management or invoicing, customer relations and legal affairs.
- With **subcontractors** acting on our behalf, for example technical service providers responsible for sending emails or hosting our Website.

- With **organisations** in charge of managing bank cards or any other means of payment.
- With **certain business partners**, whether free of charge or for a fee.
- With **third parties** involved in corporate restructuring or reorganisation (including dissolution or liquidation), including any transfer, assignment or sale of all or part of our company or assets related to a merger.
- Where We are legally required to do so in order to comply with applicable law, to respond to a court order, or more generally to comply with any request from an authorised authority.

WHERE DO WE TRANSFER YOUR DATA?

Your Data is not transferred or processed outside the European Economic Area ("EEA"), including data collected in the United States.

However, some of our subcontractors are located elsewhere in the EEA, including in Germany, Belgium, the Netherlands and Austria, and some of your Data may be shared with them. We do our best to ensure that your Data is treated securely, in accordance with this Charter and applicable data protection laws and regulations.

HOW DO WE PROTECT YOUR DATA?

We strive to provide an adequate level of protection for your Data and ensure that appropriate technical and organisational security measures are in place to best protect your Data against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access, and against all other forms of unlawful processing.

These measures include, for example, limiting access to Data to only those employees and authorised service providers who need access to it for the Purposes described in this Charter, and other administrative, technical and physical safeguards.

However, due to the inherent nature of the internet as an open global communications medium and other risk factors, We cannot guarantee that your personal information stored or sent will be completely secure from intrusion by others.

We therefore encourage you to be careful when you use the Internet to access our Website or social networks.

MINORS

LIM has adopted practices to avoid collecting or storing information about children under the age of fifteen (15), in accordance with French law. If we become aware that we have mistakenly collected

information from individuals under the age of fifteen (15), we will immediately purge that information, other than to respond to a one-time question or request from the individual or their parent or legal guardian.

WHAT ARE YOUR RIGHTS?

In accordance with Law No. 78–17 of 6 January 1978 (as amended) and the GDPR regulation 2016/679 of 27 April 2016, you have the following rights:

- ✓ **A right of access and information:** you have the right to request a copy of the Data we process about you. You have the right to be informed, in a concise, transparent, understandable and easily accessible way, of how your Data is processed. For your own privacy and security, at our discretion, we may ask you to prove your identity before providing the requested information.
- ✓ **A right of rectification:** you have the right have your Data rectified. You also have the right to have incomplete Data about you completed.
- ✓ **A right to erasure:** In certain cases, you have the right to have your Data erased. However, this right is not absolute, and we may have legal and legitimate reasons for storing this Data.
- ✓ **A right to restrict processing:** in certain cases, you have the right to restrict the processing of your Data.
- ✓ **A right to Data portability:** you have the right to receive the Data you have provided to us in a structured, commonly used and machine-readable format and you have the right to transfer this Data to another data controller without objection from LIM. This right applies only when the processing of your Data is based on your consent or on a contract where such processing is carried out by automated means.
- ✓ **A right to object to processing:** you have the right to object to your Data being processed where such processing is based on the legitimate interests of LIM. We may, however, rely on compelling and legitimate reasons to continue processing such Data. You may also object at any time to your Data being processed for marketing purposes.
- ✓ **Withdrawal of consent:** if you have agreed to us processing your Data, you have the right to withdraw your consent at any time, free of charge. If your consent is withdrawn, this will not affect the processing of your Data on other legal grounds, such as the fulfilment of your orders and the retention of your Data about your order in accordance with applicable law.

If you no longer wish to receive our advertising or promotional information, please note that you may revoke your consent to direct marketing at any time, directly from the unsubscribe link included in every advertising email we send you.



Bellevue, Chemin Fontaine de Fanny 24300 Nontron FRANCE
Tél. +33 (0)5 53 60 33 57 • Fax +33 (0)5 53 60 54 54

If you do so, we will promptly update our databases and take all reasonable steps to respond to your request as soon as possible, but we may continue to contact you to the extent necessary in connection with any product or service you have requested.

You may make a request to exercise any of these rights by contacting Us as set out below in the "How to contact us" section." Please note that if you exercise any of the above rights, you will be asked to inform us of which right you wish to exercise and to provide us with certain information for identification purposes in order to process your request and to protect you against fraudulent requests from third parties.

If, after contacting us, you feel that your "Data Protection" rights are not being respected, you may submit a complaint to the CNIL, including online (<https://www.cnil.fr/fr/plaintes>)

HOW TO CONTACT US

If you have any questions or problems concerning this Charter or the Data collection practices, or if you wish to exercise any of your rights mentioned above, you can contact us:

- By email: contact@lim-group.com
- By telephone: + 33 (0) 553 607 270
- By mail: LIM Group Chemin Fontaine de Fanny, NONTRON (24300), France

MODIFICATIONS OF THE PRESENT CHARTER:

This Privacy Charter reflects our current practices and may be changed and updated from time to time. We will ensure that you are informed of any significant changes. We will also post an updated version of this Charter on the site.

Most recent modification on 14/06/2021