

# SECURLITE CONFIDENTIALITY CHARTER

At Securlite we do everything to protect the confidentiality of your Personal Data.

It is important for us that you understand how we process your Personal Data and how we meet our obligations under the laws, regulations or directives that are applicable in terms of data protection (the "Data Protection Laws"), particularly the Data Protection Act of 6 January 1978, amended by the (EU) General Data Protection Regulation of 27 April 2016 (the "GDPR").

This Confidentiality Charter applies to the processing that we carry out on your Personal Data and describes how they are collected and processed by Securlite via its Web Site and in the context of its activity. For more information concerning your rights and the regulations applicable to the processing of Personal Data in general, please visit the site of the [CNIL](#).

## 1. DEFINITIONS

"Client" designates any physical person or legal entity which has contracted with Securlite in order to benefit from its Services.

"Personal Data" designates any information that directly or indirectly identifies a physical person (for example, name, registration number, telephone number, photograph, date of birth, place of residence, digital footprint, etc.).

"Supplier" designates any company providing equipment or services and with which Securlite works in connection with providing its Services.

"Prospect" designates any potential client of Securlite.

"Site" designates the Internet Site of Securlite available at <https://www.securlite.com/>.

## 2. IDENTITY OF THE DATA CONTROLLER

This Confidentiality Charter describes the processing activities performed on your Personal Data by: Sécurlite Z.I des Ajeux, 72400 La Ferté-Bernard, France

You may also contact us at the following e-mail address: [dataprivacy@securlite.com](mailto:dataprivacy@securlite.com)

Hereafter "Securlite." We act as Data Controller, which means that we have defined the uses and the conditions under which your Personal Data are processed. We use these Personal Data in a fair, legal and transparent manner in accordance with the Data Protection Laws.

## 3. THE PERSONAL DATA COLLECTED BY SECURLITE

Securlite is a company offering long-term intelligent lighting solutions for the problems described by its clients and by project managers.

In the context of your use of our Site and/or your use of the services cited above (the "Services"), we process your Personal Data which are defined as any data that allow you to be directly or indirectly identified.

We process the following Personal Data:

- your identity (full name, title);
- your contact information (your postal address, e-mail address, telephone number);
- your data relating to your use of our site/platform (IP address, connection data and browsing data, history of orders, preferences and centres of interest, products consulted);
- your data relating to the management of your orders (history of orders, requests for support, delivery incidents, claims, etc.).

The mandatory or optional character of the Personal Data that you are requested to provide, as well as the consequences in the event of a lack of response, are specified at the time of collecting the data by an asterisk (\*).

## 4. WHY DO WE PROCESS YOUR PERSONAL DATA?

Securlite processes your Personal Data:

- in connection with the management of our commercial relationship with you in your capacity as client (i.e., management of opening client accounts, processing your orders, claims, invoice management) or in your capacity as a supplier (opening of supplier accounts, payments and invoicing);
- in order to inform you of our news and to invite you, via our Newsletter, to the various events that we organise;
- for commercial prospecting and survey purposes;
- in order to respond to the specific requests of our clients or prospects;
- in order to improve the service quality of Securlite and to offer you innovative services (statistics, use of cookies, etc.);
- in order to manage the rights that you possess on the basis of the GDPR.

Securlite also processes your Personal Data when you browse on the Site or when you participate in the events organised by Securlite or when you respond to the questionnaires.

The processing of your Personal Data is based on various legal grounds depending on the purpose that we are seeking:

- the agreement that we have concluded with you or your company: we process your Personal Data in connection with the performance of the agreement;
- your consent: you have agreed that we may process your Personal Data in order to send you our Newsletter, for example. You may withdraw your consent at any time.
- our legal obligations: we are required to process and retain your Personal Data in order to comply with the text of a law.

## 5. DURATION OF RETENTION OF YOUR PERSONAL DATA

We retain your personal data for the time necessary to perform the purposes for which they were collected. More specifically:

Purpose	Duration of retention of the data
Management and monitoring of client orders (purchase order, delivery note, etc.)	As an accounting document, invoices are retained for 10 years following their issuance
Creation and administration of the client account	The data are retained for 5 years following the end of the commercial relationship
Client invoicing	As an accounting document, invoices are retained for 10 years following their issuance
Client base	The data are retained for the time of the commercial relationship
Management of supplier orders (purchase order, delivery note, etc.)	As an accounting document, invoices are retained for 10 years following their issuance
Creation and administration of the supplier account	The data are retained for the time of the commercial relationship
Supplier invoicing	As an accounting document, invoices are retained for 10 years following their issuance
Supplier base	The data are retained for the time of the commercial relationship
Prospects base	3 years following the collection of the data by Securlite or the last contact by the prospect
Sending of e-mail campaigns/ newsletters/ satisfaction surveys	The data are retained for 3 years following the end of the commercial relationship
Management of the exercise of rights by individuals	The data are retained for 5 years

## 6. RECIPIENTS OF YOUR PERSONAL DATA

Your Personal Data may also be transmitted to third parties:

- to our commercial partners, suppliers and sub-contractors for the performance of any agreement that we conclude with you;
- to the suppliers of audience analysis tools and search engines and other selected third parties which help us to improve and optimise our Site;
- to our regulatory authorities, the authorities responsible for the application of the law or the prevention of fraud, as well as our advisors (including attorneys and statutory auditors), the courts, any authorised organisation, with the purpose of investigating any real or suspected criminal activity or other regulatory or legal questions, etc.;
- if we have the obligation to disclose or share your Personal Data in order to comply with any legal obligation or in order to have observed or applied our user conditions and other agreements; or to protect the rights, the ownership or the security of Securlite, our clients or other persons; and
- to our legal and other advisors in connection with court proceedings in order to assert or apply our rights on the basis of any agreement.

## 7. EXERCISE OF YOUR RIGHTS

Before undertaking the processing of your Personal Data and no later than the time of collecting your Personal Data, we will inform you of the purpose of the processing with regard to your Personal Data, the recipients of these data, the retention period applied to your Personal Data, as well as your rights in this connection.

In accordance with the Data Protection Laws, you have a right of access, rectification, limitation and, if necessary, the right to delete your Personal Data. You also have the right to portability of the data.

You may also have the right, for legitimate reasons, to oppose the processing of the Personal Data concerning you.

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<b>You have the right to request access to your Personal Data.</b>	You have the right to request the confirmation of the processing of your Personal Data, access to these Personal Data (by the provision of a copy) and other information concerning the manner in which we process your Personal Data.
<b>You have the right to request that we rectify your Personal Data.</b>	You have the right to request that we rectify your Personal Data if they are inaccurate or incomplete.
<b>You have the right to request that we erase your Personal Data.</b>	You have the right to request that we erase or delete your Personal Data when there is no reason for us to continue to process them. This right applies if we no longer have a need to use your Personal Data, if you withdraw your consent to the processing of the specific categories of your Personal Data or if you oppose the manner in which we process your Personal Data (see the section <b>"You have the right to oppose the processing of your Personal Data"</b> below).
<b>You have the right to request that we limit the processing of your Personal Data.</b>	You have the right to request that we limit the processing of the Personal Data that we hold with regard to you. This right applies when: <ul style="list-style-type: none"> <li>• you believe that these Personal Data are incorrect,</li> <li>• the processing is illicit and you prefer that we block the processing of your Personal Data rather than erase them,</li> <li>• when we no longer need to use your Personal Data for the purposes for which we collected them, but they are still necessary to in order to assert, exercise or defend rights in court,</li> <li>• you wish to verify the legitimate reasons we are pursuing and whether they prevail over yours.</li> </ul>
<b>You have a right to portability.</b>	You have the right to obtain from us and to re-use your Personal Data (in a structured format which is widely used and machine readable) in order to re-use them for your own purposes in connection with other services. This allows you to be able to easily transmit the Personal Data to another organisation or to request us to do this for you.
<b>You have the right to oppose the processing of your Personal Data.</b>	You have the right to oppose the processing of your Personal Data based on our legitimate commercial interests, unless we are able to demonstrate that, overall, our legitimate interests prevail over your rights or if we need to continue to process your Personal Data in order to establish, undertake or defend in the context of court actions. However, you also have the absolute right to oppose the processing of your Personal Data for direct marketing purposes.
<b>You have the right not to be subject to automated decisions.</b>	You have the right to oppose the adoption of any automated decision, including profiling, when the decision has a legal or significant impact for you.
<b>You have the right to withdraw your consent.</b>	You have the right to withdraw your consent to the processing of your Personal Data at any time. You may generally do this by unsubscribing to communications that you no longer wish to receive. We provide instructions for unsubscribing (opt-out) in our communications.

You may exercise these rights, upon presentation of a copy of your identification document, by simple written request sent by e-mail to the following address: [dataprivacy@securlite.com](mailto:dataprivacy@securlite.com)  
We will respond to any request received from you within a period of one month following the date of the request. If your request is not sufficiently precise or does not contain all of the information allowing us to respond to your request, SecurLite may request that you provide additional information.  
You also have the right to file a claim with the national data protection agency. In France, this authority is the Commission Nationale de l'Informatique et des Libertés (CNIL) ([www.cnil.fr](http://www.cnil.fr)).

### 8. DIGITAL WILL

In accordance with the Law for a Digital Republic of 7 October 2016, you have the right to define directives concerning the retention, deletion and communication of the data after your death. In order to exercise this right, you may send your directives to the following address:  
SÉCURLITE - Z.I des Ajeux - 72400 La Ferté-Bernard - France or at [dataprivacy@securlite.com](mailto:dataprivacy@securlite.com)

### 9. COOKIES

We deposit various cookies on your terminal when you visit our Site in order to analyse and improve it.

**What is a cookie?** A "cookie" is a small text file placed in your browser software which facilitates browsing on our Site.

We may use various types of cookies:

- **Technical cookies:** these are cookies that are necessary for the correct operation of the Internet Site. You may refuse and delete these cookies by means of the settings of your browser, but your user experience will necessarily be disturbed. These technical cookies include, in particular:
  - Session cookies which allow the normal browsing session and use of the Site. Session cookies are only configured temporarily: when you close the browser, the cookies will be deleted.
  - Functional cookies which allow the user to browse the Site on the basis of a group of criteria selected in order to improve the service provided.

No.	Name	Purpose	Retention period
1	PHPSESSID	Operational	Session in progress
2	_gid	Operational	Session in progress

- **Analysis cookies:** in order to adapt the Site to the needs of the users, we assess the number of visits and pages viewed, as well as the activity of our users. These cookies help us to improve our services in order to offer you the best user experience possible.

No.	Last Name	Purpose	Retention period
1	_ga	Audience analysis	13 months
2	_gat	Audience analysis	13 months

### 10. MANAGEMENT OF COOKIES

At the time of your first visit to the Site, a banner will inform you of the use of cookies on the Site and will ask you to accept such cookies. The cookies will only be deposited if you accept them or if you continue to browse the other web pages of the Site by selecting an element of the Site (image, link, logo, search button, etc.), which will be interpreted as your acceptance of the use of cookies.

You may configure the cookies on the Site at any time. Your browser may also be configured to inform you of the cookies placed in your browser and ask you whether or not to accept them.

You may accept or refuse the cookies one-by-one or refuse them systematically.

We remind you that the configuration of the cookies may affect the way that you access our content and services which require the use of cookies. Thus, the deletion of certain cookies may change the way in which you access our services.

Each browser has its own ways of configuring the management of cookies. The procedures are described in the Help menu of the software:

- For Internet Explorer™: [click here](#)
- For Safari™: [click here](#)
- For Chrome™: [click here](#)
- For Firefox™: [click here](#)
- For Opera™: [click here](#)

With the exception of cookies that are strictly necessary for the operation of our Site, all of the cookies expire after a maximum of thirteen months.

### 11. MODIFICATIONS TO THE CONFIDENTIALITY CHARTER

We take all the measures necessary in order to communicate to you any change made to this Confidentiality Charter.

*This Charter was revised and updated for the last time on 1 October 2018.*