

WHO PROCESSES YOUR PERSONAL DATA

Rawl France SAS with its registered office at 12/14 rue Marc Seguin, 77290 Mitry Mory, France, is the controller of your personal data, meaning it is responsible to process your personal data in compliance with GDPR and other applicable laws, as well as any agreement, and apply appropriate security measures.

CONTACT DETAILS

You may contact us at any time in relation to your personal data processed by us.

Contact details: **Rawl France SAS**, 12/14 rue Marc Seguin, 77290 Mitry Mory, France

Contact details of representative for information security: **gdpr.fr@rawlplug.com**

WHAT IS THE PURPOSE AND LEGAL BASIS OF PROCESSING

Your personal data collected as a result of your accessing, browsing or using our website you enter (the „Website“) are processed for purposes and on the legal ground as follows:

- 1) **presenting the Website and its contents to you and enable you to use functions of the Website and its contents**, for the time of your presence on the Website and afterwards, according to Privacy and Security Policy – on the basis of article 6 pt. 1.a GDPR (hereafter referred to as “consent”);
- 2) **prepare, conclude and perform contracts for electronically supplied services between you or organization you represent and us on the basis of terms and conditions on the Website**, for the duration of such contract and its settlement – one the basis of article 6 pt. 1.b GDPR (hereafter referred to as “performance of a contract”), including but not limited to:
 - a) creating and managing your account registrations;
 - b) process, record and track your purchases, payments, returns, warranties, and rebates;
 - c) evaluate and respond to your requests, inquiries, and applications;
 - d) communicate with you through various channels;
 - e) publish public product reviews as submitted by you and other customers;
- 3) **carry out obligations as required by applicable laws**, including protection against and prevention from fraud and unauthorized transactions, investigate and manage claims, risk exposure, and quality, generally improve and provide security, for the time necessary to carry out such obligations – on the basis of article 6 pt. 1.c GDPR (hereafter referred to as “legal obligation”);
- 4) **control the compliance of your actions with and enforcement of applicable legal requirements and Rawlplug’s policies and terms; determine, protect and enforce any of our rights**, including an assignment of our claims as we may have against you to any third party, for the time no longer than limitation period of such rights – on the basis of article 6 pt. 1.f GDPR (hereafter referred to as “legitimate interest”)
- 5) **carry out summaries, analysis, statistics**, for the time needed to carry out thereof – on the basis of legitimate interest;
- 6) **direct marketing**, for the time needed to carry out such activities – on the basis of legitimate interest.

Personal data collected for purposes other than compliance with legal obligation may be subject of profiling, which is an automated processing of personal data to analyse or predict aspects concerning your personal preferences or behaviour (for example, to personalize marketing content sent to you).

We collect and process personal data for other purpose than above only with your expressed consent and only within the scope of such consent. You are entitled to withdraw the consent at any time, however the withdrawal of the consent will not affect the lawfulness of processing based on consent before its withdrawal.

WHAT PERSONAL DATA WE PROCESS?

When you access the Website we start to process your personal data, which we receive automatically from devices that you use to access the Website, such as IP address, location and time. Save for this personal data, we process also other personal data you provide during your interaction with contents of the Website, for example submitting any forms available on the Website, registering your account, logging into your account, publishing comments/reviews on the Website, including photographs.

Providing us with personal data is **voluntary**, however necessary to access, browse and use the Website and its contents.

COOKIES

On the Website and applications we use technologies such as cookies, local storage and other tracking technology to collect and process your personal data and other information to personalize contents and advertisement on the Website and analyse traffic data. Some contents or applications (including advertisement) on the Website may be served by third parties, including advertisers, ad networks and servers, content providers, and application providers.

Cookies are information data contained in files and stored on your device (PC, tablet, smartphone etc.) and which are send to the internet browser during every access to a website.

Detailed information on cookies and their functioning you may find in **Privacy and Security Policy** on the Website. You may also find there information on how to change settings of your internet browser to limit or disable cookies etc.

SHARING OF THE INFORMATION RAWPLUG RECEIVES

We share your personal information with:

- 1) **processors processing data on our behalf** with regards to activities rendered on our behalf:
 - a) purchasing agents and other intermediaries in the process of purchasing goods and services;
 - b) suppliers of marketing services for us;
 - c) administrators of our IT systems and providing us with IT tools and resources;
 - d) sub-contractors helping us in performing a contract, for example custom agents, carriers;
 - e) advisors, consultants, auditors, legal and tax advisors, accountants etc.
- 2) **other controllers** processing data in their own name:
 - a) purchasing agents and other intermediaries in the process of purchasing goods and services – to settle their remuneration;
 - b) couriers and post offices;
 - c) payment institutions – to process any payments from or to you;
 - d) assignees – in case of assignment of claims that we may have against you;
 - e) government authorities, judiciary, local authorities – if it is necessary under applicable laws.

TRANSFER OF PERSONAL DATA OUTSIDE EUROPEAN ECONOMIC AREA (EEA)

We intend to transfer your personal data outside EEA (territory of European Union, Norway, Iceland, Switzerland and Lichtenstein) only to the members of Rawplug Group¹, in compliance with applicable laws and applying appropriate security measures. Current information may be found on **gdpr.rawplug.com**

AUTHOMATED INDIVIDUAL DECISION MAKING

We do not issue any decision basing on automated data processing which produces a legal effect concerning you or considerably affects you.

YOUR RIGHTS

GDPR gives you following rights in relation to your personal data:

- 1) **accessing your personal data** (including receiving copies of them) – under article 15 GDPR;
- 2) **correcting your personal data** – under article 16 GDPR;
- 3) **deleting your personal data** – under article 17 GDPR;
- 4) **to demand restriction of processing** – under article 18 GDPR;
- 5) **to demand transmission of personal data** – under article 20 GDPR.

You may enforce the above rights by contacting our representative for data protection or sending a respective email to our address: **gdpr.fr@rawplug.com**

We may require additional information enabling us to verify your identity and your right to enforce the above rights.

RIGHT TO OBJECT

Apart from rights referred to in preceding paragraphs, you have the right to object, at any time, to processing of your personal data by us (including profiling) for direct marketing purpose. After filing the objection, we will refrain from processing your data for this purpose.

You have also right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on legitimate interest or public interest (including profiling). The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

COMPLAINT

You have the right to lodge a complaint to: **Commission Nationale de l'Informatique et des Libertés – CNIL**, 3 Place de Fontenoy, TSA 80715 – 75334 Paris, Cedex 07, Tel. +33 1 53 73 22 22, Fax +33 1 53 73 22 00, Website: <http://www.cnil.fr/>

- if you are of the opinion that we process your personal data illegally.

¹ **Rawplug S.A.**, ul. Kwidzyńska 6c, 51-416 Wrocław, Poland; **Koelner Rawplug IP sp. z o.o.**, ul. Kwidzyńska 6, 51-416 Wrocław, Poland; **Koelner Polska Sp. z o.o.**, ul. Kwidzyńska 6c, Wrocław 51-416, Poland;; **Koelner- Inwestycje Budowlane Sp. z o.o.**, ul. Kwidzyńska 6, Wrocław 51-416, Poland; **Rawplug Ltd**, Skibo Drive, Thornliebank Industrial Estate, Glasgow G46 8JR, the United Kingdom; **Koelner Deutschland GmbH**, Lutherstr. 54, 73614 Schorndorf, Germany; **RAWL France SAS**, ZI Mityr-Compans, 12-14 Rue Marc Seguin, 77290 Mityr-Mory, France; **Rawplug Middle East FZE**, P.O. Box 261024, Jebel Ali Free Zone, Dubai, UAE; **Rawplug Building & Construction Material Trading (L.L.C.)**, Al Qouz Industrial Area 3, 22 ND Street, Compound 81, P. O. Box 261024 Dubai, UAE; **Rawl Scandinavia AB**, Baumsgatan 4, 593 32 Västervik, Sweden; **Rawplug Ireland Ltd**, Unit 10 Donore Business Park, Donore Road Drogheda, Co Louth, Ireland; **Koelner CZ s.r.o.**, Komerční Park Tulipan, Palackého 1154/76A (hala T3), 702 00 Ostrava-Privoz, Czech Republic; **KOELNER Slovakia s.r.o.**, Dlhá 95, 010 09 Žilina, Slovakia; **Koelner Hungária Kft.**, Jedlik Ányos u. 34, 2330 Dunaharaszti, Hungary; **UAB Koelner Vilnius**, Žarijų g. 2, LT-02300, Vilnius, Lithuania; **Koelner Ukraine LLC**, vul. Naukova 3a, 79060 Lviv, Ukraine; **Koelner Trading KLD LLC**, ul. Dzerzhinskogo 219, 236034 Kaliningrad, Russia; **Rawplug Singapore Pte. Ltd.**, 25B, Loyang Crescent, Block 302, #04-11, Loyang Offshore Supply Base, Singapore 506817 #05-34, Singapore; **Rawplug Shanghai Trading Co. Ltd.**, 1/F, Building 1 No.251 Yaohua Rd, Shanghai Free Trade Zone, China; **Rawplug Inc.**, Corp. Trust Center 1209 Orange St. New Castle, Delaware DE 19801, USA.