

THE VIVAGRO COMPANY

PERSONAL DATA PROTECTION POLICY

Our company Vivagro is involved in the protection of personal data and ensures that it complies with the regulations resulting from European Regulation No. 2016/679 on the protection of individuals with regard to the processing of personal data ("GDPR Regulation") and Law No. 78-17 of 6 January 1978 on information technology as amended.

This regulation applies to all your data as long as you are a natural person and this data allows you to be identified directly or indirectly. It does not concern data relating to companies and legal persons in general, which are outside the scope of the GDPR regulation.

In order to ensure that every individual concerned is fully informed about our personal data protection policy, we have drawn up this document ("the Policy"), in which you will find information on how we collect, use and store personal data, as well as the rights of each individual.

1. Scope - purpose

This Policy covers all personal data collected from our customers, partners, suppliers, subcontractors, purchasers or distributors or any other entity with whom we have a business relationship in the course of our business activity (B to B relations).

It applies regardless of the communication channel or type of medium used for the collection or processing of data: by paper form, by our website www.vivagro.fr, by telephone, by e-mail or any other digital means.

It also applies irrespective of the place of establishment or location of the natural person concerned.

This Policy outlines the rules and principles applied by our company.

It is completed, if necessary, by all the information that may be communicated to the data subjects when their data is collected in order to specify the legal information required, such as the purpose of the collection, the retention period or the legal basis, according to each type of collection.

2. General principles

At Vivagro, we apply principles that respect the personal data collected as a result of our activity.

For example:

- No personal data is sold or resold to a third party;
- Data is only collected for specific purposes;
- We only collect data that is necessary for the purpose, for which it is collected;
- We do not carry out any canvassing by telephone or by mail except in cases permitted by the regulations;
- We do not send commercial solicitations by e-mail except where permitted by law;
- We ensure that the rights of data subjects are respected and that any questions they may have about their data are answered.

This policy was updated on **1 January 2023** and will be updated as necessary to reflect our changing needs and activities, and as necessary to meet the requirements of applicable data protection regulations.

For any information on the protection of personal data, we invite you to consult the site of the National Commission for Data Processing and Liberties www.cnil.fr in addition to this policy.

3. Legal information about the data controller

According to the regulation, the data controller is the legal person (company, municipality, etc.) or natural person who determines the purposes and means of a processing operation, i.e. the objective and the way in which it is carried out.

VIVAGRO, a limited liability company, registered under the number 494 263 288 R.C.S. Bordeaux, whose registered office is 5 ALL JACQUES LATRILLE 33650 MARTILLAC (France) is the data controller.

4. Processing by Vivagro and type of data collected

Vivagro processes your personal data. These forms of processing are described through the following information, which will be specified as necessary on a case by case basis:

- The legal basis for the processing
- The purpose(s) of the processing carried out
- The data processed
- How long your data is kept.

Among the legal bases, we can base the processing of your data on:

- The agreement: the processing of personal data is necessary for the execution of the agreement(s) concluded with our company.
- Consent: you agree to the processing of your personal data by means of express consent. You may withdraw this consent at any time.
- Legitimate interest: we may have a commercial or security interest in processing your data that is justified, balanced and does not infringe your privacy. With certain exceptions, you may object to processing based on legitimate interests at any time by notifying our services.
- A legal obligation: in this case, the processing of your personal data is made compulsory by law.

We collect personal data on a number of occasions, including:

- When you use our website www.vivagro.fr. Our website can be consulted by any visitor who wishes to:
 - o Get information about our company;
 - o Discover the products, services and solutions we offer;
 - o Please contact us via our contact form. This form allows you to send us your questions or requests for information about our products, services, solutions or our activity.
 - o Receive our newsletter
- When you open a customer account, when you place an order or within the framework of the execution of contracts and more generally of our contractual relations,
- When we contact you in the context of prospecting or canvassing for business purposes.

We collect only the data necessary for the purposes of processing.

These data fall into the following categories:

- Identification or "identity" data such as name, surname, company name, e-mail and/or telephone number and the subject of your message, on the basis of our legitimate interest in responding to your contact requests or on a contractual basis relating to the performance of our agreements;
- Data relating to orders placed, invoicing, payment, on the basis of the execution of our contractual relations;
- Technical information about the connection to our website and audience measurement: We collect certain information about a user's access to the services, including the Internet Protocol (IP) address of the user's computer and the date and time the user accessed the site. This processing is based on our legitimate interest in securing our site and/or improving our services, in particular through consultation statistics.

5. Storage time

In accordance with the legislation and regulations in force, the data collected is kept for the time strictly necessary for the purposes pursued as described above.

For example, for data collected as a result of contact requests, we keep the data for a period of 36 months from our last exchange following your request if you are a prospect. If you are one of our customers, the data is kept for the duration of the commercial relationship plus 36 months for commercial prospecting purposes.

In order to comply with our legal obligations, for example in the context of establishing, exercising or defending legal rights, or to meet legal obligations, in particular accounting, tax or archiving obligations, we may need to keep your data for longer than the periods mentioned below. In this case, we will archive your data with access restricted to authorised departments/recipients.

6. Recipients of the data collected

Vivagro does not transfer or market your data. The data you provide us with is intended only for the persons authorised to deal with your requests within our internal departments.

In order to fulfil our agreements, supply our products or services, we may also pass on some of your data to our subcontractors or service partners. Contracts are systematically concluded with the recipients of your data in order to secure the way in which they are processed, whether in an IT, legal or organisational manner.

7. Securing the data collected

The data we collect is hosted in Europe in a secure data centre. No data is transferred outside the EU.

We ensure the security and confidentiality of the data through various physical, electronic and administrative procedures.

Only authorised persons have access to personal data and only to those necessary for the processing concerned.

All employees with access to data are made aware of the confidentiality and security of personal data and, more generally, of IT security and make contractual commitments in this regard.

In addition, the following rules are implemented:

Authorisation management - User authentication

The data are only accessible to staff members authorised to process the data. All users have a login and a complex and unique password that allows them to identify and trace their actions on the entire IT system. This password must be renewed periodically.

Workplace safety

The workstations are secured with anti-virus software that performs real time monitoring. It is updated daily and automatically without user intervention. Similarly, system updates are fully automated.

Securing exchange protocols and the website

For data communication, we use interfaces using the HTTPS protocol.

Our website has an SSL certificate to ensure that information and data transfer through the website is secure. An SSL certificate ("Secure Socket Layer" Certificate) is intended to secure the data exchanged between the user and the site.

Access to premises - security

Access to the premises is strictly controlled: only authorised persons are allowed to enter the company's premises. The premises have security measures in place, including a secure access door and the use of an external surveillance company.

Document destruction procedure

The destruction of paper documents is carried out by a specialised service provider providing appropriate guarantees in terms of confidentiality and security, in line with the processing carried out, with a certificate of destruction being provided.

8. Exercising the rights of data subjects

We are committed to respecting the rights of each individual concerned under the conditions defined by the Data Protection Act and the GDPR.

Each data subject has the following rights:

- a right of access to data,
- a right of rectification,
- a right of limitation,
- a right to erasure,
- the right to withdraw consent at any time,
- as well as the right to define directives concerning the fate of their data after their death.

Each data subject also has the right to object to processing based on legitimate interest on grounds relating to his or her particular situation, as well as the right to object to commercial prospecting.

All these rights can be exercised by contacting VIVAGRO at the following address

- Or, by sending an email to the following address _____
- Or, by sending a letter to the following address _____

Proof of identity may be requested in order to verify that the applicant is the person concerned by the right exercised.

Each person also has the right to lodge a complaint with the CNIL: www.cnil.fr.