

PRIVACY POLICY
FOR WWW.LEBRONZE-ALLOYS.COM
(last updated July 2021)

This Privacy Policy applies to all personal data processing performed

by **LEBRONZE ALLOYS** (hereinafter referred to as the “**Data Controller**”),

in accordance with Regulation (EU) 2016/679 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 (“**GDPR**”) and with French Law n°78-17 of 6th January 1978 on Data Protection and Freedom of Information, known as the Data Protection Act (as amended by Law n°2018-493 of 20th June 2018 on personal data protection (1) and by any subsequent laws),

subject to the following terms and conditions:

1. Data processing

1.1. Data Controller

The Data Controller is:

LEBRONZE ALLOYS, a simplified joint-stock company, incorporated according to the Laws of France, with a share capital of 12 472 176,30 EUR, registered in the Trade and Companies Register of Châlons-en-Champagne under number 572 196 129, whose head office is located at Voie de Châlons, Route départementale 977, 51600 Suippes (France), represented by Mr. Michel Dumont, Chairman,

The contact details for the Data Controller are:

Postal address: LEBRONZE ALLOYS, Service RGPD, 68, rue Pierre Charron, 75008 PARIS, France,

E-mail address: rgpd@lebronze-alloys.com

1.2. Data processing purposes

“**Sales**” **contact form**: Data are processed in order to respond to requests for information, orders for manufactured goods sold by LEBRONZE ALLOYS, and offers for sales of products to LEBRONZE ALLOYS.

“**Brochure**” **contact form**: Data are processed in order to respond to requests for brochures about the products and/or activities of LEBRONZE ALLOYS.



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“HR” contact form: Data are processed in order to respond to unsolicited applications for jobs within the LEBRONZE ALLOYS Group and to applications in response to advertisements / job vacancies published on <https://www.lebronze-alloys.com/fr/>.

Direct marketing: Data are processed in order to send newsletters and targeted information about new products, trade fairs etc. likely to be of interest to the data subject.

1.3. Legal basis for the processing

The legal basis for the data processing is the consent of the data subject.

2. Processed data

2.1. Categories of data

“Sales” contact form:

- Surname,
- First name,
- Company,
- Telephone number,
- E-mail,
- Country,
- Sector of activity,
- Subject,
- Message,

“Brochure” contact form:

- Surname,
- First name,
- Company,
- Position,
- Telephone number,
- E-mail,
- Country,
- Sector of activity,

“HR” contact form:

- Surname,
- First name,
- E-mail,
- Subject,
- Message,
- Attachments (CV),

Direct marketing:

- Surname,
- First name,
- Company,
- Position,
- Telephone number,
- E-mail,
- Country,
- Sector of activity,

2.2. Data source

All data are collected directly from the data subject.

2.3. Mandatory data collection

All data are mandatory, unless stated otherwise. Mandatory data are marked with an asterisk and/or comment.

“Sales”, “Brochure” and “HR” contact forms: No response will be given to requests for information or brochures or to job applications unless the data are supplied. If no data are supplied, the data subject will not receive a response.

Direct marketing: No marketing will be sent unless the data are supplied. If no data are supplied, the data subject will not receive marketing.

2.4. Automated decision-making

The data processing will not involve any automated decision-making.

3. Data subjects

“Sales”, “Brochure” and “HR” contact forms: The data subjects are persons who request information or brochures or apply to jobs via the contact forms available on the website <https://www.lebronze-alloys.com/fr/>.

Direct marketing: The data subjects are persons who consent to receive marketing via the website <https://www.lebronze-alloys.com/fr/> by ticking the relevant box in the contact form mentioned above.

4. Data recipients

4.1. Categories of recipients

“Sales” and “Brochure” contact forms: All or some of the data may be sent to employees of the Data Controller, in particular those working for its Sales and Marketing Departments, depending on their needs.

“HR” contact form: All or some of the data may be sent to employees of the Data Controller, in particular those working for its HR Department, depending on their needs.

Direct marketing: All or some of the data may be sent to employees of the Data Controller, in particular those working for its Sales and Marketing Departments, depending on their needs.

4.2. Transfers of data outside the EU

“Sales” and “Brochure” contact forms: Data may be transferred outside the European Union, to subsidiaries of the LEBRONZE ALLOYS Group only.

“HR” contact form: No data will be transferred outside the European Union.

Direct marketing: Data may be transferred outside the European Union, to subsidiaries of the LEBRONZE ALLOYS Group only.

5. Data storage duration

“Sales” and “Brochure” contact forms: Data will be stored for **three (3) years** from the date of last contact with LEBRONZE ALLOYS or until the data subject withdraws their consent (by sending an e-mail to the contact details in Point 6.2), subject to any subsequent actions taken (e.g. contract signed, order placed, etc.).

“HR” contact form: Data will be stored for the time needed to process the application plus **two (2) years** from the date of last contact with LEBRONZE ALLOYS or until the data subject withdraws their consent by sending an e-mail to the contact details in Point 6.2), subject to any subsequent actions taken (e.g. candidate hired, etc.).

Direct marketing: Data will be stored for **three (3) years** from the date of last contact with LEBRONZE ALLOYS or until the data subject withdraws their consent (by sending an e-mail to the contact details in Point 6.2 or clicking the “unsubscribe” link in the mail-out).

6. Cookies

6.1. Definition of a computer cookie

A cookie is a small file stored by a server on the hard disk of the user's terminal (computer, smartphone, tablet, etc.) and associated with a website domain.

6.2. Function of a computer cookie

Cookies serve multiple purposes, such as:

- Keep the choice expressed by the users on the deposit of cookies;
- Authenticate a user to a service;
- Remember the contents of a shopping cart on a merchant website;
- Customize the user interface (e.g., language selection);
- Measure the audience of a website;
- Display personalized or non-personalized advertising;
- Share on social networks;
- Etc.

Cookies require the prior consent of the user, unless they are strictly necessary for the provision of an online communication service expressly requested by the user or have the sole purpose of enabling or facilitating communication by electronic means.

6.3. Computer cookies used by LEBRONZE ALLOYS on the Website

LEBRONZE ALLOYS uses cookies on its Website <https://www.lebronze-alloys.com/>, as follows:

| Cookie name | Domain | Duration | Purposes |
|-------------|---------------------|-----------|--|
| ga.js | lebronze-alloys.com | 12 months | <ul style="list-style-type: none"> - Determine the domain to be measured; - Distinguish unique users; - Limit the rate of demand; - Memorize the number and time of previous visits; - Store information about the source of the traffic; - Determine the start and end of a session; - Store the value of custom variables at the visitor level; - (via Google Analytics) |



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6.4. Management of computer cookies

Cookies can be managed in two ways:

- **In the "Cookies banner" :**

At the first connection of the user, the Website presents a "Cookies banner" that indicates the different types of cookies that LEBRONZE ALLOYS, or its third party partners (analysis, online sales, etc.) are likely to implant on the user's browser, as well as the purposes pursued and any specificities of the related processing. The user is offered the possibility of accepting or refusing the cookies affixing, in their totality or type by type.

- **In the browser configuration :**

The user has the possibility, at any time, to accept or refuse the cookies affixing, in their totality or type by type, by configuring the browser of his computer.

To do this, the procedure depends on the user's browser:

- Internet explorer ⇒ <https://support.microsoft.com/fr-fr/windows/supprimer-et-g%C3%A9r-les-cookies-168dab11-0753-043d-7c16-ed5947fc64d>
- Safari ⇒ <https://support.apple.com/fr-fr/HT201265>
- Chrome ⇒ <https://policies.google.com/technologies/cookies?hl=fr&gl=fr#managing-cookies>
- Firefox ⇒ <https://support.mozilla.org/fr/kb/protection-renforcee-contre-pistage-firefox-ordinateur?redirectlocale=fr&redirectslug=activer-desactiver-cookies>
- For other browsers: please consult the online help of these browsers.

7. Rights of data subjects

7.1. Information about the rights of data subjects

Data subjects whose personal data are collected have the following rights:

- Right of access,
- Right to rectification,
- Right to erasure,
- Right to restriction of processing,
- Right to object to processing,
- Right to withdraw consent at any time,
- Right to data portability.

7.2. How to exercise these rights

Data subjects may exercise their rights by writing to:

LEBRONZE ALLOYS
Service RGPD
8, rue de Hanovre
75002 PARIS
France

rgpd@lebronze-alloys.com

7.3. Supervisory Authority Complaints

If the data subject is not satisfied with the response received from the LEBRONZE ALLOYS GDPR Department, he or she may file a complaint with the French Data Protection Authority, the CNIL, at <https://www.cnil.fr/fr/webform/adresser-une-plainte>.