

BDR THERMEA FRANCE

Personal data protection policy

In this privacy policy, we explain how we collect and use your personal data in accordance with the General Data Protection Regulation (GDPR).

Personal data is any information relating to an identified or identifiable natural person, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity. Directly identifying data are, for example, first and last names, a photo, a nominative e-mail. Indirectly identifying data are, for example, an account identifier, a telephone number, the directory registration number (NIR or social security number), a fingerprint or an IP address.

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1. When does this privacy policy apply?

This privacy policy applies to all personal data that we collect, use, share and store when you use our websites, services and web forms, or when you contact us about these products and services.

This privacy policy does not apply to the collection of data via third party websites. Please refer to the privacy policy of these websites (if any) for more information.

This privacy policy has recently been supplemented with effect from 7 June 2022 and replaces any previous version. We may amend this privacy policy from time to time and will notify you of any changes by posting the revised policy on this website or by notifying you by email or via our applications.

2. Who is responsible for processing your data?

The person responsible for processing data is the natural or legal person who, alone or jointly with others, determines the purposes and means of the processing. Processing of personal data means any operation or set of operations performed upon personal data or sets of data, whether or not by automatic means, such as collection, recording, organisation, structuring,

storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

We are BDR THERMEA France, S.A.S. (simplified joint-stock company) with a capital of €229,288,696 - registered with the Strasbourg RCS (Trade and Companies Register) under no. 833 457 211. We are a leading manufacturer and distributor of innovative heating and water heating equipment. Our head office is located at 57, Rue de la Gare, 67580 Mertzwiller, France.

BDR THERMEA France, S.A.S. is part of the BDR THERMEA Group, based in Apeldoorn, the Netherlands. BDR Thermea Group owns various brands of heating equipment and water heaters known worldwide, such as Baxi, De Dietrich, Remeha, Brötje, Chappée, Oertli and Baymak. For more information about BDR Thermea Group and its brands, please visit the BDR Thermea website.

BDR THERMEA France S.A.S. is hereinafter referred to as "BDR THERMEA France" or "We". We are responsible for the collection and use of your personal data in accordance with this privacy policy. If you have any questions, comments or complaints regarding the processing of your personal data, please contact our Data Protection Officer as indicated in paragraph 4.3.

3. What data do we collect and how?

When you use our website, we collect personal data about you in the following circumstances:

3.1) When professionals register on the site, (3.2) When enquiries are made, (3.3) When a product warranty extension is required, (3.4) When requests are made to benefit from promotional or one-off offers, and (3.5) Through information we collect when you contact us, (3.6) Through cookies, and (3.7) As a supplier, when you register and use the supplier portal.

3.1. When professionals register on the site

When registering on the professionals website, you will be asked for the following personal data: title, surname, first name, profession, installer member of the loyalty programme, customer number (if available), e-mail address, business address, postcode, town, country, business telephone, fax, newsletter subscription. Mandatory fields are expressly indicated. In order to process online orders for spare parts from the spare parts site, you will also be asked to specify your billing and delivery address if different, in order to best respond to your request.

3.2. When enquiries are made

When you contact us by means of the contact forms on the websites in order to obtain information on our products or services, before or after any sale, you will be asked for the following information: surname, first name, address, postcode, town, telephone number, mobile phone number and email address. Mandatory fields are expressly indicated.

3.3. When a product warranty extension is requested

When you contact us for a product warranty extension, you will be asked for the following information: General public customer details: surname, first name, site address, postcode, town, telephone, e-mail address. PRO customer details: company name, address, postcode, town, telephone, e-mail address, customer number. Products concerned: family, range and

model of the product concerned, serial number, purchase date, commissioning date. Mandatory fields are expressly indicated.

3.4 When requests are made to benefit from promotional or one-off offers

When requesting our promotional or one-off offers, you will be asked for the following information: surname, first name, address, postcode, town, e-mail address. Depending on the operation, you may also be asked to provide information about the products concerned. Mandatory fields are expressly indicated.

3.5. Through information we collect when you contact the help service (by telephone or email)

When you send us an email or contact us via our online contact form, we record the data. When you call us, our helpdesk may store your questions or complaints in our database. We may also record telephone calls for training and service improvement purposes. Finally, depending on the elements provided to us, we record the following: surname, first name, email address, postal address and telephone number.

3.6 Through cookies

Cookies are text files stored in your connection device and used to record personal and technical data relating to navigation on the website. Cookies can be temporary or permanent.

The website uses cookies or other technologies with functions similar to cookies (hereinafter referred to as "cookies") that may collect or store your personal data.

Cookies are used to:

- improve the user experience, especially by:

- Recognising your connection device,
- Recognising your user name and password.

- analyse website traffic and data in order to:

- Measure the website audience in order to improve the user experience,
- Understand how you use this website in order to improve functionality and performance.

In the case of the use of cookies provided by our third party service providers, these may be used and stored in the same way as above.

We assure you that when transmitting the information generated by these cookies, the cookie settings ensure that the IP/MAC address is anonymised before geolocation and before storage.

By browsing and/or using the services of the website, cookies are activated by default and data may be read or stored locally on your connection device. A consent banner will be displayed the first time you log on to the website, allowing you to decide whether or not to accept cookies.

By continuing to use the website, you expressly agree to the use of such cookies by us and our partners.

You can configure your browser at any time to systematically control cookies.

3.7. As a supplier, when you log in and use the portal

BDR Thermea France is responsible for granting you access to the web portal, using your supplier code. You will be asked to personalise your password the first time you connect to the portal.

You may be required to provide us with a certain amount of data relating to your relationship with BDR Thermea France (function of the company's contacts, OTIF, performance monitoring, etc.).

These exchanges are strictly within the framework of the relationship between the supplier and BDR Thermea.

4. How do we use your data?

We use your data for the following purposes: (4.1) to provide our services and communicate with you, (4.2) for research purposes so that we can improve our products and services, (4.3) for direct marketing purposes and (4.4) to comply with our legal and regulatory obligations, and (4.5) when enrolling our customers in our loyalty programme.

4.1. Providing our services and communicating with you

We require most of the information described in paragraph 3 in order to operate our website and the services we provide.

We use the information in order to provide you with access to the professional website, which includes, for example, technical documentation, xls tools for sizing a heating system, product information and an online spare parts ordering service, etc.

We use your customer account information and contact details to send you communications, for example, about security updates or new online features and services.

We also use your data to respond to your requests for extended product warranties or promotional offers.

Finally, we use your contact information to answer your questions when you contact our support services. This data is stored with us for the purpose of processing your request and in case you have further questions on the same subject. This data will not be passed on to third parties.

The processing of personal data relating to communication with you is based on your consent.

The processing of personal data relating to the provision of our services is based both on your consent to the processing of the websites and on our legitimate interest in ensuring that you benefit from optimal conditions of navigation and accessibility to our services, particularly on our websites.

4.2. Data analysis for improving our products and services

In the context of a request for a quote made via the contact form on the consumer site, with your consent, data may be shared with partner companies (network of partner installers) in order to provide you with the specialised advice service and/or the purchase, maintenance or repair of a heating system.

The processing of personal data relating to the provision of our services is based both on your consent to the processing of the websites and on our legitimate interest in ensuring that you

benefit from optimal conditions of navigation and accessibility to our services, particularly on our websites.

4.3. Processing of data for direct marketing purposes

We use your information from our customer databases and your contact details to inform you about new products and services or news about our various brands that may be of interest to you. We carry out targeted and/or localised advertising campaigns.

In addition, we also seek to improve customer knowledge and navigation on the sites and applications by using statistical tools or cookies.

Finally, we may need to contact you to carry out satisfaction surveys.

The processing of personal data relating to the provision of our services is based both on your consent to the processing of the websites and on our legitimate interest in ensuring that you benefit from optimal conditions of navigation and accessibility to our services, particularly on our websites.

4.4. Legal and regulatory obligations

We collect, hold and use your data for our internal organisation, including to comply with our legal and tax obligations.

We collect, use, share and retain your personal data to comply with legal and regulatory obligations to which we are subject, for our legitimate interests or the interests of third parties, or on the basis of your consent.

You may withdraw your consent at any time by following the specific instructions relating to the processing for which you have given your consent. If you withdraw your consent or refuse to provide personal data that we require for the performance of any contract or compliance with a legal or regulatory obligation, we may not be able to provide some or all of the services you have requested from us. If we process your personal data for our legitimate interests or the interests of a third party, we will take reasonable measures to avoid undue prejudice. Our legitimate interests may include, for example, security and safety objectives or offering better services and products.

4.5. Membership of the loyalty programme

Some of our customers benefit from a loyalty programme. This programme allows them to benefit from referencing on our websites and to be offered a range of services available on the internet and on mobile phones in order to benefit from sales support tools (advertising tools, pro articles, visibility support, etc.), online purchase declaration modules, special commercial offers, etc. In certain cases, it is also possible to accumulate points allowing conversion into sales support tools and gifts. In this context, your data may also be passed on to suppliers of gift services.

Membership of this programme and its services is based exclusively on your consent at the time of registration.

5. Which third parties can access your data?

We may share your personal data with an installer/after-sales partner, companies within the group, service providers and our partners for the following purposes: (5.1) in connection with a request made in the contact form, (5.2) in connection with the organisation of our business, and (5.3) for research and direct marketing purposes.

5.1. In connection with a request made in the contact form

Data may be shared with partner companies (network of partner installers, after-sales partners) in order to provide you with specialist advice and/or the purchase, maintenance or repair of a heating system.

5.2. In connection with the organisation of our business

We may share your personal data with trusted third party service providers that we use (e.g. hosting providers, social networks) or with sub-contractors who are involved in providing services on our behalf (e.g. for support services). All such third parties will be required to ensure adequate protection of your personal data in accordance with the General Data Protection Regulation and to process it only in accordance with our instructions.

5.3. For research and direct marketing purposes

BDR THERMEA France is part of the BDR THERMEA group. Within our group of companies, we may exchange information for research and direct marketing purposes (see paragraph 4.3 above).

We may also share your personal data with administrative or tax authorities or in the context of judicial or administrative investigations, if we are required to do so under the applicable law.

We may share aggregated, non-identifying information with third parties. For example, we may share trends in household energy consumption. We ensure that this non-identifying information cannot be associated with specific users of our products and services.

Group companies, our service providers and our partners may be located in a country outside the European Economic Area (consisting of the countries of the European Union plus Liechtenstein, Norway and Iceland). In this case, an international transfer of personal data takes place. It is possible that the laws of the recipient countries do not ensure an adequate level of protection for your personal data, equivalent to the laws applicable in France. In this case, we will ensure that adequate safeguards are implemented in accordance with the requirements for international transfers of personal data, for example by making such transfers subject to the European Commission's standard contractual clauses.

6. How do we secure your data and how long do we keep it?

We will ensure that your personal data is properly secured using appropriate technical and organisational measures, so that it is protected against unauthorised or unlawful use, alteration, unauthorised access or accidental or unjustified disclosure, destruction or loss.

We will keep your data on our systems for as long as is necessary for the purposes described in this privacy policy and for a maximum of 15 years, or as necessary to comply with our legal obligations and to manage litigation.

7. Where is our data stored?

The personal data processed by us are hosted on servers located within the European Union by BDR THERMEA or its partners.

For reasons of security and safeguarding, data may be transferred to, accessed from and stored in a country outside the EU, in accordance with the conditions for data transfer outside the EU.

As such, any transfer of personal data outside the European Union will only be made in accordance with the European Commission's decisions on standard contractual clauses or to a country benefiting from an adequacy decision.

How do you exercise your rights?

You may exercise your right to withdraw your consent for the processing of personal data, when this was required (collection and processing of personal data outside the framework of the execution of a contract and/or the needs of the execution thereof), collected via the aforementioned contact form, at any time, in the same way as you may exercise your rights of access, rectification, opposition and portability by writing to the address dpo@bdrthermea.fr. If BDR THERMEA France does not respond within one month of your request, you are entitled to refer any claim to the *Commission Nationale Informatique et Libertés* (French data protection authority).

We may ask you to provide additional information to verify your identity. The rights described in this paragraph may be limited in certain situations - for example, where we can demonstrate that we are required to process your data by law. Due to the way in which some services are provided, it may take some time for back-ups to be deleted. We may also retain some data for longer where we are required to do so for regulatory reasons.

You may also contact us if you have any questions, comments or complaints about this privacy policy. If your questions remain unanswered, you also have the right to refer the matter to the *Commission Nationale Informatique et Libertés* (French data protection authority).