

Our data privacy policy

Groupe France Data Controller name and contact details:

INFACO SAS ("Infaco")

Bois de rozies

81140 Cahuzac sur vère

Infaco considers protecting your privacy to be of high importance. The processing of your personal data complies with legislative and regulatory provisions, in particular Regulation No. 2016/679 on the protection of personal data ("GDPR") of 25 May 2016. This declaration informs you of how your personal data ("personal data" or "data") is processed by Infaco in its capacity as data controller, as well as the procedures to use to exercise your rights:

- When you use one of the services available on the www.infaco.com, pros.infaco.com and my.infaco.com websites.
- If you are a professional, when you do business with us.

The purpose of our privacy policy is to inform users of our website and applications about the personal data we collect. This privacy policy is in parallel with the general terms and conditions of use of our website and the legal notices <https://www.infaco.com/en/legal-disclaimer/>

1 - Collection, use and storage of personal data

Infaco processes data about you, known as personal data, when you use one of our websites or when we do business with you. This data refers to any information that can be used to identify you either directly or indirectly.

A - Infaco website and Infaco application (customer section)

1. Browsing Infaco websites

When you visit the Infaco websites, you send data to our web server through your web browser. The data thus collected is as follows:

- The date and duration of your request;
- The name of your request;
- Your request start page;
- The access statuses (file transferred, file not found);
- The web browser and operating system used;
- The IP address used;
- The volume of data transferred.

To guarantee the security of our servers and to prevent any attempted attacks, we store items of data temporarily. However, we cannot use such data to identify you directly.

Purpose: The legal foundation for this processing is article 6§1f) of the GDPR, namely our legitimate interest in proposing functioning websites and in guaranteeing their security.

2. Infaco mobile applications

Infaco collects, processes and stores users' personal data in compliance with the applicable regulatory provisions in order to provide the requested services in accordance with Article 6§1b) of Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation).

Our applications can be downloaded free of charge from Google Play Store or Apple App Store, but a customer account must be created beforehand and your personal details provided. However, Infaco does not collect this data and has no

influence on or responsibility for its use.

You must accept the Google Play Store or App Store use terms and conditions to open your customer account, as well as the terms and conditions of use for our Infaco application when you download it.

To install and use our application, you must create a customer account, providing the required information in accordance with §1.A.3 "Creating a my.infaco customer account" (below).

Cookies are stored on your device when you use applications. Cookies are small text files stored on your device that provide our company certain information. The purpose of cookies is to make the application more user-friendly and efficient. Cookies cannot run programmes or transfer viruses to your computer. You can delete the cookies stored by default on your device after having used the Application.

Your data will not be shared with third parties.

Deleting your user data:

When your customer account is deleted, the data stored by Infaco is erased, provided that this erasure does not contravene any legal retention obligations.

From our mobile application, you can automatically manage, correct or delete your personal data or entries in your user profile on the "My profile" page. Once you press the "Save" button, your changes are applied or the data is deleted from our customer database.

3. Creating a my.infaco customer account

When you visit our customer area, your personal data may be used to create a MyInfaco account.

To be able to use all the features of our mobile application (registering products, managing points of interest on your farm), you must create a MyInfaco account by providing certain mandatory information, such as your first name, surname, postal address, e-mail address, mobile phone number, password and your company name if you are a professional. This data is collected in accordance with article 6§1b) of the GDPR and is used to give you access to your MyInfaco space and its features.

Other fields, such as the extra address information, are optional. Purpose: In this case, your data will only be collected with your express consent, in accordance with Article 6§1a) of the GDPR.

From your MyInfaco space, you can correct the information you entered when you opened your account. The legal foundation for this processing is article 6§1f) of the GDPR, namely our legitimate interest in proposing functioning and practical websites.

As long as your MyInfaco account is active, Infaco will continue to store your data. In particular, you have the right to delete your account and associated data in accordance with § 4 "Your rights" (below). If you have not had any active contacts with Infaco for 5 years, your MyInfaco account and its associated data will be deleted.

However, some data will be kept for a longer period if we are required to do so by law, for example data relating to legal guarantees. In such cases, your data will not be used for any purpose other than to fulfil our legal obligations.

Cookies are stored on your device when you use the application. Cookies are small text files stored on your device that provide Infaco certain information. The purpose of cookies is to make the application more user-friendly and efficient. You can delete the cookies stored by default on your device after having used the Application. They cannot run programmes or transfer viruses to your computer.

4. Contact form and customer relations

You can contact our customer relations centre using the contact form on our www.infaco.com website or by phone.

When you contact us, you must enter certain fields, such as your surname, first name, e-mail address and the subject of your request, without which we will not be able to process your request. Other fields are optional, such as your address, phone number and sector of activity.

Depending on your status and/or the subject of your request, you may be asked to provide additional information, such as your SIRET number, sector of activity, device serial number, etc. You will always be told which information is mandatory and which is optional.

Purpose:

The legal foundation for this processing depends on the nature of your request. If it relates to the fulfilment of a contract signed with us, including its pre-contractual provisions (for example a complaint about servicing, a request for the repair of a product, etc.), the legal foundation for this processing is Article 6§1b) of the GDPR, which covers the fulfilment of the signed contract.

For your other requests (for example questions about a product, getting advice, etc.), the legal foundation for this processing is Article 6§1f) of the GDPR, which covers our legitimate interest in processing your requests.

Data is collected to process and respond to requests sent using the contact form.

If you contact us by phone, we do not record any conversations with our operators. Furthermore, if you contact us using a contact form on our website, our correspondence is saved.

If you wish, you can consent to your data being used to send you our latest news (new products or services, special offers, etc.) by e-mail every month. To do that, you must tick the appropriate box to subscribe to our newsletter. You can, of course, contact us without ticking this box. The legal foundation for this processing is article 6§1a) of the GDPR, namely your express consent.

How long your data is kept before it is anonymised depends on the subject of your request. If it concerns the fulfilment of a contract signed with us, including its pre-contractual provisions (for example, a complaint about the delivery of a product purchased from our online store, a request for the repair of a product, etc.), your personal data will in principle be kept for 5 years from the moment your request is processed. For your other requests (for example: questions about a product, getting advice, etc., your personal data will be kept for a maximum of 6 months from the moment your request is processed. Please note that the data collected in this way is not used for any other purpose, including for advertising.

5. Spontaneous job application form

At Infaco, we invite you to take a look at the job opportunities available on our website by submitting your spontaneous job application using our online form. The information we collect during this process includes your surname, first name, e-mail address and the content of your job application. You can also optionally attach files.

It is important to note that to submit your application, you must accept the terms of our privacy policy.

Purpose: We only use the collected data to process and answer the requests received.

If candidates do not request the destruction of their file, the data is automatically destroyed 2 years after the last contact. The files can only be kept for a longer period with the applicant's formal consent.

6. Satisfaction survey

When you have purchased an Infaco product from our distribution network, used the services proposed on one of our websites or made a complaint, you may be invited to take part in a satisfaction survey. This satisfaction survey may be by phone or written.

Purpose: The legal foundation for this processing is Article 6§1f) of the GDPR, which covers our legitimate interest in collecting your customer experience to improve our services. You may refuse such processing at all times, free of charge and without reason, in accordance with article §4.7 below.

Your personal data will be kept for a maximum of 3 years from the date of your participation in a satisfaction survey.

7. Subscribing to our newsletter

Infaco offers the possibility of subscribing to its newsletter by entering your e-mail address on a form on our website. Once you have subscribed to our newsletter, every month, you will receive information about our products, services, offers and events by e-mail.

Subscribing to the newsletter is not compulsory and is based solely on the wish to receive the company news.

When you are invited to subscribe to the newsletter using one of our services, you are never forced to tick the box to benefit from the service. You are free to continue browsing without ticking the box.

This data is used to send the newsletter, which may be automated using a newsletter distribution tool: BREVO. This distribution tool undertakes to comply with the provisions of the European General Data Protection Regulation.

Purpose:

Recipients of newsletters are informed that BREVO may analyse their behaviour to track the deliverability of emails, opening rates, click-through rates and bounce rates.

This data is kept until you unsubscribe from the newsletter.

When you subscribe to our newsletter, we store your IP address provided by your Internet Service Provider ("ISP"), as well as the date and time of your subscription, so that we can, if necessary, subsequently identify any unlawful use of your e-mail address and to be able to obtain your consent.

When you subscribe to the newsletter at the same time as registering your product (see art. §1.A.9 below), the data you enter on the registration form will either be automatically added to your customer account or used to create a customer account. This data will be used to personalise the content of our newsletters to give you the most relevant information possible about our products, services and offers.

The legal foundation for this processing is article 6§1a) of the GDPR, namely your express consent. The storing of the date and time of your subscription to the newsletter and the IP address used is based on article 6§1f) of the GDPR, namely our legitimate interest in establishing proof of your consent.

You may withdraw your consent at all times, free of charge and without reason, either by clicking on the unsubscribe link contained in all our emails, or in accordance with article §4.7 below. Your personal data collected in this way is kept until you withdraw your consent, and for 3 years from the last active contact you had with Infaco. Once you have withdrawn your consent, the data will be deleted and you will no longer receive our newsletter.

8. Registering your products purchased from a partner or dealer

If you have purchased an Infaco product from one of our partners or dealers, Infaco proposes the option of registering your product from our customer area.

To do that, you must provide certain mandatory information, such as your surname, first name, email address, the product purchased, the date of purchase and the product serial number. For some products, additional information on their characteristics may also be required. However, for product guarantees, you may be asked whether you are a professional or a private individual. Please note that when you register your product, Infaco may send you commercial communications for similar products and services.

Purpose: The legal foundation for this processing is our legitimate interest in informing you about our products, our new products and special offers relating to the product you registered, in accordance with Article 6§1f) of the GDPR.

If you have not opened a MyInfaco account, your personal data will be kept for a period of 3 years from the last active contact you had with Infaco. You may refuse such processing at all times, free of charge and without reason, in accordance with article §4.7 below.

If you have opened a MyInfaco account, your personal data will be stored in accordance with the provisions of article §1.A.3. "Creating a MyInfaco customer account" above.

If you wish, in addition to offers and information about our similar products and services, you can also subscribe to our Infaco newsletter to get all our latest news every month by e-mail. To do that, you must tick the appropriate box to subscribe to our news. You can, of course, register your product without ticking this box. The legal foundation for this processing is article 6§1a) of the GDPR, namely your express consent.

9. Competitions and special offers

Infaco gives you the opportunity to take part in the competitions and special offers it organises. Personal data about the participants is then collected with their consent as part of the competition in order to establish the participants' identity, to notify them if they win, and to deliver the prize they have won.

To take part, you must provide your surname, first name, address and contact details. Depending on the competitions, special offers and/or your status, you may be asked for additional information, such as your sector of activity, e-mail address, date of birth, etc.

Where applicable, the terms and conditions of competitions and special offers detail the specific methods used to process your personal information.

Purpose: The legal foundation for this processing is article 6§1b) of the GDPR, which covers your participation in competitions and special offers in accordance with their rules and the related pre-contractual provisions.

Your data collected in this way will be kept for a maximum of 5 years from the last competition in which you took part and will be processed by the Marketing and Sales Department.

If you wish, you can consent to your data being used to send you our latest news (new products or services, special offers, etc.) every month by e-mail. To do that, you must tick the appropriate box to subscribe to our newsletter. You can, of course, take part in competitions and special offers without ticking this box. The legal foundation for this processing is article 6§1a) of the GDPR, namely your express consent.

Participants can unsubscribe from the mailing list at any time by clicking on the unsubscribe link featured in every newsletter.

In accordance with applicable regulations §4 "Your rights", participants may exercise their right to access, rectify and erase their personal data.

For all other requests, contact the Marketing Department by e-mail: marketing@infaco.fr

B - Additional processing specific to professionals

The following processing is only carried out when you use the www.infaco.com and/or www.pros.infaco.com website.

As a result, this processing does not concern you if you are a private individual acting as a consumer.

1. Signing a contract

Contract for the sale of equipment:

Infaco gives its professionals the opportunity to purchase a wide range of equipment.

When you purchase a machine, you must provide the following information: company name, address, postcode, town, phone number, title, surname, first name, and e-mail address. Other information can be entered, such as: SIRET number, job title, sector of activity.

Purpose: The legal foundation for this processing is article 6§1b) of the GDPR, namely the fulfilment of the contract for the sale of professional equipment and related pre-contractual provisions.

We store your data for the duration of the contract and for 5 years after it has been fulfilled. By way of exception, some

data may be kept for longer where we have a legal duty to keep it (for example, accounting data for 10 years). In that case, we do not use it for any purpose other than to fulfil our legal obligations.

Equipment financing and/or leasing and/or maintenance contracts:

Infaco also offers its professionals equipment financing and/or short or long-term rental and/or maintenance.

When you apply to finance, hire or maintain a machine, you must provide the following information: company name, title, surname, first name, address, postcode and town. Other additional information may also be required, such as: SIREN number, phone number, and e-mail address.

Purpose: The legal foundation for this processing is Article 6§1b) of the GDPR, namely the fulfilment of the request for financing, rental or maintenance of equipment, and the related pre-contractual provisions.

We store your data for the duration of the contract and for 5 years after it has been fulfilled. By way of exception, some data may be kept for longer where we have a legal duty to keep it (for example, accounting data for 10 years). In that case, we do not use it for any purpose other than to fulfil our legal obligations.

2. Sending our news and commercial communications (newsletter)

Infaco may contact you by e-mail or text message every month to send you its news for professionals, in particular:

- News specific to your sector of activity; and/or,
- On institutional topics related to your position and function; and/or,
- If you are an employee of one of Infaco's commercial partners, commercial communications conducted jointly with your employer.

Infaco may collect and process information such as your surname, first name, title, e-mail address and phone number, as well as other professional data such as the name and address of your company, your position, your sector of activity and your trading group.

This personal data is obtained either directly from you or indirectly through your employer. In the latter case, the information relating to the processing of your personal data is made available to you either within 30 days of its collection, or at the latest at the time of the first communication with you if this occurs before the 30-day period.

Purpose: The legal foundation for this processing is article 6§1f) of the GDPR, namely our legitimate interest in maintaining and developing our commercial relations with our professional customers and in sharing our news with them (new products or services, institutional information, events, organisation of product demonstrations, etc.). You may refuse such processing at all times, free of charge and without reason, in accordance with article §5.6 below.

You may withdraw your consent at all times, free of charge and without reason, either by clicking on the unsubscribe link contained in all our emails, or in accordance with article §4.7 below. Your personal data collected in this way is kept until you withdraw your consent, and for 3 years from the last active contact you had with Infaco. Once you have withdrawn your consent, the data will be deleted and you will no longer receive our newsletter.

3. Online repair request: servicing and after-sales services

Infaco offers the possibility of carrying out servicing or after-sales services through its distribution network.

To do that, you must indicate the reference of the product concerned, enter your name, address and contact details to track your repair request and allow us to return the product to you.

Purpose: The legal foundation for this processing is Article 6§1b) of the GDPR, namely the fulfilment of the repair request and related pre-contractual provisions, as well as Article 6§1 c), namely the fulfilment of our legal obligations when the repair is carried out as part of a legal guarantee.

We then store this servicing contract in the professional area.

Purpose: The customer's personal data collected using the digital platform is only used, processed and stored by Infaco for the purposes of servicing Infaco Units.

In accordance with the regulations relating to personal data and with §4 "Your rights" below, the customer has the right to access, rectify, refuse processing, withdraw consent from, and delete personal data concerning them at all times. If the customer ticks the relevant box in the servicing contract, the data collected during Infaco's servicing operations may be used by Infaco to send newsletters, promotional offers and other special offers relating to the company's products and services. You can, of course, register your servicing contract without ticking this box. Purpose: The legal foundation for this processing is article 6§1a) of the GDPR, namely your express consent.

Your data will be kept for a period of 5 years after the product has been repaired. By way of exception, some information will be kept for a longer period when we have a legal duty to keep it (e.g. data relating to legal guarantees, duration of guarantees).

2 - Social media

1. Social media plug-ins

Infaco uses "plug-ins" (additional software for a web application or desktop software) on its websites that are published by the operators of the Facebook, Instagram, LinkedIn and YouTube social media (hereinafter referred to together as the "Social Media").

You can recognise these plug-ins by their logos, which are specific to each social media, on our website. Your personal data is not collected by these plug-ins until you click on the logos.

2. How your personal data is processed

If you click on one of the plug-ins, you will automatically be directed to one of Infaco's Facebook, Instagram, LinkedIn or YouTube pages.

During this operation, the plug-in creates a direct link between your browser and the server of the social media in question using your IP address. In this context, Infaco is jointly responsible with the operators of the social media for processing your personal data.

Your personal data will be processed by:

- The social media operators, who may obtain the information according to which you have visited the site from which you are redirected; where applicable, they may link this information to your account opened with one of these social media;
- Infaco may receive anonymous statistical data from social media operators to better understand the activities of its visitors on its pages, such as clicks, "likes", posts viewed, the age of visitors, etc.

Purpose: The legal foundation for this processing is Article 6§1f) of the GDPR, namely our legitimate interest in finding out about the audience for our pages from the Social Media operators. However, when such processing is carried out using cookies, the legal foundation for the processing of such personal data is Article 6§1a) of the GDPR, namely your express consent.

In principle, Infaco will keep your data for 3 years from the date it is collected. By way of exception, when your personal data has been obtained using cookies and subject to the extent of your consent, it will be kept for a period ranging from the duration of your connection to the website, to 2 years from the time it is collected, depending on the cookies.

You can view our Cookie Management Policy on our website (legal information section) to find out more.

3. Further information

You can find out more about the processing of your personal data by Social Media operators by viewing the following pages:

- Facebook and Instagram, the processing of your personal data is carried out by Irish company Meta Platform Ireland Ltd, located at 4 Grand Canal Square, Grand Canal Harbour, D2 Dublin (Ireland).
- LinkedIn, the processing of your personal data is carried out by Irish company Facebook Ireland Ltd, located at LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2 (Ireland).
- YouTube, the processing of your personal data is carried out by Irish company Google Ireland Limited, Google Building Gordon House, 4 Barrow St, Dublin, Ireland, 1600 (Ireland).

3 - Security measures

1. Technical and organisational measures

Infaco has taken a series of security measures to adequately protect your personal data. In particular, all data is protected by technical measures and processes that restrict access to specially authorised persons who need to access it to carry out their tasks in accordance with this privacy policy. Our employees receive data security awareness training. Moreover, Infaco's websites are also protected by a firewall to prevent unauthorised access by third parties.

2. Password

Under no circumstances should you disclose your password to third parties to access our websites, and you should also remember to change it regularly. To log out of your customer account, click the "log out" button and close your browser to prevent any fraudulent access.

4 - Your rights as a user

All users concerned by the processing of their personal data may avail themselves of the following rights, pursuant to European Regulation 2016/679 and the French Data Protection Act (Act 78-17 of 6 January 1978):

1. Right of access

You have a right of access to the data we hold about you, as well as a right to ask us questions about how it is processed, in accordance with Article 15 of the GDPR.

You have the right to obtain confirmation as to whether or not your personal data is being processed and, when it is, you may also request access to this data and to additional information.

2. Right to refuse

You may refuse certain processing of your personal data at all times, in accordance with Article 21 of the GDPR. When your request concerns direct marketing operations (advertising, special offers, market research, etc.), you do not need to provide a reason for your refusal. However, for any other processing, you must inform us of the compelling reason(s) for your request to avail yourself of the right to refuse processing.

The data subject has the right, on grounds relating to their specific situation, to refuse the processing of personal data concerning them at all times, based on Article 6, §1, e) or f), including profiling based on these provisions. The data controller will no longer process the personal data unless it can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

3. Right to withdraw consent

When the processing of your personal data is based on your consent, you can withdraw it at all times, without reason, in accordance with Article 7§3 of the GDPR. For example, to withdraw consent for the newsletter. To do so, click on the "unsubscribe" link at the bottom of each advertising email or contact the Data Protection Officer (contact details at the end of the policy).

In cases where processing is based on consent, the data controller is able to demonstrate that the data subject has

given their consent to the processing of their personal data. If the data subject's consent is given as part of a written declaration which also concerns other matters, the request for consent is presented in a form which clearly separates it from these other matters, in an understandable and easily accessible form, and formulated in clear and simple terms. No part of this declaration which constitutes a breach of these rules will be binding.

The data subject has the right to withdraw their consent at all times. The withdrawal of consent does not compromise the lawfulness of processing based on consent carried out prior to such withdrawal. The person concerned is informed of this before giving their consent. Withdrawing consent is as simple as giving consent.

4. Right to erasure

In accordance with Article 17 of the GDPR, you have the right to ask us to erase your personal data. When the lawful foundation for processing is your consent and our legitimate interest, all your data will be erased, unless our interests outweigh your rights, in which case we will only keep the data necessary to fulfil that interest.

When processing is based on other legal grounds, your personal data will be erased once the intended purpose(s) have been fulfilled, in accordance with the retention periods.

Please also note that you can delete your MyInfaco account directly from this area or request its deletion from the Data Protection Officer (contact details at the end of the document).

5. Right of correction

You have the right to ask us to correct your personal data, or to restrict its processing, in accordance with Articles 16 and 18 of the GDPR.

The data subject has the right to obtain from the data controller, as soon as is possible, the correction of inaccurate personal data concerning them. They also have the right, depending on the purposes of the processing, to obtain the correction of incomplete personal data, which may include providing an additional declaration.

6. Your other rights

You may also ask us to transfer your personal data to a third party of your choice, in a format that is technically usable by you or by that third party, in accordance with Article 20 of the GDPR.

You also have the right to give us instructions on what to do with your personal data after your death, in accordance with Article 85 I. of the French Data Protection Act.

Finally, you have the right to refer matters to the competent supervisory authority in the Member State of the European Union in which you reside, or in which the alleged breach occurred, if you consider that your personal data has been processed in breach of the provisions of the GDPR. In France, the competent supervisory authority is the Commission Nationale de l'Informatique et des Libertés (CNIL), 3 Place Fontenoy, TSA 80715 Paris, 75334 Paris cedex 07, phone: +33 (0)1 53 73 22 22.

7. Exercising your rights

With Infaco:

To exercise any of your rights with Infaco, you can contact our Data Protection Officer (DPO) using the contact details given at the end of this statement.

No payment will be required to exercise your rights, other than any costs incurred in sending your requests, except in the case of repetitive and manifestly unfounded requests.

Once we have received your request, your personal data will be stored by Infaco, via the Data Protection Officer (DPO). This data and our subsequent correspondence will be kept in archive form for a period of 5 years from the final processing of your request. Please note that we may ask you for additional information to confirm your identity; this

additional data will be deleted once your identity has been confirmed.

The legal foundation for processing your personal data is Article 6§1f) of the GDPR, namely our legitimate interest. The legitimacy of this processing is to be able to prove that we have processed your request to exercise a right.

In accordance with Article 34 of the French Data Protection Act, you have the right to access, modify, correct and delete data concerning you.

To exercise your "Data Protection Act" rights, contact Infaco:

- By using the contact form on this website, indicating the subject of your request and attaching a copy of an identity document;
- By post, enclosing a copy of an identity document to the following address:
INFACO s.a.s
Bois de Roziès - BP2
81140 Cahuzac-sur-Vère, France

If, after contacting us, you consider that your "Data Protection Act" rights have not been respected, you can file a complaint with the CNIL.

With the recipients of your personal data:

To exercise any of your rights relative to the recipients of your personal data, you can either contact Infaco's Data Protection Officer (DPO) using the contact details given at the end of this statement, who will forward your request to the recipient concerned, or you can contact them directly.

Regarding the processing of your personal data carried out jointly by Infaco and the Social Media operators, you can in particular send your requests for:

Facebook and Instagram, via:

- The online form for exercising your rights;
- By post, to the following address: Meta Platforms Ireland Limited, for the attention of: Data Protection Officer, 4 Grand Canal Square Grand Canal Harbour Dublin 2 Ireland

LinkedIn, via:

- The online form for exercising your rights;
- By post, to the following address: LinkedIn Ireland Unlimited Company, Legal Dept. (Privacy Policy and Terms of Use), Wilton Plaza, Wilton Place, Dublin 2 (Ireland).

YouTube, via:

- The online form for exercising your rights.

Contact / Data Protection Officer ("DPO"):

If you have any questions about your personal data, how it is processed and/or how to exercise your rights, please contact our DPO:

- Either by email: dpo@infaco.fr
- Or by post, by writing to the Data Protection Officer, Infaco SAS, Bois de roziès 81140 Cahuzac sur Vère.

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