

Here at Cotral Lab, protecting your personal data, whether you're a customer, Internet user, user or partner, is an essential task. Cotral Lab therefore undertakes to respect law no. 78-17 of 6 January 1978 relating to data, files and freedoms, modified by European Regulation 2016/679 of 27 April 2016 relating to personal data protection.

To provide you with transparent information that's as complete as possible on the use of your personal data, Cotral Lab has developed this privacy policy.

### **What is personal data?**

Personal data is information that identifies you, whether directly or indirectly. This may include your last name, first name, telephone number or email address.

### **What are Cotral Lab's practices regarding personal data?**

Your personal data is collected in a fair, lawful and transparent manner. Your personal data thus collected is proportionate to the purposes of its processing. It allows us to provide you with a tailor-made service to carry out commercial relations and/or manage your use of the Cotral Lab website.

Protection of your personal data is also ensured by the use of strict security measures, in accordance with the applicable regulations.

### **Why collect your personal data?**

Your various categories of personal data are collected and processed to best manage your Cotral Lab products as well as contractual and commercial relations with you as customer, Internet user, user or partner. In general, the purpose of processing your personal data is the proper management of your orders, the manufacture and monitoring of your Cotral Lab products as part of the sales contract, marketing campaigns as well as satisfaction surveys, to best meet your needs.

### **Data collected and purposes of processing:**

Your data is collected:

#### **1. For the sale of products regardless of their nature:**

- your surname, first name, function, telephone number, postal address, LinkedIn profile URL, email address as the contact person for the company or individual client.

#### **2. For the design and manufacture of hearing protection:**

- last name, first name of your hearing protection users,
- scanned files of your users' hearing impressions.

#### **3. For choosing the most suitable acoustic filter:**

- surname, first name, identification of the filter suited to your needs as a user: to this end, the SAPAN software determines the most suitable filter. SAPAN asks questions about the user's environment but the answers are not saved, and are only used for choosing the protector and filter. Information related to the selected filter is stored in your Customer Space. CAPA (Hearing Protection Attenuation Control) software is used to check the attenuation of hearing protection.

**4. To design and manufacture customised safety glasses, Cotral Lab collects:**

- directly, your last name, first name as well as measurement data according to the frame selected,
- indirectly, your optical correction data (subject to your prior consent) through your prescriptions written by a healthcare professional.

**5- To send you information on products, studies and marketing campaigns:**

- your last name, first name, email address, role, telephone number as contact person for the company or person who contacted Cotral Lab to obtain information,
- your IP address,
- cookies via our website,
- your registration for webinars and newsletters.

**6- To offer you new Cotral Lab products:**

- your last name, first name, email address, telephone number as user of our current products with your prior consent.

**On what basis do we collect your data?**

The collection and processing of your personal data is aimed at complying with legal and contractual obligations as well as Cotral Lab's legitimate interest in monitoring you throughout the life of your products. Processing may be based on consent; in the case of bespoke glasses, you have the option of withdrawing it.

For the sake of transparency, Cotral Lab has listed in the table below the legal bases associated with each of the purposes of its processing:

<b>Purpose of processing</b>	<b>Legal basis</b>
The sale of Cotral Lab products	Execution of the commercial contract
For choosing the most suitable acoustic filter	Execution of the commercial contract
Managing after-sales service and warranty complaints	Cotral Lab's legitimate interest in being able to establish proof of a right or contract
The design of hearing impressions	Execution of the commercial contract
Manufacturing custom-made safety glasses according to the measurement data of the selected frame and the optical correction data provided by your user	Execution of the commercial contract and consent of your user for processing optical correction data
Sending commercial communications, carrying out studies and marketing campaigns	The company's legitimate interest in promoting its products and services, subject to respecting your right to object to receiving commercial communications of a professional nature
Keeping general accounts and auxiliary accounts as well as completing the related formalities	Compliance with legal obligations incumbent on Cotral Lab as a company

**Who can access your personal data?**

The recipients of this data are players within the Group's companies: your personal data is transmitted, within Cotral Lab departments, only to persons authorised by their functions to process it (such as persons within internal departments and opticians for manufacturing made-to-measure glasses) as well as Cotral Lab's commercial partners (such as its bespoke eyewear manufacturing partner acting on behalf of the company).

### **Is your data transferred outside the European Union?**

The processing carried out on your personal data is mainly done in Europe. However, it may happen that personal data is transferred to a country outside the European Union. If such a transfer is made to a country whose level of protection is not considered adequate by the European authorities, the relevant transfer will be framed by appropriate guarantees in accordance with the applicable legislation.

For example, the company that imports your data signs a data processing contract based on standard contractual clauses validated by the European Commission to which additional security measures are added (such as the prior pseudonymisation of the data transferred).

You can request more information on the guarantees in place by sending an email to the address shown at the bottom of the document.

### **How long is your personal data kept?**

Your personal data is kept for the time necessary to achieve the purposes of the processing carried out.

Thus, the retention period of your data corresponds to the duration of the commercial relationship between yourself and Cotral Lab: your personal data will either be deleted or anonymised 6 years after the last contact (email, phone call, appointment), or 3 years after the last contact if you are a prospect.

Should it be required that a record of some of your information is kept due to a legal obligation to which Cotral Lab is subject or to prevent any litigation, then some of your data may be archived for legally limited periods in accordance with the provisions of the Civil Code and the Commercial Code (eg: 5 years in commercial matters or 10 years in accounting matters), before their final deletion or anonymisation. In this case, your data is stored in a separate database, access to which is secure and strictly limited to authorised personnel.

Digital files of your users' hearing impressions are also kept so that protectors can be re-fabricated at any time in the event of loss, breakage or discomfort without having to take a new imprint. For this purpose, they are kept for a time equivalent to:

- 12 years from the most recent interaction.

These digital files of hearing impressions are then anonymised and kept for internal scientific studies.

Likewise, in order to manufacture bespoke protective eyewear at any time in the event of loss, breakage or discomfort, optical data is kept for a time equivalent to:

- 5 years from the most recent interaction.

### **What rights do you have with regard to your personal data?**

In accordance with applicable regulations, you have the right to access, rectify and erase your personal data. You can also exercise your right to portability in order to obtain your personal data in a structured, usable and machine-readable format, so that it can be transmitted to a third party, if your request is eligible.

You also have the right to request the limitation of the processing of your personal data as well as the right to object to its processing. In particular, you can object at any time and without reason to Cotral Lab using your personal data for sending commercial communications.

Should you consider that your rights are not being respected with regard to the protection of your data or an action relating to the conditions of the processing of your personal data would be incompatible with the provisions of this policy or the applicable regulations, you can directly file a complaint with the data protection supervisory authority.

You can contact Cotral Lab at: [info.rgpd@cotral.com](mailto:info.rgpd@cotral.com) if you wish to exercise one of your rights.  
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