

# DATA PROTECTION POLICY

This Privacy Policy aims to inform you precisely about the processing of your personal data carried out via the website [www.manitou-master2024.com](http://www.manitou-master2024.com), whose domain name is owned by MANITOU 2024 through its service provider 37DEUX. The processing of personal data of Users who become customers is detailed in the "General Terms and Conditions of Sale," the "General Terms of Use," and the "Cookie Policy" of the website.

## ARTICLE 1 – Collection and use of data

### 1.1. Types of data collected

The types of data collected, in alphabetical order, include:

Email address, billing address, shipping address, communications with customer support, user account details, consent cookies, login and logout date and time, files and links downloaded from services, activity history, identifier, social security number, phone number, activity status, time spent on a page or screen, order statistics.

Our websites use cookies to collect browsing data, based on your consent upon your first connection and then every 13 months.

You will find all relevant cookie-related information in the dedicated cookie policy document.

### 1.2. Use of data

Data is collected for the following purposes:

Creation of user accounts on the website, attribution of points, exchange of points for rewards, shipment of ordered gifts, billing for ordered gifts, extraction of order statistics, extraction of statistics related to end customers.

The various purposes of this processing are based on the contract (Article 6-1b of the RGPD).

The data retention period lasts throughout the contractual duration. Once expired, the data is extracted and returned to the client, and archived data is deleted from the platform and server after 5 years.

The maximum lifespan of cookies is 13 months. In accordance with CNIL recommendations, once this period expires, user consent will be requested again upon their next visit to the Site.

### 1.3. Data sharing and disclosure

Certain data may be transferred to a subcontractor, SALESFORCE, whose headquarters are in San Francisco (USA). However, SALESFORCE participates in the [DATA PRIVACY FRAMEWORK](#) (EU RGPD compliance) and has implemented [BCR](#) to ensure legal compliance with RGPD principles.

We reserve the right to change subcontractors or add new ones with your consent. Any substantial modification of our subcontractor list will be communicated to the concerned individuals via appropriate means.

Contractual guarantees: we require our subcontractors, through contracts compliant with Article 28 of the RGPD or CCT or DPF, to:

- Process data only for the specified purposes,
- Guarantee data confidentiality,
- Implement appropriate security measures,
- Assist our company in complying with data protection obligations,
- Delete or return all personal data upon completion of their service,
- Provide all necessary information to demonstrate compliance with their obligations,

Compliance of subcontractors: we regularly verify that our subcontractors comply with RGPD requirements and contractual clauses. This verification may include audits, inspections, or certification requests.

Liability in case of breach: In accordance with Article 82 of the RGPD, we remain fully responsible for the processing of your personal data, including when performed by a subcontractor. If a subcontractor fails to meet its data protection obligations, we will take all necessary measures to uphold the rights of affected individuals and, if necessary, seek compensation from the failing subcontractor.

## **ARTICLE 2 – Data security**

The security measures implemented to protect data are technical, organizational, and legal in nature. They follow CNIL. Guidelines and include:

- Authentication
- Unique login ID for each user
- Encryption, hashing, and data signature
- Authorization of interveners
- Physical security of premises
- Secured remote access for mobile devices via VPN
- Segmentation of IT environments
- Use of regularly updated professional antivirus software
- Implementation of two-factor authentication

Our company is committed to protecting users' personal data and complying with legal data protection obligations, particularly under the General Data Protection Regulation (RGPD).

In the event of a data breach, we have a notification procedure for the competent supervisory authority (The National Commission on Informatics and Liberty - CNIL) in accordance with legal requirements.

If a data breach poses a high risk to individuals' rights and freedoms, we commit to informing them as soon as possible. This notification will include the nature of the breach, its probable consequences, and the measures taken or planned to address and mitigate its potential negative effects.

If a data breach occurs, our company will implement appropriate technical and organizational measures to manage the incident, limit its impact, and prevent recurrence. These measures may include strengthening our security systems, modifying internal procedures, or any other action deemed necessary to protect users' personal data.

## **ARTICLE 3 – User rights**

### **3.1. Rights of access, rectification, and erasure**

In accordance with applicable national and european regulations, you have the right to be informed about the processing of your data, access your personal data, modify, rectify, erase, and port your data. Object to the processing of your data or request its restriction

The data protection officer (DPD) of 37DEUX, subcontractor of MANITOU 2024, is available for any inquiries at:

Data protection officer 37 DEUX  
31 Allée Alain Gautier, 85340 Les Sables d'Olonne,  
France  
Email: [dpo@37deux.com](mailto:dpo@37deux.com)

### **3.2. Managing cookie preferences**

From the first connection to the Site, and annually thereafter, Users can accept or refuse cookies via the banner describing their purposes. Users can also manage their cookie preferences at any time by clicking the "Manage Cookies" button.

As a general rule, the help function in your browser's menu bar will guide you on how to refuse new cookies and block cookies that have already been received. For computers used by multiple people and set to accept cookies and flash cookies, we recommend logging out of your session when leaving our websites.

To block cookies directly from their web browser, Users can follow these instructions:

- Edge: click "... " (top right) > settings > clear browsing data > choose items to delete.
- Firefox: click the menu icon (three horizontal lines, top right) > options > privacy tab > select "Use custom settings for history" > uncheck to disable cookies.
- Safari: click the menu icon (gear symbol, top right) > settings > show advanced settings > privacy content settings > block cookies.
- Chrome: click the menu icon (three horizontal lines, top right) > settings > show advanced settings > privacy > preferences > block cookies.
- Internet explorer: click the tool tab (gear symbol, top right) > internet Options > privacy > block all cookies > confirm with OK.

### 3.3. Update policy

Our cookie policy is reviewed annually. If any modifications occur, your previous consent will be revoked, and you will be notified via an alert message on the website upon your next connection.

## **ARTICLE 4 – Legal and practical information**

### 4.1. Contacts

The Data Protection Officer (DPO) of 37DEUX, a subcontractor of MANITOU 2024, is available for any inquiries at the following contact details:

Data protection officer 37 DEUX  
31 Allée Alain Gautier, 85340 Les Sables d'Olonne,  
France  
Email : [dpo@37deux.com](mailto:dpo@37deux.com)

### 4.2. Legal compliance

This Privacy Policy aims to inform you precisely about the processing of your personal data carried out via the website.

Users may request to exercise any of their rights mentioned above by contacting 37DEUX (see section 4.1 for details).

If, after contacting us, you believe that your "Data Protection and Privacy" rights are not being respected, you can file a complaint with the French data protection authority (CNIL) at: CNIL - Service des Plaintes - 3 Place de Fontenay - TSA 80715 - 75334 PARIS CEDEX 07.