

Confidentiality and personal data protection policy

Within the framework of visiting the website <https://www.mecalectro.com/> or the purchase of products online (hereinafter referred to as the “**Website**”), the Company MECALECTRO, operating the Website, may process personal data on Website users (hereinafter referred to as a “**User**”), as defined below.

In order to maintain the User’s trust, MECALECTRO invites the latter to read its policy in this regard, which describes the data collected, the use made of this and the rights that the User has over this, in compliance with Law No. 78-17 of 6 January 1978, as amended, and EU Regulation 2016/679 of 27 April 2016.

MECALECTRO shall undertake not to process personal data for purposes other than those set out in this confidentiality policy.

1. WHO COLLECTS YOUR DATA?

The company responsible for processing personal data is MECALECTRO, a simplified joint-stock company with a share capital of EUR 2,961,000, entered in the Evry Business Register under number B 409 584 059, with head office at 8 Rue Galvani, 91300 Massy, France (hereinafter referred to as the “**Company**”).

Within the framework of the Website, and in compliance with Law No. 78-17 of 6 January 1978, as amended, and EU Regulation 2016/679 of 27 April 2016, the Company collects and processes a certain amount of personal data on the User, according to the conditions and terms defined below.

2. WHAT DATA DO WE COLLECT AND WHY?

2.1. Messages sent to the Company via the contact form

The User can contact the Company using the contact form available on the Website for various reasons (request for information, notify a project, etc.).

The User is informed, when he/she enters his/her data on the contact form, of the mandatory or optional nature of the responses by the presence of an asterisk (*). If the mandatory information is not completed, the service required that involves the processing of such data cannot be implemented.

The mandatory data collected is: User’s surname, forename, company, e-mail address and the content of the message that the User wants to send it, the content of which is freely determined by the User.

The optional data collected is: position within the company, address, postcode, town, country and telephone number. The User is asked to complete the data about the company for which he/she works.

The mandatory data collected is needed for the Company to be able to respond to the User’s request.

The optional data collected allows the Company, if the User so desires, to have the exact contact details for the company in which the User works, possibly with a view to recontacting it by any other means (post or telephone) or even to build on the User’s request by consulting information on the company for which he/she works.

The Company may, depending on the nature of the User’s request, ask the latter to provide all the personal data needed to process the request by indicating to him/her the purpose of this collection.

2.2. Messages sent to the Company by any other means

The User may contact the Company by e-mail or post for various reasons (request for information, notify a project, etc.)

Within this framework, the Company collects the data voluntarily furnished to it by the User, such as contact details and the content of the message the User wishes to send it, the content of which is freely determined by the user.

This data is processed in order to be able to reply to the User’s request.

The Company may, depending on the nature of the User’s request, ask the latter to provide all the personal data needed to process the request by indicating to him/her the purpose of this collection.

2.3 Account creation

The User can create an account on the Company's Website in order to place orders more easily.

Within this framework, the Company collects the data voluntarily furnished to it by the User, by giving his/her consent, namely: identity (surname, forename, title), postal address, e-mail address, telephone number, password, and username.

2.4 Online sales

Within the framework of the order(s) placed on the Website by the User without creating an account, the Company is called on to process Users' personal data in order to deliver the order(s) to them.

Within this framework, the company collects the following personal data: identity (surname; forename, title), company name, postal address, e-mail address, and telephone number.

This data is necessary in order to process the User's order(s) and to ensure the management of his/her deliveries, complaints, returns and refunds in a secure and efficient manner.

The data relating to the orders and payments gathered within the framework of the aforementioned objective will also, under certain conditions and limits, be used for analysis purposes, and for detecting fraud and theft linked to online sales, and to comply with the applicable laws.

2.5. Canvassing

In as far as the User expressly consents to this, the Company uses his/her e-mail address to send its promotional offers and its newsletters by e-mail.

3. WHAT JUSTIFIES THE PROCESSING OF YOUR DATA?

3.1 Messages sent to the Company via the contact form

The company collects the User's personal data to perform the processing relating to the messages sent to it by the User via the contact form (Clause 2.1) only if the latter has given his/her consent by ticking the "*I accept the terms of the Confidentiality policy*" box.

When the User sends the Company a message by any other means (Clause 2.2), the User is deemed to have given his/her consent to the processing of the data with which he/she has spontaneously provided the Company.

The User may withdraw his/her consent at any time by sending a request in this regard to the following address:

By e-mail: rgpd@mecalectro.com

Or by post: MECALECTRO, 8 Rue Galvani, 91300 Massy, France.

The User's withdrawal of consent shall only apply to the future and shall not challenge the lawfulness of the processing performed prior to the withdrawal of consent. In addition, the withdrawal of consent may make it impossible for the Company to reply to the messages sent by the User.

3.2 Account creation

The Company collects the User's personal data within the framework of the User creating an account (Clause 2.3). In creating an account, the User gives his/her consent by ticking the "*I accept the terms of the Confidentiality policy*" box.

The User may withdraw his/her consent at any time and request his/her account be deleted by sending a request in this regard to the following address:

By e-mail: rgpd@mecalectro.com

Or by post: MECALECTRO, 8 Rue Galvani, 91300 Massy, France.

The User's withdrawal of consent shall only apply to the future and shall not challenge the lawfulness of the processing performed prior to the withdrawal of consent. In addition, the withdrawal of consent may lead to the user's account being deleted.

3.3 Online sales

When the User places an order on the Website without creating an account (Clause 2.4), his/her personal data must be processed in order to execute the contract and fulfil any obligation deriving therefrom, whether relating to an order, a payment or the use of other services provided by the Company or third parties.

3.4. Canvassing

The processing relating to canvassing (Clause 2.5) requires clear consent from the user by ticking the “*I wish to receive the Mecalectro newsletter*” box.

The User may withdraw his/her consent at any time, either by clicking on the link provided for this purpose in every canvassing e-mail received from the Company, or by sending a request in this regard to the following address:

By e-mail: rgpd@mecalectro.com

Or by post: MECALECTRO, 8 Rue Galvani, 91300 Massy, France.

The User’s withdrawal of consent shall only apply to the future and shall not challenge the lawfulness of the processing performed prior to the withdrawal of consent.

4. TO WHOM DO WE PROVIDE YOUR DATA?

The Company receives all the data collected and processed under its responsibility. Only duly authorized staff of the Company may have knowledge thereof.

The sub-contractors listed in Clause 5 below may have access to the data in order to provide the services incumbent on them but can in no event perform any other data processing operation, such as a modification or use for purposes other than this.

5. WHO ARE OUR SUB-CONTRACTORS?

The Company has recourse to various sub-contractors, whose respective assignments are to host the Website databases, provide Website maintenance and provide the order payment module.

The Company guarantees that its sub-contractors present sufficient guarantees as to the implementation of appropriate technical and organizational measures so that the processing meets the requirements of the EU Regulation 2016/679 and the [French] Data Protection Law.

The sub-contractors may themselves be authorized to sub-contract all or part of their operations, subject to strict compliance with the provisions of Article 28 of EU Regulation 2016/679 and the provisions of this confidentiality policy.

In its capacity as the controller, the Company remains the User’s sole point of contact.

6. WHAT ARE YOUR RIGHTS?

In accordance with the regulations in force, all Users have rights with regard to their personal data.

To exercise these rights, the User must send a request specifying in the subject of his/her letter or e-mail that this concerns a request for information, or a complaint relating to his/her personal data and will retain proof of the receipt of his/her request.

Any request in this regard must be sent either:

By e-mail: rgpd@mecalectro.com

Or by post: MECALECTRO, 8 Rue Galvani, 91300 Massy, France.

The Company reserves the right to request a copy of the identity document for the person concerned in order to prevent any fraud and/or unlawful access to the data.

However, some personal data may be exempt from such requests under certain circumstances, for example, if it infringes the rights and freedoms of third parties. If an exception applies, the Company will inform the User of this when responding to his/her request.

6.1. Right of access, right to object, to restriction, to erasure and to rectification of data

In accordance with the regulations in force, the user has the right:

- To access any of his/her personal data items held by the Company;
- To update any of his personal data items that is not up to date or is incorrect;
- To restrict the way in which the Company processes his/her personal data;
- To request the Company provide him/her with a copy of any item of his/her personal data that it holds;
- To object to the use of his/her personal data.

6.2. Right to data portability

Every User has the right to the portability of his/her data, which must be returned to him/her in a structured, currently used format, legible by computer, if he/she so desires.

The User can only request this right to portability with regard to the data he/she has actively and consciously declared or that has been generated by his/her activity, to the exclusion of all other data that is calculated, derived or inferred from the data he/she has provided. In addition, only the data processed in an automated fashion and collected on the basis of consent, or the execution of a contract are concerned by this right.

The Company reserves the right to not meet the User's request in as far as the data concerned by his/her request does not meet the aforementioned conditions.

For all the data not meeting the aforementioned criteria, the User can only exercise the rights set out in the previous clause (6.1)

The Company will not form an obstacle to the provision of the data concerned by the right to portability to another controller, either through the User or directly when this proves technically possible. In the event the direct transmission of data to another controller would not be technically possible, the Company will inform the User of this and suggest an alternative solution.

The Company shall not be responsible for the processing performed by the User on the data resulting from the right to portability once the latter has recuperated this. The Company shall no longer be responsible for the processing performed by the company having recuperated the User's data following a request made by the latter in this regard.

6.3. Right to formulate anticipatory directives

In accordance with the regulations in force, the User providing his/her personal data may formulate anticipatory directives on the use of his/her data after his/her death (for example: conservation, deletion, disclosure). The User can modify or withdraw his/her instructions at any time.

6.4. Right to lodge a complaint with the CNIL

The User is informed of his/her right to lodge a complaint with the competent control body (the CNIL in France: www.cnil.fr), in the event of non-compliance with the legal and statutory provisions by the Company or its sub-contractors within the framework of managing his/her personal data.

7. FOR HOW LONG DO WE KEEP YOUR DATA?

7.1. Messages sent to the Company

The data collected within the framework of messages of any kind sent by the User to the Company (Clauses 2.1 and 2.2) shall be kept by the Company for the period strictly necessary to process the User's request.

If applicable, depending on the nature of the request sent by the User, the data provided may be kept in an intermediate archive for a period of five (5) years strictly for the purposes of guarding against any dispute with the User, to the exclusion of any other purpose. This period corresponds to the common legal prescription period.

7.2 Account creation data

The data collected within the framework of the User creating an account on the Company's Website (Clause 2.3) will be erased on deletion of the account.

However, the Company may continue to use and store the User's data if the Company has pending obligations or of other reasons prevent the deletion, such as a pending order or an unpaid debt.

If applicable, depending on the nature of the request sent by the User, the data provided may be kept in an intermediate archive for a period of five (5) years as of its collection or of the last contact from the [User] strictly for the purposes of guarding against any dispute with the User, to the exclusion of any other purpose. This period corresponds to the common legal prescription period.

7.3 Online sale data

The data collected within the framework of orders placed by the User on the Company's Website (Clause 2.4) shall be kept by the Company for the period required to fulfil the Company's contractual obligations.

However, the Company may continue to use and store the User's data for additional purposes.

If applicable, depending on the nature of the request sent by the User, the data provided may be kept in an intermediate archive for a period of five (5) years as of its collection or of the last contact from the [User] strictly for the purposes of guarding against any dispute with the User, to the exclusion of any other purpose. This period corresponds to the common legal prescription period.

7.4. Canvassing data

The personal data used within the framework of canvassing (Clause 2.5) shall be kept for a period of three (3) years as of its collection or the last contact from the User (for example, a request for documentation or a click on a hypertext link contained in an e-mail; on the other hand, the opening of an e-mail cannot be considered as being a contact from the User).

At the end of this three (3)-year period, the Company may recontact the User to find out whether he/she wishes to continue receiving commercial correspondence. In the absence of a positive and explicit response from the User, the canvassing shall be ended.

7.5. Exercise by the User of his/her rights over his/her data

In the event a right of access or a right to rectification is exercised, the data relating to the identity documents shall be kept for the period provided for by Article 9 of the [French] Code of Criminal Procedure, namely one (1) year.

In the event a right to object is exercised, the data relating to the identity document may be archived for the prescription period provided for by Article 8 of the Code of Criminal Procedure, namely three (3) years.

In the event a right to object to receiving canvassing from the Company is exercised, the information allowing this right to object to be taken into consideration shall be kept for three (3) years as of the right to object being exercised. This data can in no event be used for purposes other than the management of the right to object and only the data needed to take the right to object into consideration shall be kept (in particular, the e-mail address).