At Cotral Lab, the protection of your personal data is of utmost importance, whether you are a customer, a website visitor, a user of our products or a service provider. Cotral Lab therefore undertakes to comply with [French] Data Protection Act No. 78-17 of 6 January 1978, as amended by European Regulation 2016/679 of 27 April 2016 on the protection of personal data.

The purpose of this policy is to provide you with transparent and complete information on how Cotral Lab uses your personal data.

I - 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.

II - What are Cotral Lab's practices regarding personal data?

Your personal data is collected lawfully, fairly and in a 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 in order to successfully conduct commercial relations and/or manage your use of the Cotral Lab websites.

The protection of your personal data is also ensured by the implementation of strict security measures, in compliance with the applicable regulations..

III - What categories of personal data may we collect?

Your various categories of personal data are collected and processed for the purposes described in the table below. In general, the categories of data collected about you are as follows:

- **If you are a customer or partner of Cotral Lab:** your contact details and business address;
- **If you are browsing our websites:** your browsing data and, where applicable, your contact data and business details.
- **If you wear our products:**

    - **For the design and manufacture of hearing protectors:** your contact details and the information needed to design suitable hearing protectors (ear prints, working environment to determine the appropriate acoustic filter, results of the hearing protector conformity check);
    - **To design and manufacture custom-made safety glasses:** your contact details, your date of birth (to check the validity of your prescription), information needed to design custom-made safety glasses (measurement data depending on the frame selected and your optical correction data via your prescriptions from by a healthcare professional, subject to prior consent).

      Depending on the case and the information transmission methods defined by your employer, Cotral Lab may collect some of your data from the latter. This is indirect collection of your data, which is limited, where applicable, to the following data categories: contact data and optical correction data.

As indicated above, we may also collect data relating to your browsing of our website pages via cookies.

Cookies are mainly used to remember your choices and preferences in order to optimise your browsing on the website. Through these, we may also, and subject to your prior consent, carry out audience measurement, enabling us to compile statistics concerning visits to the website.

For more information about cookies, the purposes for which they are used, their issuers and the means available to you to object to them, please consult our Cookie Statement available on our websites.

IV - Why do we use your personal data and how long do we keep it?

In order to simplify presentation of the characteristics of the personal data processing carried out, the table below sets out the reasons why we process your personal data (purposes), our reasons for processing it (legal bases) and the period during which we use it (storage period).

1. If you are a customer

Purpose of processing	Legal basis	Storage period
The sale of Cotral Lab products: - Managing and tracking your orders, - Registering and billing your orders, - Managing complaints, after-sales service and warranties.	Contractual performance	Throughout the contractual relationship
Managing our accounting and financial obligations	Compliance with our legal data storage obligations	We keep your data for as long as required by legal obligations or for the periods stipulated by law
Dispute management	Our legitimate interest in providing evidence in the event of a dispute	We keep your data for the applicable statutory limitation periods
Sending commercial communications or making telephone calls presenting new Cotral Lab products similar to those already purchased from Cotral Lab	Our legitimate interest in offering you products similar to those you have already purchased or in sending you our research on protective equipment, subject to complying with your objection to receiving such communications	Unless you object to receiving these communications, for a period of 3 years from the end of our commercial relationship
Managing your registrations for our webinars	Our legitimate interest in managing your registrations and participation in our webinars	For the period required to organise our events

2. If you wear our products

Purpose of processing	Legal basis	Storage period
Design of hearing protection: - Choice of the most appropriate acoustic filter, - Designing ear prints.	Contractual performance	The data required to design hearing protectors is kept for the period required to manufacture and deliver the products. The digitised hearing impression files are then archived for the life of the hearing protectors, enabling us to remanufacture new hearing protectors at any time, depending on the product, in the event of loss, breakage or discomfort, without having to take new impressions.
Custom-made safety glasses: - Taking measurements to fit the frame, - Adapting lenses according to the optical corrections to be made.	Contractual performance	The data essential to the design of safety glasses is kept for the period required to manufacture and deliver the product. Some data may be stored for the life of the product, so that custom-made glasses can be produced in the event of discomfort, without having to ask the wearer to take measurements again. The data relating to measurements and optical corrections is then archived for the duration of the wearer's prescription, enabling us to make new, custom-made safety glasses in the event of loss, breakage or discomfort, without the need to change corrections.
	Your consent to the processing of your optical correction data	

3. If you are browsing our website

Purpose of processing	Legal basis	Storage period
To ensure smooth website operation and audience measurement analyses using cookies	Our legitimate interest in ensuring the smooth operation of the website by setting cookies and tracking the traffic generated on the website	**Data required for smooth website operation**: data is kept for a period not exceeding 3 months **Data required for audience measurement analysis**: data is not kept beyond a period of 25 months
Managing your contact requests	Our legitimate interest in managing and processing your contact requests and responding to you	Your data will be kept for the period required to process your request and, where applicable, for the duration of the contractual relationship that follows the contact request.
Distribution of our newsletter	Your consent	Your data will be kept until you withdraw your consent to receive our newsletter or for a period of 3 years from your last contact with us.

4. If you are a Cotral Lab partner or service provider

Purpose of processing	Legal basis	Storage period
Managing our commercial relations: - Monitoring our contractual relations, - Billing.	Contractual performance	Data is kept for the duration of the contractual relationship and then archived in accordance with the legal obligations applicable to us
Creation of annual appraisals	Cotral Lab's legitimate interest in evaluating its service providers and partners	Data is kept for the duration of the contractual relationship
Managing our accounting and financial obligations	Compliance with our legal data storage obligations	We keep your data for as long as required by legal obligations or for the periods stipulated by law
Dispute management	Our legitimate interest in providing evidence in the event of a dispute	We keep your data for the applicable statutory limitation periods

At the end of our commercial relationship, we may archive some of your data separately from the active database and with limited access, in order to comply with a legal obligation incumbent on us or to prevent any dispute. These periods are set in accordance with the applicable legal provisions.

V - Who can access your personal data?

The recipients of this data are the Group's company stakeholders: your personal data is transmitted, within the Cotral Lab departments, solely to the people authorized by their functions to treat it (such as the people within the internal departments and the opticians for the manufacture of the custom-made glasses) as well as to Cotral Lab's commercial partners (such as its bespoke eyewear manufacturing partner acting on behalf of the company) and IT service providers, such as our host.

We may also be required, by virtue of a legal obligation, to pass on your personal data to an administrative authority or an authorised public body (e.g. social security, tax authorities or others).

VI - Is your data transferred outside the European Union?

The processing carried out on your personal data is mainly done in Europe.

However, as part of the design of custom-made safety glasses, personal data may be transferred to a country outside the European Union. This transfer is, however, made to a country that has been recognised as suitable by the European Commission.

In any event, if a transfer is made to a country whose level of protection is not considered adequate by the European authorities, the transfer concerned will be subject to appropriate safeguards in accordance with the applicable legislation (such as the signing of standard contractual clauses validated by the European Commission, to which additional security measures will be added, where appropriate, such as the prior pseudonymisation of the data transferred).

You can request more information on the transfers and guarantees put in place by sending an e-mail to the address shown at the bottom of the document.

VII - 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 may 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 restriction of the processing of your personal data as well as the right to object to its being processed. In particular, you can object at any time and without reason to Cotral Lab using your personal data to send commercial communications.

You also have the right to define specific or general directives concerning the handling of your personal data after your death, which may be registered with the data controller or a trusted third party certified by the CNIL [French data protection agency].

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

You can contact Cotral Lab at: info.rgpd@cotral.com if you wish to exercise any of these rights.
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