



PRIVACY AND PERSONAL DATA PROTECTION CHARTER

April 2024

FOREWORD



LIM GROUP attaches particular importance to the processing, confidentiality and security of your Personal Data (hereinafter referred to as the "Data"). It is important to us to offer you effective personalised services while respecting your privacy and your personal choices.

This Confidentiality and Data Protection Charter (hereinafter referred to as the "Charter") enables LIM GROUP and its subsidiaries, owner of various brands (CWD, DEVOUCOUX, BUTET...) to communicate to you in a clear, simple and precise manner its policy and practices regarding the collection, use and disclosure of information concerning you, in accordance with the data protection laws in force, such as Regulation EU 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter, the "GDPR").

WHO WE ARE

LIM GROUP (hereafter "LIM" or "We") is a simplified joint stock company, created in 2008. Located at 164 Rue Marie-Louise Acebes Bellevue NONTRON (24300), it specialises in saddlery and equestrian activities. It is registered in the Périgueux Trade and Companies Register under number 503 706 459.

LIM stands for *Leather in Motion*. Our group is a world in perpetual motion in which leather shines.

WHAT CATEGORIES OF DATA DO WE COLLECT AND HOW IS IT COLLECTED?

Personal data (the "Data") is any information relating to a natural person who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, an online identifier, or to one or more factors specific to physical, physiological, genetic, mental, economic, cultural or social identity.

How do We collect your Data?

We collect your Data in the following ways:

- Directly from you: when you use our Website and our services or when you buy products directly from our sales representatives;
- Automatically: when you access or use the Website (technical data, IP address, cookies, browsing information, etc.).

In particular when You :

- Interact with us using the contact forms;
- Sign up to receive our newsletters and corporate documentation;
- Reply to job offers.

The table below provides more detailed information and explanations on the following elements:

- In what situations may your personal data be provided or collected?
- What personal data can we obtain directly from you or as a result of your interaction with us?
- How and why can we use them?
- What is the legal basis for our use of your personal data? This is the reason why we are likely to use your data. Depending on the purpose for which the data is used, the legal basis for processing your data may be :
 - Your consent, which you can revoke at any time;



- Our legitimate interest, which may consist of improving our products and services, preventing fraud or securing our tools. And this legitimate interest is not overshadowed by your interests, fundamental rights or freedoms;
- The performance of a contract requiring the processing of such Data;
- Legal obligations: We must process your Data in order to comply with the laws and regulations in force.

Situation	Type of data	Goals	Shelf life	Legal basis
Creating and managing an account	Identity and contact details: surname, first name, address, telephone number, email address, etc.	Manage events such as competitions in which you have registered and/or taken part	<i>For the purposes of our services (personalised treatment or efficient after-sales services), we may retain your Data for as long as necessary.</i>	Performance of a contract if a purchase is made
	Demographic information such as gender or date of birth	Supply the products or services requested		Consent for marketing communications
	Information about your purchases	Respond to all your questions, suggestions and requests, including requests to exercise your rights		Legitimate interest in security and protection against fraud
	Information about your browser and browsing behaviour	Send marketing communications		
		Carry out statistical analyses, in particular to improve and adapt our product and service offerings		
		be communicated to third parties linked to the company, whether free of charge or for a fee, without the Customer's authorisation being required.		
	Identity and contact details	Supply the products or services requested	<i>For the purposes of our services (personalised treatment or efficient after-sales</i>	Performance of a contract with regard to the purchase made
	Demographic information	Providing after-sales service	<i>treatment or efficient after-sales</i>	Legitimate interest in security and protection against fraud
	Information relating to any transaction			



<p>Make a purchase</p>	<p>Payment and information</p> <p>Information about your purchases</p> <p>Information about your browser and browsing behaviour</p> <p>If you use our Connected Objects, we collect information about your use of these products.</p>	<p>Managing claims for reimbursement</p> <p>Respond to your questions, suggestions, requests, etc.</p> <p>Carry out statistical analyses, in particular to improve and adapt our product and service offerings</p> <p>Detect, prevent and combat any fraudulent or illegal activity, including to protect against payment fraud</p>	<p><i>services), we may retain your Data for as long as necessary.</i></p>	
<p>Online navigation</p>	<p>Identity and contact details</p> <p>Demographic information</p> <p>Information you make public</p> <p>Information about your browser and browsing behaviour.</p>	<p>Supply the products or services requested</p> <p>Respond to all your questions, suggestions and requests, including requests to exercise your rights</p> <p>Send marketing communications</p> <p>Take action against counterfeiting and the resale of our products in breach of our general terms and conditions and/or our distribution network</p> <p>be communicated to third parties linked to the company, whether free of charge or for a fee, without the Customer's authorisation being required.</p>	<p><i>For the purposes of our services (personalised treatment or efficient after-sales services), we may retain your Data for as long as necessary.</i></p>	<p>Consent</p> <p>Legitimate interest, particularly with regard to marketing communications</p>
	<p>Identity and contact details: surname, first name, address, telephone number, email address, etc.</p> <p>Demographic information</p>	<p>Manage events such as competitions in which you have registered and/or taken part</p> <p>Supply the products or services requested</p>	<p><i>For the purposes of our services (personalised treatment or efficient after-sales services), we</i></p>	<p>Consent</p> <p>Legitimate interest in marketing communications, for example</p>



Taking part in an event	<p>Your image and those of your horses, if you provide photos for one of our services</p> <p>Information about your browser and browsing behaviour</p>	<p>Respond to all your questions, suggestions and requests, including requests to exercise your rights</p> <p>Take action against counterfeiting and the resale of our products in breach of our general terms and conditions and/or our distribution network</p>	<i>may retain your Data for as long as necessary.</i>	
Filling in a customer information form with a sales representative	<p>Identity and contact details</p> <p>Demographic information</p> <p>Information that you communicate publicly on our social networks or websites</p> <p>Your images and those of your horses</p>	<p>Supply the products or services requested</p> <p>Send marketing communications</p> <p>Respond to your questions, suggestions and requests, etc.</p>	<i>For the purposes of our services (personalised treatment or efficient after-sales services), we may retain your Data for as long as necessary.</i>	<p>Performance of any contract</p> <p>Consent</p>
Using connected objects	<p>Identity and contact details</p> <p>Information relating to any transaction</p> <p>Payment and information</p> <p>Demographic information</p> <p>Your images and those of your horses</p> <p>Information resulting from the use of connected objects (see the General Terms and Conditions of Sale and Use for each connected object).</p>	<p>Supply the products or services requested</p> <p>Providing after-sales service</p> <p>Managing claims for reimbursement</p> <p>Respond to your questions, suggestions, requests, etc.</p> <p>Carry out statistical analyses, in particular to improve and adapt our product and service offerings</p> <p>Detect, prevent and combat any fraudulent or illegal activity, including to protect against payment fraud</p>	<i>For the purposes of our services (personalised treatment or efficient after-sales services), we may retain your Data for as long as necessary.</i>	<p>Performance of a contract</p> <p>Consent</p>
	<p>Identity and contact details</p> <p>Demographic information such as your gender or date of birth</p>	<p>Complying with our legal obligations, including providing information to regulatory bodies where required by law</p>	<p>Maximum (2) years after your last contact with LIM</p> <p>If you choose not to be contacted for</p>	<p>Performance of any contract</p> <p>Consent</p> <p>Legal obligations</p>



Job offer	<p>Your images if you provide photos for one of our services</p> <p>Information about your browser and browsing behaviour</p>		<p>future opportunities, your Data will be retained for a maximum period of (6) months after the end of the application process.</p>	
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By submitting your data, you expressly agree to LIM Group's ownership and use of your data for the purposes described below.

HOW DO WE USE COOKIES?

What is a cookie?

We may collect certain information via cookies, web beacons and other tracers.

A cookie is a small text file that is saved on your computer, tablet or mobile phone and is used to record and track data about your use of the Website, which uses cookies to identify you, for example. Cookies are managed by your Internet browser. By continuing to use the Website, you accept the setting of our cookies and acknowledge that you understand the terms of our cookie policy.

We comply with the applicable law on cookies. In particular, we only use cookies with your authorisation, where this is required by applicable law. You can change your preferences at any time by going to the "How to manage your cookies" section below. However, please note that following your refusal, certain functions, parts or features of our Website may cease to function or may prevent you from benefiting fully from our online services.

How long are cookies stored?

Cookies placed on your terminal are kept for a maximum of twelve (12) months. At the end of this period, the personal data collected through cookies will be deleted.

How do you manage your cookies?

You can easily deactivate and/or delete cookies from your computer, tablet or mobile phone by managing your browser settings. In order to manage cookies in the way that best suits you, we invite you to configure your browser according to the purpose of the cookies.

If your terminal is used by several people and when the same terminal has several browsers, we cannot ensure that the services and advertisements supposed to correspond to your use of the terminal actually correspond to your own use and not that of another user of this terminal.

WITH WHOM DO WE SHARE YOUR DATA?

We only communicate or share your Data in the following cases:

- With **LIM GROUP companies**: only authorised personnel whose activity justifies access to information, in particular for purposes of internal audit, research and development, administrative management or invoicing, customer relations and legal affairs.



- With our **subcontractors** acting on our behalf, for example the technical service providers responsible for sending emails or hosting our Website.
- With **organisations responsible for** managing bankcards or any other means of payment.
- With **certain commercial partners**, whether free of charge or against payment.
- With **a third party** in connection with a corporate restructuring or reorganisation (including dissolution or liquidation), including any transfer, assignment or sale of all or part of our company or assets in connection with a merger.
- Where We are legally obliged to do so in order to comply with applicable law, to respond to a court order, or more generally to satisfy any request from an authorised authority.

WHERE DO WE TRANSFER YOUR DATA?

Your Data will not be transferred or processed outside the European Economic Area ("EEA"), including those collected in the United States.

However, some of our sub-contractors are located in the EEA, in particular in Germany, Belgium, the Netherlands or Austria, and some of your Data may be shared with them. We do our utmost to ensure that your Data is processed securely and in accordance with this Privacy Policy and applicable data protection laws and regulations.

HOW DO WE PROTECT YOUR DATA?

We provide an adequate level of protection for your Data and ensure that appropriate technical and organisational security measures are in place to protect your Data as far as possible against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access, and against all other forms of unlawful processing.

These measures include, for example, limiting access to Data solely to employees and authorised service providers who need to know it for the Purposes described in this Charter, as well as other administrative, technical and physical safeguards.

However, due to the inherent nature of the Internet as an open global communications medium and other risk factors, We cannot guarantee that your personal information stored or sent will be completely secure from intrusion by others.

We therefore encourage you to exercise caution when using the Internet to access our Website or social networks.

MINORS

LIM has adopted practices to avoid collecting or retaining information from children under the age of fifteen (15), in accordance with French law. If we become aware that we have mistakenly collected information from individuals under the age of fifteen (15), we will immediately purge such information, except to respond to a unique enquiry or request from the individual or his or her parent or legal guardian.

WHAT RIGHTS DO YOU HAVE?

In accordance with Act no. 78-17 of 6 January 1978 as amended and RGPD Regulation 2016/679 of 27 April 2016, you have the following rights:

- ✓ **A right of access and information:** you have the right to request a copy of the Data we process concerning you. You have the right to be informed, in a concise, transparent, comprehensible and easily



accessible manner, of how your Data is processed. For your own privacy and security, at our discretion, we may ask you to prove your identity before providing the information requested.

- ✓ **A right of rectification:** you have the right to obtain rectification of your Data. You also have the right to have your incomplete Data completed.
- ✓ **A right to erasure:** in certain cases, you have the right to have your Data erased. However, this right is not absolute, and We may have legal and legitimate grounds for retaining this Data.
- ✓ **A right to limit processing:** in certain cases, you have the right to obtain the limitation of the processing of your Data.
- ✓ **A right to Data portability:** you have the right to receive the Data you have provided to Us, in a structured, commonly used and machine-readable format, and you have the right to transmit this Data to another data controller without LIM objecting. This right applies only where the processing of your Data is based on your consent or on a contract where such processing is carried out using automated processes.
- ✓ **A right to object to processing:** you have the right to object to the processing of your Data where such processing is based on LIM's legitimate interests. We may, however, rely on compelling legitimate grounds for continuing to process such Data. You may also object at any time to the processing of your Data for marketing purposes.
- ✓ **Withdrawal of consent:** if you have consented to our processing of your Data, you have the right to withdraw your consent at any time, free of charge. If your consent is withdrawn, this will not affect the processing of your Data on other legal bases, such as the fulfilment of your orders and the retention of your Order Data in accordance with applicable law.

If you no longer wish to receive our advertising or promotional information, we remind you that you can revoke your consent to direct marketing at any time, directly from the unsubscribe link included in every advertising email we send you. If you do so, we will promptly update our databases and take all reasonable steps to respond to your request as quickly as possible, but we may continue to contact you to the extent necessary in connection with any product or service you have requested.

You may make a request to exercise any of these rights by contacting Us as set out below in the "How to contact us" section. Please note that if you exercise any of the above rights, you will be asked to let Us know which right you wish to exercise and to provide Us with certain information for identification purposes in order to process your request and to protect you against fraudulent requests from third parties.

If, after contacting us, you feel that your "Data Protection" rights have not been respected, you can submit a complaint to the CNIL, including online (<https://www.cnil.fr/fr/plaintes>).

HOW TO CONTACT US

If you have any questions or problems concerning this Charter or the Data collection practices, or if you wish to exercise any of your rights mentioned above, you can contact us at :

- By email: dpo@lim-group.com
- By telephone: 05 53 60 72 70
- By post: LIM Group 164 rue Marie-Louise Acebes Bellevue 24300 NONTRON (24300)

AMENDMENTS TO THIS CHARTER :

This Privacy Policy reflects our current practices and may be amended and updated from time to time. We will ensure that you are informed of any significant changes. We will also publish an updated version of this Charter on the site.