

Disclosure pursuant to Art. 13 of Regulation (EU) 679/2016 (General Data Protection Regulation – GDPR)

Pursuant to Art. 13 of Regulation (EU) 679/2016, we hereby provide you – in accordance with the principles of fairness, lawfulness and transparency – with the following information to illustrate the processing characteristics and methods applied to the personal data conferred by you or nonetheless acquired through the use of the application termed “**Lorflam Home**” (hereinafter the “App”).

By installing the App, the data subject (hereinafter the “User”) agrees to the collection and processing of the data specified below.

1. The Data Controller

The controller of the data processed through the application is Lorflam SAS, in the person of its *pro tempore* legal representative, with head office in avenue de Kergroise 4, 56000 Lorient, France.

You can contact the Data Controller to request information regarding the processing of your personal data, exercise the rights stated under point 7) below and also request the full list of the designated data processors, by contacting Lorflam via postal mail or by writing to the following e-mail address: contact-home@lorflam.com

2. Categories of data processed, nature of the data conferral and purposes of the data processing

The Data Controller processes the following data through the App:

Data provided voluntarily by the user: data provided voluntarily by the User to use the App’s functions (including registration, management of the service, receiving assistance) includes the e-mail address, a password and data relative to the product managed through the App.

Moreover, data relative to the product can also be conferred through the acquisition and recognition of a QR code; in such case, the App will use the camera built into the User’s device.

(a) This data will be processed in order to:

- (i)** register and identify the User during the login phase;
- (ii)** provide the service requested by the User and enable the latter to manage his/her product.

In such case, data conferral for this purpose is optional; however, failure to confer the data could hamper some of the App’s functions, including the possibility of registering and using the service provided.

Nonetheless, the data collected will not be diffused to the public in any way.

3. Data processing methods

We inform you that the data conferred will be processed through computerised instruments and/or manually (e.g. on hard-copy support) for the time strictly necessary to fulfil the aims for which it

was collected and, nonetheless, with the adoption of specific security measures to prevent any whatsoever breach of the personal data, such as loss of data, its unlawful or incorrect use and unauthorised access.

These measures, however, given the nature of online transmission, cannot limit or completely exclude the risk of any unauthorised access or dispersal of the data. To this aim, we recommend periodically verifying that your device contains adequate software to protect the transmission of incoming and outgoing data over the Web (such as updated anti-viruses) and that the provider of the Internet services has adopted suitable measures to safeguard online data transmission (for example, by means of firewalls and spam filters).

Furthermore, we recommend using a unique and strong password, limiting access to your smartphone and always logging out after using the service provided through the App.

4. Legal base for data processing and data storage period

With the exception of navigation data, we inform you that – with reference to data processed to fulfil the aims of the App – the legal base consists in executing the services provided through the App and requested by downloading the App itself.

If the User confers data relative to the product through the acquisition and recognition of a QR code, and thus the App accesses the camera built into the User's device, an explicit consent will be required.

Data collected to provide the services connected to the App will be stored for the necessary period of time and for the period during which the App itself is used (without prejudice to the User's right to cancel his/her data at any time, using the functions present in the App), nonetheless for no more than 24 months from the last access to the App.

5. Potential recipients and categories of recipients of the personal data

We inform you that your personal data will not be communicated to third parties, unless in the cases for which this becomes indispensable, and only in the measure strictly necessary to fulfil the illustrated data processing purposes. Consequently, this data may be communicated to:

- (i) employees of the Data Controller, in the context of their job roles, who operate as subjects authorised to process personal data and are instructed to this aim by the Data Controller;
- (ii) external consultants and third parties (for example, providers of technical, assistance and technological services, banks and lending institutions, providers of ancillary management/maintenance services of the App, providers), acting as external data processors appointed by the Data Controller;
- (iii) administration entities and authorities for the fulfilment of legal commitments.

6. Transferral of data to non-EU countries

The management and storage of personal data will occur on servers situated within the European Union of the Data Controller and/or designated third companies duly appointed as external data processors. Currently, the servers are situated in France. The data will not be transferred to countries outside of the European Union.

7. Rights of data subjects

In relation to the processing of your personal data, you are entitled to the following from the Data Controller:

- a) request confirmation of the existence or non-existence of personal data concerning you;
- b) obtain information regarding the aims of the data processing, the categories of personal data, the recipients or categories of recipients to whom the personal data has been or will be communicated and, where possible, the duration for which the data will be stored;
- c) obtain the rectification and erasure of the data;
- d) obtain the restriction of data processing;
- e) obtain the portability of the data, that is, receive it from a data controller, in a structured and widely used format that can be read from an automatic device, and transmit it to another data controller without hindrances;
- f) oppose the processing at any time, also if the data is processed for direct marketing purposes;
- g) oppose an automated decision-making process relative to natural persons, including profiling;
- h) request access to the personal data and its rectification or erasure, or the restriction of data processing, or oppose its processing, in addition to the right to data portability.

Furthermore, pursuant to Art. 7, Par. 3, of the GDPR, we inform you that you can exercise the right to withdraw your consent, without prejudice to the lawfulness of the data processing based on the consent granted previously.

Lastly, you are entitled to file a complaint with the supervisory authority.

How to exercise your rights

To exercise the above-mentioned rights, you can send a request to the following addresses:

- via e-mail, to: contact-home@lorflam.com

- via postal mail, by writing to:

Service Clients Lorflam Home

LORFLAM SAS

4, avenue de Kergroise

56000 LORIENT, France

8. Updates to the data processing disclosure

Please note that this disclosure, issued pursuant to Art. 13 of the GDPR, will be subject to periodic updates which will be appropriately notified to all interested subjects.