

PRIVACY STATEMENT

ARTICLE 1 – APPLICATION

LYRECO LUXEMBOURG SA takes the security of personal data very seriously and takes all appropriate technological and organisational measures to comply with the Belgian and European privacy regulations.

More particularly, LYRECO LUXEMBOURG SA complies with the law of 2 august 2002 on the protection of Persons with regard to the Processing of Personal Data until the final entry into force of Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural entities regarding the processing of personal data and the free movement of such data and the revocation of Directive 95/46/EC (General Data Protection Regulation), after which the provisions of this Regulation will continue to be met.

ARTICLE 2 – DEFINITIONS

- Person concerned: person to whom the personal data apply;
- Recipient: a natural or legal entity, a service or government organisation to whom the personal data can be provided;
- Personal data: any information about an identified or identifiable person;
- LYRECO LUXEMBOURG SA: supplier of office & work solutions that will act as controller;
- Consent: any free, specific, informed and unambiguous expression of intent by which the person concerned accepts the processing of personal data by means of a statement or unambiguous action;
- Processor: a natural or legal entity, a service or public organisation that processes personal data on behalf of the controller;
- Processing of personal data: an operation or a set of operations regarding personal data or a set of personal data (collection, recording, organising, structuring, storing, changing, retrieving, consulting, using, ...);
- Controller: a natural or legal entity, a service or public organisation that sets the goal and means for the processing of personal data;

ARTICLE 3 – CONTROLLER

LYRECO LUXEMBOURG SA is "responsible for processing" resp. "Controller" of your personal data under the above-mentioned Privacy law, resp. General Data Protection Regulation. This means that LYRECO LUXEMBOURG SA sets the goal and means for the processing of your personal data.

ARTICLE 4 – GOAL AND MEANS

The transferred personal data are recorded and processed in the files of LYRECO LUXEMBOURG SA. This information will be used for the following purposes:

- Contacting and maintaining contact with customers and prospects;
- The execution of the agreements concluded with customers, in other words the follow-up of orders and the delivery thereof to the customers, as well as invoicing and sending possible payment reminders;
- Responding and answering requests, accounts and other services;
- Making proposals for future services that we can provide;
- Informing about products and services offered by affiliated companies;
- Processing transactions of service providers sub-contracted by us;
- Sharing information with financial institutions and other organisations with whom LYRECO LUXEMBOURG SA is involved in the monitoring of payment problems;
- Compliance with laws and regulations, security and process requirements;
- Collection of statistics for the analysis of our sites and our company;
- Sending newsletters;
- Setting up marketing campaigns and targeted and personalised marketing activities;
- Meeting legal obligations every time LYRECO LUXEMBOURG SA would be obliged to process your data to meet legal obligations such as keeping data for tax-related reasons or to provide information to a public organisation.

The information which LYRECO LUXEMBOURG SA collects through this site or in any other way (e.g. sales on CRM) can be divided into two categories: (1) information provided voluntarily by persons concerned to our website or in another way and (2) tracking information collected while persons concerned visit our website. This tracking information will help us to improve our website.

Voluntary information provided by persons concerned

During your use of this website, contacts with LYRECO LUXEMBOURG SA (by telephone, by conversation, through your business card or on an event) and in the context of the execution of concluded agreements, persons concerned can opt to provide information that will enable LYRECO LUXEMBOURG SA to improve its service to the person concerned.

LYRECO LUXEMBOURG SA can also collect your personal data when it has been made publicly accessible, or when you have made it publicly accessible yourself on public media and this information would prove that you are the contact designated for our service. Which personal data are collected depends on how the person concerned wishes to use this website.

- o When the person requests a catalogue: if the person concerned requests a catalogue or additional information, the person concerned must provide his/her name, e-mail address, the name of his/her organisation and the country in which he/she is established, to ensure that LYRECO LUXEMBOURG SA can send the requested material and determine whether the person concerned is already a customer of LYRECO LUXEMBOURG SA.
- o When the person concerned submits an application to create a client account: in this case LYRECO LUXEMBOURG SA asks for the name, e-mail address, address, telephone number, as well as information about the position of the person and organization and any other information that is necessary to be able to create an account and to be able to involve the person concerned in promotional or marketing campaigns.
- o If the person concerned is already a customer and logs in to the portal to place an order: if the person concerned logs in or places an order via email, fax or telephone, LYRECO LUXEMBOURG SA asks for the name, email address, address, telephone number, and

information on the position of the person and organisation and any other information necessary to fill the order.

These data can include:

- Information that the person concerned completes on request forms or other forms that can include name, address, email address, payment details;
- Information that LYRECO LUXEMBOURG SA obtains through other persons and/or organisations (such as branch organisations) to fill the order;
- Information that LYRECO LUXEMBOURG SA obtains about clients of credit registration agencies.

All personal data sent by the person concerned will only be used for the purposes indicated on the website or in this Privacy Statement.

If the person concerned wants to conclude a transaction on the basis of the offer, LYRECO LUXEMBOURG SA will collect the necessary personal data to complete the offer and fulfil the transaction, including the name, address, postcode, telephone number, email address, invoicing address or payment details of the person concerned, if these are relevant to the transaction. LYRECO LUXEMBOURG SA will use the personal data of the person concerned to process the administration of the order and to arrange delivery and in general to manage the relationship of the person concerned with LYRECO LUXEMBOURG SA.

LYRECO LUXEMBOURG SA can collect anonymous or aggregated data of a non-personal nature, such as browser type or IP address, the drive programme used by the person concerned or the domain name of the website from which the person concerned reached the website, or through which the person concerned leaves it. This makes it possible to permanently optimise the website for the users.

ARTICLE 5 – RIGHTS OF THE PERSON CONCERNED

The person concerned can simply withdraw his/her consent by:

- write to LYRECO LUXEMBOURG SA, attn. responsable GDPR, 13 rue de l'industrie, L-8339 Windhof or send an email to : gdpr.luxembourg@lyreco.com;
- If you do no longer want to receive the mailings from LYRECO LUXEMBOURG SA, you can unsubscribe through the link on the bottom;

We ask the person concerned to transmit any modifications to his/her contact data to LYRECO LUXEMBOURG SA in a timely manner, to ensure their rectification.

The person concerned has the right to inspect his/her personal data at any time for free, to rectify them or have them deleted (or restricted) by means of an email or letter.

In addition, the person concerned also has a right to transfer data. In that case, the person concerned must always enclose a copy of his/her identity card, in order to ensure that LYRECO LUXEMBOURG SA can verify that the request does refer to the personal data of the person concerned.

More information about these rights can be found on the website of the National Commission for Data Protection (www.cnpd.lu).

ARTICLE 6 – STORAGE TERM

The personal data will be stored for the time required to achieve the objectives.

ARTICLE 7 – CATEGORIES OF RECIPIENTS

LYRECO LUXEMBOURG SA does not disclose any personal data about the person concerned to third parties, unless otherwise stated in this Privacy Policy, it is allowed by law or if it has been approved by the person concerned.

Third parties to whom LYRECO LUXEMBOURG SA discloses information are legally and contractually obliged to treat the personal data of the person concerned in a confidential and secure manner. They will only use and disclose the information for situations that a reasonable person considers appropriate and in compliance with applicable laws and for the following reasons:

- to advertising agencies (online) with the purpose of (targeted) marketing campaigns;
- to branch organisations requesting a quote/ placing an order as a member of the association;
- to sub-contractors in the context of deliveries of products and services;
- to the person concerned to ensure that LYRECO LUXEMBOURG SA or our affiliates can keep the person concerned informed of certain products or services offered by our affiliates;
- to data processing services for the processing of transactions;
- to various banks through third-party payment processing systems for credit card payments with credit card numbers;
- to other financial institutions with whom LYRECO LUXEMBOURG SA has a joint marketing agreement; and
- to internal auditors, professional accountants, legal advisers for documents such as invoices and the like that contain personal customer data and of course solely for the purpose of their assignment.

If third parties wish to use your personal data for other purposes, they are legally obliged to inform you and us and, if necessary, request your authorisation.

ARTICLE 8 — GEOGRAPHIC LIMITATION OF TRAFFIC OF YOUR PERSONAL DATA

LYRECO LUXEMBOURG SA only transfers your personal data to countries that are part of the European Economic Area and in countries that provide appropriate data protection as by the European Commission.

If processing includes a transfer of your personal data to a country outside the European community which does not provide sufficient protection as recognised by the European community LYRECO LUXEMBOURG SA will only proceed with the transfer according to the following provisions:

- the Standard Contractual Clause as approved by the European Commission (Standard Contractual Clauses for processing agents 2004/915/EC or Standard Contractual Clauses for data processors 2010/87/EU or any subsequent version).
- binding "Co-operative Rules" if the concerned parties have accepted the binding European "Co-operative Rules" governing the processing of personal data by third parties.
- any other mechanism officially recognised by the applicable privacy protection legislation that guarantees an adequate level of protection of personal data. Both LYRECO LUXEMBOURG SA and its third parties will only process the personal data in jurisdictions where the applicable data protection legislation applies. These jurisdictions include: the countries of the European Economic Area and the countries recognised by the European Commission as countries providing a sufficient level of data protection (for further information see European Commission).

ARTICLE 9 – COMPLAINTS

For any other question or complaint regarding the use of personal data, the person concerned can:

- write to LYRECO LUXEMBOURG SA, attn. responsible GDPR, 13 rue de l'industrie, L-8339 Windhof;
- send an email to : gdpr.luxembourg@lyreco.com

In case of a complaint, LYRECO LUXEMBOURG SA will do everything in its power to take reasonable measures to respond to the concerns of the person concerned about the processing of his/her personal data.

If LYRECO LUXEMBOURG SA fails to give a satisfactory answer to the complaint of the person concerned, the latter can contact the National Commission for Data Protection, 1, avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette.

ARTICLE 10 – SECURITY AND CONFIDENTIALITY

LYRECO LUXEMBOURG SA has developed adapted technological and organisational security measures to avoid the destruction, loss, forgery, modification, unauthorised access or notification by accident of personal data collected on the website to third parties as well as any other unauthorised processing of these data.

Under no circumstances can LYRECO LUXEMBOURG SA be held liable for any direct or indirect damage resulting from inappropriate or unlawful use of the personal data by a third party.

LYRECO LUXEMBOURG SA informs the person concerned that the website may contain links, hyperlinks or references to other sites that LYRECO LUXEMBOURG SA does not control or manage and to which this Privacy Statement does not apply. LYRECO LUXEMBOURG SA is neither responsible for the content of such websites to which reference is made nor for the products or services mentioned there. LYRECO LUXEMBOURG SA therefore advises the person concerned to carefully read any privacy regulations of each website he/she visits, as they may differ from the present Privacy Statement.

ARTICLE 11 – APPLICABLE LAW AND COMPETENT COURTS

This Privacy Statement is governed, interpreted and implemented in accordance with Luxembourg law, which is exclusively applicable to any dispute.

The courts of Luxembourg, are exclusively competent to judge any dispute that may arise from the interpretation or the implementation of this Privacy Statement.

ARTICLE 12 – CHANGES

It is not excluded that changes will be made to the Privacy Statement of LYRECO LUXEMBOURG SA in future. If this Privacy Statement is modified, the new version will be available on website. It is therefore important to check the date of application mentioned below at each visit to the website.

This Privacy Statement was last modified and revised on 30.07.2018

ARTICLE 13 — USE OF COOKIES

Cookies are used to identify an internet user on a website and collect and store data. That status information can be e.g.: a language, an ID, an expiry date, a response address.

Cookies make it possible to store information. That information can also be recognised at a later visit by this website. Sometimes another website can read the cookie too and store information in it.

LYRECO LUXEMBOURG SA uses various types of cookies:

- a session cookie that appears as soon as you leave a website
- final cookies such as an analytical cookie that stays on the device until the expiry date (up to 13 months) or it is removed.

LYRECO LUXEMBOURG SA uses Google Analytics. You can find more information on the use of Google Analytics by LYRECO LUXEMBOURG SA on:

<http://www.google.com/analytics/learn/privacy.html>

To give visitors more information about how their data are collected by Google Analytics, Google has developed "Google Analytics Opt-out Browser Add-on". The "add-on" communicates with Google Analytics JavaScript to indicate that information about the visited website may not be

sent to Google Analytics. The "Google Analytics Opt-out Browser Add-on" does not prevent data being sent to the website itself or other analytical services.