

PRIVACY POLICY

The data controller is Societe BIC, having its registered office 14 rue Jeanne d'Asnières – 92611 Clichy Cedex – France.

1. Privacy Statement

BIC Group (meaning Société BIC and its affiliated companies and subsidiaries, and referred to herein as "BIC" or "We" or "us") is committed to protecting your privacy when visiting our website, www.bichashtagcontest.com, (the "Site"). The purpose of this privacy policy ("Privacy Policy") is to inform you about the types of information we gather about you when you visit the Site, how we use that information, whether we disclose it to anyone, and the choices you have regarding our use of your information. If you would prefer your personal data was not used in the manner described in this Policy you should not use our Site.

With the exception of information relating to your use of the Site, (see Section 4 of this Privacy Policy for more information) [and other technical information we collect automatically such as your IP address], no personal information is automatically collected from you when you visit the Site. Any other personal information we collect will have been provided by you for a particular purpose, for example, where you have entered your name and address so we can manage your subscription and deliver products you have ordered via the Site, or to participate in a contest.

In some cases, if you do not provide personal information we may not be able to provide you a service offered via the Site. We will indicate where the information must be provided in order for us to provide a service to you.

If we collect personal information from you, you may have the right to (i) access your personal information, (ii) ask to modify, delete or restrict the use of your personal information, and (iii) ask us to send you a copy of your personal information in a commonly used and machine-readable format. We will consider such requests in accordance with applicable law and may also require verification of your identity in order to process such requests.

Any such request should be directed to: lopd.biciberia@bicworld.com

2. What personal information do we collect and how do we use it?

Information you provide to us:

We may collect personal information you provide directly to us, such as when you place an order via the Site, when you subscribe to a newsletter, when you contact us via the "Contact Us" section of our Site, or otherwise communicate with us.

This personal information may include: title, name, surname, email, postal address, telephone number and any other information you choose to provide.

- Below is an explanation of the ways in which we may use this information: The information you provide to us to place an order will be used by BIC and/or an agency

working on BIC's behalf to take your order into account, process the order, deliver the ordered products, inform you on the status of your order and/or send you information about your subscription.

- The information you provide to us in the event you send a return coupon [form] will be used by BIC [and/or an agency working on BIC's behalf] to process your request for return.
- The information you provide to us to subscribe to the newsletter will be used by BIC and/or an agency working on BIC's behalf to inform you of our Site news and offers. Each email received will include an unsubscribe option.
- The information you provide to us via the "Contact Us" page will be used by BIC and/or an agency working on BIC's behalf to respond to your comments, questions or requests for information. Aside from replying to an e-mail sent by you, it is not our intention to contact you unless you request particular information. Although we will retain your contact information in our database, we will use it only to respond to your requests.

Information we collect about you

As explained in Section 1 of this Policy, when you visit our Site or use our services we may automatically collect: i) technical information such as the IP address used to connect your computer to the Internet; browser plug-in types and versions; and ii) information about your visit to our Site and use of our services.

We will use this information:

- To provide the information, products and services that you requested from us;
- To administer our Site for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To ensure that content is presented to you in a 'user-friendly' way;
- In order to help us keep our Site safe and secure;
- To deliver advertising which is relevant to you.

The personal information described above, as well as any other personal information you provide to us (for instance, for promotional operation (games, survey)), will be processed only for the purpose for which it was collected and as communicated to you in this Privacy Policy or upon the collection of your personal information.

We may also use your personal information for other purposes which are disclosed to you and to which you consent, or for such other purposes as permitted or required by applicable law.

3. What is our legal basis for processing your personal information?

We will only process your personal information where we have a legal basis to do so. Depending on the purposes for which we are processing your personal information (as explained in section 2 above), the legal basis will be one of the following:

- **Performance of a contract:** for example, where it is necessary for us to process your personal information in order to fulfill an order or subscription you have placed via our Site.

- **Your consent:** for example if you have given us your consent to provide your personal information to third parties for marketing purposes.
- **For our or our third parties' legitimate business interests:** for example, where it is necessary for BIC to process personal information for the purposes of preventing fraud.
- **Compliance with law:** for example, where BIC is subject to a legal or regulatory obligation and needs to use your personal information in order to comply.

4. Retention period of the personal information we collect

We take steps to ensure that the personal information that you provide is retained for only as long as it is necessary for the purpose for which it was collected. Personal information collected to fulfill orders made via our Site will typically be retained for the duration of the contract plus an additional period, will be in line with the statutory limitation period for the jurisdiction in question.

Where we have collected your personal information based on your consent and we have no other lawful basis to continue with the processing, you may at any time withdraw or change your consent to our use or disclosure of your personal information subject to legal restrictions. The revocation of your consent will be valid for the future and will not affect the legality of the processing that was done based on your initial consent.

5. Use of cookies and similar technologies

Like many other web sites, our Site may use a standard technology called a "cookie", or technology which is similar to a cookie, to collect and record information about your usage of the Site. Cookies are designed notably to help us recognizing your browser and thus save and remember any preferences that may have been set and to improve your user experience when you visit our Site again.

Cookies that we may issue cannot retrieve any other information from your hard drive or pass on a computer virus.

We may issue cookies that allow us to:

– compile statistics and traffic volume and measure the use of the various sections of our Site (headings and content visited, click streams) which helps us improve the value and usability of our services; to do so, we may use Google Analytics or other third party analytic tools. The information we collect is aggregated and not directly identifiable. We can share such information with developers or other service providers working with us on the Site. To learn more about Google Analytics, please visit:

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

– customize the presentation of our Site to the display settings of your data terminal (language, screen resolution, operating system, etc.) during your visit on our Site, based on your data terminal's hardware, viewing software and video software ;

- customize the advertising content displayed in our advertising space on your data terminal based on personal information that you have provided;
- allow you access to restricted and personalized areas of our Site, such as your account, based on user names, passwords and other information that you may have previously given us access ;
- enhance your visit, personalize home pages, identify which parts of a site have been visited or keep track of your preferences, track a path through our web pages.
- implement security measures, such as when you are asked to log in again to contents or a service after a certain period of time;
- store information contained in any form that you fill out on our Site to allow you access to restricted and personalized areas of our site (your account) or to products services or information you chose on the Site (content of your shopping cart).

We only use cookies to gather the information indicated in this policy and do not use cookies to gather personal identifying information about you without your consent.

In any case, you can decide to allow or block cookies. There are several ways to manage cookies, as described below. However, some difficulties to navigate on our Site might occur.

- You can configure your browser to allow cookies to be stored on your data terminal, to reject them automatically or to reject them from certain issuers. You can also configure your browser so that you are promptly asked to accept or reject cookies before a cookie is saved to your data terminal. Each browser has a different way of managing cookies and cookie settings. The configuration of your browser is described in its help menu which will inform you of how to change your cookie settings;
- Concerning Flash cookies using Adobe Flash Player, these are handled by an interface different from that provided by your browser. "Adobe Flash Player"™ is an application that enables the rapid display of dynamic content using the "Flash" computer language. Flash and other similar applications store settings, preferences and usage date using a technology similar to cookies. If your data terminal is likely to view content developed with Flash technology, please access your Flash cookies management tool directly from the Adobe website at <http://www.adobe.com> ;
- Finally, you can also connect to www.youronlinechoices.com, a website proposed by digital advertising professionals, in order to help you control, accept or reject some cookies placed in your browser.

6. Cookies issued on our Site by third parties

The issue and use of cookies by third parties are subject to the protection of privacy and/or cookie policies of those third parties.

We are likely to include software applications from third parties on our Site which allow you to share the content of our Site with others or to inform others about your visit or your opinion on the content of our Site. This is particularly the case with the "Share" and "Like" buttons on social networks like "Facebook", "Twitter", "LinkedIn ", "Viadeo", etc.

The social networks that provide these button applications may use the button to identify you even if you have not used this button during your visit our site. Indeed, this type of button application may allow the social network concerned to track your browsing of our

site, simply because your social network account was active on your device (open session) during your visit to our Site.

We have no control over the processes used by social networks to compile information about your visits to our site, nor any related personal information they may have. We invite you to review the protection of privacy policies of these social networks in order to understand the purposes behind the collection of browsing information they can compile through such buttons, especially as regards advertising. The policies of social networks must allow you to exercise your personal choice through your account settings.

7. Links to or From Other Websites.

The Site may contain links to other websites. BIC has no control over and assumes no responsibility or liability for the privacy practices of these websites. You should review the privacy policies of each website you visit.

8. Behavioral advertising

We do not track your activity on any other website, but ours. We do not use information obtained from this Site to participate in activities commonly known as behavioural advertising and we, by default, do not track your activity on any other site. Some browsers have a "do not track" feature that lets you tell websites that you do not want to have your online activities tracked. These features are not yet uniform, and our website is able to respond to some, but not all of those signals.

9. Disclosure to Third Parties

We may disclose your personal data to trusted third parties who assist us in operating the Site conducting our business. Third party providers maintain the information they need to perform their designated functions and we do not authorize such parties to use or disclose personal information for their own marketing or other purposes.

If we become involved in a transaction to sell all, or any parts, of our business or assets or merge with another business we may use or disclose personal information to other parties involved in the transaction For example, the prospective seller or buyer and our professional advisers.

We may also disclose your personal data where we are required to do so in order to comply with a legal obligation or in order to enforce our [terms of use](#) or Bases del Concurso and other agreements; or to protect the rights, property, or safety of BIC, our customers or others.

Please note that your personal information may be maintained and processed by service providers located in jurisdictions outside the UK and the European Economic Area ("EEA"), whose data protection laws may differ from the jurisdiction in which you live and which may provide you with fewer rights. We will take the steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. If you would like more information on these safeguards put in place please contact us.

Security of Your Personal Information.

We have policies and procedures in place to protect your personal information from loss, unauthorized access, modification or disclosure. In addition, we have implemented technological safeguards including security software, passwords and firewalls intended to prevent unauthorized computer access. No claim is made as to the impenetrability of the system under unusual circumstance or its resilience to future attacks.

10. Transfer and Storage of Information.

Your personal information is stored at secure locations and on servers located in the United States. We or our service providers may use servers located in the United States for back up and emergency storage of this Site. Any electronic records generated by us or our service providers during the course of your interactions with the Site may be maintained on those servers. As such, your personal information may be disclosed, processed and stored outside your country of residence. We will, however, take the steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. You may address questions about the privacy policies and practices relating to handling of your personal information by contacting us by the method set out below.

11. Children's Online Privacy

We do not knowingly collect or store any personal information from or market to children under 13 or as defined by local legal requirements.

Should we decide otherwise, we will obtain consent from a legal representative before we collect personal information of children where it is required by applicable laws and regulations (the age at which consent from a legal representative is necessary varies from country to country).

12. Contacting Us Regarding this Privacy Policy or Your Personal Information.

Questions regarding this Privacy Policy, the collection or the accuracy of your personal information, the use or disclosing of the information, or requests to correct, amend and request deletion of your personal information may be directed to:
lopd.biciberia@bicworld.com.

This Privacy Policy is subject to change at our discretion. You should periodically check this Site for changes to this Privacy Policy. All changes will be posted as soon as they go into effect.

You may also have a right to lodge a complaint with your local data protection authority however we recommend you contact us before doing so as we may be able to resolve any issues with you directly in a more efficient manner.