	QUALITY MANAGEMENT SYSTEM (QMS)	SMQ_DJUR_ENR24.A UNCONTROLLED DISTRIBUTION
	PRIVACY POLICY FOR PERSONAL DATA	Creation date: 2023.11.17 Effective date: 2023.12.05

PRIVACY POLICY FOR PERSONAL DATA

This privacy policy (hereinafter the "**Policy**") aims to inform users (hereinafter "**you**") about the processing of your personal data (hereinafter "**Data**") collected by the Company, especially during your visits to the website www.global-bioenergies.com (hereinafter the "**Site**"), operated by the company GLOBAL BIOENERGIES, with its registered office at 5 rue Henri Desbruères – 91000 Evry-Courcouronnes, France (hereinafter the "**Company**"), or during your visits to the Company's pages on social networks.

As the data controller for your Data, the Company makes every effort to protect your privacy and ensure the security of your Data in accordance with applicable regulations, including Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, dated April 27, 2016 (hereinafter the "**GDPR**").

The Policy outlined below aims to ensure transparency in the Company's practices regarding the management and protection of Data.

In the event that the Policy is translated into one or more foreign languages, only the French version shall be binding.

1. DATA COLLECTION


The Company collects your Data, especially during the following operations:

- Browsing the Site through cookies placed on your device;
- Subscribing to the Company's newsletter, including press releases and financial announcements from the Global Bioenergies group;
- Browsing and subscribing to pages edited by the Company on social networks;
- Applying for a job within the Company;
- Interactions with the Company through the contact form.

2. PURPOSES

The Company commits to collecting and processing only the Data that is adequate, relevant, and strictly necessary for its activities, for the following purposes:

- Sending the newsletter, including press releases and financial announcements from the Company;
- Conducting commercial prospecting operations and developing marketing tools;
- Responding to initial contact inquiries;
- Recruitment processes and application management;
- Generating statistics and analyses to improve understanding of the audience that visits the Site or the pages edited by the Company on social networks;
- Creating statistics and analyses, as well as measuring performance (audience, traffic, etc.) and evaluating the usage patterns of different elements on the Site (sections and content visited, navigation paths) to enhance their interest and usability;
- Compliance with legal and regulatory obligations applicable to the Company;
- Carrying out technical operations related to the aforementioned purposes.

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3. LEGAL BASIS

The Company uses your Data based on the purposes for which they were collected, relying on one or more of the following legal grounds:

- Your consent when you have provided explicit, freely given, informed, and unambiguous permission;
- The legitimate interests of the Company to fulfill its missions related to its activities, considering their necessity and legitimacy, without infringing on your rights and freedoms;
- The legal obligation of the Company to collect and retain certain Data.

4. DATA RECIPIENTS

All collected data is strictly confidential, and the Company will not disclose it to any third parties for personal use without your explicit consent.

Recipients of your Data include:

- Individuals within the Company whose roles are related to the aforementioned purposes (including marketing, communication, recruitment) or who are responsible for enforcing your rights (information, modification, withdrawal);
- Service providers of the Company to deliver services such as websites hosting, data analysis and storage, information technology and associated infrastructure, customer service, maintenance or related services, email delivery, auditing, marketing.

Additionally, your Data may be disclosed in response to an injunction from judicial or administrative authorities, if necessary.

5. TRANSFERS OUTSIDE THE EUROPEAN UNION


The Company informs you that some of its service providers may use subcontractors located in countries outside the European Union, including the United States, and commit to implementing all necessary safeguards to frame these transfers in compliance with applicable regulations. Consequently, you expressly authorize the Company and its service providers to transfer your Data outside the European Union.

The Company undertakes to take all necessary measures to carry out such transfers in accordance with current regulations.

6. DATA RETENTION PERIOD

Unless legal provisions require a longer retention period, the Company retains your Data for a duration not exceeding that necessary for the purposes for which they are processed in accordance with the Policy and in compliance with laws and regulations.

However, it is specified that after the deadlines below, and from your request for deletion, your Data may be subject to intermediate archiving to comply with the legal and regulatory obligations applicable to the Company.

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a) Browsing on the Site

During your browsing on the Site, cookies may be placed on your browsing device, depending on your choice made within the cookies banner. Thus, the retention period for Data collected by cookies subject to your consent is six (6) months, while the retention period for Data collected by cookies not requiring your consent is thirteen (13) months.

b) Newsletter

Your Data collected when you subscribe to the Company's newsletter will be kept for the duration of your subscription. Following any unsubscription, your Data may be retained and processed for a period of three (3) years. After this period, the Data will either be deleted or anonymized.

c) Job Application

Your Data collected during your job application with the Company will be retained for the entire duration of the recruitment process and for a period of two (2) years from its conclusion. After this period, the Data will either be deleted or anonymized.

7. RIGHTS AND REMEDIES

You have the following rights:


- Withdrawal of consent;
- Right of access to all Data concerning you undergoing processing by the Company;
- Right to rectification in the case of inaccurate Data;
- Right to deletion;
- Right to Data portability;
- Right to object: you can object to the Company processing Data concerning you unless the Company is required to do so as part of the contractual relationship it maintains with you, for potential legal actions, and if there are compelling and legitimate reasons for the Company to continue processing your Data;
- Right to restriction of processing of your Data in accordance with Article 18 of the GDPR;
- Right to provide instructions on the processing of Data in the event of death.

You also have the right to object, at any time, to the processing of your Data for marketing purposes.

You can exercise your rights or the option to withdraw your consent to the processing of your Data at any time by writing to the following postal address: GLOBAL BIOENERGIES, 5 rue Henri Desbruères – 91000 Evry-Courcouronnes, France or the following email address: donnees-personnelles@global-bioenergies.com.

Any request must be clear, specific, and justified, accompanied by proof of identity, and carried out in accordance with the applicable legal framework. A response will be sent to you within one (1) month from the receipt of your request. If necessary, this period may be extended by two (2) months by the Company, who will inform you in writing.

Furthermore, if, at your request, the Company provides you with a copy of your Data undergoing processing, it may, for this purpose, demand payment of reasonable fees based on administrative costs for any additional

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copies requested. When you submit your request electronically, the information is provided in a commonly used electronic form, unless you request otherwise.

If you believe that the response provided by the Company is not fully satisfactory, you can also file a complaint within the CNIL (Commission Nationale de l'Informatique et des Libertés), responsible for ensuring the protection of personal data in France, at the following address: CNIL - 3 Place de Fontenoy – TSA 80715 – 75334 PARIS CEDEX 07, Tel: 01 53 73 22 22 / Fax: 01 53 73 22 00, or at www.cnil.fr/en/complaints or www.cnil.fr.

8. SECURITY

In accordance with the provisions of Article 32 of the GDPR, to ensure the security of your Data, the Company has implemented appropriate technical, contractual, administrative, physical, and organizational measures to protect your Data from any loss, destruction, unauthorized access, and accidental or unlawful disclosure and alteration.

The Company selects subcontractors and service providers who provide guarantees in terms of quality, security, reliability, and resources to ensure the implementation of technical and organizational measures, including data security measures.


9. SOCIAL MEDIA

The Company is present on social media platforms (Facebook, Twitter, LinkedIn, YouTube...) and reminds you that accessing these social media requires your acceptance of their contractual terms, which include provisions related to data regulations for the processing carried out by them, independent of the Company's pages on these social media platforms.

To learn more about the protection of your Data when navigating on these social media platforms, the Company invites you to consult their respective privacy policies.

10. APPLICABLE LAW & JURISDICTION

The Policy is subject to French law. Any dispute relating to the Policy will be brought before the territorially competent French courts.

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11. SYNTHESIS

Purposes	Collection	Data	Legal Basis	Data Controller
Newsletters and press releases	Contact form on the Site, business cards and email exchanges	Title, Last name and first name, Email address, Company, Phone number, Mailing address, Job title	Consent	Company
Conducting commercial prospecting operations and developing marketing tools	Contact form on the Site, business cards and email exchanges	Title, Last name and first name, Email address, Company, Phone number, Mailing address, Job title	Consent	Company
Response following initial contact inquiries	Contact form on the Site, business cards and email exchanges	Title, Last name and first name, Email address, Company, Phone number, Mailing address, Job title	Consent	Company
Development of statistics and analyses, as well as measuring performance and evaluating the usage methods of the various elements comprising the site to improve their interest and ergonomics	Site browsing, social media	IP address, Visited pages, Frequency of visits	Consent	Company
Compliance with legal and regulatory obligations applicable to the Company	Site browsing, social media, Contact form on the Site, Business cards and email exchanges	Title, Last name and first name, Email address, Company, Phone number, Mailing address, Job title and all data whose collection may be required for regulatory or contractual obligations	Legal obligations	Company
Recruitment processes and application management	Applying for a job within the Company	Title, Last name and first name, Email address, Company, Phone number, Mailing address, Job title, Photography and content of curriculum vitae	Legitimate interest	Company
Comments management	Social Media (LinkedIn, Twitter, Facebook, YouTube...)	Information contained on your profile, Content of comments, Frequency of visits, "likes", etc.	Legitimate interest	Company / social media
Implementation of technical operations related to the aforementioned purposes	Site browsing, social media, Contact form on the Site, Business cards and email exchanges	Title, Last name and first name, Email address, Company, Phone number, Mailing address, Job title and all data whose collection may be required for technical operations	Legitimate interest	Company