

Privacy Policy

01-POC_01 February 21, 2019

Effective date: February 21, 2019

STS Industrie SA ("we", "us", "our") operates the https://www.stsindustrie.com website (hereinafter referred to as the "Service").

This page explains our policies regarding the collection, use and disclosure of personal data when you use our Service and the choices you have regarding such data.

We use your data to provide and improve the Service. By using the Service, you consent to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meaning as in our Terms and Conditions, which are available at https://www.stsindustrie.com.

Definitions

Service

The Service is the https://www.stsindustrie.com website operated by STS Industrie SA.

Personal data

Personal Data means data relating to a living individual who can be identified from such data (or from such data and other information in our possession or likely to come into our possession).

Usage data

Usage Data is collected automatically and is generated either by use of the Service, or by the Service infrastructure itself (e.g. page viewing time).

Cookies

Cookies are small files stored on your device (computer or mobile device).

Data Controller

Data Controller means the natural or legal person (alone, jointly or in common with others) who determines the purposes and methods by which all personal data is processed or is to be processed.

For the purposes of this Privacy Policy, we are a Data Controller of your personal data.

Subcontractors (or Service Providers)

The term Sub-Contractor (or Service Provider) refers to any natural or legal person who processes data on behalf of the Data Controller.

We may use the services of several Service Providers in order to process your data more efficiently.

Person concerned (or User)

Data Subject means any living person who uses our Service and is the subject of Personal Data.

Data collection and use

We collect several types of data for different purposes in order to provide you with our Service and to improve it.

Types of data collected

Personal Data

When you use our Service, we may ask you to provide certain personally identifiable information that can be used to contact or identify you ("Personal Information"). Personal data may include, but is not limited to:

- E-mail address
- First and last name
- Phone number
- Address, city, province, state, postal code
- Cookies and Usage Data

We may use your Personal Information to send you newsletters, marketing communications or promotions and other information that may be of interest to you. You can choose not to receive any communication from us or to receive only certain communications by clicking on the unsubscribe link or by following the instructions in each e-mail we send.

Usage data

We may also collect information about how you access and use the Service ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (i.e., IP address), browser type, browser version, the pages of our Service you visit, the date and time of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Tracking and cookie data

We use cookies and similar tracking technologies to track activity on our Service, and we retain certain information.

Cookies are low-volume data files that may contain an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies such as pixels, beacons and scripts are also used to collect and track information and to improve and analyze our Service.

You can set your browser to refuse all cookies or to notify you when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some elements of our Service.

Examples of cookies we use :

- Session Cookies. We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and settings.
- Security Cookies. We use security cookies for security purposes.

Data usage

STS Industrie SA uses the data collected for various purposes:

- To provide and maintain our Service
- To let you know about changes to our Service
- To enable you to use the interactive features of our Service whenever you wish
- To ensure customer support
- To collect valuable or analytical data that will enable us to improve our Service
- To monitor the use of our Service
- To detect, prevent and solve technical problems
- To provide you with news, special offers and general information about other goods, services and events we offer which are similar to those you have already purchased or enquired about, unless you have previously indicated that you do not wish to receive such information.

Legal basis for processing personal data under the General Data Protection Regulation (GDPR)

If you reside in the European Economic Area (EEA), STS Industrie SA's legal basis for collecting and using the personal data described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

STS Industrie SA may process your Personal Data:

- Because we need to fulfill a contract with you
- Because you authorized us to do so
- Because we have a legitimate interest in carrying out this processing and your rights do not override this legitimate interest
- For payment processing purposes
- To comply with the law

Data retention

STS Industrie SA will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Information to the extent necessary to fulfill our legal obligations (for example, to comply with applicable law), resolve disputes and enforce our agreements and policies.

STS Industrie SA will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except where such data is used to enhance security or improve the functionality of our Service, or where we are legally required to retain such data for a longer period of time.

Data transfer

Information about you, including your Personal Data, may be transferred from your region, province, country, or other territorial division to - and stored on - computers located in a place where data protection legislation differs from that of the territory in which you reside.

If you reside outside of Switzerland and choose to provide us with information, please be aware that we transfer data, including Personal Data, to Switzerland and process it there.

By accepting this Privacy Policy and then submitting this information, you consent to this transfer.

STS Industrie SA will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and your Personal Data will not be transferred to any organisation or country unless adequate controls are in place, in particular with regard to the security of your data and other personal data.

Data communication

Communication of data to law enforcement agencies

In certain circumstances, STS Industrie SA may be required to disclose your Personal Data if required to do so by law or in response to valid requests from public authorities (e.g. a court or government agency).

Legal requirements

STS Industrie SA may disclose your Personal Data if it believes in good faith that this is necessary for:

- Fulfilling a legal obligation
- Protect and defend the rights or property of STS Industrie SA
- Prevent or investigate possible wrongdoing in connection with the Service
- Ensure the personal safety of Service users and the public
- Protecting yourself against civil liability

Data security

The security of your data is important to us. However, please remember that no method of data transmission over the Internet or method of electronic storage is 100% secure. Although we strive to use commercially acceptable methods to protect your Personal Data, we cannot guarantee its absolute security.

Data protection rights granted to you by the General Data Protection Regulation (GDPR)

If you reside in the European Economic Area (EEA), you have certain data protection rights. STS Industrie SA intends to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data.

If you would like to know what Personal Data we hold about you and would like it deleted from our systems, please contact us.

Under certain circumstances, you have the following data protection rights:

The right to access, update or delete the information we hold about you. Where this option is available, you can view or update your Personal Data or request its deletion in the settings section of your account. If you are unable to perform these actions yourself, please contact us for assistance.

Right of rectification. You have the right to have your data corrected if it is inaccurate or incomplete.

Right to object. You have the right to object to our processing of your Personal Data.

Right of restriction You have the right to ask us to restrict the processing of your personal data.

The right to data portability. You have the right to receive a copy of the information we hold about you in a commonly used, structured and machine-readable format.

Right to withdraw consent. You also have the right to withdraw your consent at any time if STS Industrie SA has relied on your consent to process your personal data.

Please note that we may ask you to prove your identity before responding to requests of this nature.

You have the right to lodge a complaint with a data protection authority about our collection and use of your Personal Data. For more information, please contact your nearest data protection authority in the European Economic Area (EEA).

Service providers

We may engage third-party companies and individuals to facilitate the provision of our Service ("Service Providers"), provide the Service on our behalf, provide services related to the Service or assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are prohibited from disclosing or using it for any other purpose.

Analysis

We may use third-party Service Providers to monitor and analyze the use of our Service.

Google Analytics

Google Analytics is a web analytics service provided by Google that tracks and reports website traffic. Google uses the collected data to track and monitor the use of our Service. This data is shared with other Google services. Google may use the data collected to contextualize and personalize ads on its own advertising network.

You can prevent your activities within the Service from being made available to Google Analytics by installing the Google Analytics Opt out browser add-on. This plug-in prevents the Google Analytics JavaScript code (ga.js, analytics.js and dc.js) from sharing information about visit-related activities with Google Analytics.

For more information on Google's privacy practices, please visit Google's Privacy Policy and Terms page: https://policies.google.com/privacy?hl=en

Behavioral Remarketing

STS Industrie SA uses remarketing services to show you ads on third-party sites after you have visited our Service. We and our third-party suppliers use cookies to shape, optimize and serve ads based on your previous use of our Service.

Google Ads (AdWords)

The Google Ads (AdWords) remarketing service is provided by Google Inc.

You can opt out of Google Analytics for Display Advertising and customize Google Display Network ads by going to Google Ads Settings: <u>http://www.google.com/settings/ads</u>

Google also recommends that you install the Google Analytics Opt-out Browser Add-on https://tools.google.com/dlpage/gaoptout - in your web browser. The Google Analytics Opt-out Browser Add-on allows visitors to prevent Google Analytics from collecting and using their data.

For more information on Google's privacy practices, please visit Google's Privacy Policy and Terms page: https://policies.google.com/privacy?hl=en

Facebook

The Facebook remarketing service is provided by Facebook Inc.

You can find out more about interest-based Facebook ads on this page https://www.facebook.com/help/164968693837950

To refuse Facebook interest-based ads, follow these instructions from Facebook: https://www.facebook.com/help/568137493302217

Facebook abides by the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out of Facebook and other participating companies through the Digital Advertising Alliance in the U.S. http://www.aboutads.info/choices/, the Digital Advertising Alliance of Canada in Canada http://www.aboutads.info/choices/, the Digital Advertising Alliance in the U.S. http://www.aboutads.info/choices/, the Digital Advertising Alliance of Canada in Canada http://youradchoices.ca/ or the European Interactive Digital Advertising Alliance in Europe http://www.aboutads.info/choices/, the Digital Advertising Alliance in the U.S. http://www.aboutads.info/choices/, the Digital Advertising Alliance of Canada in Canada http://youradchoices.ca/ or the European Interactive Digital Advertising Alliance in Europe http://www.youronlinechoices.ca/ or the European Settings.

For more information on Facebook's privacy practices, please see Facebook's privacy policy: https://www.facebook.com/privacy/explanation

Payments

We may offer chargeable products and/or services as part of the Service. In such cases, we will use thirdparty payment processing services (i.e. payment processors).

We will not collect or store your payment card details. This data is communicated directly to third-party payment processors, who use your personal data in accordance with their privacy policies. These payment processors comply with the PCI-DSS standard managed by the PCI Security Standards Council, which is the result of a concerted effort between brands such as Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure secure processing of payment information.

The payment processors we work with are::

Stripe

Their privacy policy is available at https://stripe.com/us/privacy

PayPal / Braintree

Their privacy policy is available at https://www.paypal.com/webapps/mpp/ua/privacy-full

Links to other sites

Our Service may contain links to other sites that we do not operate. If you click on a third party link, you will be redirected to that third party's site. We strongly recommend that you review the privacy policy of each site you visit.

We have no control over, and accept no responsibility for, the content, privacy policies or practices of any third party sites or services.

Children's privacy

Our Service is not intended for persons under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with Personal Information, please contact us. If we learn that we have collected Personal Data from children without verifying parental consent, we will take steps to delete such information from our servers.

Changes to this Privacy Policy

We reserve the right to update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

Before the change takes effect, we will notify you by e-mail and/or by placing a prominent notice on our Service and we will update the "Effective Date" at the top of this Privacy Policy.

We recommend that you check this Privacy Policy periodically for any changes. Changes to this Privacy Policy will be effective when posted on this page.

Contact us

If you have any questions about this Privacy Policy, please contact us:

• By e-mail: sts(at)stsindustrie.ch