

**Privacy Policy
HOORTRADE**

This privacy policy applies to any collection and processing of personal data about you by HOORTRADE, a simplified joint stock company with a capital of 7,500 euros, registered in the Lyon Trade and Companies Register under number 878 143 601 and whose registered office is located at 83 – 85 Boulevard du Parc d'Artillerie in LYON (69007) (hereinafter "**HOORTRADE**").

This privacy policy applies to all collection and processing of your personal data, whether you are a customer, prospect, supplier or service provider of HOORTRADE.

• **Preliminary information**

The collection and processing of your personal data by HOORTRADE are subject to the French law n° 78-17 of 6 January 1978 on Data Processing, Files and Individual Liberties and to the European Regulation n° 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data ("**RGPD**").

HOORTRADE is a data controller within the meaning of the GDPR ([Article 4 §7 GDPR](#)).

The Data Protection Officer, appointed by HOORTRADE as part of its compliance with the RGPD, can be contacted at the following address for any questions relating to the processing of your personal data and the exercise of your rights in relation to this data:

- **By email** : rgpd@sicaan.com
- **By post addressed to his attention:** **Rémy Charpe / Hoortrade SAS**
Data Protection Officer
83 – 85 Boulevard du Parc d'Artillerie
69007 LYON

• **Collection of your personal data**

Personal data means "any information relating to an identified or identifiable natural person". "An **identifiable natural person**" is one who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier, or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity.

Regardless of your status, HOORTRADE may at any time ask you for personal data in the context of your commercial and/or contractual relationship, by means of paper forms or by filling in online forms via the HOORTRADE website accessible at the following URLs www.sicaan.at - www.sicaan.be - www.sicaan.co.uk - www.sicaan.cz - www.sicaan.de - www.sicaan.dk - www.sicaan.es - www.sicaan.fi - www.sicaan.fr - www.sicaan.gr - www.sicaan.hr - www.sicaan.hu - www.sicaan.ie - www.sicaan.it - www.sicaan.lt - www.sicaan.lu - www.sicaan.lv - www.sicaan.nl - www.sicaan.pl - www.sicaan.pt - www.sicaan.ro - www.sicaan.se - www.sicaan.si - www.sicaan.sk (hereinafter the "Site").

Categories of people concerned	Data collected	Shelf life
Customers	For the creation of the personal account on the site: Civil status / Last name / First name / E-mail address / Password	3 years from the end of the contractual relationship
	To complete your order: Delivery addresses / Billing addresses / Mobile phone number	
	For the payment of the order: Bank details	
	To complete your personal account (not required for ordering): Date of birth / Phone number	
Suppliers / contractors	Identification and contact details of the supplier / service provider concerned: Name / Address / Phone number / Email	3 years from the end of the contractual relationship
	Bank details	
Website users / prospects	Newsletter subscription: Email address	3 years from the date of collection or last contact from the prospect
	Contact request: Title / Last name / First name / E-mail address / Any personal data given in the message sent to HOORTRADE and concerning the Internet user	
	Information stored on the terminal equipment (cookies and other tracers)	13 months

If you do not provide HOORTRADE with the required data, HOORTRADE will not be able to respond to your request, validate and execute your order, provide you with the requested products and services, execute the contract between you and HOORTRADE or pay the invoices corresponding to your intervention.

No "sensitive" personal information or data is required by HOORTRADE in order to perform the contract with you.

Any additional information that is not directly necessary for the performance of your contractual or commercial relationship with HOORTRADE may only be collected by HOORTRADE if you have expressly consented to the collection and processing of such information or if HOORTRADE has a legitimate interest in such collection. You will be notified in advance of the reasons for any further collection of your data.

- Use of your data and legal basis for processing

Purposes of processing	Sub-objectives	Legal basis for the processing
Management of the commercial relationship with prospects	Commercial prospecting / sending newsletters	Consent
	Management of Internet users' requests sent via the online contact form	Pre-contractual measures
Customer file management	Validation of the personal account on the website	Performance of the contract
Follow-up of the contractual and commercial relationship with the clients	Validation of the order placed on the Site	
	Management and execution of the order	
	Management of product delivery	
	Contact with customers	
	Management and validation of online payment	
	Editing of customer invoices	
Management of customer complaints / after-sales service		
Management of supplier / service provider files	Selection of suppliers / service providers	Legitimate interest
	Drawing up contracts	Performance of the contract
	Creation / opening of supplier / service provider files or records internally	
Monitoring of the contractual and commercial relationship with suppliers / service providers	Contract management	Performance of the contract
	Placing orders with suppliers / service providers	
	Payment of supplier / service provider invoices	

Accounting management	Internal bookkeeping / Procurement management	Performance of the contract Legal obligation
	Maintaining and managing customer invoicing and supplier payments	
Management of possible disputes (all categories of persons)	Litigation management (pre-litigation / litigation)	Legitimate interest of the company in establishing proof of a right or contract
Management of requests related to personal data	Management of requests related to the exercise of your rights with regard to your personal data	Legal obligation
Assignment, transfer, sharing of files	Communication and transfer of personal data to suppliers, providers and/or subcontractors	Performance of the contract
Management of access and use of the website	Response to a contact request made through the online contact form	Pre-contractual measures
	Subscribe to the HOORTRADE newsletter	
	Management of access and use of the website	Performance of the contract Legitimate interest
	Operation and optimisation of the website	
	Access, viewing of products offered by HOORTRADE	
	Verification, identification and authentication of data entered on the website	

No commercial canvassing will be sent to you without your prior and express consent, unless you are already a customer of HOORTRADE and the information concerns products offered by HOORTRADE.

HOORTRADE will systematically inform you in advance of any processing purpose other than those mentioned above.

- **Sharing your data with third parties**

Persons performing tasks or functions within HOORTRADE are expressly authorised to access your data but only within the limits of their duties and functions.

In the course of using and processing your data, HOORTRADE may pass your data to the following entities and/or subcontractors:

- Technical service providers and/or subcontractors of HOORTRADE, who need to know some of your data in order to execute the contract between you and HOORTRADE;
- HOORTRADE accounting firm;
- Legal advice.

Each of these recipients of your data ensures the strict confidentiality of the data communicated to them and undertakes to process them only for the purposes of their intervention.

Your data may be shared with the above-mentioned recipients in the following situations and conditions:

- When you post in free comment areas of the website managed by HOORTRADE ;
- When HOORTRADE uses the services of service providers to provide support to users of the website or advertising. These service providers have limited access to your data for the purpose of providing these services and are contractually obliged to use it in accordance with the provisions of the applicable data protection regulations;
- To enable HOORTRADE to meet its legal and regulatory obligations;
- If required by law, HOORTRADE may pass on your data to pursue claims against it and to comply with administrative and legal proceedings;
- If HOORTRADE is involved in a merger, acquisition, sale of assets or receivership, it may sell or share some or all of its assets, including personal data. In this case, you will be informed before any transfer of your data to a third party.

- **Transfer of your data outside the European Union**

As part of the processing of your personal data, HOORTRADE may transfer all or part of your data to certain of its service providers established in a country outside the European Union.

In this case, HOORTRADE takes all appropriate measures to control such transfers, to ensure an adequate level of protection in the country concerned and to guarantee the security and confidentiality of your data, by committing the entities processing your data through the signature of standard contractual clauses adopted and approved by the European Commission or through any other mechanism recognised by the laws and regulations in force.

In order to exercise your rights, if your data has been transferred outside the European Union, you may request a copy of the relevant contractual clauses and details of where your data has been transferred.

In accordance with the Data Protection Act and the RGPD, you have the following rights:

- Right of access to your data ([Article 15 GDPR](#)) ([Read more](#)) ;
- Right of rectification ([Article 16 GDPR](#)), update, completeness of your data ([Read more](#));
- Right to block or erase your personal data ([Article 17 GDPR](#)), if they are inaccurate, incomplete, equivocal, out of date, or whose collection, use, disclosure or storage is prohibited ([Read more](#));
- Right to withdraw your consent at any time ([Article 13-2c GDPR](#)), without prejudice to the lawfulness of the processing of your data based on your consent and already carried out before the withdrawal of that consent;
- Right to restrict the processing of your data under limited conditions ([Article 18 GDPR](#)) ([Read more](#)) ;
- Right to object to the processing of your data ([Article 21 GDPR](#)) ([Read more](#)) ;
- Right to portability of data provided to HOORTRADE, where your data is subject to automated processing based on your consent or on a contract ([Article 20 GDPR](#)) ([Read more](#)) ;
- Right not to be subject to a decision based solely on automated processing of your data and likely to produce legal effects concerning you or significantly affecting you ([Article 22 GDPR](#));
- The right to determine what happens to your data after your death and to choose whether or not HOORTRADE will disclose your data to a designated third party ([Read more](#)). In the event of your death, and in the absence of instructions from you, HOORTRADE undertakes to destroy your data, unless its retention is necessary for evidential purposes or to meet a legal obligation.
- To know the location of the recipient of your data when it has been transferred outside the European Union and to obtain a copy of the standard contractual clause governing this transfer.
- Right to lodge a complaint with a supervisory authority, in particular the Commission Nationale de l'Informatique et des Libertés (CNIL) (<https://www.cnil.fr/fr/plaintes>).

You can exercise the above rights under the legal conditions in force, by sending HOORTRADE an **email** via the contact form dedicated to this purpose on the Site from your customer area or by **post (83 – 85 Boulevard du Parc d'Artillerie - 69007 LYON)** and attaching a copy of your identity card.

HOORTRADE undertakes to inform you of the measures taken in response to your request within a maximum of one (1) month from receipt of the request, this period being likely to be extended by two (2) months in case of complexity or number of requests.

- **Security and confidentiality measures implemented**

HOORTRADE implements organisational, technical, software and physical digital security and confidentiality measures to ensure the protection of your personal data that it collects from alteration, destruction or unauthorised access to your data.

HOORTRADE takes all necessary precautions in view of the nature of your personal data and the risks presented by the processing it carries out in the context of its activity in order to preserve the security of your data and to prevent their distortion, damage or access by unauthorised third parties.

In any event, you will be notified as soon as possible of any breach of your personal data that may pose a high risk to your rights and freedoms, in accordance with applicable legal and regulatory requirements.

- **Evolution and modification of the privacy policy**

HOORTRADE reserves the right to make any changes, corrections and/or adaptations to this privacy policy at any time, in particular in order to comply with legal and regulatory requirements applicable to the protection of personal data and to ensure full transparency of the use it makes of your personal data.

HOORTRADE will, in any case, communicate to you the new version of this privacy policy, as soon as possible, so that you can take note of any modification, correction and/or adaptation made.