

PRIVACY POLICY

This privacy policy (the "Privacy Policy") regulates the collection, processing, use and protection of data provided by users of the PERRELET LEARNING APPLICATION (hereinafter "APP") and the services and / or benefits related to it.

1.- DATA CONTROLLER

PERRELET, S.A., with registered office at Rue Bubenbergr 7, 2502 Biel/Bienne (Switzerland), registered with the Registre du Commerce du Canton de Berne, with IDE/UID CHE-107.491.208.

2.- PURPOSE OF PROCESSING

PERRELET processes personal data in compliance with the provisions of the EU General Data Protection Regulation (GDPR) and the Swiss Federal Data Protection Act (FADP) for the following purposes:

1. To manage requests for registration and participation in the training activities of the PERRELET E-LEARNING APP, including the sending of information relating thereto, and the relationship with the users of the PERRELET E-LEARNING APP.
2. The management of the sending of information and commercial communications related to products, services and commercial promotions, by any means, automated or not (mail, SMS, MMS, fax, Internet, telephone...) provided that prior express and unequivocal consent has been given.
3. The management of participation in loyalty and/or incentive programmes, commercial promotions, sweepstakes and contests and, where appropriate, the execution and promotion of the results thereof, provided that prior express and unequivocal consent has been given.

3.- DATA SUBJECT TO PROCESSING

1.- Regarding the management of applications for registration and participation in the training activities of the PERRELET E-LEARNING APP, including the sending of information relating to it, and the relationship with the users of the same, the following data is collected:

- Name and Surname
- Nickname
- Country
- Name of the shop (PERRELET watches and clocks)
- Shop Address
- Telephone
- Brands you work with at your point of sale (Festina Group)
- Email address
- Password

2.- Regarding the management of the sending of information and commercial communications, the following data is collected:

Postal and/or e-mail addresses.

**** Will commercial information be sent?**

By registering in the newsletter section, PERRELET obtains the express consent of the owners of the data to send commercial communications of products related to the company via email or any other means.

Commercial and advertising communications may be sent by different means, according to the user's behaviour and preferences or tastes, creating profiles.

3.- Regarding the management of participation in loyalty and/or incentive programmes, commercial promotions, sweepstakes and contests and, where appropriate, the execution and promotion of the result thereof, the data provided for in the terms and conditions of each promotion, sweepstakes, contest, etc. are collected, but, without prejudice to the foregoing, in the case of obtaining incentives, prizes, etc., ID and a full postal address must be provided.

4.- LEGITIMATION:

The legal basis for the processing of personal data is as follows:

- The legal basis for the Management of applications for registration and participation in the training activities of the PERRELET E-LEARNING APP, including the sending of information related to it, and the relationship with the users of the same is the satisfaction of the legitimate business interest in the execution of a commercial contract of sale and/or lease of services, prior consent and compliance with legal obligations.

- The legal basis for sending commercial advertising communications related to products and services to customers is based on prior consent.

- The legal basis for sending commercial communications to participants in loyalty and/or incentive programmes, competitions, sweepstakes and promotions is prior consent.

5.- RECIPIENTS OF THE DATA.

The recipient of the data is PERRELET, which will use them solely and exclusively for the purposes for which they were collected.

Data is communicated in the following areas and cases:

- Internally: There is no communication of data to other companies

- External (third parties, external to PERRELET): The data will be transferred to third parties when there is a legal obligation or in execution of a contract, such as, for example: entities related to data transmission (telecommunications), competent Public Administrations, in the cases foreseen in the Law and for the purposes defined therein (e.g. Tax Administration).

International data transfers are not carried out.

6.- WHAT ARE YOUR RIGHTS WHEN YOU GIVE YOUR CONSENT?

Those affected, as owners of their data, may exercise their rights of access, rectification, opposition, cancellation, limitation and portability of the processing of those in front of

PERRELET.

The interested parties have the following rights:

- Access: (Art.15 RGPD and Art.8 FADP) - Allows you to obtain confirmation if PERRELET processes your personal data, as well as to consult your personal data included in FESTINA's files.
- Rectification: (Art 16 RGPD and Art.5 FADP) - Allows you to modify your personal data when they are inaccurate, as well as to complete those that are incomplete.
- Opposition: (Art 21 RGPD and Art 4 FADP) - You may request that your personal data not be processed. PERRELET will stop processing the data, except for compelling legitimate reasons or the exercise or defence of possible claims.
- Cancellation: (Art 17 RGPD and Art 5 FADP) - Allows you to request the deletion of personal data when, among other reasons, the data are no longer necessary for the purposes for which they were collected.
- Limitation: (Art 18 RGPD and Art 12, 13 and 15 FADP) You may request the limitation of the processing of your data in the following cases:
 - (a) As long as the accuracy of your data is contested;
 - b) When the processing is unlawful, you object to the deletion of your data, and request the limitation of its use;
 - c) When PERRELET does not need to process your data but you need them for the exercise or defense of claims;
 - d) When you have objected to the processing of your data for the fulfilment of a public interest mission or for the satisfaction of a legitimate interest, while it is being verified whether the legitimate grounds for the processing outweigh yours.
- Portability: (Art.20 RGPD) - You will be able to receive, in electronic format, the personal data that you have provided us and those that have been obtained from your contractual relationship with PERRELET, as well as to transmit them to another entity.

PERRELET.COM/PERRELET.CH customers have and may exercise their rights of access, cancellation, rectification and opposition to PERRELET, either by post to Rue Bubenbergr, 7, 2502, Biel/Bienne (Switzerland), or by writing to the following address: perrelet@perrelet.com.

In case of any questions regarding data protection, you can contact the Data Protection Officer by mail at the following address: dpo@perrelet.com.

If you believe that the company has not processed your personal data in accordance with applicable law or that you have not obtained satisfaction in exercising your rights, you may lodge a complaint with the national data protection authorities in your EU country of residence (https://edpb.europa.eu/about-edpb/board/members_en) or with the Swiss Federal Data Protection and Information Commissioner -FDPIC- (<https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/links/data-protection---switzerland.html>) for Swiss residents.

For residents of CALIFORNIA, please refer to point 9 of this document.

7.- RETENTION OF DATA.

The data related to the management of applications for registration and participation in the training activities of the PERRELET E-LEARNING APP, including the sending of information related to it, and the relationship with the users of the same will be kept for as long as the contract is in force.

Once this relationship has ended, if applicable, the data may be kept for the time required by the applicable legislation and until the expiry of the statute of limitations for any liabilities arising from the contract.

The data related to the sending of information and commercial communications of PERRELET products or services will be kept indefinitely, until, where appropriate, the interested party expresses their wish to delete them.

Data related to participation in loyalty and/or incentive programmes, competitions, draws and promotions will be kept for the duration of the same, according to their specific bases, in order to manage their development and, afterwards, until the possible responsibilities derived from their execution expire.

8.- ADDITIONAL INFORMATION

- **Minors:** According to Art 8 RGPD, the processing of personal data of minors is only lawful when they are at least 16 years old. However, those over 13 but under 16 may also give valid consent if so provided by the relevant national legislation, and provided that "the consent is validly given by the holder of parental authority or guardianship over the minor". There is no case in which minors under the age of 13 can themselves validly consent to the processing of their data.
- **Updating of data:** Users of the APP must communicate, immediately, any modification of their data, so that the information held by PERRELET is at all times updated and does not contain errors.
- **Links:** This Privacy Policy is applicable exclusively to the information collected in the APP. The APP may contain links to websites. Please note that PERRELET is not responsible for the privacy and data processing of these so it is recommended that you read the privacy policies and data processing of these pages.

9.- SPECIAL NOTICE TO CALIFORNIA RESIDENTS.

California Civil Code Sections 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 state that organizations must disclose certain categories of information if it is collected, transferred as "consideration," or transferred to fulfill a "business purpose" of the organization.

The categories of personal information we collect and transfer in various contexts are listed in Section 3 of this document.

California Civil Code Section 1798.83 permits users of websites residing in California to request certain information about the disclosure of personal information to third parties for their direct

marketing purposes.

To make such a request, please contact us at: perrelet@perrelet.com.

In addition, under California Civil Code Section 1798.100 et seq. of the California Civil Code, California residents have the right to:

- Request disclosure of the specific categories and pieces of information collected about them;
- Request disclosure of the business purpose for collecting or selling personal information; the categories of third parties with whom it is shared; and the categories of sources from which personal information is collected;
- Request deletion of personal information collected, subject to the limitations set forth in California Civil Code Section 1798.105(d);
- Not be discriminated against for exercising the rights guaranteed by California Civil Code Section 1798.100 et seq.

Requests for disclosure or deletion of your personal information may be made by email to: perrelet@perrelet.com.