



External Privacy Policy

1. Introduction

SMRC Automotive Modules France SAS, a company incorporated under French law, registered in the Arras Trade and Companies Registry under number 410 314 876 and domiciled at rue Léon Duhamel, 62440 Harnes in France ("**SMRC**", "**we**", "**our**") respects the privacy of any person providing us with their personal data.

This external privacy policy ("**Privacy Policy**") describes how we collect and use personal data relating to visitors to our website, applicants for a position with SMRC in France, our customers and suppliers ("**you**", "**your**") in accordance with the General Data Protection Regulation ("**GDPR**").

It also describes the legal bases on which we rely to process personal data, the people with whom we share it and how it is stored.

We are a data controller. This means that we decide how we store and use personal data about you. We are required by the GDPR to provide you with all information contained in the Privacy Policy.

It is important that you read this Privacy Policy, as well as any other information that we may provide on specific occasions when we collect or process your personal data, so that you know how and why we use this information.

2. How is your personal data collected?

We may collect personal data about you directly from you or through third parties, such as a recruitment agency, vendors you are a customer, market research companies, companies in the group to which SMRC belongs, websites public etc.

In addition, we publish the website www.reydel.com (the "**Site**") through which we may collect personal data using cookies. To find out more about our use of cookies, please read our [cookies policy](#).

We can collect this information in a variety of ways. For example, data may be collected through forms, purchase orders, resumes, correspondence with you, interviews or meetings.

3. Type of personal data, purposes and legal bases

By personal data, we mean any information about a person from which that person can be identified. This does not include data for which the identity has been deleted (anonymous data).

You will find below an overview of:

- categories of personal data about you that we use and store;
- purposes for which such personal data are collected;
- legal basis on which the processing is based.

Category of data subjects	Type of personal data	Purpose of the processing	Legal basis of the processing
VISITORS OF THE SITE	<ul style="list-style-type: none"> • your name, first name • the name of the company for which you work • your email address • your phone number • IP address and connection data (cookies) 	<ul style="list-style-type: none"> • enable the proper functioning of our Site (including handling questions and requests, managing requests for the rights of individuals, allowing the resolution of disputes, handling complaints) 	<ul style="list-style-type: none"> • our legitimate interest: customer service management
		<ul style="list-style-type: none"> • to enable you to access our Site, or to use it (cookies) 	<ul style="list-style-type: none"> • our legitimate interest: cookies strictly necessary to provide the service specifically requested by you
		<ul style="list-style-type: none"> • store information about your preferences, and allow us to customize our Site according to your interests (cookies) 	<ul style="list-style-type: none"> • your consent (cookies)
		<ul style="list-style-type: none"> • prepare reports or compile statistics to improve our goods and services (cookies) 	<ul style="list-style-type: none"> • your consent (cookies)
CANDIDATES TO A POSITION IN FRANCE	<ul style="list-style-type: none"> • your name, first name • your email address • your phone number • training • any information you may have included on your resume • any information we were able to collect during your interviews with us 	<ul style="list-style-type: none"> • manage our recruitment program 	<ul style="list-style-type: none"> • our legitimate interest: recruitment programme management
		<ul style="list-style-type: none"> • make a decision concerning your recruitment and inform you of this decision 	<ul style="list-style-type: none"> • our legitimate interest: recruitment decision
CUSTOMERS	<ul style="list-style-type: none"> • your name, first name • your job 	<ul style="list-style-type: none"> • provide the goods or services that are relevant to you or your employer (including confirming and processing orders, 	<ul style="list-style-type: none"> • in execution of a contract that we have concluded with you

	<ul style="list-style-type: none"> the name of the company for which you work your business e-mail address your business phone number if you are present on our premises, video surveillance recordings 	managing the account you have with us, (billing)	
		<ul style="list-style-type: none"> sending non-commercial communications relating to an order 	<ul style="list-style-type: none"> in execution of a contract that we have concluded with you
		<ul style="list-style-type: none"> sending commercial communications about our products or services 	<ul style="list-style-type: none"> our legitimate interest: to expand our business
		<ul style="list-style-type: none"> provide you with technical assistance 	<ul style="list-style-type: none"> in execution of a contract that we have concluded with you
		<ul style="list-style-type: none"> for the detection and prevention of fraud, other criminal offences and for risk management purposes 	<ul style="list-style-type: none"> compliance with a legal obligation and our legitimate interest
		<ul style="list-style-type: none"> manage your queries or problems regarding our products and services, including any questions regarding the manner in which we collect, store and use your personal data, or any request for you to obtain a copy of the data we hold about you 	<ul style="list-style-type: none"> our legitimate interest: customer service management
		<ul style="list-style-type: none"> ensure network and data security 	<ul style="list-style-type: none"> our legitimate interest: security management
		<ul style="list-style-type: none"> conduct statistical analysis and market studies 	<ul style="list-style-type: none"> our legitimate interest: to know our market and thereby expand our business
SUPPLIERS	<ul style="list-style-type: none"> your name, first name 	<ul style="list-style-type: none"> enable us to receive and manage your products and services 	<ul style="list-style-type: none"> under a contract we have with you or your employer

<ul style="list-style-type: none"> Your email address your phone number the name of the company for which you work your job username and password of the supplier portal 	(including, auditing suppliers and tracking quality and logistics incidents)	
	<ul style="list-style-type: none"> manage the supplier portal which is accessible via the Website 	<ul style="list-style-type: none"> our legitimate interest: managing the relationship with our suppliers
	<ul style="list-style-type: none"> ensure network and data security 	<ul style="list-style-type: none"> our legitimate interest: security management
	<ul style="list-style-type: none"> conduct statistical analysis and market studies 	<ul style="list-style-type: none"> our legitimate interest: to know our business and expand it

We believe that the risk of personal data that we process on the basis of our legitimate interests is not excessive or intrusive. In particular, we have put in place measures to protect your rights by applying appropriate retention periods and ensuring appropriate security controls.

4. If you fail to provide personal data

If you choose not to provide the personal data we request, we may not be able to provide you with the products and / or services you have requested or fulfil the purposes for which we have requested the personal data.

5. Recipients of your personal data

We will share your personal data with third parties when required by law, when it is necessary to manage the contractual relationship we have with you or when we have another legitimate interest in doing so. We will share your personal data with the following categories of third parties:

- other parties such as legal, governmental or regulatory authorities (for example in matters regarding tax deductions), tax advisers, statutory auditors, lawyers and other external professional advisers; and
- companies that provide us with products and services, such as:
 - banks and insurance companies; and
 - providers of computer and business support systems, including delivery, email archiving, backup and disaster recovery service providers, and cybersecurity, hosting, and maintenance services; marketing and advertising services.

Some of these companies may use your data in countries that are not part of the European Economic Area. See Article 6 below.

We will also disclose your personal data to third parties:

- if we sell or buy a business or assets, we may disclose your personal data to the seller or prospective purchaser of that business or assets;



- if SMRC or substantially all of its assets are acquired by a third party, in which case the personal data held by SMRC will form part of the transferred assets; and
- if we have the obligation to disclose or share your personal data in order to comply with any legal obligation, any lawful request of the government or law enforcement authorities and if this may be necessary to meet the requirements of national security or law enforcement or to prevent illegal activity.

Third parties with whom we share your personal data are limited (by law and by contract) in their ability to use your personal data for the specific purposes we have identified. We will always do our utmost best to ensure that third parties with whom we share your personal data are subject to confidentiality and security obligations in accordance with this Privacy Policy and applicable laws. We only allow them to process your personal data for specific purposes and in accordance with our instructions.

Except as expressly stated above, we will never share, sell or rent your personal data to any third party without notifying you and / or obtaining your consent. If you have given us your consent to use your information in a particular way, but you change your mind afterwards, you must contact us and we will stop doing so.

6. Data transfers outside the European Economic Area

We may transfer your personal data outside the European Economic Area ("EEA"), particularly in India to Samvardhana Motherson International Limited, the parent company of our group.

If you would like to receive more information about data transfers outside the EEA that we carry out, please contact us at privacy@reydel.com.

7. Retention period of your personal data

We will only keep your personal data for the time necessary to fulfil the purposes for which we collected it, including to meet any legal, accounting or reporting requirements.

To determine the appropriate retention period of personal data, we take into account the quantity, nature and sensitivity of personal data, the potential risk of harm resulting from the unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and the possibility of attaining those purposes by other means, as well as applicable legal requirements.

- **visitors:**
 - *Complaints, queries, claims:* we delete your personal data two years after your complaint, question, complaint has been closed;
 - *Cookies:* we will delete cookies after 13 months unless you give us your consent to their continued use after the expiry of such period.
- **candidates:**
 - *Applicants who are not successful:* in the event of a negative outcome to an application, we will inform you if we wish to keep your recruitment file, in order to give you the opportunity to request the destruction. If you do not request the destruction of your file, we will automatically delete your file 2 years after our last contact with you;
 - *Successful applicants:* To learn more about how we handle the personal data of our employees, apprentices and trainees and the applicable retention periods, please read the SMRC Staff Privacy Policy.

- **customers:** 15 years from the last commercial contact with the customer.
- **suppliers:** 15 years from the last commercial contact with the supplier.

8. Your rights

As a data subject, you have certain rights with regard to your personal data. These rights are not absolute and each of these rights is subject to certain conditions in accordance with the GDPR and applicable national laws.

- **Right of access:** you have the right to obtain a confirmation from us as whether your personal data are processed by us, as well as certain other information (similar to that provided in this Privacy Policy) on how they are used. You also have the right to access your personal data by requesting a copy of your personal data. This allows you to know and verify that we use your information in accordance with data protection laws. We may refuse to provide information when this may reveal personal data about another person or negatively affect the rights of another person.
- **Right of rectification:** you can ask us to take steps to correct your personal data if they are inaccurate or incomplete (for example, if we have the wrong name or the wrong address on file).
- **The right to erasure:** also known as the "right to be forgotten", this right allows you, in simple terms, to request the erasure or deletion of your personal data when, for example, there is no compelling reason for us to continue using them or their use is illegal. However, this is not a general right of erasure and there are some exceptions, for example when we have to use the information to defend a lawsuit or to be able to comply with a legal obligation.
- **The right to restrict processing:** you have the right to "block" or prevent further use of your personal data when we examine a request for correction or as an alternative to erasure. When processing is limited, we can always keep your personal data, but we cannot use it further.
- **The right to data portability:** you have the right to obtain and reuse certain personal data for your own needs at different companies (which are separate data controllers). This only applies to personal data that you have provided to us, which we process with your consent and for contract performance purposes, which are processed by automated means. In this case, we will provide you with a copy of your data in a structured, commonly used and machine readable format or (where technically possible) we will be able to transmit your data directly to another controller.
- **The right to object:** you have the right to object, at any time, to certain types of processing, for reasons related to your particular situation, to the extent that such processing is carried out for the purposes of the legitimate interests pursued by SMRC. We will be allowed to continue processing personal data if we can demonstrate that the processing is justified by compelling and legitimate reasons that outweigh your interests, your rights and freedoms or if we need them for the establishment, the exercising or defending legal proceedings. If you object to the processing of your personal data for direct marketing purposes, we will no longer process your personal data for such purposes.
- **The right to withdraw your consent:** when we process your personal data on the basis of your consent, you may withdraw your consent at any time. However, such a withdrawal does not affect the lawfulness of the processing that took place prior to this withdrawal.



- **The right to provide us with instructions on how your personal data will be used after your death:** you have the right to provide us with instructions on the management (e.g. retention, erasure and disclosure) of your data after your death. You can change or revoke your instructions at any time.

If you would like more information on your rights, if you wish to exercise one of them or if you have a complaint, please contact us at privacy@reydel.com.

If you are not satisfied with our response to your complaint or if you believe that the processing of your personal data does not comply with applicable data protection laws, you may file a complaint with the supervisory authority competent for data protection. The Commission Informatique et Libertés (CNIL) is the data protection authority in France.

We will review all such requests and provide our response within the timeframes provided by applicable law. Please note, however, that certain personal data may be exempted from such requests in certain circumstances, including if SMRC must continue to process your personal data for its legitimate interests or to comply with a legal obligation.

You will not have to pay any fees to access your personal data (or to exercise any other rights). However, we may charge a reasonable fee if your access request is clearly unfounded or excessive. We may also refuse to comply with the request in such circumstances.

We may need to ask you for specific information to help us confirm your identity and to guarantee your right to access this information (or to exercise your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to a person who is not entitled to receive it.

9. Security of your personal data

SMRC undertakes to protect personal data against loss, misuse, disclosure, alteration, unavailability, unauthorised access and destruction, and takes all reasonable precautions to protect the confidentiality of personal data, including by taking organisational and technical measures appropriate. Although we make every effort to protect the personal data you provide to us, the transmission of information over the Internet is not completely secure. As such, you acknowledge and agree that we cannot guarantee the security of the personal data that you transmit to us over the Internet and that such transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to prevent unauthorised access.

If we have given you (or you have chosen) a password that allows you to access our systems or any portal or account, you are required to maintain the confidentiality of this password. We ask that you never give a password to anyone.

We have procedures in place to deal with any alleged breach of data security and we will notify you and any applicable supervisory authority of an alleged breach where we are legally required to do so.

10. Third party websites

The Site may contain links to other websites operated by third parties. Please note that this Privacy Policy only applies to personal data that we (or third parties acting on our behalf) collect and we cannot be held responsible for personal data collected and stored by third parties. Third party websites have their own terms and privacy policies, and you should read them carefully before submitting personal data to these sites. We do not assume or accept any responsibility for the content of these third-party websites or third-party terms or policies.



11. Data Protection Officer

We have appointed a Data Protection Officer of the group of companies to which SMRC belongs. If you have any questions about this Privacy Policy, how we handle your personal data, or if you wish to exercise any of your rights, please contact us at privacy@reidel.com.

12. Changes to this Privacy Policy

We reserve the right to update this Privacy Policy at any time. Please check this Privacy Policy regularly to be informed of any changes. We may also advise you of any means from time to time of any changes in the processing of your personal data.