

DATA PROTECTION POLICY

The law and notary firm De Gaulle Fleurance is concerned about protecting the privacy and data of their contacts (users of their websites and Internet platforms, contacts established within the framework of professional meetings, business files, assignments, partnerships, services, applications, etc.). De Gaulle Fleurance thus ensures adopting and respecting a data processing policy that complies with the regulations in force.

For this reason, De Gaulle Fleurance respects the applicable European law on the protection of personal data, and, in particular, the European General Regulation on the Protection of Personal Data n°2016/679 of 27 April 2016 (known as the "GDPR / RGPD"), as well as all the rules of national law adopted in application thereof, on a subsidiary basis, and which may be applicable depending on the case.

The purpose of this Personal Data Protection Policy (the "Policy") is to provide with clear, simple and full information to the persons concerned ("you" or "your") on the way in which De Gaulle Fleurance, in its capacity as data controller, collects and processes personal data concerning you ("the personal data") and on the means available to you to control this processing and to exercise your rights.

1. ON WHAT OCCASIONS ARE YOUR PERSONAL DATA COLLECTED?

De Gaulle Fleurance may collect your personal data in the context of professional meetings, business files, partnerships, applications, your visit to our premises, your visits to our websites and web pages and your use of our online services, in particular online information.

Declarative personal data are those that you provide via forms, whether dematerialized on the websites, in paper format or in response to questions asked to you by lawyers, notaries or members of the firm.

De Gaulle Fleurance takes into account the principles of data minimization, data protection from their conception and data protection by default. Consequently relevant, adequate, and limited information necessary for the purposes for which it is processed is collected.

Mandatory declarative personal data are indicated by a "*" sign on the collection medium or by an express mention to that effect. Apart from these cases, you are free to provide or not all or part of your personal data. However, such a decision could limit your access to certain services or products offered by De Gaulle Fleurance, or other functionalities offered by its websites and mobile applications.

2. ON WHAT BASIS IS YOUR DATA COLLECTED?

Your personal data is processed by De Gaulle Fleurance in the cases allowed by the applicable regulations, and in particular under the following conditions:

- when you have given your free, specific, informed and unequivocal consent to the processing of your personal data (e.g.: subscription to thematic information, registration for an event, etc.);
- when this is necessary for the performance of a contract or pre-contractual measures taken at your request (e.g.: application, handling of a file, need for access to a dataroom, etc.);
- to comply with De Gaulle Fleurance's legal or regulatory obligations (e.g. the fight against fraud);
- when the legitimate interests of De Gaulle Fleurance may be such as to justify processing by the firm (e.g.: computer security measures).

Information in accordance with the applicable law is provided in each case.

It is hereby specified that for minors under the age of 18, this consent must be given or authorised by the holder of parental responsibility. If the latter discovers that personal data of the minor concerned has been entrusted to De Gaulle Fleurance without his or her consent, he or she may request De Gaulle Fleurance to delete this personal data by following the procedure described in point 7.2. of the present Policy.

3. WHY IS YOUR PERSONAL DATA COLLECTED?

Your personal data is collected for specific, explicit, and legitimate purposes.

Depending on the case, your personal data may be used for the following purposes:

- dialoguing with you in the context of files, missions, partnerships, etc.;
- carry out KYC ("Know Your Customer") procedures, particularly in the context of the fight against fraud or the registration of names or brands or their renewal;
- to participate in satisfaction surveys, analyses, and statistics in order to improve our products and services as well as our knowledge of our customers, prospects and partners;
- to request, obtain or receive information about De Gaulle Fleurance or one of its affiliated entities, or about the products and services offered by the latter or their partners;
- subscribe to and receive thematic information (legal training, documentation, invitations, activity reports, etc.);
- process your job application;
- improve your customer experience.

De Gaulle Fleurance may also use your personal data for administrative purposes or for any other purpose imposed by legislation in force.

4. WHO ARE THE RECIPIENTS OF YOUR PERSONAL DATA?

As your personal data is confidential, only persons duly authorised by De Gaulle Fleurance may access your personal data, apart from their possible transmission to the services in charge of a control or inspection in accordance with the applicable regulations.

All persons having access to your personal data are bound by an obligation of confidentiality.



These persons include authorized staff (lawyers, notaries, legal experts, administrative employees) within the company and its affiliated entities. Our service providers may also be required to process personal data that is strictly necessary for the performance of the services we entrust to them (IT services, electronic and postal distribution, logistics and catering, etc.). With your consent, we may also share your data with our partners who co-organize events with us, as well as those who carry out formalities related to the corporate life of legal entities (e.g. publication in the trade register) or the registration or securing of names or assets in the digital sphere (in particular, registering domain names on the Internet or in the metaverse).

In the event of recourse to affiliates, service providers or partners located outside the European Economic Area, De Gaulle Fleurance undertakes to verify that an adequacy decision or appropriate guarantees and measures have been put in place in order to ensure that your personal data benefits from an adequate level of protection (in particular thanks to the European Commission's standard contractual clauses or binding Corporate Rules)

5. HOW IS THE SECURITY OF YOUR PERSONAL DATA MAINTAINED?

De Gaulle Fleurance takes care to protect and secure your personal data in order to ensure their confidentiality and prevent them from being distorted, damaged, destroyed or disclosed to unauthorized third parties.

When the disclosure of data to third parties is necessary and authorised, De Gaulle Fleurance ensures that these third parties guarantee the same level of protection for the data concerned as that offered by De Gaulle Fleurance, and requires contractual guarantees so that, in particular, the data is processed exclusively for the purposes that you have previously agreed to, with the required confidentiality and security.

De Gaulle Fleurance implements technical and organizational measures to ensure that personal data is stored securely and for the duration necessary to fulfil the purposes pursued in accordance with applicable law.

Although De Gaulle Fleurance takes reasonable measures to protect your personal data, no transmission or storage technology is completely foolproof.

In accordance with the applicable European regulations, in the event of a proven breach of personal data likely to result in a high risk to the rights and freedoms of the persons concerned, De Gaulle Fleurance undertakes to communicate this breach to the competent supervisory authority and, where required by the said regulations, to the persons concerned (individually or in general as the case may be).

Without prejudice to the foregoing, it is your responsibility to exercise caution to prevent unauthorized access to your personal data and to your terminals (computer, smartphone, tablet, etc.).

In addition, the Company's websites may contain links to third-party websites that may be of interest to you. De Gaulle Fleurance has no control over the content of these third-party sites or over the practices

of these third parties regarding the protection of the personal data they may collect. Consequently, De Gaulle Fleurance declines all responsibility concerning the processing by these third parties of your personal data, which is not subject to the present Policy. It is your responsibility to inform yourself about the personal data protection policies of these third parties.

6. HOW LONG WILL YOUR PERSONAL DATA BE KEPT?

De Gaulle Fleurance stores your personal data for the time necessary to achieve the purposes for which it was collected, subject to the legal possibilities of archiving, obligations to retain certain data, and/or anonymization.

In particular, we apply the following retention periods for these few broad categories of personal data:

- Personal data of customers/prospects/business partners: as long as the user is active and, at the latest, 3 years after the last contact with the user;
- Personal connection data (data rooms): 1 year after the last login;
- Personal data of applicants (recruitment): the time necessary to process the application and, in case of a negative outcome, 2 years after the last contact (unless the applicant agrees to a longer period).

7. WHAT ARE YOUR RIGHTS TO YOUR PERSONAL DATA AND HOW TO EXERCISE THEM?

7.1. Your rights

Respecting the limits provided by the regulations in force, you have the following rights with regards to your personal data:

- Right to information on the processing of your personal data

De Gaulle Fleurance strives to provide you with concise, transparent, understandable and easily accessible information on the conditions for processing your personal data, in clear and simple terms.

- Right of access, correction and deletion (or "right to be forgotten") of your personal data

The right of access allows you to obtain from De Gaulle Fleurance confirmation as to whether or not your personal data is being processed and the conditions of such processing, as well as to receive an electronic copy of your personal data (for any additional copy, De Gaulle Fleurance is entitled to demand payment of a reasonable fee based on the administrative costs incurred).

You also have the right to obtain from De Gaulle Fleurance, as soon as possible (and by default, within 30 days, subject to the details below), the correction of your personal data.

Finally, subject to the exceptions provided by the applicable law (e.g.: retention necessary to comply with a legal obligation), you have the right to ask De Gaulle Fleurance to delete your personal data, as soon as possible, when one of the following reasons occurs:

- Your personal data are no longer necessary for the purposes for which they were collected or otherwise processed
- You wish to withdraw your consent on which the processing of your personal data, if any, was based and there is no other basis for such processing;
- You consider and can establish that your personal data has been unlawfully processed;
- Your personal data must be erased in accordance with a legal obligation.

- Right to limit the processing of your personal data

The applicable regulations provide that this right may be invoked in certain cases, in particular the following:

- when you contest the accuracy of your personal data ;
- when you consider and can establish that the processing of your personal data is unlawful but you oppose to the deletion of the personal data and demand instead the limitation of the processing;
- when De Gaulle Fleurance no longer needs your personal data but they are still necessary for the establishment, exercise or defense of legal claims;
- When you object to the processing being based on the legitimate interests of the controller, during the verification as to whether the legitimate grounds pursued by the controller prevail over those of the person involved.

- Right to portability of personal data

Where the processing is based on your consent or a contract, this right to portability allows you to receive the personal data that you provided to De Gaulle Fleurance in a structured, commonly used format and to transmit this personal data to another controller without De Gaulle Fleurance hindering it.

When technically possible, you may request that De Gaulle Fleurance transfers your personal data directly to another controller.

- Right to withdraw consent to the processing of personal data

When De Gaulle Fleurance processes your personal data on the basis of your consent, this consent may be withdrawn at any time by using the means provided for this purpose (procedure indicated in point 7.2 of this Policy). On the other hand, and in accordance with the applicable law, the withdrawal of your consent is only valid for the future and therefore cannot call into question the lawfulness of the processing carried out prior to this withdrawal.

- Right to lodge a complaint with a supervisory authority

If, despite the efforts of De Gaulle Fleurance to preserve the confidentiality of your personal data, you believe that your rights have not been respected, you have the right to lodge a complaint with a supervisory authority. A list of supervisory authorities is available on the European Commission's website. In France, this is the CNIL, which can be contacted at the following postal address: 3, Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07 or on its website at: <https://www.cnil.fr/fr/cnil-direct/question>.

- Right to decide what happens to your personal data after your death

Finally, you have the right to organize the fate of your personal data after your death by adopting general or specific directives. De Gaulle Fleurance undertakes to respect these directives. In the absence of directives, De Gaulle Fleurance recognizes the possibility for heirs to exercise certain rights, in particular the right of access, if it is necessary for the settlement of the deceased's estate; and the right of opposition to proceed with the closure of the deceased's user accounts and to oppose the processing of their data.

7.2. How to exercise your rights

For any question relating to this Policy and/or to exercise your rights as described above, you may contact De Gaulle Fleurance, either electronically or by post, by sending a letter accompanied by a copy of any identity document to

dp@dgfla.com

or

Personal Data Management Department
De Gaulle Fleurance
9 rue Boissy d'Anglas 75008 Paris
France

De Gaulle Fleurance commits to answer to you as soon as possible, and at the latest within one month after receipt of your request.

If necessary, this deadline may be extended by two months, taking into account the complexity and number of requests addressed to De Gaulle Fleurance. In this case, you will be informed of the extension and the reasons for the postponement.

If your request is submitted in electronic form, the information will also be provided to you electronically where possible, unless you expressly request otherwise.



If De Gaulle Fleurance does not comply with your request, it will inform you of the reasons for its inaction and you have the possibility to lodge a complaint with a supervisory authority and/or to seek legal redress.

9. APPLICABLE LAW AND COMPETENT COURT

This Policy is subject to French law. In the event of a dispute and in the event that an amicable agreement cannot be reached, the competent courts will be those within the jurisdiction of the Court of Appeal of Paris, notwithstanding multiple defendants or the introduction of third parties.

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