

## PRIVACY POLICY

Respect for the rights and freedoms of individuals and the protection of their personal data lies at the heart of the concerns of the HAMELIN (HOLDHAM) Group and its different subsidiaries (“HAMELIN”).

In the interests of transparency, HAMELIN has drawn up this privacy policy (“Privacy Policy”) for the users (“you”) of the Pelikan Hubs website (“Website”).

The Privacy Policy complements the Website’s General Terms of Use. It seeks to

1. Outline HAMELIN’s undertakings regarding the protection of your data,
2. Inform you of your rights and
3. Provide details of the processing performed on your data

Concise Dictionary:

- **Personal Data:** information that directly or indirectly identifies a person, such as a name, a postal or email address, a photograph, a telephone number, a bank account number or any other data permitting the identification of a natural person;
- **Data Controller:** person or organization that determines the purposes and means of the processing of personal data;
- **Processing:** any operation, or series of operations, applied to personal data or sets of data, such as collection, conservation, use, structuring, etc.

### I. HAMELIN’s Undertakings

- **What are HAMELIN’s undertakings with regard to data processing?**

HAMELIN undertakes to process your data lawfully, fairly and transparently and to update them as regularly as possible.

To ensure that it abides by its different data protection obligations, HAMELIN has appointed a Data Protection Officer (“DPO”). The latter may be contacted at the following address: [data.protection@hamelinbrands.zendesk.com](mailto:data.protection@hamelinbrands.zendesk.com).

- **What are HAMELIN’s undertakings with regard to the conservation of your data?**

HAMELIN undertakes to retain your data solely for the time necessary to achieve the purposes of their processing.

- **What are HAMELIN’s undertakings with regard to the security of your data?**

HAMELIN informs you that physical, electronic and administrative security measures have been put in place, including the use of extended firewalls and passwords to secure access to your personal data.

- **What are HAMELIN's undertakings with regard to the transfer of your data?**

As some of HAMELIN's service providers and subsidiaries are located outside the European Union, your data may be assigned to non-EU third countries. HAMELIN ensures that the appropriate guarantees stipulated by European regulations are implemented.

Thus, HAMELIN oversees any transfers made to its subsidiaries located outside the European Union by means of the Standard Contractual Clauses mechanism of the European Commission.

With regard to transfers made to its service providers and by its service providers, HAMELIN ensures that they fall within the framework of the appropriate guarantees, including the Binding Corporate Rules, the Privacy Shield Certification and the Standard Contractual Clauses of the European Commission.

## II. Your Rights

- **What are your rights?**

In accordance with the current legislation, you have the following rights:

- The right to ask the data controller for **access** to your personal data;
- The right to request **the rectification or suppression** of the latter;

- **How to exercise your rights**

You can exercise your rights by writing to the following address: [corporate.privacy@hamelinbrands.zendesk.com](mailto:corporate.privacy@hamelinbrands.zendesk.com)

## III. The Processing of your Data

- **Who is responsible for processing your data?**

The data controller is HOLDHAM, whose head office is located at 1, Rue du Campus, 14200 HEROUVILLE SAINT CLAIR ("we").

The processing of your data is based on our legitimate interest in providing you with the best possible services and obtaining statistics on visits to our Website.

In order to provide you with clear information on the processing of your data, we have drawn up the table below.

## What data do we read and collect?

We read:

- Your browser's language
- Your IP address

We collect:

- Your IP address and your browsing data.
- The data provided by you on the contact form (i.e. your email address, your name and surname and your IP address).

## Why do we process your data?

We process this data in order to:

- Improve your experience on the website
- Enable the website to work,

We process this data in order to:

- Obtain technical and audience-related statistics,
- To reply to your requests,
- To combat spam

### • Who are your data assigned to?

Your data are assigned to members of our staff authorized to process them by virtue of their duties, as well as to our service providers who require access to them in order to operate or improve the Website services.

We ensure that the latter provide the guarantees necessary for the protection of your data.

We do not use your data for any other purpose and we **do not resell or hire out any data to external entities.**

Personal data is collected solely for the purpose of organizing the Pelikan Hub event and, where applicable, for future integration of Pelikan fans into further projects.

HAMELIN reserves the right to share Hub Masters' personal data with group-owned national organizations or service providers for the delivery of giveaways. For Hub Masters in the United States and Canada, data is transmitted to Coles of London, 8510 McAlpine Park Drive, Suite 107, Charlotte, NC 28211, USA and European Manufacturing & Design Ltd. , PO Box 72040, Woodbridge RPO Pine Valley, Ontario Canada.

Personal data is stored and processed on the servers of Google SARL, registered office: GOOGLE IRELAND LIMITED, BARROW STREET, DUBLIN (99132). French offices: 8 Rue de

Londres, 75009 Paris, Tel. no.: +33 1 42 68 53 00. Datacenter: 7330 Saint-Ghislain, Belgium, Tel. no.: +33 805-980-425

Consent to the storage of personal data may be revoked at any time by contacting: [data.protection@hamelinbrands.zendesk.com](mailto:data.protection@hamelinbrands.zendesk.com).