

## PROTECTION OF PERSONAL DATA

Overcome is concerned about the protection of personal data. It is committed to ensuring the best level of protection to your personal data in accordance with the law Informatique et Libertés.

For any information on the protection of personal data, you can also consult the website of the Commission Informatique et Liberté [www.cnil.fr](http://www.cnil.fr)

Personal data is collected by:

Overcome , SARL with capital of 160,000 euros, whose registered office is at 13-15 rue des Sablons 75116 Paris, registered with the Paris Trade and Companies Register under number B 347 453 771

Hereinafter referred to as " OVERCOME "

### 1. **Why this privacy statement?**

Anyone who uses the web S ite provides certain personal data. This personal data is information that allows us to identify you as a natural person, whether we actually do it or not. You are identifiable as soon as it is possible to create a direct or indirect link between one or more data and you as a natural person.

We use and process your personal data only in accordance with the Law on the Protection of Privacy and other relevant legal provisions. Any reference in this privacy statement to the 'Privacy Act' refers to a reference to the Law of 8 December 1992 on the protection of privacy with regard to the processing of personal data. Any reference to the Regulation is a reference to the Regulation of 27 April 2016 on the protection of individuals with regard to the processing of personal data and the free movement of such data (GDPR).

Each User of the Website is notified by means of this Privacy Statement regarding the processing activities that Overcome may do with its personal data. Overcome reserves the right to modify this Privacy Statement at any time. Any substantial modification will be clearly indicated to the User.

### 2. **Who processes personal data?**

#### **2.1 Processor**

Overcome is responsible for the processing and determines alone, or in collaboration with others, what personal data is collected, as well as the purpose and means for the processing of such personal data.

#### **2.2. Processor (s)**

Overcome is free to use data processors. A processor is a natural or legal person who processes personal data on request or on behalf of the controller. The processor is required to ensure the security and confidentiality of the data. The processor always acts according to the instructions of the controller.

Overcome uses the following categories of "processors":

hosting companies, external payment service providers, logistics partners , routing companies .

### 3. **On what legal basis are my data processed?**

In accordance with the law on the protection of the privacy and the Regulation, we treat the personal data on the basis of the following legal reasons:

- Based on the execution of the contract as agreed with the User, or the completion of pre-contractual steps, at the request of the user ;  
or
- On the basis of compliance with legal or regulatory provisions, relating to the management of the contractual relationship, and in particular billing;
- Based on our legitimate interest in sending information and flyers to our customers;
- Based on your express consent to send promotional offers (direct marketing).

### 4. **What personal data is processed?**

Overcome undertakes to collect and process only the personal data that are relevant and necessary to achieve the purposes for which they are processed. The following categories of personal data are processed:

- Personal identification data (surname, first name, address);
- Contact information (phone number and e-mail address);
- Electronic identification data (IP address, location, cookies);
- Personal data (civility, sex, age, date of birth, nationality, RPPS number, medical specialties).

This data is collected when you register on the Website and / or place an order. Data may also be provided to external partners, subject to your permission. Other personal data may be collected later, for example as part of our after-sales service. The amount of data collected depends on your use of the Website and the functionality of the Website.

In addition, we use cookies to recognize the User and offer them a personalized user experience, to remember their technical choices (for example, a language or a "shopping cart") and to detect and correct any error on the Website. For more information on how we use cookies, please see our Cookie Policy .

### 5. **For what purposes will my personal data be used?**

Overcome collects your personal information in order to provide each User of our platform with a secure, optimal and personalized user experience. The collection of personal data may intensify as the User makes more intensive use of the platform and our online services. Overcome reserves the right to suspend or cancel certain transactions if data is missing, incorrect or incomplete.

Data processing is essential for the operation of the platform and related services. The treatment is carried out exclusively for the following specific purposes:

- Customer management: customer administration, order management, deliveries, invoicing, credit checks, support, complaint tracking and newsletter sending.
- Litigation management.
- Protection against fraud and offenses.
- Personalized marketing and advertising if you have expressly accepted it. In this case, you are free to withdraw your consent at any time.

The user always provides the personal data himself and can thus exercise a certain degree of control. If some data is incomplete or apparently incorrect, Overcome reserves the right to temporarily or permanently postpone certain expected transactions.

## 6. Who receives your personal data?

Your personal data will only be processed for internal use within Overcome . Your personal data will not be sold, transmitted or communicated to third parties, except in the case of explicit and prior consent on your part.

## 7. How long do we keep your personal data?

Your data will be kept for 3 years.

They will no longer be used afterwards for commercial purposes.

The User validly exercises the right to delete personal data to this email address : rgpd@overcome.fr .

## 8. What are your rights ?

### **8.1 Guarantee of lawful and secure processing of personal data**

Your personal data will always be processed for legitimate purposes, as stated in Article 5. They are collected and processed in an appropriate, relevant and proportionate way, and are not kept longer than necessary to achieve the set objectives.

### **8.2 Right of access**

If you can prove your identity, you will have the right to obtain information about the processing of your data. This gives you the right to view the purposes of the processing, the categories of personal data, the categories of recipients to whom the data was sent, the criteria that determine the retention period of the data and the rights you can exercise regarding your data.

### **8.3 Right of rectification of personal data**

Inaccurate or incomplete data can be corrected. It is the responsibility of the User to make the necessary changes to his "User Profile". You can also contact us with a change request.

### **8.4 Right to delete your personal data**

You also have the right to obtain the deletion of your personal data, in the following cases:

- Your personal data are no longer necessary for the purpose set;
- You withdraw your consent to the processing of your data and there is no other legal basis that justifies the processing of your data;
- You have filed a legal objection to the processing of your personal data;
- Your data is processed illegally;
- Your data must be erased under a legal obligation.

The deletion of data is mainly related to their visibility; Deleted data may be temporarily stored.

### **8.5 Right to limitation of treatment**

In some cases, you have the right to limitations on the processing of your personal data. Especially in case of dispute as to the accuracy of the data, whether the data are necessary in the context of legal proceedings or during the time required for Overcome to verify that you can validly exercise your right to erasure.

### **8.6 Right to object**

You have the right at any time to oppose the processing of your personal data for purposes of 'direct marketing', profiling or for purposes that arise from the legitimate interests of the data controller. Overcome will cease to process your personal information, unless can not demonstrate that there are compelling legitimate reasons for the processing of your personal data that override your right to object.

### **8.7 Right to portability of data**

You have the right to obtain from Overcome any personal data you have provided us in a structured, commonly used and machine readable format. You also have the right to transfer this personal data to another controller, unless technically impossible.

#### **8.8 Right to withdraw your consent**

You have the right to withdraw your consent at any time , for example when you have given it for direct marketing purposes.

#### 9. **How can you exercise your rights?**

If you wish to exercise your rights, you must send a written request and proof of identity by registered mail to the address mentioned at the top of this document, or to Overcome by email at [rgpd@overcome.fr](mailto:rgpd@overcome.fr) . We will respond as soon as possible, no later than one (1) month after receipt of your request.

#### 10. **Possibility to lodge a complaint**

If you do not agree with the processing of your personal data by Overcome, you have the right to file a complaint with the relevant supervisory authority.