

# PRVACY POLICY

The company LEMERLE SAS (hereinafter "**LEMERLE**") manufactures and markets golf equipment and in particular connected golf putters (hereinafter the "**Products**") through its website <https://lemerle.golf> (hereinafter after the "**Website**").

As part of the use of the Site, users (hereinafter the "**Users**") and when they place an order the customers (hereinafter the "**Customers**") are required to communicate personal data concerning them.

LEMERLE, data controller, attaches the greatest importance to the confidentiality and security of this personal data. This privacy policy (hereinafter the "**Privacy Policy**") has been founded in compliance with the laws, regulations and standards in force and explains what personal data is concerned, how it is collected, processed, disseminated and stored, and for what purposes.

The personal data collected by the Data Controller (namely LEMERLE) depends on your use of the Site and may include personal data that you have provided.

- Via the "Send us an email" form;
- When placing an order on the Site;
- When collecting data relating to the use of the Site and in particular the collection of Cookies;
- During requests, withdrawals, claims and/or disputes

## 1 – DATA COLLECTED

LEMERLE ensures that it collects and processes the data strictly necessary for the purpose of placing an order, described in Article 2 of this Privacy Policy. They concern:

- User and Customer identification data (surname, first name, email, telephone number(s), postal address);
- Data relating to payment methods such as the Customer's bank details;
- Data relating to the follow-up of the commercial relationship: requests for information, order history and exchanges with the services;
- Cookie-type browsing data.

## 2 – PURPOSES OF THE PROCESSING OF DATA COLLECTED

### 2.1. Personal data :

The processing implemented by LEMERLE meets an explicit, legitimate and determined purpose. The data is processed mainly for the following purposes:

Purposes	Legal basis
<ul style="list-style-type: none"><li>• Management of contact and information requests</li><li>• Ordering Products on the Site</li><li>• Organization of Product Delivery and transport tracking</li><li>• Organization of payments on the Site: via Paypal account or payment by credit card</li><li>• Administrative management of the contract: management of invoicing, storage of orders, management of requests for withdrawal and guarantees</li></ul>	<ul style="list-style-type: none"><li>• Execution of pre-contractual measures or execution of a contract.</li></ul>
<ul style="list-style-type: none"><li>• Drafting of control reports for the purpose of improving the quality of the service rendered</li></ul>	<ul style="list-style-type: none"><li>• LEMERLE's legitimate interest in understanding and adapting to the needs of Customers.</li></ul>
<ul style="list-style-type: none"><li>• Development of commercial statistics</li></ul>	<ul style="list-style-type: none"><li>• LEMERLE's legitimate interest in studying the attractiveness of its offer</li></ul>
<ul style="list-style-type: none"><li>• Distribution of personalized commercial offers</li><li>• Send information about the LEMERLE company and newsletters</li><li>• Administer a promotion or survey</li><li>• To be contacted by email</li></ul>	<ul style="list-style-type: none"><li>• Consent and/or legitimate interest of LEMERLE</li></ul>

## 2.2. Cookies :

The Site uses several types of Cookies for different purposes:

- **Functionality cookies:** Essential for using the Site, they allow you to use the main features of the Site such as managing your basket and the ordering process, maintaining identification throughout navigation, adaptation of the presentation of the Site to the display preferences of the User terminal, management and secure access to the Customer's personal space, transaction security, etc. These Cookies are necessary for the provision of services when browsing the Site. These Functionality Cookies cannot be disabled, as the Site cannot function properly without these Cookies.
- **Analytical and audience measurement Cookies:** These are non-individualized Cookies that provide better knowledge of the use (for example, the pages most often consulted) and the performance of the Site in order to improve its operation. These Cookies can be installed on the User's computer by the Data Controller or by its service providers and audience measurement partners. These Cookies are not essential for navigation but make it possible to measure the performance of the Site, to detect navigation problems, to facilitate research, to analyze the content consulted, or to optimize the operation of the Site.
- **Personalization cookies:** They allow you to visit the Site in a personalized way, depending on the years

It is considered that the User has given his consent to the deposit of cookies, if the User continues browsing by clicking on the "Ok, accept all" button on the banner informing him of the use of Cookies, or on a element of the Site such as an image, a title, a button etc. or by going to any page other than the page through which he accessed one of the Sites when he first connected. This agreement is only valid for a period of thirteen (13) months from the first cookie deposit. Once this period has passed, consent will be requested for the use of these cookies.

You can at any time choose to oppose or limit the recording of Cookies by configuring your browser software (Internet Explorer, Google Chrome, Safari, Firefox, etc.) and insofar as your terminal is likely to display content developed with the Flash language, you can access your tools for managing Flash Cookies.

Your browser can be configured to notify you of the Cookies that are stored on your computer and ask you to accept them or not. You can accept or refuse Cookies on a case-by-case basis or refuse them systematically.

Please note that this configuration of your browser may deprive you of access to certain content or significantly disrupt your browsing and the services you expect from our Site. Where applicable, we decline all responsibility for the consequences related to the degraded behavior of our Site resulting from the impossibility of using the Cookies necessary for its operation. If your browser is configured to refuse all Cookies, you will not be able to make purchases or take advantage of essential functions of our Site, such as storing items in your basket or receiving personalized recommendations.

In order to manage Cookies as closely as possible to your expectations, we invite you to configure your browser taking into account the purpose of Cookies as mentioned above.

The configuration of each browser is different. It is described in the help menu of your browser, which will allow you to know how to modify your wishes in terms of Cookies. This tells you how to refuse new Cookies or obtain a message notifying you of their receipt or how to deactivate Cookies, either systematically or according to their issuer. You can also delete Cookies manually.

**For more information on the use, management and deletion of "cookies", for any type of browser, please consult the following link: <https://www.cnil.fr/fr/cookies-les- tools-to-master> them**

## **3 - RECIPIENTS**

The data may be collected or transmitted, and processed by a third party in the name and on behalf of LEMERLE within the strict limits of the reasons mentioned in Article 2.

In this case, LEMERLE ensures that all the service providers with which it works preserve the confidentiality and security of the data. LEMERLE may, for example, ask to provide services that require the processing of its Customers' personal data to:

- **Subcontractors:** partner structures that provide part of the service, IT services such as maintenance and technical support services for databases as well as for software and applications that may contain data concerning Users, Customers or prospects of LEMERLE, marketing and/or web agencies that carry out the website, the advertising, marketing and commercial campaigns of LEMERLE.
- **Recipients or joint data controllers:** lawyer, auditor, chartered accountant, etc., competent public authorities at their request. 4 –

## STORAGE DURATION

Personal data is kept only for the time necessary to fulfill the purposes mentioned above or to enable LEMERLE to meet its legal obligations, namely, in particular, for five (5) years following any end of the contract. for the management of disputes and for a period of ten (10) years in terms of invoicing.

When data is no longer useful, it is deleted.

## 5 – TRANSFER OF PERSONAL DATA ABROAD

The processed data is hosted by LEMERLE, in France. LEMERLE does not transfer data outside the European Union.

## 6 – SECURITY AND CONFIDENTIALITY

LEMERLE implements organizational, technical, software measures in terms of physical and computer security to protect personal data against alteration, destruction and unauthorized access.

Respect for confidentiality and data protection is binding on all LEM employees, service providers and subcontractors.

## 7 – RIGHTS OF USERS / CUSTOMERS

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In application of the regulations applicable to personal data, Users and Customers have the following rights:

- The right to access and rectify personal data concerning them. In this case, before the implementation of this right, LEMERLE may request proof of the User's or Customer's identity in order to verify its accuracy.
- The right for the User or the Customer to withdraw their consent at any time to the processing of their personal data, for processing carried out on this basis.
- The right to request the deletion of personal data. However, the data necessary for compliance with a legal obligation imposed on the Data Controller cannot be deleted. In addition, the data necessary for the execution of the contract will be deleted at the end of the notice period of thirty (30) days, the request for deletion of the data making it impossible for LEMERLE to fulfill the execution of the Contract.
- Opposition to the processing of their personal data, for legitimate reasons. The Customer is aware that the exercise of this right of opposition may lead to the impossibility for LEMERLE to execute all or part of the order when this right is exercised on data necessary for the execution of the latter.
- Limitation of processing, allowing the User or Customer to temporarily freeze the use of some of their personal data by LEMERLE.
- The portability of its data. In accordance with Article 20 of European Regulation No. 2016/679 known as "GDPR", the person concerned has the right to receive the personal data concerning him that he has provided to LEMERLE, in a structured format, commonly used and readable by machine, and has the right to transmit this data to another controller without LEMERLE, to whom the personal data has been communicated, obstructing it.
- The Customer can finally define the fate of his data after his death and choose whether LEMERLE communicates (or not) this data to a third party he has previously designated. In the event of death and in the absence of instructions from him, LEMERLE undertakes to destroy this data, unless their conservation proves necessary for probative purposes or to meet a legal obligation.

The rights relating to the GDPR can be exercised by mail or email with the Data Protection Officer or his representative: LEMERLE

119 chemin du Four 84400 Villars

Email : [contact@lemerle.golf](mailto:contact@lemerle.golf)

If you believe, after contacting us, that your "IT and Freedoms" rights are not respected, you can send a complaint to the CNIL services.

## 8 – CHANGES TO THE PRIVACY POLICY

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LEMERLE reserves the right to modify or update this Policy at any time and without notice.