

## **Mulann' Privacy Policy**

Mulann is committed to protecting your privacy and providing you with a positive experience while using our websites, products, or services.

Mulann reserves the right, at any time, to modify this Privacy Policy. If we make revisions that change the way we collect, use, or share personal information, we will post those changes in this Privacy Policy. If we make material changes to our Privacy Policy, we will also notify you via email as well as by posting a notice on our website or sending you a notification via email. You should review this Privacy Policy periodically so that you keep up to date on our most current policies and practices. We will note the effective date of the latest version of our Privacy Policy at the end of this Privacy Policy.

### **1. Scope**

This Privacy Policy provides you with guidance on your rights and obligations in relation to your personal information.

Mulann' Privacy Policy (the "Privacy Policy") establishes and communicates the key principles that Mulann follows in protecting the personal information that we collect and process. Please note that some privacy rights and obligations may differ in certain locations based on local law, in which case Mulann will comply with the local legal requirements. To the extent a notice provided at the time of collection from a website or specific product conflicts with this Privacy Policy, such specific notice or supplemental privacy statement will control.

### **2. Collection of Personal Information**

"Personal information" is any information that can be used to identify an individual, and may include things such as your name, physical address, email address, phone number, login information, marketing preferences, company affiliation, or geographic location. Mulann may collect personal information that is necessary for legitimate business purposes, which will be disclosed to you at the time of collection. Mulann will only use this information for the purposes for which it was collected. Mulann may also collect personal information from trusted third-party sources and engage third parties to collect personal information to assist us. We shall ensure that third parties we use are compliant with EU-US privacy regulations.

One of the most common methods of collecting personal information is during the online form submission or registration process, including where a website user is requesting some information, a courtesy newsletter, registration for an event, or responding to similar offers such as sample reports, white papers, or further product information.

In some instances, Mulann and the third parties we engage may automatically collect and aggregate data using cookies, weblogs, web beacons, and other similar applications. This information is used to better understand and improve the usability, performance, and effectiveness of our content delivery

services and to help us tailor content or offers for you. Please read the “Cookies” section below for more information.

### **3. Purpose and Use of Personal Information**

Mulann may use your personal information for operational, legal, administrative, and other legitimate purposes permitted by applicable law. Some of the ways we may use personal information include:

- Providing you with requested products or services.
- Providing you with information regarding similar products or events.
- Analyzing and monitoring extent of use.
- Providing customized product and service information.
- Allowing users to participate voluntarily in mailings or other events.
- Providing product service updates, information, and alerts.
- Sending communications, including for marketing or other customer satisfaction purposes.
- Order processing, and to provide transaction documents.
- To contact users for information verification purposes.

### **4. Right to Access, Correct and Delete Personal Information**

We strive to make sure that our information about you is reliable, accurate, and up-to-date. While personal information is maintained by Mulann, you may access your personal information to the extent required by law to review, update, and correct inaccuracies and, as the case may be, delete such personal information, pursuant to applicable regulations. Upon request made to the contact listed below, we will provide you with reasonable access to the personal information we collect about you. Because personal information—for example, your email address—is required to communicate with you, we retain personal information as long as your account is active. You will have the opportunity to correct, transfer, update, modify, or delete this information. You may also limit the use and disclosure of your information by either unsubscribing from marketing communications or contacting us at the address listed below under the section titled “Contact Information” or by emailing [privacy@mulann.com](mailto:privacy@mulann.com). Please note that some information may remain in our records even after you request deletion of your information, to the extent permitted by the EU General Data Protection Regulation 2016/679. Additionally, there may be limits to the amount of information we can practically provide. For example, we may limit access to personal information where the burden or expense of providing access would be disproportionate to the risks to an individual’s privacy or where doing so would violate others’ rights.

### **5. Sharing Personal Information**

Mulann may disclose personal information to its subsidiaries and affiliates.

There may be instances when Mulann may disclose your personal information without providing you with a choice in order to honor a request that you have made through the products or services; comply with the law or in response to a court order, government request, or other legal process; protect the interests, rights, safety, or property of Mulann or others; protect against fraud or for risk management purposes; or respond to adverse third parties (i.e., adverse parties and their counsel and other agents) in the context of litigation. In addition, if Mulann sells all or part of its business or makes a sale or transfer of assets or is otherwise involved in a merger or business transfer, you agree that Mulann may transfer your personal information to a third party as part of that transaction.

In all cases Mulann requires all unaffiliated third parties to treat personal information as confidential. Mulann will not provide personal information to third parties for their own marketing purposes without your consent.

If you participate in a discussion forum, chat room, or provide comments related to Mulann on a social media or other public platform, you should be aware that the information you provide there (i.e., your public profile) will be made broadly available to others, and could be used to contact you, send you unsolicited messages, or for purposes neither Mulann nor you have control over. Also, please recognize that social media forums and chat rooms not controlled by Mulann may have additional rules and conditions. Mulann is not responsible for the personal information or any other information you choose to submit on these forums that are not Mulann-controlled.

Mulann may offer you the ability to share personal information through a social networking site (e.g., Facebook, Twitter), using such site's integrated tools (e.g., Facebook "Like" button, or Twitter "Tweet" button). The use of such integrated tools enables you to share personal information about yourself with other individuals or the public, depending on the settings that you have established with such social networking site. For more information about the purpose and scope of data collection and use in connection with such social networking site or a site's integrated tools, please visit the privacy policies of the entities that provide these social networking sites. Mulann is not responsible for the personal information or any other information you choose to share through any social networking site.

## **6. Security of Personal Information**

Mulann has physical, administrative, and technical safeguards in place to help protect the personal information Mulann collects. Mulann will take reasonable and appropriate steps to ensure safety of your personal information in compliance with applicable regulation.

## **7. Retention of Personal Information**

Mulann will retain your personal information as needed to fulfill the purposes for which it was collected. We will retain and use your personal information as necessary to comply with our business requirements, legal obligations, resolve disputes, protect our assets, and enforce our agreements.

## **8. Cookies**

When visiting a Mulann website, our servers may query your computer to see if there are cookies previously set by Mulann. A cookie is a text file that is created when your browser visits a particular website, such as a Mulann website. Afterwards, every time you visit the Mulann website, your browser retrieves and sends this file to the Mulann website's server. Cookies enhance the website user experience by:

- Helping Mulann authenticate you as a user when you log in to a secure area of the website;
- Storing information about your website user activities so you may easily pick up where you left off on the Mulann' server's pages;
- Storing your user preferences, which allows you to customize how information is presented through site layouts or themes; and
- Personalizing the manner in which Mulann responds to you via marketing communications.

The cookies Mulann collects may include the following information: a unique identifier, user preferences, and profile information used to personalize the content shown to the individual users. You will be informed about our use of cookies when you visit the Mulann website. It is your choice

whether you allow Mulann to store such information on your computer or device. You may be able to set your web browser to alert you when a cookie is being used, and may use your browser to accept or reject the cookie; additionally, you may also disable the cookie feature on your browser entirely. However, disabling cookies may prevent you from using some features on Mulann websites. You can find more detailed information about cookies and how they work at [aboutcookies.org](http://aboutcookies.org).

We may collect and share the physical location of your device with your consent for purposes consistent with this Privacy Policy, such as to provide you with personalized location-based products or services. In some instances, you may be permitted to allow or deny such use of your device's location, but if you choose to deny such use, we may not be able to provide you with the applicable personalized products or services.

Some web browsers and devices permit you to broadcast a preference that you not be "tracked" online. At this time, Mulann does not modify your experience based upon whether such a signal is broadcast.

## **9. Cross Border Transfer of Personal Information**

As Mulann is a global organization, we may transfer your personal information to a Mulann subsidiary or affiliate, or to third parties as described above that are located in various countries around the world. By using our websites or products, or providing any personal information to us, where applicable law permits, you consent to the transfer, processing, and storage of such information outside of your country of residence where data protection standards may be different.

Mulann safeguards and enables the global transfer of personal information in a number of ways. If you have any complaints regarding our compliance with this Privacy Policy, you should first contact us at the address listed below under the section titled "Contact Information" or by emailing [privacy@mulann.com](mailto:privacy@mulann.com). We will investigate and attempt to resolve complaints and disputes regarding collection, use, and disclosure of personal information in accordance with this Privacy Policy.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact your local supervisory authority. Under certain conditions, more fully described on the Privacy Shield website, you may invoke binding arbitration when other dispute resolution procedures have been exhausted. If you are an employee, past employee, or prospective employee, please see Section 10 for information concerning who to contact if you have an unresolved privacy or data use concern.

## **10. Prospective Employee and Employee Information**

If you submit an application for employment to or are currently an employee of Mulann, Mulann is authorized to collect the information in any form it obtains through your application for employment or continued employment with Mulann, and your submission of employee related documents, including but not limited to the personal information that you submit in connection with your employment or intended employment (collectively "Employee Information"). Examples of Employee Information collected in connection with your employment or application for employment includes but is not limited to your name, date of birth, government issued identification (passport, social security number, driver's license number), banking information, marital status, benefit information, title, employment history, education, job qualifications, and other relevant employee personal data. We also collect some of this information about your dependents when you provide it to us when you enroll in health and other benefits or provide contact information. Employee Information does not

include any information that is available to the general public and excludes information generally available on a business card.

Mulann will collect, use, store and retain, and secure your social security or other identification number in accordance with this Privacy Policy. Mulann will not intentionally communicate or make available, in any manner, your social security or other identification number to the general public. Mulann will not print your social security or other identification number on any card required for you to access colleague member services provided by Mulann. Mulann will not require you to transmit your social security or other identification number over the Internet, unless the connection is secure or the social security or other identification number is encrypted. Mulann will not print your social security or other identification number on any materials that are mailed to you, unless state or federal law requires or permits the social security or other identification number to be on the document to be mailed.

In accordance with applicable law, Mulann may use Employee Information to evaluate applications for employment, manage work-related aspects of the employee-employer relationship (i.e., training, payroll, benefits, travel, reimbursement expenses, performance appraisals, succession planning, and team member safety), investigate and respond to any claims related to your employment, and comply with applicable laws and regulations. Your Employee Information will not be used for marketing purposes by us or any third party, unless you specifically consent to such use.

Mulann shares your Employee Information with third parties who provide outsourced human resource functions to us. Those third parties are required to protect your Employee Information. Mulann may disclose your Employee Information if required or permitted to do so by law (such as when part of a governmental agency action or litigation), governmental or quasi-governmental requests, or a regulatory organization, or to relevant third parties such as site technicians, brokers, auditors, lawyers, or professional advisors. In the event that Mulann considers it necessary or where required by law to disclose Employee Information in certain situations where the health, safety, or wellbeing of a team member is at imminent risk, we may share your Employee Information with our outside lawyers, law enforcement or others who are legally authorized. As Mulann continues to develop our business, we may buy or sell assets. In the unlikely event that Mulann or substantially all of our assets are acquired Employee Information may be one of the transferred assets.

Employee Information may be stored in hard copy or electronic format within your branch office or in the cloud in the United States or other countries where Mulann, its affiliates, agents, or contractors conduct business. Your Employee Information may be transferred into our human resources systems and used to manage your employment, may become part of your personnel file, and may be used for other work-related purposes. Your Employee Information will be kept for as long as is legally required.

If you have any complaints regarding our compliance with this Privacy Policy, you should first contact us at the address listed below under the section titled "Contact Information" or by emailing [privacy@mulann.com](mailto:privacy@mulann.com).

## **11. EU General Data Protection Regulation**

The Mulann Privacy Policy addresses our commitment to the processing of personal data in accordance with the EU General Data Protection Regulation 2016/679.

## **12. Other Contractual Relationships**

If you enter into a separate contractual relationship with Mulann which requires, or contemplates, collecting, using, or sharing information about you in a manner that is different than that which is described in this Privacy Policy, the terms of that agreement will apply.

### **13. Other Websites**

This Privacy Policy does not apply to sites or applications offered by other companies or individuals, including third party products and services, that may be displayed as content in a search on our website. Mulann encourages you to read the privacy policy of any third party site or applications before transmitting personal information.

### **14. Contact Information**

If you have any questions or concerns related to this Privacy Policy, please contact Mulann at [privacy@mulann.com](mailto:privacy@mulann.com)

Mulann SA  
9 rue Blaise Pascal  
22300 Lannion  
France

If Mulann needs, or is required, to contact you concerning any event that involves information about you we may do so by email, telephone, or mail.

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