

Personal data protection policy

1. General Information

LABOGENA DNA remains committed to protecting your personal data, which is the subject of this document entitled "Personal Data Protection Policy."

Definitions:

For convenience, the following terms in bold are defined as follows:

- **"LABOGENA DNA"** refers to our simplified joint-stock company (SAS), registered with the Rennes Trade and Companies Register under number 798 033 817, and whose registered office is located at Rue Éric Tabarly, 35538 NOYAL-SUR-VILAINE CEDEX, France.
- **"Data"** refers to your personal data, as defined in Article 4 of the GDPR and as defined below;
- **"LIL"** refers to French Law No. 78-17 of 6 January 1978 on Information Technology, Data Files and Civil Liberties, as amended;
- **"Policy"** refers to this Personal Data Protection Policy;
- **"GDPR"** refers to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data;
- **"Website"** refers to this website administered and managed by LABOGENA DNA.

A. Therefore, your Data is processed securely and in accordance with applicable French legislation and regulations, including the GDPR and the French Data Protection Act (LIL).

B. This Policy is intended to explain how LABOGENA DNA processes your Data, particularly in connection with your use of the Website.

2. Data Controller and Contact

The Data controller is LABOGENA DNA.

Data Protection Officer or GDPR Officer:

- You can contact customer service at any time, and they will forward your request to the relevant GDPR officer. You can do this by sending an email to clients.labogena@labogena.fr or by mail to LABOGENA DNA's registered office.

They will respond as soon as possible and within a maximum of 30 (thirty) days from the date of receipt of your request or, if applicable, from the date of receipt of proof of your identity.

3. Legal Basis for Data Processing

LABOGENA DNA processes data, primarily the collection, recording, organization, structuring, storage, use, and dissemination of personal data:

- Either to comply with a legal obligation;
- Either as part of preparing a quote (pre-contractual phase);
- Or in the performance of a contract and, more broadly, business relations, including the general terms of use (GTU), general terms of sale (GTS), and internal regulations;
- Or with the explicit consent of the data subject (example: contact form via the checkbox "By checking this box, I agree that my personal data may be used to allow LABOGENA DNA SAS to respond to me," referring to this privacy policy);
- Or for legitimate interests, including promoting its products to its customers (products similar to those previously ordered by a LABOGENA DNA customer); or in cases of suspected or attempted fraud on the Website.

4. Data Subject to Different Processing Methods

4.1. LABOGENA DNA may collect and process the Data of its clients, prospects, contacts, and more generally, the Data of Website users.

4.2. Only the Data necessary for the purposes of the processing in question is processed.

4.3. Some Data is collected directly from you (a), some automatically (b), and some indirectly (c).

a) Data collected directly from you

4.4. Consent to the processing of your Data is obtained directly and explicitly from you. You may exercise your rights at any time as described in Article 9 below.

4.5. If your Data is collected via a form, you will be informed whether the information is mandatory or optional by the placement of an asterisk (*) next to the relevant fields.

Category of persons concerned by the processing	Data likely to be collected
Clients	▪ Identity: Name, surname of the individual (natural person; private individual) or legal entity (legal representative) ▪ Contact details: Email address, postal address, telephone number(s) ▪ Position or corporate mandate ▪ Information on the place of performance of services (corporate name, registration number, turnover, etc.) ▪ Bank details: Bank account details
Prospects	▪ Identity: surname, first name; corporate name ▪ Contact details: email address, postal address, telephone number(s) ▪ Information about the entity concerned (registration number, turnover, etc.)

b) Automatically Collected Data

Regarding the use of cookies, please consult the Website's cookie policy on the corresponding tab (at the bottom of the Website).

c) Indirectly Collected Data

LABOGENA DNA may indirectly collect your data, particularly through partnerships in R&D projects or by integrating third-party databases.

In all cases, LABOGENA DNA is committed to complying with the provisions of Article 14 of the GDPR.

5. Purposes of processing

Your Data is collected and processed for the following purposes:

- To perform the contract concluded with LABOGENA DNA;
- To promote and enhance the visibility of LABOGENA DNA's activities;
- To manage the Website;
- To write articles;
- To maintain the relationship between the data subject and LABOGENA DNA;
- To optimize your browsing experience on the Website;
- To respond to your requests:
 - for information via the contact form on the Website;
 - based on the exercise of your rights (Article 9 below);
- and other purposes consistent with the above purposes, including organizing marketing activities consistent with our business.

6. Data Recipients

6.1. The Data collected on the Website is intended for:

- LABOGENA DNA;
- partners with whom LABOGENA DNA has entered into a contract requiring compliance with legal provisions for the protection of personal data;
- LABOGENA DNA's subcontractors.

6.2. It may be transmitted to subcontractors that LABOGENA DNA may use to perform services and only to the extent necessary for the completion of the tasks entrusted to them. For example, these may include the following activities:

- hosting;
- IT management.

6.3. LABOGENA DNA:

- ensures that its staff and subcontractors comply with applicable data protection regulations and this Policy;

- requires its subcontractors and staff to pay particular attention to the confidentiality and security of data.

7. Data Retention Period

7.1. We retain your Data for as long as we are required to do so under applicable laws and for the purposes defined above.

7.2. The retention periods for your Data are listed below.

	Data (see Article 4 above)	Data retention period
Customer management	Customer Data	For the entire duration of the contractual relationship
Contact person management	Contact person Data	For the entire duration of the contractual relationship
Prospect management	Prospect Data	3 years from the end of the business relationship or the last contact
Site Traffic and Connection Data	Cookies - IP address, date, time, and duration of each connection, or information that identifies the recipient of a communication	13 months from the date of collection

7.3. When you cease using our services, we may store your Data in an aggregated or anonymized format.

7.4. In addition, notwithstanding the aforementioned retention periods, we may also retain your Data as reasonably necessary to comply with our legal obligations, to resolve and defend ourselves against disputes, and to enforce our agreements.

8. Data Security and Storage

8.1. LABOGENA DNA is committed to ensuring the security and confidentiality of your Data in accordance with best practices, i.e., by requiring an adequate level of protection as recommended by the CNIL (French Data Protection Authority).

8.2. LABOGENA DNA regularly tests its internal procedures in the event of a technical or physical incident to guarantee and maintain optimal responsiveness and efficiency.

8.3. However, given the structure of the Internet and networks, LABOGENA DNA cannot guarantee a specific outcome in terms of security. In the event of the detection of a security breach likely to pose a high risk to your rights and freedoms, LABOGENA DNA undertakes to inform you as soon as possible and to take, to the extent possible, the best measures to neutralize the intrusion and minimize its impact.

8.4. LABOGENA DNA regularly backs up your Data to limit the impact of a security breach.

9. To exercise your rights

9.1. You have the right to access the Data we hold about you and to correct, update, rectify, delete, erase, or otherwise modify your Data if it is inaccurate or has been processed in violation of applicable data protection regulations.

9.2. You may also object to the processing of your Data or exercise your right to data portability.

9.3. To exercise your rights, you can send an email to customer service using the contact details provided in Article 2 above.

9.4. When contacting us, please include the information necessary for your identification (last name, first name, email address) as well as any other information necessary to confirm your identity. In case of doubt, LABOGENA DNA may request a copy of your identity document in accordance with applicable regulations.

9.5. LABOGENA DNA undertakes to consider the exercise of your rights as soon as possible, except where the law or a legitimate reason requires them to retain some of your Data.

9.6. LABOGENA DNA reserves the right to charge for the actual costs related to your request within the limits set by the French Data Protection Act (LIL).

9.7. If you are not satisfied with the response, you may file a complaint with the French Data Protection Authority (CNIL) at the following address: Commission nationale de l'informatique et des libertés (CNIL) – 3 place de Fontenoy – TSA 80715, 75334 PARIS CEDEX 07. You may also file this complaint on the CNIL website: <https://www.cnil.fr/fr/plaintes>.

9.8. For more information on personal data, please visit the CNIL website: <https://www.cnil.fr>.

10. Changes to the Policy

10.1. LABOGENA DNA reserves the right to modify this Policy, in particular to comply with applicable legal and regulatory provisions. LABOGENA DNA will publish the updated policy on the Website as soon as it comes into effect.

10.2. LABOGENA DNA will make commercially reasonable efforts to generally inform all users of substantial changes to this Policy, including by posting a notice on our Website.

10.3. Nevertheless, you should review this Policy regularly. To help you keep track, we will update the "Last Updated" date at the beginning of this document, which reflects the effective date of our Policy.

10.4. Your continued access to or use of our services after the update date constitutes your acceptance of the updated Policy.