# **PRIVACY POLICY**

### Updated: June 2025.

This page informs you how Cycles Revolution SAS, owner of the Eclair brand, uses the data you may be required to transmit to us when using the eclairbikes.com website (hereinafter, "the Site").

If you have any additional questions, please contact us at the address below.

This privacy policy is intended, in particular, to ensure that our Site complies with the General Data Protection Regulation (GDPR – in French) currently in force in the European Union (<u>https://www.cnil.fr/fr/reglement-europeen-protection-donnees</u>).

# Personal data

When using the Site, we may collect certain personal data about you (email address, identity, postal address, IP address of your device). This data is collected to create your personal account (newsletter subscription, access to the online store) and allow you to benefit from the services offered by the Site (online orders).

For statistical purposes and to offer you a better service, we may also collect non-personal data when you browse our Site (browser type, operating system, internet provider, navigation path on the Site, etc.).

## **Data controller**

The data controller is Cycles Revolution SAS. More detailed information is available on the legal notice page (<u>https://eclairbikes.com/en/legal-notice/</u>).

You can reach us using the following contact email address: hello@eclairbikes.com.

## Data processing on our Site

#### Browsing the Site

When you browse the Site, we use the IP address of your device (smartphone, tablet, or computer) to enable your browser to display the content you request.

#### Personal account and online orders

To place an order on the Site, you must create a personal account (see our Terms and Conditions – T&Cs). To create this account, we will ask for your email address.

If you place an order on our Site, we will also ask for your first and last name and your postal address. These may be shared with our subcontractors.

#### Newsletter

You may subscribe to our newsletter, which we send by email.

By subscribing, you agree to provide us with your email address and acknowledge that you have read the terms of this privacy policy.

To send this newsletter, we use the services of Brevo, located in Paris, France (<u>https://www.brevo.com/fr/</u>).

You can unsubscribe from the newsletter using the link at the bottom of each message.

#### **Contact form**

We provide a contact form on our Site to allow you to communicate with us.

If you use this form, we will ask for your name and email address to respond to your request.

These requests are processed internally and are not shared with any external service provider.

# Site traffic analysis

To improve the services offered by our Site, we use Google Analytics. This service requires the use of cookies (see below) and involves transmitting your IP address to Google servers in the USA. The address is anonymized before transmission (partial masking).

You can find more information about Google's privacy policy here: <u>https://policies.google.com/privacy</u>.

# **Data sharing**

To allow you to share content from our Site, we provide sharing links to various social networks (Facebook, Instagram, Threads, X, LinkedIn), which may collect data about you. You can consult their privacy policies via the following links:

Meta : https://www.facebook.com/privacy/policy

X : https://x.com/en/privacy

Linkedin : https://www.linkedin.com/legal/privacy-policy

# Data retention period

The personal data you provide when using the services offered by our Site (personal account, online ordering, newsletter, online chat) is stored in our database as long as you continue to use these services. If you no longer use your account or unsubscribe from the newsletter, your data will be retained for an additional 5 years for statistical analysis purposes.

If you would like this data deleted before that time, you may request it (see below).

# Your rights

As a data subject, the GDPR allows you to exercise the following rights by sending your request to the contact email address listed above.

### **Right of Access and Data Communication**

You may at any time request access to the data we hold about you by email.

You also have the right to ask us to rectify or delete this data using the same contact method. We reserve the right not to respond to abusive requests (e.g., excessive in frequency or systematic in nature).

For security reasons, we will ask you to provide proof of identity when making such requests.

If you have created a personal account on our Site, you can view and/or modify your data by logging into your account with your email address and password.

### Withdrawal of Consent

You may withdraw or modify your consent to data collection at any time by using the button located at the bottom left of each page.

In the event of a dispute, you may file a complaint with the relevant authority (in France: <u>https://www.cnil.fr/fr/adresser-une-plainte</u>).

# Use of cookies

During your first visit to the Site, we inform you that data about your browsing is collected via cookies. Cookies are small text files stored on your device through your browser. They contain information necessary for the operation of the Site, or are used for statistical or marketing analysis.

You can prevent cookies from being installed (and delete existing ones) through your browser settings. However, this may affect how websites display or function.

You can find general information about cookies on the CNIL website (in French): <u>https://www.cnil.fr/fr/cookies-et-autres-traceurs/comment-se-proteger/maitriser-votre-navigateur</u>

### **Functional cookies**

These are necessary for the operation of the Site and its services. They cannot be refused.

- Complianz Cookies: used to manage your consent. Expiration period: 12 months.
- pll\_language: used to remember the selected display language. Expiration: 12 months.
- Brevo Cookies: used for email marketing and online chat functionalities. Expiration period: 6 months (email marketing) and 7 days (online chat).

### **Tracking cookies**

These improve the user experience on the Site and are only installed with your consent (see above).

- Google Tag Manager Cookies: used to analyze Site traffic. Expiration: 12 months.
- Meta Cookies: used to measure ad effectiveness on Facebook, Instagram, and Threads. Expiration: 3 months.