

Roger Dubuis

Privacy Policy

Last updated: December 2019

About Roger Dubuis and this Privacy Policy

Manufacture Roger Dubuis SA, a branch of Richemont International SA has its registered offices at Rue André-De-Garrini 2 – CP 149, CH 1217 Meyrin 2 (Geneva), Switzerland. In this Privacy Policy, we use the term Roger Dubuis (and "**we**", "**us**" and "**our**") to refer to the head office of Manufacture Roger Dubuis SA, a branch of Richemont International SA at the registered address above, our affiliates and our boutiques.

Please take a moment to read the following policy that explains how we collect, use, disclose and transfer the personal information that you provide to us on our websites, mobile applications and other digital platforms (together referred to as the "**Platforms**"), when you visit a Roger Dubuis boutique, contact the Roger Dubuis concierge by telephone, or when you interact with us over social media platforms. It also explains how we collect information through the use of cookies and related technologies when you use our Platforms.

Where we offer our products for sale online or by phone through the Roger Dubuis Client Relations Center, you must read the applicable Conditions of Sale, which will govern the terms and conditions of any such purchases made in this way.

General Data Protection Regulation Representative

For the purpose of the General Data Protection Regulation in the European Union, we have appointed the following entity as our legal representative:

Data Protection & Privacy Team

RLG EUROPE B.V.

Herengracht 436

1017BZ Amsterdam

The Netherlands

Updates to this Privacy Policy

From time to time we may update this Privacy Policy. When we do, we will publish the changes on this Platform.

Information you provide to us and how we use it

We collect the information from you as detailed below:

- To access certain areas of our Platform, you will need to register with us. During the registration process you will be asked to submit personal information about yourself (including your name and address, date of birth, e-mail address and telephone number). By entering your details in the fields requested, you enable Roger Dubuis to provide you with the services you select;
- When you purchase products online or by phone, we collect information such as your purchase details and relevant payment information. In addition, we will also collect personal information from you when you correspond with us (for example, if you contact us with a query about one of our products or services), when you provide your details when you visit a Roger Dubuis boutique or contact the Roger Dubuis concierge by telephone. Please note that phone calls will on occasion be recorded for security, training and development purposes;
- If you choose to interact with Roger Dubuis via a social media platform or other third party service, we will collect the information you have provided to us through that platform;
- We also collect certain information automatically about visitors to our Platform, described in the section headed "*Cookies and other information that we automatically collect*", below; and
- We will collect information about your location to the extent that we provide any location services, described in the section headed "Location services" below.

We will use the information we collect from you to:

- Manage and fulfil purchase and repair orders, facilitate delivery, and to provide after-sales services;
- Manage our accounts and records;
- Deal with your enquiries and requests;
- Send service related communications, including announcements and administrative messages such as order confirmation;
- Identify products and services we think you might be interested in based on your information, such as your purchase history and your previous interactions with us;
- Send you marketing communications (including e-mails and social media audience matching) relating to us and other third party partners and that we think may be of interest to you where we have a legitimate basis to do so (please see the "*Your choices*" section below for further information about how you can control these updates);

- Conduct market research so that we can continuously improve the services we provide to our customers;
- Undertake credit checking, prevention of fraud and other prohibited or illegal activities as part of our efforts to keep our Platform and services secure; and
- Understand how our Platform is used so that we can continuously improve our Platform and services and other offerings.

Where you have agreed to a particular use of your information, we process it on the basis of your consent. You may withdraw that consent at any time (for example, for us to send you marketing communications) by contacting us (see the section headed “*Contact us*” below). We also process your information where this is necessary for the performance of a contract with you or where it is necessary for our legitimate interests of operating, protecting and improving our business.

Cookies and other information that we automatically collect

Like most platforms, Roger Dubuis logs IP addresses and uses cookies and similar technologies that allow us to recognise you and to customise your experience, and provide us with information about the way our visitors access our Platform. You can find out more about how we use cookies and related technologies below.

What is a cookie?

Cookies are text files, containing small amounts of information, which are downloaded to your computer or mobile device when you visit a website or mobile application. They are used to recognise your computer as you move between pages on a website, or when you return to a website or mobile application you have visited previously. Cookies are widely used in order to make platforms work, or to work more efficiently, as well as to provide information to the owners of the platform.

We use cookies to enhance the online experience of our visitors (for example, by remembering your language and/or product preferences) and to better understand how our Platform is used. Cookies will tell us, for example, whether you have visited our Platform before or whether you are a new visitor. They can also help to ensure that adverts you see online are more relevant to you and your interests.

There are two broad categories of cookies:

- **First party cookies**, served directly by Roger Dubuis to your computer or mobile device. They are used only by Roger Dubuis to recognise your computer or mobile device when it revisits our Platform.
- **Third party cookies**, which are served by a third party service provider on our Platform, and can be used by the service provider to recognise your computer or mobile device when it visits other

platforms. Third party cookies are most commonly used for platform analytics or advertising purposes.

Cookies can remain on your computer or mobile device for different periods of time. Roger Dubuis uses both 'session cookies' and 'permanent cookies'. Session cookies exist only while your browser is open and are deleted automatically once you close your browser. Permanent cookies survive after your browser is closed, and can be used to recognise your computer or mobile device when you open your browser and browse the internet again.

What cookies does Roger Dubuis use?

The Platform serves only the following types of cookies to your computer or mobile device:

<i>Type of Cookie</i>	<i>Purpose</i>
Cookies necessary for essential purposes	These cookies are essential to provide you with services available through this Platform and to use some of its features, such as access to secure areas. Without these cookies, services you have asked for, like transactional pages and secure login accounts, would not be possible.
Functional Cookies	These cookies serve a variety of purposes related to the presentation, performance and functionality of this Platform. Their overall purpose, however, is to enhance visitors' experience and enjoyment of this Platform. For example, some of these cookies enable visitors to specify language, product or other platform preferences.
Performance Cookies	These cookies are used to collect information about how visitors use our Platform. The information gathered does not identify any individual visitor and is aggregated. It includes the number of visitors to our Platform, the platforms that referred them to our Platform and the pages that they visited on our Platform. We use this information to help run our Platform more efficiently, to gather broad demographic information and to monitor the level of activity on our Platform.
Advertising Cookies	When you visit our Platform or click on advertisements or promotional areas on the Platform these cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help to evaluate the effectiveness of advertising and promotion. They are usually placed by advertising networks with our permission. They remember that you have visited a platform and this information is shared with other organisations such as advertisers.

Social Cookies	These cookies enable users to share pages and content through third party social media and other platforms. The companies that serve these cookies may also use your information to serve targeted advertising on other platforms.
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How to control or delete cookies

We use non-essential cookies on the basis of your consent. You have the right withdraw that consent and refuse the use of cookies at any time and we have explained how you can exercise this right below. However, please note that if you choose to refuse cookies you may not be able to use the full functionality of our Platform.

You can set your cookie preferences by changing your browser settings so that cookies from this Platform cannot be placed on your computer or mobile device. In order to do this, follow the instructions provided by your browser (usually located within the “Help”, “Tools” or “Edit” facility).

Further information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org and www.youronlinechoices.eu.

IP addresses

We will collect information about your computer or mobile device, including where available your IP address, operating system, log-in times and browser type. We use this information to better understand how visitors use our Platform and for internal reporting purposes. We will anonymise and share this information with advertisers, sponsors or other businesses.

About Advertising

The Platforms use third parties such as network advertisers and ad exchanges to serve you ads on third party platforms after you leave our Platforms, and we use third party analytics and other service providers to evaluate and provide us and/or third parties with information about the use of the Platforms and viewing of ads and of our content. Network advertisers are third parties that display advertisements, which are based on your visits to the Platforms and other apps and sites you have visited. Third party ad serving enables us to target advertisements to you for products and services that you might be interested in.

Third party tracking technologies are not controlled by us, even if they are associated with our Platforms or our ads. Statements regarding our practices do not apply to the methods for collecting information used by these third parties and others or the use of the information that such third parties collect. The relevant third party’s terms of service, privacy policy, permissions, notices and choices should be reviewed regarding their collection, storage and sharing practices. We make no representations regarding the policies or practices of third party advertisers or advertising networks or exchanges or related third parties.

You have choices in respect of the delivery of ads. You can opt-out of receiving certain types of behavioural ads by visiting the third party websites described in the section headed “*How to control or delete cookies*” above. We are not responsible for effectiveness of or compliance with any third parties’ opt-out options.

Location services

Some of the services that we provide are able to use information about your location. For these services, which are typically available on mobile devices or applications, you are provided with the opportunity to provide your consent to the use of location services, which, for example, process information deriving from GPS, sensors, beacons or Wi-Fi access points in order to allow you to benefit from a more personalised service. Your device will have settings that allow you to turn off these services should you no longer wish to benefit from them.

Sharing your information

We do not share personal information about you with other people or non-affiliated companies except under the following circumstances:

- we will disclose your personal information to third party providers for the purposes of providing online and other payment services, handling credit checks and fraud prevention, and any other services required in order for us to use your information for the purposes specified in the section entitled *Information you provide us and how we use it*;
- we will disclose your personal information to any law enforcement agency, court, regulator, government authority or other third party where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party; and
- we will disclose your personal information to any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this Privacy Policy.

International transfers

We have implemented standard contractual clauses to ensure adequate safeguards are in place to protect your information where it is transferred to our affiliated companies and boutiques in territories outside the European Economic Area and Switzerland. Where we share your information with a third party service provider outside of the European Economic Area and Switzerland (as detailed in the section entitled *Sharing your information*), we contractually oblige the third party service provider to implement adequate safeguards to protect your information.

Protecting your information

We want you to feel confident about using our Platform, and we are committed to protecting the personal information we collect. We limit access to personal information about you to employees who reasonably need access to it, to provide products or services to you or in order to do their jobs. We have appropriate technical and organisational physical, electronic, and procedural safeguards to protect the personal information that you provide to us against unauthorised or unlawful processing and against accidental loss, damage or destruction. However, where we ask you to choose a password in order to access certain parts of our Platform, you are responsible for selecting a secure password and keeping that password confidential. You should choose a password which you do not use on any other site, and you should not share it with anyone else.

Retaining your information

We keep your information for only as long as is necessary for our purposes, and in particular to protect ourselves in the event of a legal claim (for example, information relating to a contract with you will be kept for the lifetime of the contract and up to ten years after). After this period it will be deleted or in some cases anonymised. Where we sought your consent to process your personal information and we have no other lawful basis to continue with that processing, if you subsequently withdraw your consent we will delete your personal information.

If you request that we no longer send you direct marketing communications, we will keep a record of your request and contact details to ensure that your request is respected.

Your choices

You have the right to ask for access to any personal information that we hold about you in our records, to correct any inaccuracies and to update any out-of-date information. In some circumstances, you have the right to request the erasure of your personal information or a restriction of its use.

You have the right to object to us processing your personal information in some cases. In particular, you can ask us to stop sending you direct marketing communications at any time (however please note that we may continue to send you service-related (i.e. non-marketing) communications, such as e-mail updates on your order status). If you wish to exercise any of these rights, please write to us at the address listed below.

You may unsubscribe from e-mail marketing communications at any time by e-mailing the address below in the section headed "*Contact us*" or clicking on the 'unsubscribe' link in any Roger Dubuis marketing e-mails.

If you have a concern about how we use your information, as a first step please contact us using the details set out below and we will do our best to resolve your concern. After investigating your concern, we will

respond to you in writing within a reasonable time setting out our proposed remedial action. If you think we have processed your personal information in a manner which is unlawful or breaches your rights you also have the right to complain to a European Data Protection Authority in your place of residence or work, or the jurisdiction in which the processing took place.

California Privacy Rights

This section applies solely to the personal information collected online and offline of California consumers (excluding our employees, applicants, staff and contractors). This section is intended to address the relevant notice requirements of the California Consumer Privacy Act of 2018 (the “CCPA”), and uses certain terms that have the meaning given to them in the CCPA.

- **Your information, sources and purposes:** Please refer to the sections above headed “Information you provide to us and how we use it” and “Cookies and other information that we automatically collect” for a description of the personal information we may collect about you (or have collected in the preceding 12 months) and the sources of such information (such as directly from you and your device or through certain third parties). These sections also describe the purposes for which we may use or have used such information.
- **Sharing your information:** We may have shared your personal information with certain categories of third parties, as described in the section headed “Sharing your information” above.
- **Selling your information:** We have not sold personal information in exchange for monetary compensation. As described in the sections headed “Cookies and other information that we automatically collect” and “About Advertising”, we may allow certain third parties (such as certain advertising partners) to collect your personal information via automated technologies on our Platforms in an effort to serve you content and advertisements that may be of interest to you. You have the right to opt out of this disclosure of your information, as described in the section headed “How to control or delete cookies.”
- **Your rights:** Subject to exceptions under applicable law, you may have certain choices regarding our use and disclosure of your personal information, as described below:
 - **Access:** You have the right to request, twice in a 12-month period, that we disclose to you the personal information we have collected about you during the past 12 months and details regarding our collection, use, disclosure and sale, if any, of such information.
 - **Deletion:** You have the right to request that we delete certain personal information we have collected from you.
 - **Opt-Out of Sale:** You have the right to opt out of certain cookie use, as described in the section headed “How to control or delete cookies.”

To exercise your rights, please contact us as described in the section headed “Contact Us” below. If you exercise your rights, we may require you to provide certain information to verify your identity (such as your name, email address, phone number and/or address) or the authority of any third person acting on your behalf.

- **No discrimination:** If you choose to exercise any of your rights under the CCPA, you have the right to not receive discriminatory treatment by us. This section is available in alternative formats upon request by contacting us as described in the section headed “Contact Us” below.
- **Personal, family and household clients:** In addition, under California Civil Code Section 1798.83, if you are a California resident and your business relationship with us is primarily for personal, family or household purposes, you may request certain data regarding our disclosure, if any, of personal information to third parties for the third parties’ direct marketing purposes. To make such a request, please send an e-mail message to our e-mail address below with “Request for California Privacy Information” in the subject line. You may make such a request up to once per calendar year. If applicable, we will provide you, by e-mail, a list of the categories of personal information disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, along with the third parties’ names and addresses. Please note that not all personal information sharing is covered by Section 1798.83’s requirements.

Contact us

If you have any questions or comments about this Privacy Policy, or privacy matters generally, please contact us at the address provided below. You can also use this address if you wish to request access to the personal information we hold about you or to unsubscribe from any further e-mail marketing communications.

If you have any questions about this Privacy Policy or the manner in which your information may be processed, please contact us at: contact@rogerdubuis.com.

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