

CHARTER ON PERSONAL DATA



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1.3	16/07/2026	Update	Compliance Officer	NA

"Cromology" (representing, individually and collectively, the companies Cromology Holding, Cromology Services, Cromology Distribution, International Coating Products, Cromology Research & Industry, Cromology Research & Industry Nord, Cromology Research & Industry Ouest, Cromology Research & Industry Savoie, Réunion, and Cromology Benelux) places particular emphasis on protecting the personal data of internet users who visit its websites and/or use its mobile applications (hereinafter collectively referred to as the "Site") and of customers at its Tollens and Zolpan stores (hereinafter the "User").

Cromology is committed to ensuring the highest level of protection for this data in accordance with the provisions of Law No. 78-17 of January 6, 1978, on Information Technology, Data Files, and Civil Liberties ("Data Protection Act") and European Regulation 2016/79 of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR").

This Privacy Policy (hereinafter the "Policy") provides information on how your personal data may be collected, stored, used, and processed by Cromology, as the data controller.

By using the Site, placing an order, or making a purchase at our stores within the Tollens and Zolpan networks (hereinafter the "Stores"), by contacting our customer service department, or by signing up for our prospect database, you acknowledge and declare that you have read and accepted these rules governing the processing of your data and thereby consent to its collection, storage, use, and processing by Cromology under the terms detailed below.

These rules apply whenever you provide us with your personal data and to any processing we may perform on that data.

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1. TYPE OF DATA COLLECTED BY CROMOLOGY

The data collected by Cromology is as follows:

- Last name, first name, phone number, mailing address, email address, and favorite store are the data collected to create a user account, which will allow the User to place orders online or in-store and, with their consent, to receive updates about Cromology and the brand of the relevant Website or store, as well as to take advantage of any promotional offers on our products. At any time, the User may opt out of receiving further marketing communications from the Cromology Group by clicking on the hyperlink included in every email sent by the Group to the email address provided when the User created their account;
- The first and last names, customer account number, email address, mailing address, and phone number are the data collected in connection with any request for information and/or contact submitted by the User to the Cromology Group via the form provided for this purpose, which will enable the Group to respond to the User;
- The email address and ZIP code needed to save the simulation project generated by the Cromology app;

In connection with email communications (including newsletters and promotional offers), Cromology also uses open tracking pixels.

2. PURPOSE OF DATA PROCESSING BY CROMOLOGY

As a data controller, Cromology is committed to adhering to the following two principles:

- You are the sole owner of the data we collect and process about you;
- Your personal data is processed in a transparent, confidential, and secure manner.

Cromology may process your personal data to fulfill the following purposes and in accordance with the following legal bases:

- to manage the creation and maintenance of user accounts (the legal basis for which is the performance of the contract);
- to process and fulfill orders you place through the Site, by phone, or in Stores, including managing your payments (the legal basis for which is the performance of the contract);
- to process and resolve all your complaints or questions regarding your past or future orders, your user account, or our brands (the legal basis for which is legitimate interest);
- to monitor, develop, and improve the Site and your use of the Site (the legal basis for which is consent);
- to analyze your behavior on the Website or in the Stores and your responses to our marketing campaigns in order to improve or personalize the products and services we offer you (the legal basis for which is consent);

- to use email open tracking pixels to improve the relevance of communications and personalize the content sent, measure the performance of marketing campaigns, optimize the customer experience and the quality of mailings, and adjust the frequency and content of communications (the legal basis for which is consent or legitimate interest for emails intended to help secure customer authentication, or the performance of the contract for informational or functional emails necessary for the contractual relationship with the customer);
- to send you information and promotional offers regarding existing or new products and services related to Cromology's brands via email, social media, phone, or in-store (the legal basis for which is consent or legitimate interest in offers for products similar to those you have already purchased);
- to provide you with personalized services and offers via email, by phone, on the Website, or in-store (the legal basis for which is consent);
- to offer you a backup service for your simulation project via the Cromology app (the legal basis for which is the performance of the contract);
- handle requests related to the exercise of your rights (the legal basis for which is a legal obligation).

If the fields marked with an asterisk are not fully completed by the User, their request cannot be processed.

3. RECIPIENTS OF YOUR PERSONAL DATA

Generally speaking, depending on the products or services you order, your personal data may also be shared with service providers with whom Cromology works. These service providers will have access only to the personal data strictly necessary for them to perform their tasks (such as home delivery or credit card refunds) and agree not to use your data for any purpose other than that requested by Cromology in accordance with these data processing rules. These service providers act solely as Cromology's data processors; under no circumstances will they share this information with third parties or use it for any other purposes.

You may object to this by exercising your rights as described below. In that case, your access to our services will be affected.

Your data may be disclosed to public institutions or public authorities only if required by law.

User data collected through the Site when creating a user account, via the contact form, or through the Cromology App is intended exclusively for Cromology's marketing and sales departments.

Subject to their consent, Users' data may be shared with Cromology's business partners.

4. TRANSFER OF YOUR PERSONAL DATA

Cromology is a multinational company. Our customers and operations are located around the world. As a result, we collect and transfer personal data on a global scale. Therefore, we may need to transfer your personal data outside your country of residence.

If your personal data is transferred to a country outside the EEA, we will ensure that your data is protected and transferred in accordance with legal requirements.

With regard to data transferred outside Europe, for example, this protection is implemented by at least one of the following means:

- the country to which we transfer your data is recognized by the European Commission as providing an adequate level of protection for personal data;
- the recipient has signed a contract that includes “standard contractual clauses” approved by the European Commission and imposes an obligation to protect your personal data;
- In other cases, the law may allow us to transfer your personal data outside of Europe by other means.

For more information on how your personal data is protected in the event of a transfer outside of Europe (including a copy of the standard contractual clauses in place with the recipients of your personal data), please contact us using the contact information provided in paragraph 9 below.

5. PROTECTION OF YOUR PERSONAL DATA BY CROMOLOGY

We implement technical measures and security controls to protect your personal data and to prevent its accidental or unlawful destruction, loss, alteration, unauthorized access, disclosure, or modification.

Different levels of protection are applied to customer files depending on the sensitivity of the information they contain. Appropriate controls (such as restricted access) are in place on our computer systems. Only our authorized employees may access the facilities used for the collection, processing, or storage of Personal Data.

6. HOW LONG CROMOLOGY RETAINS YOUR PERSONAL DATA

Once an online order has been placed, the customer’s data is stored for a period of five (5) years in a separate, restricted-access information system, plus the duration of any legal proceedings that may be initiated. At the end of this period, the data is permanently deleted. With regard to banking data used for online payments, the credit card number and expiration date are retained for fifteen (15) months following the date of the charge, and the security code on the credit card is retained only for the duration of the transaction. However, customer data used for marketing purposes is retained for a period of three (3) years from the date of the last online purchase or the last contact initiated by the customer.

Prospective User data is retained for a period of three (3) years from the date it is collected by the Cromology Group via the account creation form or from the date of the last contact initiated by the prospective User.

Data collected through the Tollens Simulator app is retained for a period of three (3) years from the date it is collected by Cromology.

With regard to User data collected via the contact form, it is deleted as soon as the User’s request has been processed and Cromology has provided the User with an appropriate response.

7. YOUR RIGHTS REGARDING YOUR PERSONAL DATA

In accordance with European Regulation 2016/679 (GDPR) and the amended “Data Protection Act” of January 6, 1978, you have the right to exercise the following rights:

- The right to access your data,
- The right to rectification and the right to erasure of your data (right to be forgotten),
- The right to restrict the processing of your data,
- The right to data portability,

- The right to object to the processing of your data,
- The right to provide instructions regarding what should happen to your data after your death.

All requests must include:

- ✓ The last name, first name, and email address of the User exercising their rights;
- ✓ Specify the exact address to which the confirmation that their request has been received will be sent;
- ✓ In case of doubt, proof of identity may be requested.

We are committed to responding to requests to exercise your rights as promptly as possible and, in any event, in accordance with the statutory time limits, within a maximum of three (3) months following Cromology's receipt of the complete request.

The "Tollens Simulator" mobile app is operated by Cromology Holding, a simplified joint-stock company (SA), with its registered office located at 12 cours Michelet, arrondissement of Michelet, 92800 Puteaux, registered with the Nanterre Trade and Companies Register under number 488 401 985; Phone: +33 (0)1 49 06 24 72;

The website <https://www.plasdox.com/> is operated by Cromology Services, a simplified joint-stock company, with its registered office at 12 cours Michelet, Carré Michelet, 92800 Puteaux, registered with the Nanterre Trade and Companies Register under number 592 028 294;

The websites <https://tollens.com/>, <https://www.zolpan.fr/>, <https://www.pro.tollens-zolpan.fr/>, <https://www.districtcolor.fr/> as well as the stores operating under the "Tollens" and "Zolpan" brands are the responsibility of Cromology Distribution, a simplified joint-stock company, with its registered office located at Carré Michelet, 12 cours Michelet, 92800 Puteaux, registered with the Nanterre Trade and Companies Register under number 306 289 307;

The website <https://www.icp-alltek.com/> is operated by International Coating Products (ICP), a simplified joint-stock company with its registered office located at Zone Industrielle Blossieu, 01150 LAGNIEU, registered with the Bourg-en-Bresse Trade and Companies Register under number 350 096 277;

The website <https://www.tollens.be> is operated by Cromology Bénélux, a public limited company under Belgian law, with its registered office located at Boulevard de la Deuxième Armée Britannique 63-65, 1190 Forest, and registered with the Cross-Reference Database of Enterprises under number 0440.527.973.

To exercise your rights, please send us the details of your request to the following address:

- by email: donnees.personnelles@cromology.com
- by mail: Attention: GDPR Officers, Cromology, Carré Michelet, 12 cours Michelet, 92800 PuteauxPuteaux

8. LINKS TO OTHER WEBSITES

The fact that we provide you with access to other websites through hyperlinks does not make us responsible for those sites' personal data practices.

9. COOKIE POLICY

9.1 What is a cookie ?

A cookie is a small file (an alphanumeric identifier) stored on your device (computer, tablet, or mobile device) that contains information specific to the Site user. In particular, it allows us to link a device to other information related to your experience with our services (such as location, language, font size, and other display preferences) for a certain period of time.

9.2 Why are we using cookies ?

When you visit our Site or web page, cookies may be placed on your computer, mobile device, or tablet by us or our partners in order to facilitate and personalize your online experience and provide you with convenient features that save you time, subject to the preferences you have selected, which you may change at any time. We may use the following three types of cookies:

✓ Technical cookies related to the Site's functionality (required):

These include cookies that are essential for navigating the Site and using its features; without these cookies, certain Site settings may not function properly.

✓ Cookies that track website usage statistics:

These are cookies that track users' browsing activity in order to compile website traffic statistics and monitor the Site's performance. This data also allows us to improve the Site and provide a better user experience.

Express consent is required to use these services. By accepting these cookies, you are helping us improve our Site.

✓ Advertising cookies:

These cookies collect information about your browsing habits to enable the Cromology Group and its partners to provide you with advertisements that are better tailored and more relevant to your interests.

To use these services, your express consent is required. If you disable these cookies, ads will still appear as you browse, but they will not be tailored to your interests and will therefore be less relevant.

9.3 How long do cookies remain stored?

Cookies stored on your device will not be retained for more than thirteen (13) months from the date they were last set.

9.4 How do I accept or reject cookies?

Whether cookies are stored on your device depends on your choice, except for functional and security cookies, which are necessary for our Website to function properly.

You can accept or reject cookies on a case-by-case basis or reject them automatically. Please note that these settings may affect your ability to access content on our Website that requires the use of cookies. Please also note that deleting certain cookies may affect your ability to access our Website.

Each web browser has its own cookie management settings. The procedures are described in the browser's Help menu:

- For Internet Explorer™ : [cliquez ici](#)
- For Safari™ : [cliquez ici](#)
- For Chrome™ : [cliquez ici](#)
- For Firefox™ : [cliquez ici](#)
- For Opera™ : [cliquez ici](#)

You can review information about cookies and configure your settings to accept or reject them at any time by clicking the "Cookie Management" link at the bottom of each page on the Site.

For more information on the use of cookies, please visit the CNIL website at the following address: <http://www.cnil.fr/vos-droits/vos-traces/les-cookies/><http://www.cnil.fr/vos-droits/vos-traces/les-cookies/>

10. CONTACT

If you have any questions regarding our policies for processing your personal data in connection with the Website or the Stores, please feel free to contact the relevant data controller by sending an email to the address provided in the section titled "Your Rights Regarding Your Personal Data ».

11. MODIFICATION OF THE CHARTER

Cromology reserves the right to modify all or part of these rules at any time without notice. Use of the Site will be subject to the rules in effect at the time of your use, unless such modifications are substantial and affect individual rights under laws relating to privacy and the protection of personal data.

For further information on the protection of personal data, any User may visit the website of the French Data Protection Authority (Commission nationale de l'informatique et des libertés) at the following address: www.cnil.fr.