

Confidentiality Policy and Privacy Protection

Our commitment regarding your personal data

Aware that via our websites www.laponie-ice-driving.com and www.lapland-ice-driving.com, and also as a result of subscription to or purchase of our Products and Services you give us personal information, our key concern is the protection of that data, and to guarantee transparency in its use.

1. [General](#)
2. Data controller and data protection officer
3. Purpose of personal data processing
4. The data we collect
 - 4.1. The information you send direct
 - 4.2. The information we collect automatically
 - 4.3. [Length of time your data is stored](#)
5. [Recipients of the data we collect and purpose](#)
6. [Transfer of personal data](#)
7. [Your rights concerning your personal data](#)
8. [Cookies](#)
9. [Change to our confidentiality and privacy protection policy](#)

1. General

Laponie Ice Driving AB, Slagnasvägen, Box 39, 93831 ARJEPLOG – SWEDEN, a company in the SAS HOLDEC group, 20 rue Gustave Madiot 91070 Bondoufle – France attaches great importance to the protection of and respect for your personal data and confidentiality.

This data confidentiality and privacy protection policy, hereafter referred to as « Policy » details the way in which we handle personal data which we receive and/or which we are sent as a result of the sale of our Products and Services, hereafter referred to as « Data ».

We are hereby informing users of our sites and of our Products and Services (hereafter referred to as « Users », « You ») of the manner in which we collect, use, store and share the data which you are asked to provide.

We would ask you please to read the current document carefully in order that you are aware of and understand the way in which we handle your data.

The Policy will apply from May 25th 2018. All use of our services by users after this date will constitute acceptance of the current Policy. If you do not accept the terms of the Policy, please do not use the websites any further, follow us on social media and Products and Services of Laponie Ice Driving AB. The Policy may be modified at any time by Laponie Ice Driving AB, hence we suggest that you refer to it regularly.

This Policy is additional to the General Conditions of Sales and Particular Conditions of Sale. These documents are accessible on the websites : <https://www.laponie-ice-driving.com> et <https://www.lapland-ice-driving.com> under the heading « Legal ».

The confidentiality Policy will also provide explicit information regarding consent relating to the processing of your personal information on each relevant occasion.

The information and data which you send directly to Laponie Ice Driving AB via the website, or which are collected by Laponie Ice Driving AB in one way or another as a result of the use of its Products and Services will be treated by Laponie Ice Driving AB equitably, transparently and in compliance with the law. To this end, and as set out in detail below, Laponie Ice Driving AB takes the recognised international principals regarding data handling into account, such as limitations on purpose of the processing, limitations on the storage of the data, of data minimisation, of the quality of the data and of confidentiality.

2. Data controller and data protection officer

Laponie Ice Driving AB, as described in the introduction to this confidentiality Policy, acts as data controller for all personal data handled by the websites and Product and Services sales.

The Laponie Ice Driving AB data protection officer can be contacted at this address : dpo@laponie-ice-driving.com or by phone on +33 (0)1 60 76 25 25.

3. Purpose of personal data processing

In order to allow users of our sites access to our Products and Services, and to allow Laponie Ice Driving AB to evaluate and improve these Products and Services, Laponie Ice Driving AB requires the collection of data about you via its websites.

In this context and for your information your data will be processed automatically, based on acceptance of the current Policy, for the following purposes :

- Identification of users for access to Laponie Ice Driving AB sales support Chat
- Develop anonymised Products and Services web page usage information

In accordance with the regulations, you have the right to object to such treatment at any time.

We use the data we receive in order to facilitate :

- The processing of orders or subscriptions to our Products and Services, particularly concerning the registration, recording, implementation, client management and possible disputes, the provision of our Products and Services, their improvement and maintenance in a secure environment, the verification, identification and authentication of data supplied by the user.
- The personalisation of the Products and Services in accordance with the user's profile
- The sending of sales and other communications, both on our own account as well as on that of « Sponsors » accounts- as identified on the Partners page on the website- in addition to information relating to the use of our Products and Services, advice on goods or services which may interest you according to your preferences as indicated, and which you may change at any time at Laponie Ice Driving AB
- The sending of information on behalf of other entities within the Holdec group, belonging to Laponie Ice Driving AB
- The maintenance of our websites and internal technical operations concerning problem-solving, data analysis, tests, studies and surveys
- The improvement and optimisation of our websites and especially to ensure that our content is adapted to your device
- The use of interactive functionality on our sites
- The maintenance of a safe and secure environment on our sites
- The evaluation of the efficacy of messages we send and adaption to our users

4. The data we collect

We may receive and process the following data :

4.1 The information you send direct

Using our services or wishing to benefit from them, you may give us data of which certain parts may identify you (« Personal Data »). This is especially the case when you contact us via the contact form on the websites, when you fill in a form, when you take part in one of our contests, when you use the Chat module, when you send us a request or order by post or by email and more generally when you contact us (Client Service)- whether this is by phone, email or any other means of communication.

This information contains specifically the following:

- The data relevant to your identity (first and second names, month and year of birth)
- Your contact details (eg: street address, country and/or email, phone number, and/or company)

- Certain of this data (identified with an « * » on our website contact form) are obligatory. Otherwise, you will not be allowed to submit your contact form to Laponie Ice Driving AB, who in turn are then not able to deal with your request or your subscription to our Products and Services.
- The detail of financial or accounting activities, particularly concerning your bank details
- Where appropriate, your replies to our surveys, questionnaires (eg : satisfaction survey) and the comments you have left on our pages (web, social media)

4.2 The information we collect automatically

In the instances where you connect with our websites whilst using the social media functions (for example, if you use Facebook), Laponie Ice Driving AB will have access to your profile information on that social network according to the general conditions of use of the social network in question concerning the treatment of your data by this third-party and to facilitate the integration of these data.

Likewise, when you interact with the social network functions, such as « Like », « Subscribe », « Share » and « Comment », Laponie Ice Driving AB will have access to your profile information on that social network according to the general conditions of use of the social network in question concerning the treatment of your data by this third-party and to facilitate the integration of these data. We may also examine parts of your data depending on the settings of your social profile.

Our Product and Services webpages or posts may contain links to the internet sites of our partners or of third-parties. Please note that these internet sites have their own personal data protection policy and that we do not accept responsibility concerning the use made by these sites of data collected when you click on these links. We suggest that you make yourself aware of their policies prior to sending them your personal data.

On each of your visits, we may collect information concerning the devices on which you use our websites or networks through which you access our Products and Services, such as :

- Your IP address
- Connection data
- Type and version of browser used
- Type and version of browser plugins, systems and operating platforms
- Information concerning your clickstream data, particularly your navigation of the various page URL's
- The content you access or consult
- The search terms
- Download errors
- The duration of particular page visits, the interactions with the page
- Telephone numbers used to contact us
- Among the technologies used to collect this data, we also employ cookies (to learn more about this, please refer to the relevant part of this document)

Please note that we may hold certain data about you in cases where the law requires us to do so, or when we have legitimate cause to do this. This would be the case for instance if we considered that fraud was being committed, or that our General or Particular Conditions of Sale were being violated.

4.3 Length of time your data is stored

The Personal Data processed within the context of our offers and Services are kept by Laponie Ice Driving AB for a period judged strictly to be appropriate for the purpose.

In every case, and bearing in mind that this personal information is being used in order to supply the Products and Services, Laponie Ice Driving AB may continue holding it for a longer period if such a measure is necessary to protect its interests, taking into account any liability arising from the Supply of Services.

The personal data being used for marketing purposes and profiling will be held by Laponie Ice Driving AB for a period beginning at the time you give your consent and ending with the withdrawal of said consent, and during all the periods where this consent has been renewed, if renewed at regular intervals. Once your consent is withdrawn, the personal data can no longer be used for these purposes, although it may be held by Laponie Ice Driving AB specifically if considered necessary to protect our interests, taking into account any liability arising from the Supply of Services.

5. Recipients of the data we collect and purpose

Using our websites and social networks, various of your data are visible to other members of our community via feedback through your public profile.

We may also share data concerning you with other entities in the Holdec group within the framework of this Policy. This processing is based on the legitimate interest of Laponie Ice Driving AB in its data processing role.

The list of possible recipients in detail :

- Persons, companies or experts acting as advisors and consultants alongside Laponie Ice Driving AB in the accounting, administrative, legal, fiscal, financial fields and for questions relevant to debt-recovery regarding the supply of the Products and Services, which persons and bodies are acting generally as agents in the processing of data on behalf of Laponie Ice Driving AB.
- Bodies engaged in the provision of web Services (for example, suppliers of data storage or email platforms)
- Persons authorised by Laponie Ice Driving AB to process personal data necessary to carry out activities linked specifically to the supply of the Products and Services
- Other companies within the Holdec Group, for the purposes of internal administration, specifically for the processing of personal data of clients or of employees.

We also work in close collaboration with third-party companies which may have access to your data, and specifically :

- The sub-contractors we use for technical matters, cold-calling, digital campaigns or suppliers of analytical solutions (such as Google analytic).
- The sponsors of Laponie Ice Driving AB : in accordance with the legislation and with your consent when it is required, we will be able to use and transmit the data you have passed to us via our websites, social media, and Products and Services for sales and marketing purposes by Laponie Ice Driving AB partners (for example in order to send you information letters, invitations to events or other communications which may interest you). You can withdraw your consent at any time by

clicking on the unsubscribe link in each one of these communications or by contacting us by the means described in article 2.

We do not share your data with the third-parties mentioned above in the following cases :

- When we rely on a service provider regarding performance of contractual relations which we have with our users (execution of a contract)
- When we rely on a service provider regarding the supply, improvement and optimisation of our Products and Services (legitimate interest of the Data Controller)
- When we are required by law or if we believe in good faith that it is necessary to respond to any claim against Laponie Ice Driving AB, complying with any judicial request, fulfilling any contract entered into with our clients, such as the General Conditions of Sale, the Particular Conditions of Sale and the current Policy, in emergencies where public health or the physical integrity of a person is at stake, concerning enquiries and investigations, or ensuring the rights, the property and the security of Laponie Ice Driving AB, its users and more generally all third-parties (compliance with legal obligation).
- When this forms part of agreements entered into with the sponsors of Laponie Ice Driving AB. In the hypothetical case where we were to sell or acquire a company or assets, we reserve the right to share your personal data with the potential seller or buyer of this company or its assets (lawful interest)

If Laponie Ice Driving AB or all or part of its assets are acquired by a third-party, the data in our possession will- if need be- be transferred to the new owner (lawful interest)

In accordance with applicable legislation and with your consent when it is required, we may aggregate the data referring to you and which we receive or send to our sponsors, particularly all or part of your personal data and information collected via cookies. This aggregated information will only be used for the purposes described above. We have no control over the collection or processing of your data by our sponsors on the own systems.

6. Transfer of personal data

Given the international nature of Laponie Ice Driving AB's operations, your personal data may be transferred to a destination in a different country.

We prefer to hold your data within the European Union. However, it is possible that the data which we collect when you use our Products and Services may be transferred to sub-contractors in another country. We may rely on them for the supply of the services.

In the case of this kind of transfer, we assure ourselves that the processing takes place according to the existing regulatory regime.

Laponie Ice Driving AB takes every appropriate step to ensure the lawfulness and safety of such transfers of personal data, specifically based on the appropriate procedures set by the European Commission, the standard data protection clauses adopted by this same European Commission, or other measures of protection available or conditions of transfer considered adequate. Other information concerning this matter is available, and may be obtained by sending a written request to Laponie Ice Driving AB at the following address : dpo@laponie-ice-driving.com or by phone on +33 (0)1 60 76 25 25

7. Your rights concerning your personal data

The Holdec Group, of which Laponie Ice Driving AB is part, has appointed a Data Protection Officer for all the European bodies in the Group.

For all questions concerning the current Policy or for all requests regarding your Data, you can contact the Data Protection Officer by email at this address : dpo@laponie-ice-driving.com or by sending a mail for their attention to the addressed mentioned at the head of this document.

You have the right to obtain a copy of the data we hold which concerns you, according to the current legislation. Before replying to your request, we may- in accordance with requirements- verify your identity and ask you to provide us with more information in order to respond to your enquiry.

We will make every effort to respond to your request within a reasonable time, and in all events within the period as dictated by the law. If you wish to exercise this right, please contact us by one of the means mentioned above.

As user of our websites and Products and Services, you also have the option of accessing the data which we hold in order to correct, modify or delete any incorrect detail. You undertake to supply us with complete information, exact, valid and up-to-date. You may also ask that your data be deleted at any time by contacting our DPO at : dpo@laponie-ice-driving.com

The exercise of these rights is free of charge (apart from communication and/or postal costs which are the responsibility of the person concerned). Laponie Ice Driving AB has a period of 30 days to reply to your request, counting from the time of receipt of the request.

In accordance with the rules in force, Laponie Ice Driving AB may ask for reasonable payment, based on the administrative costs for all extra copies requested by the person concerned.

You also have the right:

- To define the guidelines regarding what happens to your data after your death
- To lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL)
- To the portability of your data which you have supplied to us in the context of processing based on the consent or execution of a contract
- To the limitation of processing of your Data
- To oppose the processing of your Data

To exercise these rights, please contact the Data Protection Officer at: dpo@laponie-ice-driving.com or by post to the address indicated in article 1

8. Cookies

A cookie is a small data file copied onto the hard drive of your computer or your mobile device by a website or online service. It registers information relative to the navigation by your device on a site or online service (such as for example pages visited, along with dates and times), which may be read on your subsequent visits. Laponie Ice Driving AB may send these cookies when you visit or connect with our websites. The duration of validity of the cookies installed by Laponie Ice Driving AB is 13 months, in accordance with the legislation.

The cookies implemented on our websites are of varying kinds and have different purposes:

- navigation cookies, which simplify navigation
- session or flash cookies, which enable a media player to work when required by our websites

- audience statistics cookies installed by our sub-contractors which allow the collection of behavioural information. This data enables us for example to know if you have already visited the site, to help us know which information may interest you the most, and to improve your browsing and make it more interesting. For this, we keep track of your preferences when you visit our websites.

Laponie Ice Driving AB uses these cookies to detect navigation problems which may arise, and to improve the performance and functionality of the websites.

You can select to refuse or accept the installation of the behavioural cookies and/or cookies by configuring your internet browser from your device. Access to certain offers and sections on our websites may as a result become altered or impossible. You are invited to look at the CNIL internet site at this address: <http://www.cnil.fr> or to consult the help facility and/or documentation for your web browser.

You can restrict the use of cookies by modifying the settings of your browser:

- Internet Explorer (PC version):

Click on patterned X in the upper part of the browser window, and select "Internet Options"

In the Options window, click on the "Privacy" tab

Click on the "Advanced" button

To activate cookies, choose "Accept" or "Ask"

To deactivate cookies, choose "Accept" or "ask"

You can do the same for third-party site cookies

- Microsoft Edge (PC version)

Click on the three dots (...) in the upper right-hand corner of the browser window and select "Settings"

In the "Advanced Settings" section, click on "View advanced settings"

In the cookie section:

To activate cookies and third-party cookies, choose "Don't block cookies"

To activate cookies originating from primary sites (such as those suggested by Laponie Ice Driving AB), choose "Block only third-party cookies".

To deactivate cookies, choose "Block all cookies"

- Microsoft Edge (Mobile version)

Click on the three dots (...) in the lower part of the browser window and select "Settings"

In the "Advanced Settings" section, click on "Privacy"

To activate cookies, deactivate "Prohibit tracking"

To deactivate cookies, activate "Prohibit tracking"

- Firefox (PC version)

Click on the hamburger menu in the upper part of the browser window and select "Options"

Select the pane "Privacy and security"

To activate cookies, tick the box "Accept cookies and site data (recommended)"

To deactivate cookies, select the box "Block cookies and site data (this may prevent some sites from functioning properly)".

- Firefox (Mobile version)

Click on the three vertical dots in the upper part of the browser window and select "Settings"

Select the "Privacy" pane

Click on "Cookies"

To activate cookies and third-party cookies, choose "Allow"

To activate cookies originating from primary sites (such as those suggested by Laponie Ice Driving AB, choose “Allow, except third-party cookies”

To deactivate the cookies, choose “Not allowed”

- Chrome (PC version)

Click on the three vertical dots in the upper right-hand part of the browser window and select “Settings”

Expand the section “Advanced” and click on “Content settings”, then “Cookies”

To activate cookies, choose “Allow sites to save and read cookie data (recommended)”

First- and third-party cookies are allowed. To only allow first-party cookies, click “Prevent third-party websites from saving and reading cookie data”

To deactivate cookies, deselect “Allow sites to save and read cookie data (recommended)”

- Chrome (Mobile version)

Click on the three vertical dots in the upper right-hand part of the browser window and select “Settings”

Expand the section “Advanced settings”

Click on “Site settings”

Click on “Cookies”

To activate cookies, select “Cookies”- First- and third-party cookies are allowed

To only allow first-party cookies, deselect “Allow third-party cookies”

To deactivate cookies, deselect “Cookies”

- Safari (PC version)

Select menu Safari > Preferences

Click on the “Privacy” section

In the section “Cookies and website data”:

To activate cookies, select “Always allow”. “Only allow for this website”

To activate cookies previously visited, select “Only allow for visited websites”

To deactivate cookies, select “Always block”

- Safari (Mobile version/ Apple iOS)

Go to iPhone “Settings”

Click on “Safari”

Go to the section “Privacy and security”

To activate cookies, Deactivate “Block all cookies”

To deactivate cookies, Activate “Block all cookies”

- For other browsers and mobile devices:

If you wish to restrict the use of cookies for a different browser, or on a mobile device, go to the official Web page of the browser or device manufacturer or consult the documentation supplied and follow the instructions

9. Changes to our confidentiality and privacy protection policy

We may occasionally modify the current Policy. When this is necessary, we will inform you and/or ask for your agreement. We advise you to consult this page regularly to make note of any potential changes or additions to our Policy