

Our Philosophy

Cervelo SA (“Cervelo”) believes that having a relationship with our customers that is founded on trust is not merely the law but also good business. We believe in giving full disclosure about the kinds of information we gather and what we do with it. We are committed to ensuring that your privacy is protected.

Cervelo is committed to protecting your privacy rights. To this end, we have prepared this Privacy Policy to inform you about our ongoing commitment to ensuring your personal information remains accurate, confidential and used only for identified purposes, regardless of how it is provided to us. This Policy also addresses how you can inquire about the personal information we hold about you and how we will respond to such a request.

What is “Personal Information?”

Personal information is any information that identifies you, or by which your identity could be deducted. It does not include:

- the name or business address or telephone number of an employee of an organization;
- corporate business contact information; and
- aggregated information that is no longer related to a specific identifiable individual.

Cervelo reserves the right to use aggregated or anonymous information in any way it considers appropriate.

Why Do We Collect Personal Information from You?

We collect personal information to

- understand your needs when they are shopping for a high-performance bicycle;
- track and identify market trends;
- determine the credit-worthiness of a business or individual;
- provide information to you about new bikes and products; and
- inform you of exciting upcoming events.

Collecting your personal information helps us be a brand leader in bikes and provide you with unparalleled service and support. We may at times collect sensitive financial, family, and personal preference information from you, which helps us to better understand our market. Having such information help us to design bikes that meets the needs of different market sectors, which in turn will result in cost savings to you, the consumer.

At times Cervelo may require certain financial information to determine your credit-worthiness as a distributor or as an applicant for credit. If you choose not to provide us with certain personal information required for a product or service, such as to complete a purchase order or process an application for credit we will advise you if the transaction cannot be completed without your personal information.

What Personal Information Do We Gather?

The kind of personal information we will ask for includes your name, e-mail address, phone number, address, type of business, customer preference information, customer number, as well as such other personal information that is needed to fulfill the purposes identified in this Privacy Policy.

When you apply for credit, Cervelo may ask you for financial information, which includes but is not limited to:

- estimates of annual sales;
- the status and ownership of your premises;
- your landlord's name and telephone number;
- trade references;
- bank account and contact information; and,
- copies of recent balance sheets and income statements.

We may also ask you for government identification as part of our application for credit. You should know that most applications for credit have an impact on your credit rating as reported by a credit bureau and by applying for credit, you expressly consent to the collection, use and disclosure of your information to third party credit scoring providers.

How Do We Collect Your Personal Information

In collecting your personal information, we continuously strive to be in full compliance with the Act and otherwise conduct our information collection with utmost care and concern for your privacy. We may collect personal information directly from you when you purchase one of our products, apply for credit, or in the course of our dealings with you. We may ask you to fill out an online product registration card after purchasing one of our products. Sometimes we may also obtain information about you from other sources, for example:

- your landlord in an application for credit;
- a government agency or registry;
- your business partners; and
- other individuals or organizations that you have given your informed consent for us to contact.

We may collect your personal information through the telephone, Internet, email, or paper based forms. We may also send cookies to your computer which allow us to collect information regarding your surfing habits and the websites that you visit within the Cervélo site.

Consent

Consent for the collection, use and/or disclosure of personal information may be obtained orally or in writing and may be expressly given or implied. In determining how we obtain your consent, we will take into account the sensitivity or the personal information about you that we are collecting, using and/or disclosing.

CERVÉLO PRIVACY POLICY

When we use your personal information to provide products or services to you, including for billing and credit purposes, and when we use your personal information to include you in any direct marketing activities, we will assume that you have consented to such use unless you specifically advise otherwise. If you tell us that you no longer wish to receive information about our services, or about new developments, we will not send any further material.

Disclosure of Your Personal Information

Under certain circumstances, we may disclose your personal information when we are required by law to do so or when you have consented to the disclosure. We also reserve the right to disclose your personal information to third parties to help collect payment from you for any product purchase or service. Your personal information may also be transferred to third-party services providers for administrative purposes (e.g. credit bureau check or a computer back-up service) and the third party is bound by our privacy policy. Public information about you may also be freely disclosed.

Updating Your Information

Since we use your personal information to provide products and services to you, it is important that the information is accurate and current.

If, during the course of your dealings with Cervelo, any of your information changes, please inform us by contacting our Privacy Officer so that we can make any necessary changes.

Security of Your Personal Information

Cervélo takes all reasonable precautions to ensure that your personal information is kept safe from loss, unauthorized access, modification, or disclosure. However, data that is transported over an open network, such as the Internet or e-mail, may be accessible to anybody. Cervélo cannot guarantee the confidentiality of any communication or material transmitted via the Internet or email and if disclosing any personal information via an open network, you acknowledge that it is potentially accessible to others, and may be obtained and used by others without your consent. In particular, while individual data packets are often encrypted, the names of the sender and recipient are not. Even if both the sender and recipient are located in the same country data may also be transmitted via such networks to other countries regularly and without controls, including to countries that do not afford the same level of data protection as your country of residency.

Your data may be lost during transmission or may be accessed by unauthorized parties. Cervélo does not accept any liability for direct or indirect losses as regards the security of your data during its transfer via Internet. Please do not correspond or transmit data over the Internet if you require a secure form of communication.

Obtaining Access to Your Personal Information

Upon written request we will provide you with access to all information (including proprietary information) that we maintain about you, including financial information (such as credit card information), unique identifier information (such as customer number or password), transaction information (such as dates on which you made purchases, amounts and types of purchases), contact information (such as name, address, phone number) that we maintain about you, and a

CERVÉLO PRIVACY POLICY

description of the information that we maintain. You can access this information by writing to us at the following address:

Cervélo SA
Privacy Officer
privacy@cervelo.com

Correcting Errors

If we hold information about you and if you can establish that it is not accurate, complete, and up-to-date, we will take reasonable steps to correct it.

Can I Be Denied Access to My Personal Information?

Your rights to access your personal information. We may deny access when:

- denial of access is required by law;
- information relates to existing or anticipated legal proceedings against you; and
- when granting you access would have an unreasonable effect on other people's privacy.

If we deny your request for access to, or refuse a request to correct information, we will provide you with an explanation.

Retention of Your Personal Information

Cervélo keeps your personal information on file as long as is reasonably necessary for us to complete the objectives set out at the time of collecting the information. When conducting market analyses we may retain your personal information as long a reasonably necessary to establish and identify market trends. In other circumstances, such as in an application for credit, we will retain your personal information for as long as reasonably necessary to complete our dealings with you, or as may be required by law, whichever is longer.

Changes to this Privacy Policy

Since Cervélo regularly reviews all of its policies and procedures, Cervélo may change its Privacy Policy from time to time. All changes to this policy will be posted promptly to inform you of what information is collected, how it is used, and under what circumstances it may be disclosed.

Request for Access and Inquiries/Complaints

If you have any questions, or wish to access your personal information, please write to our Privacy Officer at:

Cervélo SA
Privacy Officer
privacy@cervelo.com