

## **PRIVAMAP PRIVACY POLICY**

**LAST UPDATE: 05/07/2024**

### **1. PREAMBLE**

Welcome to our page dedicated to our “Privacy Policy” for the platform published by the company PRIVAMAP SAS accessible on the internet at the following address at [www.privamap.com](http://www.privamap.com) and to any personalized address created for each customer (the “Platform”).

We thank you for using our Platform and our solution which facilitates the guidance of professionals within private sites (the “Services”) as well as our various features offered on our Platform (the “Products”). The protection of personal life is of utmost importance to us and we take the protection of your data very seriously.

This page allows you to know in particular:

- what Personal Data we process about you;
- why and how we treat them;
- where the data comes from;
- who intervenes and;
- what legal bases we rely on to do so.

The company PRIVAMAP SAS simplified joint stock company with share capital of €1,500, domiciled at 225 Rue des Templiers in Lille (59000), registered in the Lille Trade and Companies Register under number 897 713 954 (“PRIVAMAP” , “we”, “us” or “our”), including our subsidiaries, are committed to protecting and respecting the privacy of any person whose Personal Data we process in the context of providing our Products and Services under the PRIVAMAP brand.

PRIVAMAP is the controller of Personal Data (the “Data Controller”). This means that we decide how we store and use Personal Data about you. We are required, under the GDPR, to provide you with all the information in the Privacy Policy

We absolutely want to explain to you here how we process your Personal Data and how we go about respecting your integrity in accordance with European Regulation No. 2016/679, known as the General Data Protection Regulation (“GDPR”). We encourage you to read this Privacy Policy. Using it should help you make informed decisions.

If you have any questions about this Privacy Policy or general questions regarding your Personal Data, do not hesitate to contact us at [dataprotection@privamap.com](mailto:dataprotection@privamap.com) .

### **2. WHO IS COVERED BY THIS PRIVACY POLICY?**

The processing implemented by PRIVAMAP through the Platform concerns Users of the Platform wishing to create an account on the Platform (the “Data Subjects”).

### **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

Your Personal Data is collected directly from you.

Technical information (for example, IP address, information about your browser, etc.) is also transmitted to PRIVAMAP by your terminal when you use the Platform.

#### **4. TYPOLOGY OF PERSONAL DATA, PURPOSES AND LEGAL BASES**

By “Personal Data” we mean any information about a person from which that person can be identified directly or indirectly. This does not include data for which identity has been removed (anonymous data).

Below you will find an overview of the different categories of Persons concerned by this Privacy Policy as well as:

- type of Personal Data about you that we use and store;
- purposes for which this Personal Data is collected;
- legal bases on which the processing is based.

##### **4.1 Category of persons concerned**

The persons concerned by the processing are the Users of the PRIVAMAP Platform, both on its website and on its geoguiding solution.

##### **4.2 Type of Personal Data**

PRIVAMAP collects your Personal Data when you create an account on our Platform (a “User Account”), subscribe to our newsletter or contact customer service.

The Personal Data collected by PRIVAMAP if you are a User are as follows:

- Email directly
- Name
- First name
- Phone number
- Any other information provided by the User through their use of the Platform.

PRIVAMAP also collects information regarding your browsing activity on the Platform, for example:

- the type of terminal you are using (smartphone, computer, tablet, etc.);
- the operating system of your terminal;
- your internet service provider;
- the browser used;
- the IP address of your terminal;
- your language preferences.

PRIVAMAP collects the User's Personal Data, if the User agrees to establish the security protocol established by articles R.4515-4 to R.4515-11 of the Labor Code. These data are as follows:

- Name
- First name
- Phone number
- Email
- Signature
- Truck license plate

As part of the security protocol, PRIVAMAP collects Personal Data from the transport company. These data are as follows:

- Name
- First name
- Phone number
- Email
- Signature

As part of the security protocol, PRIVAMAP collects Personal Data from the manager of the site where PRIVAMAP offers its solution. These data are as follows:

- Name
- First name
- Phone number
- Email
- Signature

On the host site, PRIVAMAP collects Personal Data from all people completing the security protocol. These data are as follows:

- Name
- First name
- Registration number
- Signature

Finally, if the User has consented to the use of the geoguiding application in addition to the security protocol, PRIVAMAP collects the following Personal Data:

- Driver position on site (latitude/longitude/time)
- Dangerous behavior of the driver (entry into prohibited zone, excessive speed, navigation error, etc.)

#### **4.3 Purpose & legal basis of processing**

Here are the processing purposes for which we collect your Personal Data with the associated legal bases for processing:

Purpose	Legal basis for processing
<ul style="list-style-type: none"> <li>• Enable the proper functioning of the Platform (including processing questions and requests sent via our contact form)</li> </ul>	<ul style="list-style-type: none"> <li>• Our legitimate interest: management of the service</li> </ul>
<ul style="list-style-type: none"> <li>• Ensure the creation, security, personalization and management of your User Account</li> </ul>	<ul style="list-style-type: none"> <li>• Execution of a contract and the General Conditions of Use of the Platform</li> </ul>
<ul style="list-style-type: none"> <li>• Allow you to access and use the Platform</li> </ul>	<ul style="list-style-type: none"> <li>• Our legitimate interest: cookies strictly necessary for the provision of the service that you have expressly requested</li> </ul>
<ul style="list-style-type: none"> <li>• Retain Personal Data required to be able to meet legal obligations and manage data communication requests from authorized authorities</li> </ul>	<ul style="list-style-type: none"> <li>• Meet our legal or regulatory obligations</li> </ul>
<ul style="list-style-type: none"> <li>• Sending marketing communications concerning our Products or Services (such as newsletters relating to PRIVAMAP brand news)</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent if you are a consumer and our legitimate interest if you are a professional: developing our activity</li> </ul>
<ul style="list-style-type: none"> <li>• Management of complaints and complaints</li> </ul>	<ul style="list-style-type: none"> <li>• Execution of the sales contract (CGV)</li> </ul>
<ul style="list-style-type: none"> <li>• Implementation of the security protocol</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligation provided for by the articles R.4515-4 to R.4515-11 of the Labor Code and consent</li> </ul>
<ul style="list-style-type: none"> <li>• Using the geoguiding solution</li> </ul>	<ul style="list-style-type: none"> <li>• Execution of a contract and the General Conditions of Use of the Platform</li> </ul>

## 5. IF YOU FAIL TO PROVIDE PERSONAL DATA

If you choose not to provide the Personal Data we request, we may not be able to provide you with the Products and/or Services you have requested or fulfill the purposes for which we requested the Personal Data.

## 6. WHAT ARE PERSONAL DATA FLOWS?

Access to your Personal Data is strictly limited to:

- PRIVAMAP employees authorized, due to their functions, and bound by an obligation of confidentiality;
- To PRIVAMAP subcontractors contractually responsible for carrying out the tasks necessary for the proper functioning of the Platform and its Services, namely the cloud storage of the Platform and your Personal Data.

As part of the execution of their services, PRIVAMAP subcontractors comply with the provisions of the GDPR.

PRIVAMAP may share your Personal Data with judicial authorities, independent administrative authorities or any other organization if required by law.

Third parties with whom we share your Personal Data are limited (by law and contract) in their ability to use your Personal Data for the specific purposes we have identified. We will always make every effort to ensure that third parties with whom we share your Personal Data are subject to confidentiality and security obligations consistent with this Privacy Policy and

applicable laws. We only allow them to process your Personal Data for specific purposes and in accordance with our instructions.

Except as expressly stated above, we will never share, sell or rent your Personal Data to any third party without notifying you and/or obtaining your consent. If you have given us consent for us to use your information in a particular way, but later change your mind, you should contact us and we will stop doing so.

## **7. PROCESSING OF DATA OUTSIDE THE EUROPEAN UNION**

PRIVAMAP does not transfer Personal Data outside the EEA, to countries which have not been the subject of an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR, or without that standard contractual clauses from the European Commission have been concluded.

## **8. DURATION OF STORAGE OF YOUR PERSONAL DATA**

We will only retain your Personal Data for as long as necessary to fulfill the purposes we collected it for, including to satisfy any legal or accounting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve these purposes through other means, as well as the applicable legal requirements.

For Personal Data relating to Users of the Platform, we retain Personal Data:

- claim, questions, complaints: 3 years following a claim, question or complaint having been closed;
- contact form: 3 years from your request;
- subscription to a newsletter: as long as the Data Subject does not unsubscribe;
- account creation: until your account is deleted.
- Personal data necessary to comply with our obligations regarding the fight against money laundering and the financing of terrorism (“AML-FT”): 5 years
- All Personal Data resulting from the security protocol (Platform User, transport company, site having integrated the PRIVAMAP solution): 3 months from the last use
- All Personal Data allowing the use of the geoguiding solution: 3 months from the last use

After the set deadlines, the data is either deleted or kept after having been anonymized, in particular for reasons of statistical use. They can be kept in the event of pre-litigation and litigation. Please note that deletion or anonymization are irreversible operations and that PRIVAMAP is subsequently no longer able to restore them.

## **9. RIGHTS OF PERSONS CONCERNED**

As a Data Subject, you have various rights. These rights are not absolute and each of these rights is subject to certain conditions in accordance with the GDPR and applicable national laws.

- **the right of access**- you have the right to obtain from us confirmation as to whether or not your Personal Data is being processed by us, as well as certain other information (similar to that provided in this Privacy Policy) about how it is used. You also have the right to access your Personal Data, by requesting a copy of the Personal Data concerning you. This allows you to know and verify that we are using your information in accordance with data protection laws. We may refuse to provide information where doing so may reveal Personal Data about another person or adversely affect the rights of another person.

- **the right of rectification-** you can ask us to take steps to correct your Personal Data if it is inaccurate or incomplete (for example, if we have the wrong name or address).
- **the right to erasure-** also known as the “right to be forgotten”, this right allows you, in simple terms, to request the erasure or deletion of your Personal Data when, for example, there is no compelling reason for us to continue using them or their use is illegal. However, this is not a general right to erasure and there are some exceptions, for example where we need to use the information to defend a legal claim or to be able to comply with a legal obligation.
- **the right to limit processing-** you have the right to “block” or prevent further use of your Personal Data when we are assessing a request for rectification or as an alternative to erasure. Where processing is restricted, we may still retain your Personal Data, but we cannot use it further.
- **the right to data portability-** you have the right to obtain and reuse certain Personal Data for your own purposes across different companies (which are separate data controllers). This only applies to Personal Data that you have provided to us, which we process with your consent and for the purposes of contract performance, which is processed by automated means. In this case, we will provide you with a copy of your data in a structured, commonly used and machine-readable format or (where technically possible) we may transmit your data directly to another Data Controller.
- **the right to object-** you have the right to object to certain types of processing, for reasons related to your particular situation, at any time, to the extent that this processing takes place for the purposes of legitimate interests pursued by PRIVAMAP. We will be allowed to continue processing Personal Data if we can demonstrate that the processing is justified by compelling legitimate reasons which override your interests, rights and freedoms or if we need it for the establishment, the exercise or defense of legal actions. If you object to the processing of your Personal Data for direct marketing purposes, we will no longer process your Personal Data for such purposes.
- **the right to withdraw your consent-** where we process your Personal Data based on your consent, you have the right to withdraw your consent at any time. However, such withdrawal does not affect the lawfulness of the processing which took place before such withdrawal.
- **the right to provide us with instructions on the use of your Personal Data after your death–** In France, you have the right to provide us with instructions on the management (for example, retention, erasure and disclosure) of your data after your death. You can change or revoke your instructions at any time.

## 10. EXERCISE OF RIGHTS

If you have any questions about this Privacy Policy, about how we process your Personal Data or if you wish to exercise any of your rights, please contact our dedicated department at the following address: [dataprotection@privamap.com](mailto:dataprotection@privamap.com) .

If you are not satisfied with our response to your complaint or if you believe that the processing of your Personal Data does not comply with applicable data protection laws, you can lodge a complaint with the supervisory authority competent in matters of data protection. The Commission Informatique et Libertés (“CNIL”) is the lead data protection authority for PRIVAMAP.

Any request will be examined within the time limits provided for by applicable law. Please note, however, that certain Personal Data may be exempt from such requests in certain

circumstances, including if PRIVAMAP needs to continue to process your Personal Data for its legitimate interests or to comply with a legal obligation.

Exercising your right of access (or any other right) will not generate any costs. Sometimes, we will not be able to grant your request if it is manifestly unfounded or excessive.

We may need to request specific information from you to help us confirm your identity and ensure your right to access that information (or exercise your other rights). This is an appropriate security measure to ensure that Personal Data is not disclosed to any person who does not have the right to receive it.

#### **11. HOW IS THE DATA SECURED?**

PRIVAMAP ensures that Personal Data is processed securely and confidentially, including when certain operations are carried out by subcontractors. To this end, appropriate technical and organizational measures to avoid the loss, misuse, alteration and deletion of Personal Data concerning you are put in place. These measures are adapted according to the level of sensitivity of the data processed and according to the level of risk presented by the processing or its implementation. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable supervisory authority of a suspected breach where we are legally required to do so.

Unfortunately, the security of data transmissions over the Internet or data storage systems cannot be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you believe that the security of an account you have with us has been compromised), please notify us immediately by contacting us at the coordinates above.

#### **12. THIRD PARTY APPLICATIONS**

Furthermore, PRIVAMAP is not responsible for hypertext links directing to the Platform, which third-party internet applications could integrate even if PRIVAMAP has authorized the third-party publisher of said third-party application to place such a link.

#### **13. CONTACT DETAILS**

If you have any further questions or comments about our Privacy Policy, please contact us at: [dataprotection@privamap.com](mailto:dataprotection@privamap.com).

#### **14. MODIFICATION TO THIS PRIVACY POLICY**

PRIVAMAP may modify this Privacy Policy periodically to reflect changes in our practices in this area. When we change this Privacy Policy, we will also change the "Last Updated" date located at the top of the first page. We invite you to regularly consult this Privacy Policy to be informed of how PRIVAMAP protects your Personal Data.