

## Personal data protection charter related to Transitec's clients, partners, suppliers and visitors

For transparency purposes regarding the processing implemented, this charter describes and informs whom it may concern how Transitec, as data controller, undertakes to collect, use and protect the personal data in its possession with all due care and for the sole purpose for which it was collected.

### 1. Definitions

The term "personal data" refers to "any information relating to an identified or identifiable natural person", directly (e.g., last name, first name) or indirectly (e.g., client's user name or number, telephone number, biometric data, specific elements proper to a physical, physiological, genetic, psychic, economic, cultural or social identity, including voice or image).

The terms "clients, partners, suppliers and visitors" refer to any legal or natural person who gets in touch or is in contact with Transitec, in a formal or informal setting, including by simple consultation of Transitec's means of communication (e.g., website).

Transitec refers to each of the Transitec Group companies.

### 2. General principles

Transitec attaches the greatest importance to personal data protection.

Any transaction undertaken by Transitec using or based on personal data provided to it or derived from specific investigations is carried out in compliance with applicable regulations.

Personal data is collected, stored, processed and transmitted in accordance with existing laws and case law and the principles in force at Transitec, indicated here:

- personal data is processed fairly and lawfully;
- personal data is collected for specified, explicit and legitimate purposes and is not further processed in a way incompatible with those purposes;
- the personal data collected is adequate, relevant and not excessive in relation to the purposes for which it is collected;
- the personal data collected is kept in its identifiable form for a period not exceeding the one needed to achieve the purposes for which it has been collected.

### 3. Use of personal data

As part of its consulting engineering activities, Transitec is implementing a number of personal data processing operations, which are designed to:

- study mobility demand and/or behaviours (e.g., car park meter readings, business trip optimisations, etc.);
- provide the necessary communications in the usual framework of business relationships.

### 4. Recipients of personal data

The data collected at Transitec is intended for the persons in charge of its processing for the usual or agreed purposes. Personal data will never be transferred or disclosed to third parties, unless requested or authorised by the client, partner, supplier or visitor who initially must have provided the data to the company prior to it being processed.

### 5. Retention of personal data

Transitec will retain personal data for the period necessary to satisfy the usual or agreed purposes, unless a longer retention period is authorised or required by law or case law.

### 6. Security of personal data

Transitec is doing everything in its power to comply with the legal requirements governing personal data security and is taking reasonable measures to protect all personal data against loss, theft, misuse and unauthorised access, disclosure, alteration and destruction. Transitec would undertake to notify the owner/supplier as soon as possible if the existence of any security flaw that may affect all or part of the personal data in its possession transpired. To achieve this, Transitec may use any email address that was previously communicated to it, regardless of the context in which this email address was sent to it. Therefore, by sending an email address to Transitec, the client, partner or supplier doing so expressly agrees that Transitec may use the email to inform them of any security flaw involving their personal data.

### 7. Rights recognised by Transitec

In accordance with the applicable legal framework, each client, partner, supplier or visitor is entitled to the following rights regarding their personal data:

- the right to consult, access, update, complete and correct their data;
- the right to have their personal data deleted or removed when they are inaccurate, incomplete or ambivalent;
- the right to withdraw consent at any time during the collection of personal data;
- the right to limit the processing of personal data;
- the right to object to the processing of personal data;
- the right to be entitled to the portability and transfer of personal data.

These rights may be exercised by writing to the following address: [dataprivacy@transitec.net](mailto:dataprivacy@transitec.net)

Transitec reserves the right to refuse requests for access or deletion of personal data if and insofar as the disclosure or deletion of the requested data is not required or authorised by applicable law. To protect data against fraudulent access requests, Transitec reserves the right to verify the identity of individuals by requesting sufficient information to confirm the identity of the person making the request before authorising access or correction of personal data.

## 8. Use of Transitec's communication tools

Using Transitec's website (<https://transitec.net>) and/or Transitec's social media accounts (Facebook, LinkedIn, Twitter, etc.) implies full acceptance and respect of the existing general terms and conditions, which may be amended or supplemented at any time.

The purpose of these communication tools is to provide information on the services that Transitec provides or offers. The data published is given as an indication and is subject to changes or developments from the time it was uploaded. Transitec cannot guarantee whether the data provided is complete, accurate and up to date. Therefore, each user must acknowledge that they are using this data under their exclusive responsibility.

The mere consultation of Transitec's website does not require that personal data be provided. On the other hand, personal data transmission is necessary when communication forms (e.g., contact form, application form) are used.

## 9. Amendment of the charter

Transitec reserves the right to supplement or amend this charter in accordance with the development of the legal framework and specific needs.