



# Privacy Policy

The present privacy policy (“Privacy Policy” or “Transatel Privacy Policy”) outlines the way in which Transatel uses, shares and protects personal data controlled and/or processed by Transatel (“Personal Data”). It summarizes all the organizational and technical measures and principles that are taken to protect Personal Data’s privacy.

Transatel’s Privacy Policy complies with the General Data Protection Regulation (n°2016/679) of April 27th, 2016 (“GDPR”) and the French “Loi sur la protection des données personnelles” of May 14<sup>th</sup>, 2018.

## Contact

### **Transatel**

Société Anonyme à directoire et conseil de surveillance

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92913 Paris La Défense Cedex

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+ 33 (0)1 70 75 24 00

If you have any question, please contact our DPO.

### **Data Protection Officer (DPO)**

[dpo@transatel.com](mailto:dpo@transatel.com)

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## I. WHAT PERSONAL DATA TRANSATEL CONTROLS AND/OR PROCESSES?

Transatel has different activities. For each of them, Transatel's role is different. Regarding:

- **Subscribers data.** A subscriber is a person who has subscribed a mobile offer operated by Transatel. Transatel is controller or processor of the data.
- **Clients data.** A client is a professional who uses Transatel to enable its mobile offer. Transatel is the processor of the data.

In each of the Transatel activities, all the information needed is not the same. Transatel works towards collecting and/or processing only the information required for the engagement of our employees and the Transatel services functioning.

Personal Data only includes information relating to natural persons who:

- can be identified or who are identifiable, directly from the information in question (e.g. name); or
- who can be indirectly identified from that information in combination with other information (e.g. Mobile Station Integrated Services Digital Network).

Pseudonymized data can help reduce privacy risks by making it more difficult to identify individuals, but it is still personal data.

If Personal Data can be truly anonymized, then the anonymized data is not subjected to the GDPR. It is important to understand what Personal Data is in order to understand if the data has been anonymized.

Information about companies or public authorities is not Personal Data. However, information about individuals acting as sole traders, employees, partners and company directors where they are individually identifiable, and the information relates to them as an individual may constitute Personal Data.

Transatel may collect and/or process the following information:

As a mobile service provider for business (MVNA, MVNE, 901-A, 901-E), Transatel processes:

- Information about individuals who represent the Transatel customers (e.g. Name, Address, Phone number, email etc.)
- Traffic usage information about the subscribers of Transatel customers:

- Provisioning information
- xDR (e.g. MSISDN, ICCID, called numbers, etc.)
- Voicemails
- SMS content
- Data traffic information (e.g. IP address, visited website etc.)

As a mobile service provider for end-user subscribers (MVNO, 901 -O), Transatel collects and processes:

- Identifying information (e.g. Name, Address, Phone number, copy of ID etc.)
- Financial information (e.g. IBAN etc.)
- Traffic usage information about the Transatel own subscribers:
  - Provisioning information
  - xDR (e.g. MSISDN, ICCID, called numbers, etc.)
  - Voicemails
  - Data content
  - Data traffic information (e.g. IP address, visited website, Logs etc.)
- VIN (Vehicle Identification Number)

Information processed by Transatel for its M2M activity are not covered by the GDPR, unless they relate to the individuals who represent the Transatel M2M customer.

## II. COMPLIANCE WITH LOCAL LAWS AND REGULATIONS

Transatel fully complies with local laws and regulations in every country it operates.

## III. PURPOSE OF COLLECTING AND/OR PROCESSING

As a Personal Data controller, Transatel collects and processes Personal Data to engage its own employees and to supply a mobile service to its own customers and subscribers.

As a Personal Data processor, Transatel processes Personal Data to supply integrated mobile solution to MVNO customers which provide mobile services to their own subscribers. Most of the collection and processing are based on contractual obligations.

Also, Transatel needs some of your Personal Data to comply with legal & regulatory obligations to help for instance crime detection and prevention.

#### IV. HOW YOUR DATA IS SECURED?

To ensure confidentiality, Transatel set up organizational and technical measures to avoid any personal data violation, as well as when the data is operated by a subcontractor. These measures are in place to prevent data loss, data misuse, data alteration, data erase. The security measures are leveled according to the sensitivity of the data and the processing as well. We have set a security policy in respect of the legal requirements.

#### V. LOCATION OF PERSONAL DATA

Personal Data processed by Transatel are all located in the European Union. In case of disclosure to a third party out of the European Union, Transatel guarantees that either an adequate level of protection is operated (e.g. US Privacy Shield etc.) or our third-party is bound by “standard contractual clauses” edited by the European Commission

#### VI. CONSERVATION OF PERSONAL DATA

At Transatel, we conserve data for different purposes such real-time access to provide services, back-up to prevent any failure and archiving.

The time we conserve your Personal Data depends on the execution of your contract or the applicable legal & regulatory obligations. In any case, you are informed of the time we retain your Personal Data.

Knowing also, Transatel can keep your Personal Data with the purpose of statistics. In this case, Transatel will anonymize your Personal Data.

#### VII. PRINCIPLES

Transatel’s Privacy policy is governed by principles. Those principles lead Transatel’s work in protecting data privacy.

#### A. Training staff members

We dedicate time to train and inform our staff what is at stake with the GDPR compliance. Regularly, we set specific training to make sure that our staff is fully aware of the regulation applicable.

#### B. Privacy by design

Transatel, from the conception of a project, always keeps in mind collecting Personal Data must be limited to what is necessary. Our staff works towards minimizing the use of Personal Data to the strict necessary. We have a document that recaps the process in which we assess the need of personal data for new projects.

#### C. Privacy by default

Transatel is dedicated to protecting people's privacy. To achieve this goal, Transatel always displays the most protective option to customers by default. It is only with the customer's consent that Transatel can change this option. We have documents which summarize Transatel's actions regarding Privacy by Default. We update it regularly.

#### D. Minimization

Transatel collects only the information needed for its services to function. Transatel limits the data collected. Also, Transatel delete data when it is not required for the service to operate. Regularly, Transatel operates purges through all system to ensure that we only keep data needed.

#### E. Cooperation

Transatel fully cooperate with the data protection authorities to comply with the legislations where it operates. Transatel has its disposal different documentation about our security measures to comply with the obligation of "accountability".

#### F. Restriction to access

Transatel limits access to Personal Data to only authorized staff. We control access to personal data. Transatel grants this access to people who are trained to handle such sensitive material. Transatel has implemented systems to protect the access to our system.

### VIII. RIGHTS FOR INDIVIDUALS

#### A. Right to access

At any time, you have the right to access to your information. We will provide you all the information that we have about you in our system.

#### B. Right to fill a complaint

If you estimate that there is violation in the way we process your data, you have the right to fill a complaint towards the French data control authority: Commission Nationale Informatique et Libertés (CNIL).

#### C. Right to rectification

In the case we have incorrect information about you, you can ask us to modify or update an information. In this case, for certain types of information, a justification will be asked.

#### D. Right to portability

You have the right to recover the personal data held on you in a machine-readable format. Noted that, regarding Transatel's activities, such right is not relevant in any of our businesses.

#### E. Right to restriction

You have the right to restrict Transatel from processing your Personal Data. Storage of your data is authorized but we cannot use it. This right applies only under certain circumstances.

#### F. Right to erasure (“right to be forgotten”)

You have the right to have your Personal Data erase from our database. Knowing that, due to requirements, the pursuit of the service needs some of your data. Erasure will imply the suspension of the service.

### IX. MODIFICATION OF OUR PRIVACY POLICY

Transatel reserves the right to modify its Privacy Policy. In this case, you will be informed through e-mail or any other mean. The future modifications will always comply with applicable regulations.

### X. HOW TO EXERCISE THESE RIGHTS ?

TO EXERCISE THE RIGHTS LISTED ABOVE YOU CAN EITHER :

- Send an e-mail to [dpo@transatel.com](mailto:dpo@transatel.com)
- Send a mail to : Délégué à la Protection des Données, Service Juridique, Immeuble Sense, 20 - 22 Rue Jean Jaurès, CS 90073, 92816 PUTEAUX CEDEX