

# Visitor Privacy Notice & Cookie Notice

## VISITOR PRIVACY NOTICE

This version was published, and is valid from, 2024/04/03.

This notice provides information on processing of personal data of occasional and professional visitors to the Flexis premises by a company which is part of the Flexis (“Privacy Notice”). If you are visiting or have visited the premises of a Flexis company, we may process personal data about you.

For the purpose of this notice, the “Flexis” means Flexis SAS (publ.) and entities directly or indirectly controlled by Flexis SAS including but not limited to entities belonging to any of the Flexis principal Business Areas (as may exist from time to time).

This Privacy Notice applies only when a company which is part of the Flexis is collecting or otherwise processing personal data for its own purposes (i.e., when a company of the Flexis (either alone or in common with other entities) is a controller and therefore determines the purposes for which and the manner in which any personal data is processed).

This Privacy Notice does not apply when a company of the Flexis is collecting or otherwise processing personal data on behalf of another company, such as Flexis’s independent dealers, importers, suppliers, and customers.

In addition to this Privacy Notice, some systems, applications, and processes of a company of the Flexis may contain their own privacy notices, which provide additional details about what specific personal data is collected and how it is stored, used, and transferred.

### **Identity and contact detail of the controller and the Flexis Privacy Officer**

The Flexis company that you are or have been visiting (below referred to as “Flexis”) is the controller of the personal data that Flexis obtains from you and the other sources described below.

“Controller” means that it is Flexis that decides on the purpose and means for the processing of your personal data. Flexis is responsible for the processing of your personal data under applicable data privacy laws and regulations.

If you have questions regarding the processing of your personal data, please contact the Flexis Privacy Officer at [contact@flexis-mobility.com](mailto:contact@flexis-mobility.com) or by post or phone at:

Flexis SAS  
122-122 bis avenue du Général Leclerc  
92100 Boulogne-Billancourt  
France

**What categories of personal data may Flexis process, on which legal ground(s) and for what purpose?**

For the purposes of this Privacy Notice, “personal data” is any information about a specific individual or that identifies or may identify a specific individual. In other words, it is any piece of information than can be linked to you.

For the purposes of this Privacy Notice, the term "process" or “processing” means any use of personal data, including but not limited to the collection, recording, organization, storing, adaptation, alteration, transferring, making available, blocking, deletion or destruction of personal data.

*Legal ground*

Flexis will process your personal data based on either of the following legal grounds, see also further details below.

- Legal obligation. Flexis may process your personal data if such processing is necessary to comply with a legal obligation, e.g. to comply with court orders and legal reporting requirements.
- Legitimate interests. Flexis may process your personal data if such processing is necessary for the purposes of a legitimate interest pursued by Flexis or a third party. It is generally considered to be in Flexis’s legitimate interest to manage its daily operations, secure its facilities and equipment and keep internal control. In order to base its processing of personal data of its visitors on the legitimate interest-basis, Flexis makes an assessment on case-by-case basis. Example, Flexis may need to process certain personal data to enable the administration of your visit to the Flexis where Flexis’s legitimate interest is to manage its daily operations in a secure manner.

Where it is stated herein that Flexis relies on its legitimate interests for a given processing purpose, Flexis is of the opinion that its legitimate interests are not overridden by your interests, rights or freedoms given (i) the transparency Flexis provides on the processing activity, (ii) Flexis’s privacy by design approach, (iii) Flexis’s regular privacy review and (iv) the rights you have in relation to the processing activity. If you wish to obtain further information on this balancing test approach, please contact the Flexis Privacy Officer via the contact details set out above.

- Vital interests. Flexis may process your personal data to protect the vital interest of you and others if Flexis has valid reasons to believe that such processing of your personal data may prevent or reduce any significant potential harm to you or others.

Flexis may process the following categories of data which, in itself or in combination with other data, may constitute personal data and for the general purposes stated in Table 1 below.

*Flexis will not necessarily process all the data listed below about you, and some of the purposes for processing will overlap and there may be several purposes which justify our use of your personal data.*

*Table 1 – Categories of Personal Data, Purpose and Legal Ground for Processing*

Categories of Personal Data	Purposes of Processing	Legal Ground for Processing
Contact data, such as name, title, place of work e-mail address, passport no, driver ID, food preferences and cloth sizes	<ul style="list-style-type: none"> <li>• Enabling registration of visitors in Flexis’s visitor registration systems</li> <li>• General administration of visits</li> <li>• Enable travel and hotel bookings</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interest (to manage visits to Flexis premises)</li> </ul>

<p>Time data, such as date and time of when the visit occurred</p> <p>Vehicle detail data, such as registration number of the vehicle that you state upon registration</p>	<ul style="list-style-type: none"> <li>• Enabling registration of time of visits</li> <li>• Enabling visitor access to parking lots</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interest (to manage visits to Flexis premises)</li> <li>• Legitimate interest (to manage visits to Flexis premises)</li> </ul>
<p>Security data, such as access cards, access rights and use of access cards and access rights given to you. Passport number, Driver ID, Social Security number.</p>	<ul style="list-style-type: none"> <li>• Enabling visitor to access Flexis facilities in a secure manner</li> <li>• Enabling identification and verification of visitors</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interest (to enable secure access to Flexis facilities)</li> <li>• Legal obligation</li> </ul>
<p>IT-related data, such as user-ID, passwords and log-in details for your use of Flexis public networks (if applicable)</p> <p>Image material, such as video footage that is being recorded on a Flexis company closed-circuit television system (“CCTV”) installed on the applicable Flexis company premises or other video and related security/monitoring systems whether on Flexis premises or not but to which we have a legitimate purpose in viewing / accessing</p>	<ul style="list-style-type: none"> <li>• Enabling access to Flexis public internet networks</li> <li>• Manage safety and security at Flexis facilities</li> <li>• Developing and/or refining the production process</li> <li>• Efficiency improvement.</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interest (to manage public internet access control, data protection and cyber security in general)</li> <li>• Legitimate interest (to maintain security and safety, prevent fraud or theft; and (where applicable) to assist with regulatory compliance)</li> </ul>
<p>Individual data, such as food preferences</p>	<ul style="list-style-type: none"> <li>• Enabling the provisions of meals during visits</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interest (to manage meals during visits to Flexis premises)</li> </ul>

*Specifically about CCTV monitoring*

Flexis may use CCTV monitoring (as defined above) where permitted by law. CCTV monitoring is generally used to control and prevent unauthorized access to Flexis's premises and equipment, however in some countries it may also be used for the purpose to ensure compliance with health and safety guidelines and procedures and for overall production improvement purposes. CCTV images and recordings are securely stored and only accessible on a need-to-know basis (for example, to investigate an incident).

### **From where will Flexis obtain your personal data?**

Flexis will obtain the personal data from yourself or the person you are visiting us together with, as it is possible for visitors to enter the names of their group of visitors. Further, if you are visiting a Flexis employee, that person may provide personal data about you to the reception for registration purposes. The information might also be retrieved from a market company where the Flexis representant is not present but have informed for example the Exhibition center about customers who will be visiting, for example Exhibition centers. Some personal data might also be automatically generated from Flexis's IT-system and CCTV systems, such as log information and/or image materials.

### **What happens if you do not provide Flexis with any personal data?**

Your decision to provide any personal data to Flexis is voluntary, however for security purposes, all visitors must register themselves in connection with visits to Flexis premises. If you do not wish to provide your personal data in connection with a visit, we may not be able to grant you access to the Flexis premises.

### **How will Flexis share your personal data?**

Your personal data may be shared with other Flexis companies and with certain categories of third parties (as further detailed below), which may involve transferring your personal data to other countries.

#### *Sharing of personal data within the Flexis*

The Flexis is a global organization with offices and operations throughout the world, and your personal data may be transferred or be accessible internationally throughout the Flexis's global business and between its various entities and affiliates.

Any transfers of your personal data to other Flexis companies (including transfers from within the EU/EEA to outside the EU/EEA) will be governed by an intercompany agreement based on EU approved Standard Contractual Clauses or such other mechanisms as have been recognized or approved by the relevant authorities from time to time.

Such agreement reflect the standards contained in European data privacy laws (including the EU General Data Protection Regulation). Having this agreement in place means that all Flexis entities must comply with the same internal rules. It also means that your rights stay the same no matter where your data are processed by Flexis.

#### *Sharing of personal data with third parties outside of the Flexis*

In addition to the sharing of personal data between Flexis companies as set out above, Flexis may also share your personal data with certain categories of third parties, including:

- Business partners, such as Flexis's suppliers and service providers in connection with their provision of products and services to the Flexis, such as IT service providers.
- Professional advisors, such as insurers, lawyers and other professional advisors in connection with insurance claims, audits and the receipt of advisory services
- Emergency service providers, such as the police, fire brigade, ambulance and roadside assistance to protect the vital interest of you and other such as in connection with emergency assistance.
- Law enforcement, regulatory authorities and other public and judicial bodies in connection with legal obligations such as court orders or legal reporting requirements or if considered necessary in exceptional cases to protect the vital interest of you or others.

Any third party service providers and professional advisors to whom your personal data are disclosed, are expected and required to protect the confidentiality and security of your personal data and may only use your personal data in compliance with applicable data privacy laws and regulations.

Further, in the event any Flexis company that is located within the EU/EEA transfers personal data to external third parties that are located outside of the EU/EEA the relevant Flexis company will satisfy itself that there are appropriate safeguards in place which provide adequate levels of protection of your personal data as required by applicable data privacy laws (including the EU General Data Protection Regulation). For example, this may include the use of EU approved Standard Contractual Clauses or such other mechanism as have been recognized or approved by the relevant authorities from time to time.

If you have questions about how Flexis will share your personal data, please contact the Flexis Privacy Officer via the contact details set out above.

### **How does Flexis safeguard personal data?**

Flexis utilizes appropriate and reasonable legal, technical and organizational security measures, including information technology security and physical security measures, to adequately protect personal data.

These measures are appropriate to the risks posed by the processing of personal data and to the sensitivity of the personal data and take into account the requirements of applicable local law. In addition, the measures are continuously improved in line with the development of available security products and services.

Flexis requires all persons to abide by applicable security policies related to personal data when using Flexis systems.

### **For how long will Flexis process your personal data?**

Flexis will normally process your personal data for a maximum period of two (2) years after your visit. After this period, Flexis will only process the personal data as may be required to comply with local legal obligations or to satisfy any legal requirements in the event of an actual, threatened or anticipated dispute or claim.

### **Your data protection rights**

You may be entitled, where provided for under applicable data privacy laws and regulations, to:

- Request access to the personal data Flexis process about you: this right entitles you to know whether we hold personal data about you and, if we do, to obtain information on and a copy of the specific pieces and categories of personal data.
- Request a rectification of your personal data: this right entitles you to have your personal data corrected if it is inaccurate or incomplete.
- Object to the processing of your personal data: this right entitles you to request that Flexis no longer processes your personal data.
- Request the erasure or deletion of your personal data: this right entitles you to request the erasure or deletion of your personal data, including where such personal data would no longer be necessary to achieve the purposes.
- Request the restriction of the processing of your personal data: this right entitles you to request that Flexis processes your personal data only in limited circumstances, including with your consent.
- Request portability of your personal data: this right entitles you to receive a copy (in a portable and, if technically feasible, readily usable format) of your personal data, or request Flexis to transmit such personal data to another data controller.
- In the event that our processing of your personal data or part thereof is based on your consent, to withdraw at any time your consent, in which case Flexis will cease any further processing activities of your personal data or the relevant part thereof (however such withdrawal will not affect the legality of the data processing activities prior to the withdrawal).

Please note that Flexis may not always be obliged to comply with a request of deletion, restriction, objection or data portability. Assessment may be made on a case by case basis of Flexis's legal obligations and the exception to such rights.

You also have the right to lodge any complaints you may have regarding Flexis's processing of your personal data to a supervisory authority. For more information about these rights and how to exercise them, please contact the Flexis Privacy Officer via the contact details set out above.

### **What happens if this Privacy Notice changes?**

Flexis encourages the periodic review of this Privacy Notice to stay aware of any changes to it. We reserve the right to amend this Privacy Notice as needed. When we do, we will note near the top of this Privacy Notice the date that any such changes are made and/or when they become effective.

## **COOKIE NOTICE**

This cookie notice describes how Flexis, company registration number 911 040 483 Nanterre having its registered address at Flexis, 122-122 bis avenue du Général Leclerc, 92100 Boulogne-Billancourt, France, hereinafter referred to as "Flexis", "we", "us", uses cookies at <https://flexis-mobility.com>.

Flexis is the controller for the use of cookies on the website as well as for processing of your personal data that is collected through cookies when you visit <https://flexis-mobility.com>. For further information about our processing of personal data through cookies, please see our Website notice <https://flexis-mobility.com/en/pdf/data-privacy>.

### **What is a Cookie?**

A cookie is a small piece of data sent from a webpage and stored in a user's web browser, mobile phone, or other device while the user is browsing that webpage. A cookie can help the webpage provider to recognize your device the next time you visit that webpage, provide you with access to certain functions on the webpage and/or register your surf patterns.

There are two types of cookies, persistent cookies and session cookies. Session cookies are stored temporarily when you as a visitor visit and browse our website and are deleted when you close your web browser.

Persistent cookies are stored as a file on the computer during a period of time, until you as a visitor or the server that sent them, delete them.

Furthermore, cookies can be divided into first and third-party cookies. First-party cookies are set by the website owner and third-party cookies are set by another website.

There are other technologies such as pixel tags, web bugs, web storage and other similar files and technologies that may carry the same functions as cookies. In this cookie notice, we use the term "cookies" for cookies and all such similar technologies.

For more general information about cookies, please see [www.aboutcookies.org](http://www.aboutcookies.org) and/or [www.allaboutcookies.org](http://www.allaboutcookies.org).

If you do not allow this website to use cookies, then certain features or sections of this site may not be available to you or may not function as expected.

## Which cookies does the website use?

We use the following cookies for the purposes set out below:

### Cookie List

A cookie is a small piece of data (text file) that a website – when visited by a user – asks your browser to store on your device in order to remember information about you, such as your language preference or login information. Those cookies are set by us and called first-party cookies. We also use third-party cookies – which are cookies from a domain different than the domain of the website you are visiting – for our advertising and marketing efforts. More specifically, we use cookies and other tracking technologies for the following purposes:

#### *Strictly Necessary Cookies*

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

Strictly Necessary Cookies		
Cookie Subgroup	Cookies	Cookies used
Tarteaucitron.io	tarteaucitron	First Party
Piwik Pro	ppms_ ; _pk_**	First Party

#### *Performance Cookies*

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance.

Performance Cookies		
Cookie Subgroup	Cookies	Cookies used
Google.com	_ga ; _ga_*** ; _gcl_au	Third Party

## How do I change my cookie settings?

Consenting to our use of cookies is optional and you can at any time choose to withdraw your consent. All cookies except necessary cookies will be removed. To withdraw your consent, please visit *Cookie Management*.

You can block some cookies through your browser settings. In such case, your browser automatically rejects use of such cookies or informs you every time a website (such as ours) requests to use cookies. Please see more specific information below

After your visit to our website you can review and delete any permanent cookies that have been stored on your browser. To make identifying our cookies easier we have provided the name of each cookie in the table above.

### *Specifically about browser settings*

Many web browser settings allow you to view and delete cookies from your computer and disable or block the installation of cookies on your computer. Below you can find relevant instructions for the different browsers:

- Chrome (link: <https://support.google.com/>)
- Safari (link: <https://support.apple.com/>)
- Safari on iPhone and iPad (link: <https://support.apple.com/>)
- Internet Explorer and Microsoft Edge (link: <https://support.microsoft.com/>)
- Firefox (link: <https://support.mozilla.org/>)
- Opera (link: <https://www.opera.com/help/tutorials/security/privacy/>)

### *Future changes*

We reserve the right to update and change this cookie notice from time to time, including as required by applicable laws and regulations.

## Questions?

If you have any questions or comments about our use of cookies, please contact [contact@flexis-mobility.com](mailto:contact@flexis-mobility.com) for more information.