



ALSTOM - Data Privacy Charter

To be used as is

DOCUMENT SUMMARY :

The Alstom Data Privacy Charter must be communicated to every Alstom employee and be available on the alstom.com website, with a special care to people directly handling sensitive personal data .

Verified By :	Inge DE VENTER/ VP Ethics & Compliance	08/09/21
Approved By :	Emmanuelle PETROVIC/ GENERAL COUNSEL	20/09/21



ALSTOM	Data Privacy Charter	Document Reference: LGL-WMS-026 Version C	Application date : September 2021
Written by:	Michael PLOENES / Privacy Officer		
Verified by:	Inge DE VENTER / VP Ethics & Compliance	Ensures that the technical/ process accuracy has been checked.	
Approved by:	Emmanuelle PETROVIC / General Counsel	Orders, by his/her signature, the implementation of the document.	

Purpose / Objectives

The purpose of this Charter is to reaffirm the practices and procedures of Alstom regarding data protection and compliance with Data Protection Laws.

The Alstom Data Privacy Charter must be communicated to every employee and be available on the alstom.com website.



Ethics & Compliance



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At Alstom, your **data privacy** is essential.

The protection of your personal data is a **fundamental right** set forth in the Charter of Fundamental Rights of the European Union, and a key principle of our Code of Ethics :

“Alstom will take all necessary steps to ensure that personal data is handled appropriately and in compliance with all company instructions and applicable data protection laws and regulations. No personal information will be communicated to third parties unless necessary and permitted by law. In the course of performing your work you may have access to the personal information of others. Access to this data is restricted to those employees who have a legitimate reason to handle this information on Alstom’s behalf due to the nature and scope of their individual function and work responsibilities. Every employee has the responsibility to take steps to safeguard any personal information from mishandling, misuse, or disclosure.”

- Alstom Code of Ethics

As a normal part of our business activities, Alstom is required to collect and use some of your personal data. In doing so, Alstom is committed to protecting your privacy by preserving the security, integrity, and confidentiality of each individual’s personal data. Alstom strives to comply with any applicable data protection laws and regulations in all countries in which Alstom is present and doing business. In particular, Alstom ensures full compliance with the EU General Data Protection Regulation 2016/679 of 27 April 2016 (the “EU GDPR”) and any applicable national data protection laws.

The main categories of persons whose personal data are collected and processed are:

- Employees
- Job Applicants
- Business Partners (customers and suppliers)

Data Privacy Notices have been issued for each of these categories and are available on the Alstom website here.

“Personal data” means any information relating to you as an identified or identifiable individual, whether directly or indirectly (e.g., your first name, last name, email address). The information can be either private or professional as well as IT connection data.

As the data **“Controller”** pursuant to the EU GDPR, Alstom determines the purposes and means of the processing of your personal data. “Processing” means any operation which is performed on your personal data, from the point of collection up to and including the final destruction or deletion of the data.

ALSTOM Transport SA, a French société anonyme, having its registered office in France, at 48 rue Albert Dhalenne, 93400 Saint-Ouen is the Controller for the Alstom Group ("**ATSA**").

It is responsible for all processing activities and serves as the main contact point with our lead supervisory authority (the French CNIL - Commission Nationale de l'Informatique et des Libertés) and the data protection supervisory authorities.

ATSA will work with local Alstom's affiliates/subsidiaries for compliance with specific local rules related to local processing of your personal data. Alstom's affiliates/subsidiaries may act as Joint Controllers, depending on the nature of the processing and the autonomy of these entities

Alstom's guiding principles with regard to your personal data are:

Transparency

Alstom will always process your personal data lawfully, fairly, and in a transparent manner. You have the right to know who, where, what, and why Alstom is processing your personal data.

Proportionality

Alstom collects your personal data for specified, explicit, and legitimate purposes only or to comply with our legal obligations. Your personal data are not further processed in a manner that is incompatible with these purposes.

Necessity

Alstom will only collect and process your personal data limited to what is adequate, relevant, and necessary in relation to the business purpose

Your personal data **are kept accurate, up to date** (where necessary), and in a form which permits your identification only for the period of time necessary for the purposes for which they are processed.

Alstom ensures that appropriate security, integrity, and confidentiality measures are implemented within Alstom, using **appropriate technical and organisational** measures, to provide protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

As a multinational group, Alstom has a **legitimate interest** in transmitting your personal data within the Alstom Group, to affiliates/subsidiaries located all around the world (e.g., for internal administrative purposes). Alstom may also need to outsource

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some services to external service providers located outside the European Union. In these cases of **international transfer**, Alstom ensures that appropriate safeguards are duly implemented in order to provide an adequate level of protection to your personal data.

Pursuant to the EU GDPR, you have the right to **access, rectify**, and/or, in certain circumstances, erase any of your personal data that could be held by Alstom, and/or to **restrict** or **object** to the processing of your personal data. You have the right to data **portability**, only if applicable. Also, when you have given us consent to the processing of your personal data, you have the right to **withdraw your consent** at any time.

Should you wish to exercise these rights, or should you have any questions related to data privacy, please kindly contact our Ethics & Compliance Department at data.privacy@alstomgroup.com.

When you contact us, Alstom strives to give you full satisfaction when it comes to the protection of your personal data. Nevertheless, should you remain dissatisfied, you are also entitled to contact any competent data protection supervisory authority, such as the CNIL (Commission Nationale de l'Informatique et des Libertés) in France.

A – Definitions and References

A-1 Definitions

For the purpose of this document the following definitions shall apply:

- **E&C**..... Ethics and Compliance
- **CNIL** Commission Nationale de l'Informatique et des Libertés
- **EU**..... European Union

A-2 References

The following documents are referenced through the text.

A-2.1 Parent documents

[P1] ALS-POL-006 Ethics and Compliance Policy

A-2.2 Other documents

[O1] REF-WMS-001..... Instruction for Control & Security

B – Control Sheet

Version	Date	Content of Modification	Author(s)
A	May 2018	First issue	Anne-Sophie RACT
B	Dec 2018	Update due to new organization	Anne-Sophie RACT
C	Sept 21	Replacement of globe with old values Team/Trust & Action by the E&C Brand and the AIR values, quotation of the new Code of Ethics 2020 relevant section	Michael PLOENES