

Alstom Data Privacy Charter

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 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.

Data Privacy in iPrefer

Specifically, for the processing of iPrefer, Standard Life will collect and process information about employees and any included dependents such as date of birth and National Insurance number in order to provide the products or services offered within iPrefer. They will only collect and process data which is specifically required for the provision of the products and services selected and this data may include sensitive personal data (for example, medical data is needed in order to process a Life Assurance renewal).

Standard Life will also keep relevant personal information and records (e.g. emails and calls with you) in order to meet different legal and regulatory requirements. The collection, retention and security of personal data will be in compliance with Alstom's Data Protection Charter (as shown above).

In order to administer your contractual benefits (pension, health insurance, life assurance, group income protection) and to offer the above flexible benefits in iPrefer, Alstom are required to transfer to Standard Life your personal data (name, employee number, gender, NI number, job title, home address, birth date, work email address, current salary and benefits data).