

## PRIVACY POLICY

Michelin is committed to protecting your personal information and being clear and transparent about what information we collect and how we will use it. This policy explains how any personal information we collect when you use our mobile app or digital services, or that you provide to us, will be processed by us.

Please read the following policy carefully to understand our views and practices regarding your personal information and how we will treat it.

### 1. Who we are and how we can be contacted?

Our full company name is Manufacture Française des Pneumatiques Michelin (“**Michelin**”) and when you use our mobile app and our services directly, we act as a Data Controller.

If you need to contact us please use the dedicated form in the app.

### 2. About our Data Protection Officer

While everyone at Michelin is committed to protecting and respecting your privacy and we have a Data Protection Officer who deals with all aspect of personal data at Michelin. You can contact our Data Protection Officer by sending an email to [privacy.fr@michelin.com](mailto:privacy.fr@michelin.com).

### 3. Other policies and information we encourage you to read

While this Privacy Policy contains all the information you need on how we collect and use your personal information on our mobile apps, there is information in some other places which we encourage you to read.

Additional privacy policies  
Our Cookie Policy  
Linked Platforms

- Additional privacy policies

This is our main privacy policy for your use of mobile app and digital services and products offered by Michelin. However, there may be additional information in privacy policy for specific digital products and services. Please read these policies when you register or subscribe to these products and services.

- Our Cookie Policy

When you use our mobile app and other digital products and services provided by us, information can be collected through cookies to distinguish you from other users of our mobile app and other digital products and services. We have a separate Cookie Policy which explains our use of cookies and the purposes for which we use them. We encourage you to read our Cookie Policy.

- Linked platforms

Our mobile app may contain links to and from our mobile apps and digital platforms of our partner networks, advertisers, affiliates and social media pages. If you follow a link to any of these mobile apps, please note that these mobile apps have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these mobile apps.

### 4. Information we may collect from you

This section sets out:

- how we collect your personal information;
- the categories of data that we collect;
- a description of how we plan to use the information we collect;

- the legal basis that we will rely on to process information collected;
- how long we will hold the information collected; and
- specific types of data

We may collect and hold the following information about you:

Data collected	Purpose/Activity	Type of Data	Lawful basis for processing	Retention period
Information you provide to us when you complete a survey or respond to a questionnaire or submit a review or feedback (“ <b>Review Data</b> ”).	To collect information about a specific matter, for example, our services to you or reviews of our products/services. In many cases surveys, and questionnaires are anonymous and we only collect personal information for statistical data. If this is not the case, we will let you know at the time of collecting the information. If such functionality is available, feedback and reviews may be disclosed on the Mobile app with some personal information. In such case, you will be informed.	Information may include your full name, your email address and other personal data requested.	As the legal basis for processing Review Data, we will use our legitimate interests in the monitoring and improvement of our products and services to our customers and users and in the sharing of customer experience with webusers.	While we like to retain reviews and feedback from you to help other webusers, we will anonymise or delete your reviews and feedback after 3 years.  Any information collected pursuant to a survey or questionnaire will be deleted within 3 years of you submitting your responses. Any information retained will be statistical data only.
If you register for any of our digital products or services via an account we will request information to enable us to identify you and provide the products and services to you (“ <b>Account Data</b> ”).	Account Data will be processed for the purpose of operating our mobile apps, providing digital services you sign up for, communicating with you about those digital products and services and maintaining back-ups of our services.	Account Data will include your full name, email address. We may also ask you to set a password so you can securely log on to your account.	The performance of the agreement between you and us for the provision of the digital product and services is the legal basis for processing Account Data.	We will retain Account Data for as long as you have an account with us. If you do not access your account for 24 months, we will delete your account data so that we do not keep information for longer than is necessary. You can of course, create a new account if you like.
Information you provide us when you communicate with us, e.g. by email or contact us form via our mobile apps or through the live chat function on our mobile app	This information is used to enable us to respond to or following up on your comments, queries or questions	Information may include your full name, your email address and other personal data you provide us to enable us to deal with your communication.	We will use our legitimate interests in the assisting you and answering your communications as the legal basis for processing Communication Data.	We will hold on to Communication Data for as long as it is necessary to enable us to deal with the matter relating to that communication. Once your matter has been dealt with, we will delete

("Communication Data")				Communication Data within 6 months.
If you request further information from us by signing up to receive any of our newsletters or marketing communications ("Marketing Data"). For further details, see section 6 below.	Marketing Data is processed for the purposes of sending you the relevant notifications and/or newsletters and/or any marketing communication.	We will ask you for your name and email address so we can send you these information.	The legal basis for this processing is consent.	We will not keep Marketing Data more than 3 years after our last contact.

### Voluntary Information

When you provide us information (for example, the information set out in the scenarios above), in some cases we may ask you for additional, voluntary information. This information will be identified as optional and is used to help us better understand our customers and tailor our services to them.

### Statistical Information

We also collect and use aggregated data such as statistical or demographic data ("**Aggregated Data**"). Aggregated Data may be derived from your personal information but does not reveal your identity in any way. For example, we may aggregate your Usage and Device Data to calculate the percentage of our mobile app users accessing a specific feature of our mobile app. Aggregated Data is used for our own business purposes only.

### Sensitive Personal Information

While we do not request sensitive personal data, we do have sections on our mobile apps where you can submit additional information, for example, when you submit a review. If you submit information on these free text section, only submit information you are comfortable providing and always bear in mind that it may be sensitive information. If you submit reviews or feedback for our mobile app, please remember that this information will be visible to others users of our mobile app.

## 5. Marketing Communications

You will receive marketing communications or newsletters from us only (i) if you wish it, (ii) if you are one of our customers, provided that this communication will concern similar products or services or if (iii) this communication is linked to your business activity.

In this context, we will use the information you provide us, usually just your name and email address.

In any case, you can unsubscribe or make stop direct marketing from us at any time either

- (i) by clicking on the unsubscribe option at the bottom of each marketing communication we send to you; and
- (ii) by contacting us by email or letter using any of the contact details set out in this notice.

We will generally send you marketing communications until you choose to unsubscribe from receiving them. However, if we have not heard from you for a while or notice that you have not opened our emails in a period of 3 years, we will remove your details from our database. There's nothing stopping you for subscribing again at any time.

From time to time we may also use your Usage and Device Data to make online suggestions and recommendations to you about goods or services that may be of interest to you. This is necessary for the legitimate interest of our business in developing our products and services and growing our business.

## 6. Information we collect about you from other places

To enable us to provide you with our services, we may receive personal information about you from other sources, including:

- We may receive information about you if you use any of the other mobile apps we operate or the other products and/or services we provide. We also work closely with third parties (including, for example, business partners, sub-contractors in technical, payment services, analytics providers, search information providers and credit reference agencies) and may receive information about you from them. The legal basis for his processing is our legitimate interests, namely monitoring and improving our mobile app, products and services.
- Information from our web servers' logs, for example information about your computer, such as your IP address, operating system and browser type. We may also collect information on the searches you carry out on our mobile app and your interaction with communications we send you, for example, when you open email communications. ("**Usage and Device Data**"). This information is used by us for system administration and to analyse how people are using our mobile apps and digital platforms. It also helps us to provide the best online infrastructure for your online activities. The legal basis for this processing is our legitimate interests, namely monitoring and improving our mobile app, products and services.
- As mentioned above, we collect information using cookies or other similar technologies stored on your device about how you use our mobile app, digital products and services. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our mobile apps and deliver a better and more personalised service to you. You can read our Cookie Policy.

## 7. Where we store your personal information

All information you provide to us is stored on secure servers within EEA.

While we are committed to keeping your personal information secure, the transmission of information online via the internet is not completely secure. We, together with our service providers will do our best to protect your personal information but information provided is at your sole risk.

## 8. Sharing your personal information

We only share your personal data with people who have a need to know such information to perform their responsibilities. We may share your personal information with the following:

- **Within the Michelin Group** - we may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries to the extent necessary for the same purposes of the initial processing set out in this policy.
- **Service Providers** - Michelin may share your personal information with selected service providers that Michelin may use to process your request or provide its services to you. These service providers act as data processors on our behalf and provide IT and system administration services, such as hosting and email services and managing the ratings and reviews.

These service providers are legally obligated to keep the personal information they may have received confidential and secure and to use your personal information the basis of our instructions only.

We may also share your personal information with third parties:

- (i) For legal reasons

If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions and other agreements; or to protect

the rights, property, or safety of the Michelin Group, our customers, or others. In this context, we may disclose your personal information to our professional advisors who are under a duty of confidentiality.

(ii) On the basis of your consent

Third parties can collect information about you on our mobile app, products or services via cookies or similar technologies, in order for example to provide personalised ads or to make profiling. These cookies will be accepted by you in accordance with our Cookie Policy.

## **9. International Transfers of Personal Data**

Michelin is an international group with databases in the various countries in which it operates. Michelin may transfer your personal data within the group to one of its databases or to its external partners located outside of your home country.

As levels of data protection vary worldwide, we do not transmit your personal data to Michelin group companies or to third-party companies outside of the European Union unless these companies offer the same or similar level of personal data protection as Michelin.

For transfers within Michelin, the company has adopted internal rules governing the transfer of personal data from the European Union or European Economic Area.

Transfers of data outside the group are governed either by the BCR of the subcontractor or by contracts containing the clauses of the European Commission for suppliers established outside the EU to guarantee a similar level of protection as that of your home country.

## **10. How long will personal information be kept by us?**

As a rule, we will not hold your personal information for any purpose or purposes for longer than is necessary to fulfil the purposes we collect it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. For more specific retention periods, please see section 4 above.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see your right to be deleted below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **11. Your rights under data protection legislation**

Data protection legislation provides you with certain rights when it comes to the processing of your information.

### **The right to be informed**

You have the right to be informed about how we collect and process your personal information, including who we are, how we use your personal information and your rights in relation to your personal information. We have gathered all the information you need in this privacy notice.

### **The right of access your information**

You have the right to access the personal information we have on you. We can confirm whether or not your information is being processed and provide you with access to your personal information.

### **The right to correct your information**

If your personal information is inaccurate or incomplete, you are entitled to have that information corrected and updated. If we have disclosed your information to any third parties, where possible, we will inform them of any updates you provide to us. You can update the personal information we hold about you by contacting us using any of the contact methods details in this Privacy Policy.

### **The right to delete your information**

You have the right to request the deletion or removal of your personal information where there is no reason for us to continue to process it. The circumstances in which you can request the right to be forgotten includes, where the information is no longer necessary in relation to the purpose for which it was originally collected or processed and where you have withdrawn your consent to processing.

There are some limited circumstances where the right to be forgotten does not apply – if you want to know, just ask.

### **The right to restrict processing**

You also have the right to ‘block’ or suppress the processing of your personal information. If you request us to suppress your personal information, we will stop any further processing of it.

### **The right to transfer information**

If you want to move or transfer your personal information to a different service provider or copy your information for your own purposes, you have the right to have your information transferred to another person.

### **The right to object**

You have the right to ask us not to process your personal information for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your information for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your information.

### **For further information on your rights**

You can find further information on your data protection rights from the data protection supervisory authority of your country.

### **12. What can you do if you're not happy?**

We are committed to protecting and respecting your privacy. However, if you're not happy with how we collect or process your information or just want some further information on your rights, you can contact us using the dedicated form in the app.

We will work with you to resolve any issues you may have and aim to answer any question raised by you as soon as possible.

You can also make a complaint to the data protection supervisory authority of your country.

### **13. About Data Security**

Michelin has implemented measures to protect the privacy, security and integrity of your personal data. Access to personal data is restricted to those employees and service providers who need to know this information and who have been trained to comply with rules on confidentiality.

On Michelin's commercial sites, banking information will be collected for the purposes of effective, legal secure payment processes. These measures may consist of SSL encryption (intended to make the data unreadable to others) during the collection or transfer of confidential data. Said information will be used only for purposes of online payment and will not be retained.

Michelin ensures that your personal data are not altered, damaged or accessed by unauthorised third parties.

#### **14. Changes to our Privacy Policy**

We may change our policy from time to time. Any changes we make to this policy in the future will be posted on this page. If you have an online account with us, we may notify you of any changes by email or through your account the next time you log on.

**Date:** 2022 March