

# Information on the protection of your personal data

Groupe Renault continuously ensures compliance with the regulations on the protection of personal data (hereinafter "personal data") and places it at the heart of its ethics, as described in its Group Personal Data Protection Policy accessible at <https://www.renaultgroup.com/en/our-commitments/the-groupe-renault-and-your-personal-data/>

Groupe Renault believes that the protection of personal data is essential in order to build a relationship of trust with its customers. In this regard, it intends to ensure the highest transparency regarding the processing of personal data that it carries out on the data that its customers provide to it or which it collects through the various contacts that its customers may have with it.

The purpose of this information policy is to inform you in detail of the terms and conditions of processing of your personal data by Groupe Renault for the provision of your Smart Charge service, as well as the rights and options you have to control your data and protect your privacy. For more information on the processing of your personal data for other services offered by Groupe Renault, please visit <https://www.renault.fr/donnees-personnelles.html>

## • 1- WHO PROCESSES YOUR PERSONAL DATA?

**Renault SAS** processes your personal data as data controller. The contact details of its data protection officer are as follows: Renault SAS, Legal Department – Data Protection Officer, 13/15 quai le Gallo 92100 Boulogne-Billancourt.

## • 2- WHAT PERSONAL DATA DO WE PROCESS?

"Personal data" refer to any information that can identify you either directly (such as your name) or indirectly (for example by means of a unique customer number).

In general, we undertake to collect only personal data that are relevant and appropriate to each of the purposes for which we process your data.

The personal data we collect depends on our interaction with you and may include information about:

- Your **ID** and your **contact details** (surname, first name, postal address, email address, telephone, etc.),
- Your **payment** and **transaction** data (type of payment, discount granted, etc.),
- Data relating to our **business relationship**, in particular our interactions and contracts (order history, after-sales interventions, service contracts, competitions, interactions with our customer service, etc.),
- The **identification data of your vehicle** (brand, model, registration, chase number, etc.),
- Your **geolocation** data (your consent is collected when required by regulations),
- Data related to **the use of the vehicle** (mileage) and its **battery** (charge level, etc.),
- Data required to **check the battery** (locking/unlocking, pre-conditioning, programming the battery charging, etc.) or the **provision of connected services or in-car applications**,
- Data necessary to **carry out loyalty, prospecting, study and survey** activities (such as your vehicle preferences),

- Data about **the use of our websites and mobile applications**, as well as our communications (number of visits, page visited, opening of our messages, etc.).

As such, the data essential to meet your request or for the purposes of a contract or a legal obligation are indicated in the collection form (notably by asterisks). If you do not wish to provide the mandatory data, we will probably not be able to process your request or provide you with the relevant services.

We invite you to keep us regularly informed in writing of any changes to your contact details. The products and services we offer are mainly aimed at adults. We do not therefore carry out any specific processing on minors.

### • 3- WHAT ARE YOUR PERSONAL DATA USED FOR?

In the context of our relationship, and in accordance with the context in which your data are collected, we may use your data to:

#### A – Manage our first interactions

Aims	Legal basis
Monitoring of visits to the mobile application, and management of its operation and security,	This processing is based on our legitimate interest (providing you with a secure application)
Requests for information	This processing is justified by the pre-contractual relationship resulting from your request or our legal obligations (cooperation with authorities for the recovery of infringements)

#### B – Manage our business relationship

Aims	Legal basis
Your user accounts and authentication means	This processing is justified by performance of the contract that you entered into with us.
Your claims	This processing is based on our legitimate interest (prevention of legal action)
Respond to your requests for the exercise of rights in relation to your personal data (see section on "what are your rights")	This processing is based on our legal obligations and may require verification of your identity
Our satisfaction surveys, management and response to your opinions, in order to improve customer satisfaction and our products and services	This processing is based on our legitimate interest (improving our products and services)
Management of our consolidated prospective customer/customer database	This processing is based on our legitimate interest (have an up-to-date and consolidated view of the data)

Aims	Legal basis
Management of your vehicle relationship, in particular the different operations carried out on your vehicle	This processing is based on our legitimate interest (monitoring the quality of our products)
A vehicle recall due to a quality problem	This processing is based on our legal obligations (regulations on defective products) and on our legitimate interest (ensuring the quality of our products)

When you are in contact with our call centers, our aim is to respond appropriately to your requests. In order to improve the quality of our services and to train and assess our employees, your calls may be recorded. However, you can object to this at any time, without giving a reason.

#### C – Manage the services provided by your connected vehicle and in-car applications

Aims	Legal basis
Ensuring systems cyber security	This processing is justified by our legitimate interest (providing you with secure systems)
Activate your connected services and in-car applications, manage your accounts and associated contracts	This processing is justified by performance of the contract that you entered into with us
Provide you with connected services and in-car navigation applications	This processing is based on your consent
Manage and provide you with services related to your battery and associated connected services and in-car applications	This processing is justified by performance of the contract that you entered into with us

Some connected services and in-car applications may require the processing of your location data. Your consent is requested prior to the processing of these data. You may withdraw your consent and suspend this processing at any time.

We are committed to respecting your privacy, but we remind you that it is your responsibility to inform any other user or purchaser of the vehicle of the conditions under which their data is processed by Renault.

#### D – Conduct studies and analyses

Studies and analyses are carried out to measure our performance, assess the quality of our products and services and the level of customer satisfaction, and continuously improve them.

Aims	Legal basis
Ask you to respond to studies in the context of the development of new products and services and the measurement of our brand image,	This processing is based on your consent
Reporting to measure our commercial performance, including the effectiveness of our marketing operations,	This processing is based on our legitimate interest (measuring the performance of our business)

Aims	Legal basis
Research and development of new products and services	This processing is based on our legitimate interest (improving our products and services)
Ensure the quality of our vehicles and parts, in particular through incident studies and sustainability,	This processing is based on our legitimate interest (improving our products)

#### E – Manage our marketing operations

Aims	Legal basis
Sending advertising campaigns (digital or not), newsletters,	This processing is based on your consent or our legitimate interest (providing you with relevant content)
Competitions, events, sponsorship,	This processing is based on the contract (acceptance of payment)

### **3.3 – How long we store your data**

In accordance with the regulations, we undertake to retain your personal data only as long as necessary to achieve the intended purpose, to meet your needs, or to meet our legal obligations. In order to determine this duration, we take into account, in particular, the following elements:

- The duration of your contract,
- The time necessary to process your request or complaint,
- The period during which your user account is opened, except in case of inactivity for 3 years,
- The need to maintain a certain history of your interactions with us, for the proper management of our business relationship, which varies notably depending on whether you have purchased a vehicle, a service such as repair, or only interact with us without entering into contracts with us,
- Our legal or regulatory obligations (this is particularly the case for the technical data of our vehicles).

When we no longer need to use your personal data, they are deleted from our systems and records or anonymized in order to no longer identify you. However, we may retain some of your personal data in archive in order to be able to respond to any legal action, for the period of limitation provided for by applicable law.

#### **• 4- WHO HAS ACCESS TO YOUR PERSONAL DATA?**

Within Groupe Renault and members of its network, we ensure that only persons duly authorized with regard to their duties and tasks to process your personal data are authorized to do so.

In order to process all or part of your personal data, we rely on trusted third party vendors, acting as processors in accordance with our instructions and on our behalf only, including but not limited to:

- Hosting, operation and maintenance of our mobile application,
- The provision of authentication services,
- Customer relationship management (call centers, provision of communication tools, etc.)

- The provision of services relating to our marketing, including the sending of commercial offers,
- The organization of competitions, events,
- Conducting studies and surveys.

For all of these data sharing, we only work with trusted companies and secure these relationships (contracts, audits, guarantees and security tests, etc.).

Lastly, we may disclose your personal data to third parties in order to comply with any legal obligation (such as the recovery of a traffic offence following a vehicle test drive) or administrative or judicial decision.

## • 5- WHAT ARE YOUR RIGHTS?

### 5.1- Your rights

You have several rights in application of the regulations on the protection of personal data:

- **A right to object** to the processing of your personal data, subject to justifying reasons relating to your particular situation, and a right to request the **restriction** of the processing of your personal data, in certain cases provided for by the regulations.
- **A right to object to any commercial prospecting**: you may at any time ask to no longer receive communications relating to our offers, news and events. This right may be exercised via the unsubscribe link present in each marketing email. You can also **object to profiling**.
- **A right to withdraw your consent** at any time, for the purposes for which we have collected your consent.
- **A right to information**: you have the right to obtain clear, transparent and comprehensible information about how we use your personal data and your rights. This policy is an example.
- **A right of access to your personal data**: you have the right to obtain information about the processing of your personal data (in particular the data that are used, for what purposes, etc.) as well as a copy thereof.
- **A right of rectification**: you have the right to have your data corrected if they are inaccurate or incomplete, despite our efforts to keep them up to date, which will enable us to comply with our obligation to have up-to-date data about you.
- **A right to the portability** of your data, that is, under certain conditions, the right to receive the personal data you have provided to us, in a structured, commonly used digital format, and that it be transmitted to a third party if technically possible.
- **A right to erasure** (or right to be forgotten): you have the right to have your data erased or deleted. This right may be limited with regard to our contractual obligations (contract in progress) or legal obligations (prevention of legal actions in particular).
- **A right to define directives**, either general or specific, with regard to certain processing, for the storage, erasure and communication of your personal data in the event of death. You can amend or delete these directives at any time. You can inform us of these specific directives by writing to the address indicated below.

Lastly, you have the right to lodge a complaint with the CNIL regarding the processing of your personal data. We encourage you to contact us before any complaint, so that we can try to solve your problem together.

### 5.2- How to exercise them?

You can update your contact details and manage your consents for commercial marketing directly in your user account.

To exercise any of your rights, you can send us your request at any time via the form <https://www.renault.fr/vos-droits.html>, or by email [dpo@renault.com](mailto:dpo@renault.com), or by post to Renault SAS, Legal Department – Data Protection Officer, 13/15 quai le Gallo 92100 Boulogne-Billancourt. We may ask you for certain information or documents (e.g. identity card, vehicle registration document) when we are unable to identify you or to identify your vehicle details. You have the right to register free of charge on the Bloctel opposition list, managed by Opposetel, in order not to be the subject of commercial solicitations by telephone. Registration on this list does not, however, prevent us from contacting you for marketing purposes during the term of your contract with us, unless you have specifically exercised your right to object in order to no longer receive commercial offers from us.

- **6- HOW DO WE SECURE YOUR DATA?**

Your data are stored on secure servers. We put in place, and demand from our partners, appropriate security and data protection measures, in line with the latest technologies. Where the processing of a datum involves its transfer, we ensure that this transfer is carried out under appropriate conditions ensuring an adequate level of protection, security and confidentiality.

When creating a digital account, entering a password that meets our security standards is mandatory and is part of our privacy policy. It is your responsibility to keep it secret.

To the extent possible, your data are processed in the European Economic Area (EEA). However, some of our service providers or their subcontractors are located in countries outside the EEA, your personal data are processed in those countries. Some of these countries may have a regulation on personal data that is different from that of the European Union. In such cases, we pay particular attention to ensure that the data are transferred in accordance with the applicable regulations, and we implement guarantees to ensure a level of protection of your privacy and your fundamental rights that is equivalent to that offered by the European Union (in particular through the use of the European Commission's standard contractual clauses). Upon simple request to the address mentioned in the section "What are your rights", we can provide you with more information about these transfers (including the standard contractual clauses of the European Commission).

- **7- CHANGING INFORMATION**

We may occasionally modify this policy. When necessary or required, we will notify you and/or seek your consent. We therefore suggest that you read it each time you visit to ensure you are aware of its latest version.

*Version 02 updated on 02/02/2022*

*This new version is an in-depth overhaul of the previous version. It is more accessible and complete. Here you will find all the terms of use of your personal data (in particular an exhaustive list of our purposes). The processing of your personal data for connected services and in-car applications is now included in this policy. We provide you with new information on profiling. This version also provides more transparency on the recipients of your personal data, either within or outside our group.*