

PRIVACY POLICY

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The application “Free2Move” is owned/offered by Free2Move SAS, 45 rue de la Chaussée d’Antin, 75009 Paris, France.

Please read this policy carefully before using this application because it explains how we will process personal data. Using this application indicates that you accept this policy.

1 Types of data being processed

We care about your privacy. We collect and process various types of personal data via this application. This includes:

- Information you provide to us when registering, requesting and using our application, such as name, address, e-mail address
- Information collected with cookies
- Information about your vehicle and specific contract data that we need for the individual performance of the application and to provide the best service for your vehicle
- Geolocation data: Please note that the use of the application requires for some services the collection of geolocation data. You may, however, at any time deactivate the geolocation function on your smart device. You need to be aware that if the geolocation service on your smart device is deactivated features and functions, which rely upon location data, will not be available.

For further details, see section 2.

2 Information about the processing of personal data

Your personal data will be processed for your registration, for providing the Service and for general administration purposes by Free2Move SAS, 45 rue de la Chaussée d’Antin, 75009 Paris, France as controller, as follows.

We as controller process your personal data as follows:

Data / Data Categories <i>(mandatory data is marked with an *)</i>	Purposes
Respective identification and contact details: Name*, email address*, phone no.*, postal address*, language	(Pre) Registration process
Respective identification and contact details (name*, email address*; phone no., postal address, login (e-mail address), password, (* if applicable), contact preferences), charging pass (card with RFID chip) ID, vehicle identification data (vehicle identification number (VIN)*, license plate), product and service specifications (e.g. model, trim,	- Provision of Services through the App - Account management - Invoicing - Managing and optimising customer relations; - Ensuring the proper functioning of the application

engine), vehicle state of charge for Trip Planner, language	- Managing requests for access, rectification and card stop rights - The exercise of remedies and the management of complaints and disputes
Geolocation data*	
Information collected via cookies	Please see section below Cookies for detailed information

The data elements marked with an asterisk (*) are mandatory and a contractual requirement. You are therefore obliged to provide the personal data. In case you don't provide the data, we cannot fulfil your request.

Your personal data will be stored for five years after the contractual relationship has been terminated. If you interrupt the subscription process before signing your contract, your user account will be deleted within three years of data collection and the corresponding data will be deleted. In case you have provided your consent for marketing purposes, your personal data will be stored for these purposes for three years after the last contact with us.

Geolocation data is stored for two months after the completion of the service requiring information on your geolocation to be executed. You have the option of deactivating the geolocation device at any time and free of charge by proceeding as follows:

- You are using the application from the on-board computer of your Group vehicle: Press the SOS button and the Assistance button simultaneously for less than one second. The Vehicle then proposes to switch to "non-geolocated" mode and asks to confirm this action by pressing the Assistance button. A voice message confirms the status change. It is specified that the geolocation of the Vehicle is automatically reactivated each time the Vehicle is started;
- You are using the application from your smartphone: go to your smartphone's settings to disable geolocation.

In the event geolocation is disabled, Free2Move SAS informs you that the services requiring the collection of your geolocation cannot be performed.

We disclose your personal data for the below listed purposes to the following recipients:

- A. Purposes related to the performance of a contract or related to steps at the request of the data subject prior to entering into a contract according to Art. 6 (1) 1 b) General Data Protection Regulation (GDPR)

Data/Data Categories	Purposes	Recipients
Respective identification and contact details*, language*, vehicle identification data*, respective product and service specifications*, geolocation data	Service fulfilment	We disclose your personal data to the respective (IT-)service providers to support the administration of the named purposes.
Name, postal address, e-mail-address, mobile phone	Send the Recharge Card	Futurlog SASU, 25 avenue Rapp, 75007 Paris, France
Geolocation, type of cable	To display charging stations nearby	PlugSurfing
Start and end address, percentage of battery, vehicle model	Providing Service: Trip planner	BeNomad

Respective identification and contact details*, language*, vehicle identification data*, respective product and service specifications*,	Call Center	<i>Active Contact SARL located in Tunisia (2 Rue de Guinée, 1002 Tunis – Tunisie)</i> <i>We also disclose your personal data to the respective (IT-) Service provider who is placed outside the European Economic Area (EEA) in Tunisia. There is an <u>adequacy decision</u> of the European Commission for Tunisia.</i>
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B. Purposes related to the legitimate interests pursued by the controller or by a third party according to Art. 6 (1) 1 f) GDPR unless you have exercised your right to object (Art. 21 (1) GDPR):

Data/Data Categories	Purpose(s)	Recipient(s)
Respective identification and contact details*, product and service specifications*	<ul style="list-style-type: none"> - Market research and consumer surveys to receive feedback related to Free2Move products and services (e.g. customer satisfaction surveys) only in case the customer can be contacted via the respective communication channel(s) for these purposes without customer's prior consent - Develop statistics, trade surveys - The improvement of Free2move Services to meet your needs - Offer additional services 	We disclose your personal data to the respective engaged processors to support the administration of the named purposes

3 Interaction with social networks

3.1 Customer care and assistance via Social Media

You may contact us also via our Social Media Channels. E.g., if you send us a message or post something on our Social Media Channels, we may use the information in your message or post to follow-up with you on the issue you contacted us for via the Social Media Channel which you used. In order to give you the assistance you requested, we may ask you to provide via direct or private message further information such as details on the issue, name, email, VIN, phone, location (city/state) and/or make, model and year of the vehicle. The information you provide will not be used for direct marketing; market research for service and product improvement will only be carried out on bases of aggregated (anonymized) data.

Please note that you should not include any sensitive data (such as information on racial or ethnic origin, political opinions, religious or philosophical convictions, or health) into you post or message. Be aware that if you post something on a public Social Media Channel, anyone might be able to read it.

4 Your Rights

As data subject, you have the right of access, right to rectification, right to erasure (right to be forgotten), right to restriction of processing, right to data portability, right to object to processing of personal data concerning you which is based on Art. 6 (1) 1 e) or f) GDPR or where the personal data are processed for direct marketing purposes in accordance with the applicable law.

Please note that your above-mentioned rights are restricted by law and must be fulfilled by us possibly only under certain conditions.

If you want to claim your above-mentioned rights please contact us per email (available on <https://www.free2move.com/fr-FR/support>) or send us a letter to FREE2MOVE SAS, 45 rue de la Chaussée d'Antin, 75009 Paris, France.

Your personal data can be updated by us as the responsible controller at any time (e.g. change your address)

To exercise your right to lodge a complaint (Art. 77 GDPR) please contact us per email (available on <https://www.free2move.com/fr-FR/support>) or send us a letter to FREE2MOVE SAS, 45 rue de la Chaussée d'Antin, 75009 Paris, France.

Changes to the Privacy Policy

All future changes to our Privacy Policy will be posted on this application. You should therefore periodically review these for changes to our Privacy Policy.

5 Contacting us

FREE2MOVE SAS, 45 rue de la Chaussée d'Antin, 75009 Paris, France