



## Privacy and Data Protection Policy

Free2Move SAS places a particular importance on personal data protection.

Free2Move is committed to ensuring that your personal information is protected and never misused. To improve technology and customer experience, we collect information through the Free2Move website and app, and our other connected tools. We carefully protect this information and handle it with discretion.

The main reason why we collect your personal data is to provide and improve services, products and customer experience that you, and all of our customers, expect from us.

This Privacy Policy describes how your personal data is processed by Free2Move SAS as data controller.

This Privacy Policy governs the manner in which Free2Move SAS processes the personal data of its Users as defined below and in accordance with the amended French law n°78-17 of 6 January 1978 "Informatique et Libertés" (Information Technology and Freedom) and the European General Data Protection Regulation 2016/679 of 27 April 2016 (hereinafter "GDPR"), and any National Transposition Measures. Together, these are called "Applicable Regulations".

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## 1 About this policy

This Privacy Policy is applicable between Free2Move SAS, a simplified joint stock company whose registered head office is located at 45 rue de la Chaussée d'Antin, Paris, 75009, and registered with the Paris Trade and Companies Register under number 790 020 606 (hereinafter referred to as "Free2Move") and any person connecting to the site as defined hereinafter or using Free2Move's services (hereinafter referred to as "the User")

For the purposes of this Privacy Policy, and for data processing as described below, Free2Move is considered to be a data controller or processor.

In this Privacy Policy, when "Free2Move", "we", "us" or "our" appears, this refers to Free2Move SAS as well as its affiliates who provide you with the services in your country.

### Read more

#### Legal reminder:

The **data controller**, according to the Informatique et Libertés (Information Technology and Freedom) law and the GDPR, determines the means and purposes of data processing. Where two or more data controllers jointly determine the purposes and means of data processing, they are known as **joint controllers** .

The **processor** processes personal data on behalf of the data controller, acting under the authority and instructions of the data controller.

Terms used within the Free2Move Privacy Policy are defined as follows:

- ✔ **"User Account"**: refers to the User's personal space on the site which is used to access to the services offered by Free2Move. The User Account is created by the User by registering via the following URL <https://www.free2move.com/fr-FR/inscription>.
- ✔ **"Cookies"**: refers to small text files created by the publisher of the visited site and placed on the hard drive of the User's device (computer, smartphone, tablet, etc.), or any similar tracking technology. In particular, they allow a User to be identified when logging in the User Account, and they memorise the details of the latter.
- ✔ **"Driver"**: refers to any User using a service that requires the creation of a Driver Profile.
- ✔ **"Personal data"**: refers to personal data as defined in Article 4(1) of GDPR as part of this Privacy Policy.
- ✔ **"Identifiers"**: refers to the login and confidential password allowing the User to access the User Account. The login details are to be used exclusively by the User who is solely responsible for them.
- ✔ **"Driver Profile"**: refers to the page on the site accessible via the User Account on which the Driver gives the information required to hire a vehicle.

- ✔ **"General Data Protection Regulation" or "GDPR"**: refers to the EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regards to the processing of personal data and on the free movement of such data, and which repealed Directive 95/46/EC.
- ✔ **"Services"**: refers to all the features and services offered by Free2Move on its site.
- ✔ **"Site"**: refers the website accessible at [www.free2move.com](http://www.free2move.com) and the Free2Move mobile application accessible via app stores. The site includes all web pages and features provided to Users.
- ✔ **"Processor"**: refers to the natural or legal person, public authority, service provider or any other body that processes personal data on behalf of and according to the instructions of Free2move in line with with Article 4(8) of the GDPR.
- ✔ **"Processing"**: refers to any of the operations referred to in Article 4(2) of the GDPR, performed on personal data in the context of the execution of this Privacy Policy.
- ✔ **"User"**: refers to any Internet user who creates a User Account, whether they passively or actively use the services offered on the site.
- ✔ **"Visitor"**: refers to any Internet user accessing the Site, whether or not they are registered as a User.
- ✔ **"Personal Data Breach"**: refers to a security breach as described in Article 4(12) of the GDPR.

## 2 Features of the Free2Move website

On its site, Free2Move, as the data controller, only collects the personal data necessary for the explicit purposes described below:

### ✔ Creating and Verifying a User Account

[Read more](#)

#### Data processing details

The data processing covers:

- Site registration to allow you to access your User Account and the services offered by Free2Move.

#### Legal basis

Free2Move processes your data in accordance with the General Terms and Conditions of Use accepted upon registration on the site.

#### Details of the personal data collected

Your identification and contact data, i.e. email, first name, surname, telephone number.

#### Duration of retention of personal data

Your personal data is held for a period of three (3) years after your last use of the Free2Move services.

#### Recipients of personal data

Only persons authorised by Free2Move and the service providers necessary for the delivery of our services have access to your personal data. Your personal information is not shared, exchanged, sold or communicated to any other person. The recipients of your personal data may vary depending on the service used.

For more information, consult the section which corresponds to the service used.

## ✔ Creating and validating a Driver Profile

[Read more](#)

### Data processing details

Free2Move collects the personal data necessary for you to hire or use a vehicle as part of its services.

### Legal basis

The contractual execution of the General Terms and Conditions of Use of Free2Move accepted upon registration on the site.

Free2Move is legally required to ensure that you have a valid driving licence.

### Details of the personal data collected

Your ID, photograph, driving licence and bank card.

### Duration of retention of personal data

Your personal data is held for a period of three (3) years after your last use of the Free2Move services.

Bank details are kept until consent is withdrawn and/or the validity of the bank card details have expired.

### Recipients of personal data

Only persons authorised by Free2Move and the service providers necessary for the delivery of our services have access to your personal data. Your personal information is not shared, exchanged, sold or communicated to any other person. The recipients of your data may vary depending on the service used.

For more information, consult the section which corresponds to the service used.

## ✔ Responding to your Requests and Complaints

[Read more](#)

### Data processing details

Free2Move processes personal data in order to respond to contact requests and complaints made by the User via the "Contact Free2Move" section.

### Legal basis

We have a legitimate interest in providing Users with the best possible experience on the site, while improving its quality and content.

Responses to contact requests and complaints are made exclusively on the basis of the User's prior consent.

### Details of the personal data collected

Your identification and contact data, the content of your request or complaint and its response, as well as any other personal data held by Free2Move that is strictly necessary to process your request or complaint.

### Duration of retention of personal data

When a request is made, your personal data is kept for the time it takes to process it.

In the event of a complaint, your personal data may be kept until the applicable period has lapsed. This period will depend on the type of contract and the parties involved.

### Recipients of personal data

The authorised personnel of Free2Move's Customer Service and After-Sales Service, as well as our service providers in charge of requests and complaints, such as our call centre or assistance service providers. Your personal information is not shared, exchanged, sold or communicated to any other person. The recipients of your data may vary depending on the service used.

## ✔ Making the Most of the Free2Move Newsletter

[Read more](#)

### Data processing details

When you subscribe to the newsletter on our site, Free2Move processes your email address to send you the newsletter, to the exclusion of any other mail or messaging service.

### Legal basis

The newsletter is sent on the basis of the User's prior consent. You can unsubscribe at any time by clicking on the unsubscribe link in the newsletter.

### Details of the personal data collected

Your email address.

### Duration of retention of personal data

Free2Move keeps your email address until you unsubscribe via the unsubscribe link in the newsletters.

## Recipients of personal data

The Free2Move Marketing and Communication department. Customer Service. The Technical and IT Department.

IT providers of analytical, CRM and emailing solutions used by Free2Move. Your personal information is not shared, exchanged, sold or communicated to any other person. The recipients of your personal data may vary depending on the service used.

### ✔ Improving the site and its Features and Ensuring they Function Properly

[Read more](#)

## Data processing details

The data processing covers:

- General administration of the site
- Statistical analysis of site traffic
- General site security management
- The depositing of cookies and other trackers, details of which can be found in our

[Cookie Management Charter](#)

## Legal basis

We have a legitimate interest in providing Users with the best possible experience on the site, while improving its quality and content.

## Details of the personal data collected

Your login details and user information to enable you to access your User Account and the Free2Move Services.

## Duration of retention of personal data

Cookies and other trackers may be placed on the User's device for a maximum period of thirteen (13) months from the date they were placed.

The information collected through trackers is kept for a maximum period of twenty-five (25) months from the date of collection.

## Recipients of personal data

The Free2Move Marketing and Communication department. The Technical and IT Department.

IT providers of analytical solutions used by Free2Move. Your personal information is not shared, exchanged, sold or communicated to any other person. The recipients of your personal data may vary depending on the service used.



## ✔ Sending our Promotional Offers and Managing your Satisfaction

[Read more](#)

### Data processing details

Free2Move carries out commercial, marketing, communication and/or advertising actions to inform its customers about promotional offers. These actions include

- Emailing campaigns to invite you to subscribe to the Free2Move newsletter or to benefit from promotional offers,
- Informing our customers by email about offers proposed by Free2Move in relation to their professional activities and which are likely to interest them,
- Sending surveys, satisfaction polls, studies or statistics to evaluate the quality of our services and anticipate our customers' needs,
- Organising competitions or lotteries so you can benefit from offers, gifts and promotions.

You may at any time object to the processing of your personal data for marketing, communication or advertising purposes by clicking on the unsubscribe link in our emails.

### Legal basis

For individual customers: your consent to receive communications and promotional offers from Free2Move, and our legitimate interest in ensuring customer satisfaction and follow-up.

For business customers: Free2Move's legitimate interest in carrying out marketing, communication and advertising campaigns to provide you with commercial offers related to your business activity.

### Details of the personal data collected

The data entered when creating your User Account.

### Duration of retention of personal data

Your personal data is kept until you unsubscribe via the unsubscribe link in our emails, or, if you do not unsubscribe, for a period of three (3) years from the last time you used the Free2Move services.

### Recipients of personal data

The Free2Move Marketing and Communication department. The Technical and IT Department.

IT providers of analytics, CRM and emailing solutions used by Free2Move, social media platforms, analytics companies, marketing and advertising consultancies. Your personal information is not shared, exchanged, sold or communicated to any other person. The recipients of your personal data may vary depending on the service used.

## ✔ Processing Job Applications

[Read more](#)

### Data processing details

Free2Move processes your personal data to respond to and follow up on your applications for jobs published in the "Job Opportunities" section of the site.

### Legal basis

The processing of applications is carried out on the basis of the pre-contractual measures taken in anticipation of recruitment.

Free2Move has a legitimate interest in organising its recruitment processes.

### Details of the personal data collected

Your identification and contact data as well as attachments to your application (CV, cover letter).

### Duration of retention of personal data

If your application is successful, Free2Move will retain your personal data for the duration of your employment and for a period of five (5) years after you leave for any reason. Some personal data may be retained for a longer period of time if required by law or regulation.

If your application is unsuccessful, Free2Move will keep your personal data for a period of two (2) years from the date of your application on the site unless you give your written consent to be kept in Free2Move's database beyond this period.

### Recipients of personal data

Free2Move's Human Resources Department, Administrative and Financial Department and Legal Department, as well as the recruitment, temporary employment, freelance administration and consultancy service providers appointed by Free2Move. These service providers are subject to a confidentiality obligation. Your personal information is not shared, exchanged, sold or communicated to any other person. The recipients of your personal data may vary depending on the service used.

## ✔ Managing Requests to Exercise Information Technology Rights and Freedoms

[Read more](#)

### Data processing details

This data processing covers all the operations necessary to follow up requests to exercise information technology rights and freedoms sent to Free2Move (classification of the request, investigations, carrying out specific technical operations, etc.).

### Legal basis

Our legal obligation arising from Articles 15 and following of the GDPR and Articles 48 and following of the French Data Protection Act.

### Details of the personal data collected

When you exercise your information technology rights and freedoms, Free2Move collects the personal data necessary to respond to your request. This is your identification and contact data, details of your request to exercise your information technology rights and freedoms and, if necessary, a copy of an identity document or equivalent proving your identity.

### Duration of retention of personal data

Personal data is kept for the calendar year in which the request was received and for the next five (5) years from the date it was received.

In the event that you exercise the right to object, personal data is kept for six (6) years from the receipt of the request, in accordance with the applicable limitation periods.

Identity documents that may be sent to Free2Move are:

- Deleted immediately in the event that the Data Protection Officer (hereinafter referred to as "DPO") is not competent to deal with the request, unless it is necessary for the request to be forwarded to the relevant department, or if the request correctly addressed to the DPO does not require the submission of an identity document;
- Deleted one (1) year after receipt of the request in other cases.

### Recipients of personal data

The DPO and Free2Move staff as well as Free2Move's service providers whose contribution is requested by the DPO. Your personal information is not shared, exchanged, sold or communicated to any other person. The recipients of your personal data may vary depending on the service used

## 3 Free2Move Services

Free2Move only collects the personal data necessary for the explicit purposes of each service in its capacity as data controller.

### 3.1 Short-Term Rental

#### Data processing details

Free2Move collects your personal information to enable you to book and hire an available vehicle that meets your needs.

Your personal data is processed for the following purposes:

- ✓ **Booking and hiring the vehicle**
- ✓ **Unlocking the vehicle (for vehicles which can be accessed 24/7)**
- ✓ **The inventory of fixtures at pick-up**
- ✓ **Returning the vehicle**
- ✓ **The inventory of fixtures at drop-off**
- ✓ **Invoicing of the rental**
- ✓ **Where applicable, managing requests for breakdown assistance and repairs, and assisting with or managing of complaints**
- ✓ **Developing statistics**

With this type of data processing, Free2Move has concluded a contract with the contractors used for your bookings, under which each of them is co-responsible within the meaning of Article 26 of the GDPR. Free2move and these contractors have thus jointly committed to inform you of the nature of this data processing, your rights, and to implementing the appropriate organisational and technical measures to ensure the security and confidentiality of your personal data.

Details of the features of this data processing are described below.

**Read more**

### **Legal basis**

The contractual execution of the General Terms and Conditions of Rental accepted at the time the vehicle was reserved as well as the rental offer and the reservation of the vehicle, which are considered as special conditions supplementing the General Terms and Conditions of Rental.

Vehicle geolocation data is only collected for vehicles accessible 24/7 and only when the vehicle is parked and locked, on the basis of your prior consent.

### **Details of the personal data collected**

- Your User Account and Driver Profile data,
- The time and place of your departure and arrival,
- Data on the vehicle and its use,
- The data required to draw up the inventory of fixtures at pick up and drop-off,
- Data relating to payments and deposits (including any outstanding payments and arrears), invoicing and promotions,
- The data necessary to respond to your requests for assistance, troubleshooting and complaints,
- Statistical data,
- Where applicable, data on offences committed during the rental,

- Data related to claims of any kind, accident, loss, theft, attempted theft, fire, collision or other damage to the vehicle.

Free2Move may also collect the vehicle's geolocation data to allow you to benefit from assistance and breakdown services in the event of damage, accident, loss, theft or incident of any kind.

### Duration of retention of personal data

The data necessary for the management of our commercial relationship is kept for a period of three (3) years from the date you last used Free2Move services, except where there is a legal obligation to keep it for a longer period for accounting or tax purposes.

Geolocation data is kept for a period of two (2) months from the date it was collected.

### Recipients of personal data

Free2Move may share some of your personal information with:

- The agencies making up the network of licensees who are responsible for the delivery and return of the vehicle,
- Financial and payment collection service providers (payment services, billing, missed payment management, detection of fraudulent transactions),
- IT and security providers,
- Service providers that embed and connect technology,
- Insurance companies and insurance brokers,
- Providers of assistance, breakdown services, servicing, maintenance and repairs of the vehicle,
- Vehicle inspection and damage report providers,
- Call centre providers,
- Any commercial partner or supplier acting on behalf of Free2Move to provide a service,
- The companies belonging to the Stellantis Group,
- The local authority in charge of traffic offences. If Free2Move receives a speeding or parking ticket following your car rental, your identity will be communicated to the said authority so that you can pay the corresponding ticket,
- Local administrative or judicial authorities if we are required to do so by applicable law or regulation, including in response to a legal process, such as a court order or subpoena, or to comply with other national, state, provincial or local laws

## 3.2 Subscription and Medium-Term Rental (Car On Demand)

### Data processing details

Free2Move collects your personal information to enable you to hire a vehicle with or without a time commitment that meets your needs.

Your personal data is processed for the following purposes:

- ✓ Making contact and drawing up an estimate
- ✓ Checking compliance with eligibility criteria
- ✓ Creating a subscription contract with or without a time commitment suited to your needs
- ✓ The execution of the subscription contract which may or may not contain a time commitment
- ✓ Delivery and return of your vehicle
- ✓ Developing statistics
- ✓ Where applicable, the management of requests for breakdown assistance, maintenance or replacement, or the management of complaints

**Read more**

### Legal basis

The execution of the subscription contract which may or may not contain a 'Car on demand' time commitment, including the General Terms and Conditions of Rental, the special conditions, the assistance conditions and, if applicable, the insurance conditions.

Vehicle geolocation data is only collected with your prior consent.

### Details of the personal data collected

- The data required to draw up an estimate suited to your needs and a subscription contract with or without a time commitment (identification and contact data, address data, driving licence, data required to study your solvency),
- Data on the vehicle and its use,
- The data required to inspect the vehicle at the pick-up appointment,
- The data required to draw up the report on return of the vehicle,
- Payment details (including any outstanding payments and arrears) for the direct debit of monthly subscription payments (including bank details) and, where applicable, any guarantees, co-rentals and/or surety bonds,
- The data necessary to respond to your requests for assistance, maintenance, replacement or to complaints,
- Statistical data, in particular for the purposes of predictive maintenance and future changes to the subscription contract,
- Where applicable, data on offences committed during the rental,
- Data relating to claims of any kind, whether it be accident, loss, theft, attempted theft, fire, collision or other damage to the vehicle.

Free2Move may also collect the vehicle's geolocation data to enable you to benefit from assistance and breakdown services in the event of damage, accident, loss, theft or problem of any kind.

### Duration of retention of personal data

The data necessary for the management of our commercial relationship is kept for a period of three (3) years from your last use of Free2Move services or from the last time you contacted us to request a quote, except where there is a legal obligation to keep data for a longer period for accounting or tax purposes.

Geolocation data is kept for a period of two (2) months from the date it was collected.

### Recipients of personal data

Free2Move may share some of your personal information with:

- Financial and payment collection service providers (payment services, billing, missed payment management, detection of fraudulent transactions),
- IT and security providers,
- Insurance companies and insurance brokers,
- Service providers that embed and connect technology,
- Providers of assistance, including vehicle transfer assistance, breakdown services, maintenance and repairs,
- Vehicle inspection and damage report providers,
- Providers of electronic signatures,
- Call centre providers,
- Any business partner or supplier acting on behalf of Free2Move in providing of third party services,
- Companies belonging to the Stellantis Group,
- The local authority in charge of traffic offences. If Free2Move receives a speeding or parking ticket following your car rental, your identity will be communicated to the said authority so that you can pay the corresponding ticket,
- Local administrative or judicial authorities if we are required to do so by applicable law or regulation, including in response to a legal process, such as a court order or subpoena, or to comply with other national, state, provincial or local laws.

## 3.3 Carsharing

### Data processing details

Free2Move collects your personal data to enable you to locate the self-service vehicles available around you and to hire the vehicle of your choice.

Your personal data is processed for the following purposes:

- ✔ **Locating available vehicles around you**
- ✔ **Booking and unlocking the vehicle**
- ✔ **Returning and locking the vehicle**
- ✔ **Billing for your journey**
- ✔ **Where applicable, the management of requests for repairs, assistance or the management of complaints**
- ✔ **Developing statistics**

[Read more](#)

[Legal basis](#)

The contractual execution of the Carsharing General Terms and Conditions of Rental accepted when the vehicle was booked and the General Terms and Conditions of Use Carsharing.

Geolocation data from your smartphone and the vehicle are collected with your prior consent. This data is necessary to enable you to locate available vehicles in your vicinity.

### Details of the personal data collected

- Your User Account and Driver Profile data,
- Your location and start and end time of the rental,
- Data relating to the vehicle and its use, including the route taken,
- Data relating to payment, invoicing or promotions,
- The data necessary to respond to your requests for assistance, troubleshooting or complaints,
- Statistical data,
- Where applicable, data on offences committed during the rental,
- Data relating to claims of any kind, accident, loss, theft, attempted theft, fire, collision, soiling, damage or any other damage to the vehicle.

Free2Move may also collect your geolocation data to allow you to locate available vehicles in your vicinity and to benefit from assistance and breakdown services in the event of damage, accident, loss, theft or problem of any kind.

### Duration of retention of personal data

The data necessary for the management of our commercial relationship is kept for a period of (three) 3 years from the date you last used Free2Move services, unless we are required by law to keep it for a longer period for accounting or tax purposes.

Geolocation data is kept for a period of two (2) months from the date it was collected.

### Recipients of personal data

Free2Move may share some of your personal information with:

- Financial and payment collection service providers (payment services, billing, missed payment management, detection of fraudulent transactions),
- IT and security providers,
- Insurance companies and insurance brokers,
- Service providers that embed and connect technology,
- Providers of assistance, breakdown services, maintenance, cleaning, charging and repair of the vehicle,
- Vehicle inspection and damage report providers,
- Call centre providers,
- Any commercial partner or supplier acting on behalf of Free2Move to provide a service,
- Companies belonging to the Stellantis Group,



- The local authority in charge of traffic offences. If Free2Move receives a speeding or parking ticket following your car rental, your identity will be communicated to the said authority so that you can pay the corresponding ticket,
- Local administrative or judicial authorities if we are required to do so by applicable law or regulation, including in response to a legal process, such as a court order or subpoena, or to comply with other national, state, provincial or local laws.

### 3.4 Car with Driver (Ride)

#### Data processing details

Free2Move collects your personal data to allow you to book an available transfer vehicle that meets your needs.

Your personal data is processed for the following purposes:

- ✓ **Booking a transfer vehicle that meets your needs**
- ✓ **Real-time tracking of your route on the app**
- ✓ **Route invoicing**
- ✓ **Developing statistics**

#### Read more

#### Legal basis

The contractual execution of the Ride General Terms and Conditions accepted when the transfer vehicle was booked.

The geolocation data from your smartphone is collected with your prior consent. This data is necessary to enable you to locate available vehicles in your vicinity and to track your journey.

#### Details of the personal data collected

- Your User Account data,
- Your start and end time,
- The details of the chosen vehicle,
- Data relating to payment, invoicing or promotions,
- Data necessary to respond to your requests for assistance or complaints,
- Statistical data.
- If you are arriving from an airport, the name of the airline you travelled with and your flight number so that the driver can meet you at the exit of the corresponding arrival terminal.

Free2Move also collects your geolocation data to enable you to locate available vehicles in your vicinity and to benefit from after-sales services should a problem arise.

#### Duration of retention of personal data

The data necessary for the management of our commercial relationship is kept for a period of three (3) years from the last time you used Free2Move services, unless we are required by law to keep it for a longer period for accounting or tax purposes.

Geolocation data is kept for a period of two (2) months from the date it was collected.

### Recipients of personal data

Free2Move may share some of your personal information with:

- The VTC (car with driver) vehicle company corresponding to the chosen vehicle,
- Financial and payment collection service providers (payment services, billing, missed payment management, detection of fraudulent transactions),
- IT and security providers,
- Insurance companies and insurance brokers,
- Call centre providers,
- Any commercial partner or supplier acting on behalf of Free2Move to provide a service,
- Companies belonging to the Stellantis Group,
- Local administrative or judicial authorities if we are required to do so by applicable law or regulation, including in response to a legal process, such as a court order or subpoena, or to comply with other national, state, provincial or local laws.

## 3.5 Electric Charging (Charge My Car)

### Data processing details

Free2Move collects your personal data to allow you to charge your vehicle according to your needs.

Your personal data is processed for the following purposes:

- ✓ Locating compatible charging stations nearby or on your route
- ✓ Planning a route adapted to your vehicle and its battery life
- ✓ Connecting to the vehicle
- ✓ Activating and stopping recharging from your smartphone or with the Free2Move 'carte de recharge' top-up card
- ✓ Signing up for the monthly subscription and paying for the recharge
- ✓ Monitoring your energy use on your smartphone with the Free2Move application
- ✓ Monitoring battery charge and vehicle geolocation for route calculation
- ✓ Developing statistics

[Read more](#)

[Legal basis](#)

The contractual execution of the General Terms and Conditions of Sale accepted when using the Charge My Car service and the General Terms and Conditions of use of the Free2Move Application.

The geolocation data of the vehicle and your smartphone are collected only with your prior consent. This data is necessary to enable you to locate charging stations near your vehicle and to calculate your route.

### Details of the personal data collected

- Your User Account data,
- The data relating to the delivery and billing addresses of the 'carte de recharge' top-up card when the monthly subscription is taken out,
- Your vehicle data including VIN, charge status and route,
- Data relating to payment, invoicing or promotions,
- Data necessary to respond to your requests for assistance or complaints,
- Statistical data.

Free2Move also collects your geolocation data to allow you to locate charging stations on or near your route, track your journey and locate your vehicle to calculate a route.

### Duration of retention of personal data

The data necessary for the management of our commercial relationship is kept for a period of three (3) years from the last time you used Free2Move services, unless we are required by law to keep it for a longer period for accounting or tax purposes.

Your geolocation data is kept for a period of two (2) months from the date it was collected. You can deactivate geolocation at any time in the settings of your smartphone.

### Recipients of personal data

Free2Move may share some of your personal information with:

- Navigation solution providers,
- Logistics providers,
- Call centre providers,
- IT and security providers,
- Financial and payment collection service providers (payment services, billing, missed payment management, detection of fraudulent transactions),
- Insurance companies and insurance brokers,
- Any commercial partner or supplier acting on behalf of Free2Move to provide Free2Move or third party services, in particular those that manage charging stations, top-up charging cards and journey planning,
- Companies belonging to the Stellantis Group,
- Local administrative or judicial authorities if we are required to do so by applicable law or regulation, including in response to a legal process, such as a court order or subpoena, or to comply with other national, state, provincial or local laws.

## 3.6 Parking

### Data processing details

Free2Move collects your personal data to allow you to reserve an available parking space that meets your needs.

Your personal data is processed for the following purposes:

- ✔ Allowing you to locate available car parks which meet your needs
- ✔ Allowing you to reserve a parking space
- ✔ Invoicing of the used parking space
- ✔ Developing statistics

### Read more

### Legal basis

The contractual execution of Free2Move's General Terms and Conditions of Car Parking Space Rental and the General Terms and Conditions of Use of the company that operates the car park accepted when booking the service.

### Details of the personal data collected

- Your User Account data,
- The date and place of drop-off and pick-up of your vehicle,
- The number plate of your vehicle if the selected car park is equipped with an automatic plate reader,
- Data relating to payment, invoicing or promotions,
- Data necessary to respond to your requests for assistance or complaints,
- Statistical data,
- If you wish to park near an airport, you can enter the name of the airline you are flying with and your flight number.

### Duration of retention of personal data

The data necessary for the management of our commercial relationship is kept for a period of three (3) years from the last time you used Free2Move services, unless we are required by law to keep it for a longer period for accounting or tax purposes.

### Recipients of personal data

Free2Move may share some of your personal information with:

- The company that operates the selected car park,
- Financial and payment collection service providers (payment services, billing, missed payment management, detection of fraudulent transactions),
- IT and security providers,
- Insurance companies and insurance brokers,

- Call centre providers,
- Any commercial partner or supplier acting on behalf of Free2Move to provide a service,
- Companies belonging to the Stellantis Group,
- Local administrative or judicial authorities if we are required to do so by applicable law or regulation, including in response to a legal process, such as a court order or subpoena, or to comply with other national, state, provincial or local laws.

## 4 Free2Move Business Solutions

### 4.1 Connect Fleet

#### Data processing details

Free2Move, as data processor collects your personal data to allow you to access an online fleet management platform that meets your needs.

Your personal data is processed for the following purposes:

- ✓ Providing you with our online fleet management platform
- ✓ Allowing you to view your fleet data
- ✓ Contacting one of our advisers

#### Read more

#### Legal basis

Your data and the usage data of your car fleet are processed in execution of the contract signed with Free2Move or at your request when you ask to be contacted by one of our advisers.

#### Details of the personal data collected

- Your identification and contact information,
- Your login details for the Connect Fleet platform,
- Data on the use of your vehicle fleet, including vehicle VIN, data shared by the User (including first names, surnames, telephone numbers, email addresses, home addresses and vehicles of employees/drivers), geolocation and vehicle feedback data.

#### Duration of retention of personal data

The data necessary for the management of our commercial relationship is kept for a period of three (3) years from the last time you used Free2Move services, unless we are required by law to keep it for a longer period for accounting or tax purposes.

Geolocation data is kept for a period of two (2) months from the date it was collected.

#### Recipients of personal data

Free2Move may share some of your personal information with:

- IT and security providers,
- Service providers that embed and connect technology,
- Any commercial partner or supplier working on behalf of Free2Move to provide the service, and in particular suppliers of telematic boxes which geolocate vehicles,
- Local administrative or judicial authorities if we are required to do so by applicable law or regulation, including in response to a legal process, such as a court order or subpoena, or to comply with other national, state, provincial or local laws.

## 4.2 Fleet Sharing

### Data processing details

Free2Move, as a data controller, collects your personal data to allow you to supervise and turn a profit on your fleet of vehicles by making them available to your employees according to your needs.

Your personal data is processed for the following purposes:

- ✔ **Allowing you to access our car-sharing fleet monitoring platform and track the use of your vehicles**
- ✔ **Allowing your employees to access the FleetSharing platform or application and book vehicles online 24/7**
- ✔ **Enabling the driver to lock and unlock the vehicle in use (by access card or smartphone)**
- ✔ **Contacting one of our advisers**

### Read more

### Legal basis

Your data and the usage data of your car fleet are processed in execution of the contract signed with Free2Move or at your request when you ask to be contacted by one of our advisers.

### Details of the personal data collected

- Your identification and contact information,
- Your login details for the online booking platform and the Fleet Sharing application,
- Usage data of your car fleet, including the VIN of the vehicles, data shared by the User (in particular the first names, surnames and addresses of employees/drivers), geolocation and data reported by the vehicles.

### Duration of retention of personal data

The data necessary for the management of our commercial relationship is kept for a period of three (3) years from the last time you used Free2Move services, unless we are required by law to keep it for a longer period for accounting or tax purposes.

Geolocation data is kept for a period of two (2) months from the date it was collected.

## Recipients of personal data

Free2Move may share some of your personal information with:

- IT and security providers,
- Service providers that embed and connect technology,
- Any commercial partner or supplier working on behalf of Free2Move to provide the service, and in particular suppliers of telematic boxes which geolocate vehicles,
- Local administrative or judicial authorities if we are required to do so by applicable law or regulation, including in response to a legal process, such as a court order or subpoena, or to comply with other national, state, provincial or local laws.

## 4.3 Leasing

### ✔ Responding to your contact requests

[Read more](#)

### Legal basis

Your data is processed in execution of the contract signed with Free2Move or at your request when you ask to be contacted.

### Details of the personal data collected

Your email address and telephone number.

### Duration of retention of personal data

The data necessary for the management of our commercial relationship is kept for a period of three (3) years from the last time you used Free2Move services, unless we are required by law to keep it for a longer period for accounting or tax purposes.

## Recipients of personal data

Free2Move may share some of your personal information with:

- Leasing companies;
- Financial and payment collection service providers (payment services, billing, missed payment management, detection of fraudulent transactions),
- IT providers;
- Any commercial partner or supplier acting on behalf of Free2Move to provide a service,
- Companies belonging to the Stellantis Group, including PSA Automobiles SA,
- Local administrative or judicial authorities if we are required to do so by applicable law or regulation, including in response to a legal process, such as a court order or subpoena, or to comply with other national, state, provincial or local laws.

## 4.4 Energy Transition Advisory Service (E-Mobility Advisor)

### Data processing details

Free2Move collects your personal data to allow you to ensure the energy transition of your car fleet according to your needs.

Your personal data is processed for the following purposes:

- ✔ Enabling you to benefit from our fleet electrification assessment service, including an assessment of your fleet's electrification potential and an estimate of the number of charging stations required
- ✔ Providing you with a personalised consulting solution through the Free2Move mobility package
- ✔ Offering you vehicles adapted to the way in which your employees actually use them
- ✔ Contacting one of our advisers

### Read more

### Legal basis

Your personal data is processed in execution of the contract signed with Free2Move or at your request when you ask to be contacted by one of our advisers.

### Details of the personal data collected

- Your identification and contact information,
- The data used to connect to the platform,
- Usage data of your car fleet, including VIN of the vehicles, data shared by the User (in particular the first names, surnames and addresses of employees/drivers), geolocation and data reported by the vehicles.

### Duration of retention of personal data

The data necessary for the management of our commercial relationship is kept for a period of three (3) years from the last time you used Free2Move services, unless we are required by law to keep it for a longer period for accounting or tax purposes.

### Recipients of personal data

Free2Move may share some of your personal information with:

- Any commercial partner or supplier acting on behalf of Free2Move to provide a service,
- Local administrative or judicial authorities if we are required to do so by applicable law or regulation, including in response to a legal process, such as a court order or subpoena, or to comply with other national, state, provincial or local laws.



## 4.5 Mobility Card

### Data processing details

Free2Move collects your personal data to give you access to a Mobility Card to use for payments and which meets your needs.

Your personal data is processed for the following purposes:

- ✔ Enabling you and your employees to benefit from Mobility Card advantages (mobility account and payment card giving access to all mobility providers)
- ✔ Allowing you to allocate a budget dedicated to mobility for each of your employees and to monitor costs (parking, fuel, train, plane, tolls, rental, etc.)
- ✔ Allowing your employees to pay their professional mobility expenses directly with the Mobility Card or with their smartphone (electric recharging, fuel or other mobility expenses)
- ✔ Contacting one of our advisers

### Read more

### Legal basis

#### Details of the personal data collected

- Identification and contact data, i.e. first names, surnames, email addresses and telephone numbers of the employees,
- The login data for the account management platform and web application,
- The Mobility Card usage data,
- Data relating to payment (including any outstanding payments and arrears), billing or promotions.

#### Duration of retention of personal data

The data necessary for the management of our commercial relationship is kept for a period of three (3) years from the last time you used Free2Move services, unless we are required by law to keep it for a longer period for accounting or tax purposes.

#### Recipients of personal data

Free2Move may share some of your personal information with:

- Any commercial partner or supplier working on behalf of Free2Move to provide the service, in particular any supplier of corporate payment cards, accounting applications and Saas solutions,
- Companies belonging to the Stellantis Group,
- Local administrative or judicial authorities if we are required to do so by applicable law or regulation, including in response to a legal process, such as a court order or subpoena, or to comply with other national, state, provincial or local laws,

## 5 Cookies

When you connect to the site, we automatically record information about your use of the site and information obtained from your web browser.

We collect this information in two ways:

- **Log files:** When you use our site, connection data may be automatically recorded in our server logs such as your IP address, your user name, your operating system and its location, the type of browser you are using, the pages you have visited.
- **Cookies:** When you visit our site, cookies are placed on your device. These cookies allow us to authenticate and identify you, speed up your navigation on our site, and allow you to access the site's various functionalities.

If you do not want your personal data to be collected using cookies, you can reject the use of cookies on the site home page. However, this may reduce the performance and functionality of the platform and its tools. For more information, please see our [Cookie Management Policy](#).

### Read more

#### ✔ Technical or functional cookies

Some cookies ensure that certain parts of the site function correctly and that your User preferences are remembered. Functional cookies make it easier for you to visit our site. These mean you do not have to enter the same information repeatedly when visiting our site. We may place these cookies without your consent.

#### ✔ Analytical cookies

We use analytical cookies to optimise User experience on our site. These analytical cookies allow us to obtain information about the use of our site. We ask for your written permission to place analytical cookies.

#### ✔ Advertising cookies

We do not use advertising cookies on this site.

#### ✔ Social media buttons

We have included buttons on our site so that users can promote web pages or share them on social networks like Facebook.

Please read the privacy statements of these social networks (which may change from time to time) to find out what they do with your personal data processed using these cookies.

### Details of the cookies we use

#### ✔ Google Analytics

We use Google Analytics for website statistics. For more information, please read the Google Analytics Privacy Policy.

## 6 Your Rights

In accordance with the Data Protection Act and the GDPR, you have the following rights:

- ✓ Right of access ([Article 15 GDPR](#)), right to rectification ([Article 16 GDPR](#)) and to update;
- ✓ Right to erasure of your personal data ([Article 17 GDPR](#)) when it is inaccurate, incomplete, ambiguous, outdated, or when its collection, use, communication or storage is prohibited;
- ✓ Right to withdraw your consent at any time ([Article 13-2c GDPR](#));
- ✓ Right to restriction of the processing of personal data ([Article 18 GDPR](#));
- ✓ Right to object to the processing of your personal data ([Article 21 GDPR](#));
- ✓ Right to data portability of data you have provided to us, where it is subject to automated processing based on your consent or a contract ([Article 20 GDPR](#));
- ✓ Right to lodge a complaint with the supervisory authority responsible for the protection of personal data ([Article 77 GDPR](#));
- ✓ The right to determine what happens to your personal data after your death and to choose whether or not we disclose your data to a designated third party. In the event of your death and in the absence of instructions from you, we undertake to destroy your personal data, unless their retention is necessary for evidential purposes or to meet a legal obligation.

You may request to exercise these rights by e-mail to [privacy@free2move.com](mailto:privacy@free2move.com) or by post to Free2Move, Service Commercial - Vos droits - 45 rue de la Chaussée d'Antin, Paris, France, 75009 In case of doubt about your identity, you may be asked to provide proof of identity.

To find out more about your rights, you can also consult the website of the local authority responsible for the protection of personal data.

## 7 Data Security

Free2Move and its possible data processors undertake to implement all technical and organisational measures to ensure the security of personal data processing and the confidentiality of your personal data, according to current technical means and in application of the amended Loi informatique et Libertés (Information Technology and Freedom law), the European Data Protection Regulation (GDPR) and law n°2018-133 of 26 February 2018 "bearing various provisions to adapt European Union law in the field of security".

Your data is collected, stored and managed securely through our hosting service provider: Amazon Web Services (AWS).

Free2Move takes the necessary precautions, with regard to the nature of your personal data and the risks presented by data processing, to preserve the security of your personal data and, in particular, to prevent it from being distorted, damaged or accessed by unauthorised third parties (this includes physical protection of the premises, an authentication process for our customers with personal and secure access via confidential identifiers and passwords, logging of connections, encryption of certain data, etc.).

## 8 Sharing & Transferring your Data Outside the EU

The majority of Free2Move's processes, procedures and systems may be shared with Free2Move's subsidiaries. In any event, we ensure that access to your personal data is limited to the members of staff who need it, and that all staff understand how and why we protect your personal data.

The personal data collected by Free2Move is stored and processed in the European Union, where Free2Move is located.

We may transfer your personal data to recipients located outside the European Union, in particular when you use Free2Move's services in a country outside the European Union or in the context of Customer Service, requests and complaints.

Before we transfer personal data outside the European Union, we ensure that we have transfer mechanisms in place that comply with the requirements of the EU Regulation to safeguard the privacy of your personal data.

### Privacy Policy Update

This Privacy Policy may be modified at any time, in particular in accordance with the various legislative and regulatory changes. To this end, the User may find the update directly on the site.