

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 website 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.

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Who we are and how we can be contacted?

Our full company name is Transityre BV (“**Michelin**”) and when you use our website and our services directly, we act as a Data Controller. If you need to contact us, please refer to your usual representative.

About our Privacy Department

While everyone at Michelin is committed to protecting and respecting your privacy and we have a data protection Privacy Department who deals with all aspect of personal data at Michelin. You can contact them by sending an email to privacy.fr@michelin.com

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 websites, there is information in some other places which we encourage you to read.

- Our Cookie Policy
- Our Terms of Website Use

- Our Cookie Policy

When you use our website and other digital products and services provided by us, information can be collected through cookies to distinguish you from other users of our website 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 here [Cookies-Policy.pdf](#)

- Terms of use

Our Terms of Website Use tells you the terms on which you may make use of our websites and should be read alongside this Privacy Policy. You can read our Terms of Website Use here [Legal-Notice.pdf](#)

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
If you sign up for the BIBEXPORT platform, we will request informations that will allow us to identify and provide the products and services you signed up for (« Account Data »).	Account Data will be processed in order to make the BIBEXPORT platform work, to provide online services you signed up for, to discuss regarding these online products and services and proceed to the conservation of our services.	Account Data will include your login. We may also ask you to set a password to allow you to log onto your account safely.	The performance of the agreement between your company and us for the furnishing of online products and services is the legal basis of the processing of Account Data.	We retain Account Data as long as the account exists. If you do not log onto your account for more than 24 months, we will delete all Account Data to not store this data more than needed. You can obviously create a new

				account if you wish to do so.
Information you provide us when you communicate with us, e.g. by email (« Communication Data »)	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 your our legitimate interest to assist you and answer your communication as the legal basis of 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 within 6 months.
The platform BIBEXPORT allows to transmit alerts such as alerts regarding the validation of an order or the passing of a payment term. (« Alert Data »).	Alert Data will be processed to warn you when your order is confirmed, when payment terms are passed.	Information may include your full name, your email address and other personal data you provide us to enable us to deal with these alerts.	The performance of the agreement between your company and us for the furnishing of online products and services is the legal basis of the processing of Alert Data.	The duration of the contrat + 10 years.
In general, the BIBEXPORT Platform allows you to manage your orders and shippings, restocking, consult your documents (checks ecc.) and	Business Data will be made available on the BIBEXPORT Platform to allow you acces it more easily.	Information may include your full name, your email address and other personal data you provide us to	The performance of the agreement between your company and us for the furnishing of online products	The duration of the contrat + 10 years.

manage your complaints (« Business Data »)		enable us to deal with these different operations.	and services is the legal basis of the processing of Alert Data.	
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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 website users accessing a specific feature of our website. 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 websites 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 website, please remember that this information will be visible to others users of our website.

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 websites 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 website, 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 website 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 websites 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 website, products and services.

As mentioned above, we collect information using cookies or other similar technologies stored on your device about how you use our website, digital products and services. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our websites and deliver a better and more personalised service to you. You can read our Cookie Policy here [Cookies-Policy.pdf](#).

The legal basis for this process is your consent or, if necessary, our legitimate interest to ensure the monitoring and improvement of our website, or products and services.

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.

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. In particular, your contact data (email address, interests) can be shared with Michelin Group companies in order to know you better and personalize the experience that Michelin companies can bring you and sending you marketing offers and communications related to the newsletters to which you have subscribed.
- **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.

- **Third parties** - 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 website, 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. You can read it [Cookies-Policy.pdf](#).

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. By clicking on [BCRs](#), you can find the details of these rules.

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.

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 5 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.

Your rights under data protection legislation

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

- The right to be informed
- The right to access your information
- The right to correct your information
- The right to delete your information
- The right to restrict processing
- The right to transfer information
- The right to object to processing
- The right to give instructions beyond your death
- For further information on your rights

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. You can also exercise the right at any time by contacting us through your usual representative.

The right to define the outcome of your personal information after your death

You have the right to give us instructions on what we wish that we do with your personal information after your death. We will register it and if we heard that such event occurred, we will comply with your instructions.

For further information on your rights

You can find further information on your data protection rights from the CNIL at www.cnil.fr or with your local control authority.

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 through your usual representative.

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.

After getting in touch with us, if you consider that your rights are not respected or that the measures of access control are not in compliance with rules regarding Data Protection, you can file a complaint to the CNIL.

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.

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.

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