

## PERSONAL DATA PROTECTION POLICY – AXXÈS

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Updated on 1 July 2025

In this personal data protection policy (the “Policy”), Axxès informs you of the conditions under which your personal data is collected, the purposes for which data from the site (www.axxès.fr) (the “Site”) is processed and your rights.

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#### **1. WHO IS THE DATA CONTROLLER?**

For all the processing operations presented in this policy, Axxès, a simplified joint stock company (SAS) registered with the Lyon trade and companies register (RCS) under number 482 930 385, and based at 15, rue des Cuirassiers, 69003 Lyon, France, acts as the data controller within the meaning of the GDPR (“Axxès” or “We”).

#### **2. WHICH PERSONAL DETAILS DO WE PROCESS?**

We collect and process the following personal data about you:

- Identification data (first name and last name, email address, postal address and telephone number);
- Data about your professional situation (e.g. job title, professional contacts);
- Connection data (IP address and connection logs);
- Data about transactions carried out via the Site (data about purchases of Axxès products and services, exchanges with our customer service department via the Axxès portal or customer area);
- Financial data relating to your purchases via the Axxès portal or customer area (e.g. payment methods, invoices);
- Navigation tracking data;
- Data relating to job applications (CV, covering letter).

Only the personal data strictly necessary for the purposes described below is collected.

You do not have to provide us with the personal data we request. However, if you decide not to provide this information, we may not always be able to provide you with our products and services, or answer your questions.

### 3. WHAT ARE THE PURPOSES OF THE PROCESSING?

The table below lists the purposes for which your personal data is processed, together with the corresponding legal basis and data retention period:

Purpose	Legal basis	Retention period
<b>During sales of Axxès products and services</b>	Managing the customer relationship	Duration of the contract with Axxès
	Creating and managing the customer's main account in the Axxès customer area/portal	
	Fulfilling and tracking product orders	5 years from completion of the order
	Issuing invoices and tracking payments	10 years
<b>For communications operations and organising customer events</b>	Sending newsletters and information emails about Axxès activities	Duration of the contract with Axxès
	Managing registration for events	Duration of the contract with Axxès
<b>For commercial prospecting operations with potential B2B customers</b>	Contacting B2B prospects to offer them Axxès services	Axxès' legitimate interests 5 years
<b>To improve the Site and our portal/customer area</b>	Monitoring the operation of the site, audience statistics and users' browsing habits via cookies (see cookie policy)	Consent 13 months maximum
<b>To ensure the security of the Site and the portal/customer area</b>	Implementing security and fraud prevention systems	Axxès' legitimate interests 6 months maximum

	Purpose	Legal basis	Retention period
<b>For recruitment</b>	Processing applications	Pre-contractual measures	Duration of the recruitment process
<b>During requests for information</b>	Processing requests for information sent via the contact forms on the Site and in the customer area/portal	Axxès' legitimate interests	3 years from the date the request is processed
<b>During satisfaction surveys</b>	Managing customer satisfaction surveys	Axxès' legitimate interests	2 years
<b>When you ask to exercise your rights</b>	Processing requests to exercise individual rights (right of access, right to object, etc.)	Legal obligations	5 years from the date of the request to exercise a right

#### 4. WHO RECEIVES YOUR PERSONAL DATA?

The following people receive your personal data, depending on the processing carried out:

- Axxès in-house teams;
- Providers acting on our behalf for the purposes listed above;
- Motorway operating companies, as relevant for the services provided.

The data is never transferred to countries outside the European Union. If this were nevertheless to occur, we undertake to ensure that these transfers take place in compliance with the regulations in force or with regulations offering an adequate and equivalent level of protection.

#### 5. WHAT ARE YOUR RIGHTS WITH REGARD TO YOUR PERSONAL DATA?

In accordance with the applicable legislation, you have a number of rights concerning the collection and processing of your personal data:

- **Right of access:** you have the right to ask Axxès about the processing of your personal data;
- **Right of correction:** you have the right to ask for your personal data to be corrected if it is inaccurate. You also have the right to complete any personal data about you that is incomplete, by providing an additional declaration;
- **Right of deletion:** this right may be exercised to the extent that it does not impair the performance of the contract or our compliance with our legal and regulatory obligations;
- **Right to limit** how we process your personal data if it is inaccurate or unlawful, or if you have objected to the processing;

- **Right to withdraw, at any time, the consent** you gave to the processing of your personal data based solely on your consent;
- **Right to object** to the processing of your personal data;
- **Right to portability** of your personal data.

You also have the right to define general and/or specific instructions about what should happen to your personal data and how you want your rights to be exercised after your death.

To ensure the information we hold about you is always accurate, we recommend regularly updating your personal data.

You can express any requests to exercise your rights about your personal data by contacting us:

- By email at [data-privacy@axxes.fr](mailto:data-privacy@axxes.fr); or
- By post by writing to Axxès SAS, for the attention of the DPO, 15 Rue des Cuirassiers, 69487 Lyon Cedex 03, France.

If you are not satisfied, you can complain to the French data protection authority:

- By post: Commission Nationale de l'Informatique et des Libertés (CNIL), 3 Place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07, France (tel. +33 (0)1 53 73 22 22); or
- Online: <https://www.cnil.fr/fr/plaintes>

## 6. WHAT SECURITY MEASURES ARE IN PLACE?

As the data controller, we take all the necessary steps to preserve the security and confidentiality of your data, including preventing damage and access by unauthorised third parties. For this purpose, we apply all the technical and organisational measures that will guarantee an adequate level of security in view of the risks. We also ensure that our subcontractors comply with the rules on personal data protection.

## 7. WHAT ABOUT CHANGES TO THIS POLICY?

This policy may evolve and changes may therefore be made. In the case of minor changes, the new policy will be published online in the relevant section of the website. In the case of substantial changes, including alterations to the purposes or the exercise of your rights, you will be informed.