

# Privacy Policy \_ GDPR Charter

## (General Data Protection Regulation)

At HOWA TRAMICO, we take the protection of personal data very seriously. This commitment aligns with the General Data Protection Regulation (EU Regulation 2016/679), which mandates that European companies regulate the collection and processing of "personal data."

This document explains the personal data collected and how it may be used. You will also find contact information for any questions or concerns about personal data processing.

### **I. Data Protection**

HOWA TRAMICO is committed to ensuring the security and confidentiality of your personal data, in compliance with regulations. We implement technical and organizational measures to prevent unauthorized access or damage to your data. HOWA TRAMICO carefully selects its partners, subcontractors, and hosting providers based on their ability to safeguard the entrusted data, regularly verifying that they continue to meet security standards.

### **II. Data Collection**

Only information strictly necessary to provide the most suitable service for your needs is collected. This data is justified and proportionate to the intended purpose. Personal data may be collected directly from the individual or indirectly. "Personal data" refers to any information relating to an identified or identifiable person, directly or indirectly, through one or more unique identifiers.

Categories of personal data collected by HOWA TRAMICO include:

- Identification data (photo, ID number, address, phone number, etc.)
- Employment information
- Website browsing data
- Family status information
- Health data (disability status and medical restrictions)
- Banking information (account number)

### **III. Data Retention Period**

Information necessary to meet our legal obligations is retained for a limited period. This period is documented in our processing register.

### **IV. Purposes of Data Processing**

We process the data provided to us for purposes such as:

- Marketing and commercial communications: GDPR Art.6.1.f) legitimate interest.
- Newsletter management: GDPR Art.6.1.f) legitimate interest.
- Client and supplier account management: GDPR Art.6.1.f) legitimate interest.
- Requests to exercise rights: GDPR Art.6.1.c) legal obligation.
- Personnel management (recruitment, career, payroll, etc.): GDPR Art.6.1.f) legitimate interest
- Site access management: GDPR Art.6.1.f) legitimate interest

These processes are documented in our processing register.

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### V. Recipients of Personal Data

Your personal data is processed by authorized HOWA TRAMICO personnel and may also be shared with third parties in the following cases:

- When sharing data with subcontractors, service providers, and/or technical providers is necessary.
- When HOWA TRAMICO processes your data for marketing purposes, it may be shared with partners (affiliates, resellers, business partners).
- In compliance with legal, regulatory, or judicial decisions.

### VI. Personal Data Transfer

When HOWA TRAMICO transfers personal data outside the European Union, it ensures that the destination country provides an adequate level of protection as determined by European regulations (GDPR). Otherwise, HOWA TRAMICO ensures that the transfer complies with regulations to protect the information.

### VII. Cookies

In certain cases, we store information known as “cookies” on your computer to offer specific services or better understand your preferences to optimize our website. Cookies are small text files, often containing a unique identifier, saved on your computer from a web server.

You can control cookies on this website through the cookie banner or by adjusting your web browser settings to refuse cookies entirely, accept them only on request, or delete them when you close your browsing session. Please note that restricting cookies may limit certain services and website functions.

Categories of cookies used on this site:

- a. **Audience Measurement and Statistics Cookies:** These cookies anonymously record and analyze page views, visitor behavior, and frequency of visits to produce statistical analysis that helps improve site content.
- b. **Technical, Setting, and Navigation Cookies:** These cookies facilitate navigation between pages and are necessary for specific features or services (account creation, login, form information, etc.). They also remember usage preferences, displaying settings that ease navigation on future visits.

### VIII. Your Rights

In accordance with the GDPR, you have the following rights:

- **Right of Access:** Know whether your data is processed, access your data, and receive information on :
  - Processing purposes
  - Categories of processed data
  - Data recipients
  - Data retention duration
- **Right of Rectification:** Request the correction or update of inaccurate or incomplete personal data.
- **Right to Restrict Processing:** Request restricted processing under certain conditions, such as during data accuracy verification.
- **Right to Data Portability:** Request data reuse elsewhere or have it transferred to a third party in a structured, commonly used, machine-readable format.
- **Right to Erasure:** Request the deletion of personal data with identity verification. If we need to retain your data for legal reasons, we will inform you accordingly.
- **Right to Object:** Refuse data processing for a specific purpose or, if initially accepted, object to its continuation.
- **Right to Withdraw Consent:** Withdraw consent for personal data processing, without affecting the lawfulness of prior processing based on that consent.

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To exercise these rights, please contact our Data Protection Officer (DPO) by mail at: DPO, HOWA TRAMICO, 480 route d'Authou, 27000 BRIONNE, France Or via email at: [DPO@howa-tramico.com](mailto:DPO@howa-tramico.com)

For France, if you feel your data rights are not respected, you may contact the CNIL (<https://www.cnil.fr/fr/plaintes>).

### IX. Data Breach Procedure

In case of a personal data breach, individuals may contact the DPO, who will:

- Assess the breach's criticality level.
- Verify protection measures' presence and effectiveness.
- If there is a risk to individuals, notify the CNIL within 72 hours of the alert.
- Develop an action plan with all stakeholders to prevent recurrence.
- Inform affected individuals of the situation's evolution.

### X. Charter Update

This charter may be updated to ensure compliance with the Data Protection Act and GDPR. Any new version will be communicated as specified by management.

### Glossary

1. **Personal Data:** Any information relating to an identified or identifiable individual, such as name, address, email, online ID, location data, cookies, etc.
2. **Data Subject:** The individual to whom personal data pertains.
3. **Processing:** Any operation performed on personal data, automated or otherwise, including collection, storage, modification, deletion, etc.
4. **Data Controller:** The entity deciding the purposes and means of data processing.
5. **Consent:** The clear, specific, informed, and freely given agreement for data processing.
6. **Data Protection Officer (DPO):** The person ensuring GDPR compliance.
7. **Data Minimization Principle:** Data processing limited to necessary information.
8. **Transparency Principle:** Providing understandable, accessible information on data processing.
9. **Data Breach:** Security breach leading to unauthorized data access, loss, or alteration.
10. **Supervisory Authority:** The public body overseeing GDPR application, like the CNIL in France.