

# **Personal Data Processing Policy**

The personal data we collect includes the information you provide directly to us, data relating to your use of our services, and, in certain cases, information provided by third parties. We use this information to deliver our services, gain a better understanding of how you interact with them so we can improve and personalise your experience, and to develop applications, technologies, and content best suited to our customers. We also use your personal data to send you tailored advertising messages aligned with your interests, in compliance with applicable legislation.

## **DISCLOSURE OF YOUR PERSONAL DATA**

We may disclose personal information concerning you to subsidiaries of Smart2Move as well as to companies providing services on behalf of Smart2Move. We may also disclose certain information about you to trusted business partners. In addition, we may disclose personal information to public authorities where required by law or where necessary to protect the interests of Smart2Move and its users.

## **Smart2Move Privacy Policy**

This Privacy Policy applies to all Smart2Move devices and services, including platforms, applications, training, customer service, and online services provided.

## **What Data Do We Collect?**

Smart2Move collects information about you through various means.

## **Information You Provide Directly**

In connection with certain services, you may provide us with information directly. For example:

- When you create an account or profile within one of our services, you provide details such as your name, date of birth, and contact information including your phone number and email address.
- If you order a product or paid service, you provide your name, address, contact information, and payment and delivery details to enable us to process your order. You may also choose to store your payment details on our server to simplify future transactions.
- When using the application or platforms, health-related data may be collected. This may include information about your physical condition and data that may identify you or allow us to infer aspects of your health.
- When contacting customer service, we request certain information to verify your identity and the product in question before responding to your enquiry.
- When communicating with customer service or other staff, your communications may be processed through our systems.

## Information Related to Your Use of the Services

In addition to the information you provide, we collect information relating to your use of our Services through your devices' software and by other means. This information includes the following:

- **Device information:** Information relating to your device, particularly when it is a connected device (such as model and identifier), and to the software (such as operating system and software version), other unique device identifiers, personal identifier, phone number, sales code, access logs, cookies, pixels, and other similar technologies (as further described below under the section "Cookies, tags and other technologies"), registration information, and the settings of the devices you use to access the Services.
- **Usage history information:** Diagnostic information, technical, error, and usage data such as the time and duration of your use of the Services, the Services installed on your devices, any information stored in the cookies we have placed on your devices, and error reports and crash logs.
- **Location information:** When you use certain Services, we may receive the postal code and the location inferred from the IP address.

## Publicly or Commercially Available Data

We may collect publicly or commercially available information, including social media content, and combine it with other data about you to better understand your needs, preferences, and interests.

## Other Information We Collect

We also collect information concerning you and other information relating to your devices or to the use of the Services, when you expressly consent to provide it to us. We obtain your consent in compliance with the applicable legislation.

## Your Choices

You may choose not to provide certain requested information, for instance when purchasing a product or service. However, this may limit your access to certain features or services. We strive to clearly indicate such limitations when requesting your data to allow informed choices.

## How Is Your Information Used?

We use the information we collect for the following purposes:

- To facilitate your registration, or that of your device, to our Services.
- To provide you with the Service or functionality you have requested.

- To deliver personalized content and services based on your previous activity within our Services.
- To send you advertisements, promotions, and personalized, targeted and/or generic offers that may be of interest to you within our Services, on our websites and those of third parties, and on online platforms, including social media platforms (in compliance with applicable law). We will only send you personalized or targeted advertisements, promotions and offers where you have consented to receive marketing messages, including through the use of Google Analytics and Matomo Analytics data.
- To provide you with promotional offers and direct marketing messages (including via push notifications, emails, and SMS), but only with your prior consent.
- To conduct, evaluate and improve our business operations, which includes, among other things, developing and refining existing or new products and services, managing and optimizing our communications, analyzing our Services and customer base (including conducting market research, soliciting your feedback on our products and services, and carrying out customer satisfaction surveys, subject to your consent where required), as well as combining, aggregating and anonymizing data.
- To provide software updates and maintenance and support services for your devices.
- To provide you with technical support for devices that are under warranty.
- To ensure product security and prevent fraud in cases where devices are no longer under warranty. In such cases, we may collect the IMEI number and serial number.
- To analyze your devices in the event of repair.
- To protect the rights, interests, property and safety of Smart2Move, its affiliates, business partners, or customers.
- To respond to your requests and inquiries, including those relating to your personal data.
- To detect, prevent, and combat any fraudulent activity on our Services and hold offenders accountable.
- To comply with, and enforce, applicable legal obligations, relevant industry standards, and our internal policies, including this Privacy Policy.
- To analyze any defective device that is returned. We ensure that all personal data contained on a defective device is deleted prior to conducting any analysis.

We use and combine the information we collect about you through our Services, your devices, or other sources to simplify and enhance your user experience. For instance, you may save your payment details on our website to streamline future checkouts via our payment platform Stripe.

### **Who Do We Share Your Data With?**

We share your data only for the above purposes, with:

- **Our Affiliates:** Companies within the Smart2Move group that we own or control.
- **Business Partners:** Partners with whom we collaborate. These business partners independently control and manage your personal information.
- **Service Providers:** Carefully selected companies that provide services on our behalf or in our name, including product repairs, reception services, customer support and assistance, advertising, satisfaction surveys, invoicing, or email delivery. These service providers are also contractually obligated to protect your information.
- **Other Parties Where Required by Law or to Protect Our Services:** For example, we may be required to disclose your information under applicable laws, legal proceedings, or a government order. Authorities may also request access to your information for law enforcement, national security, counter-terrorism, or other public safety purposes.
- **Other Parties in Connection with Corporate Transactions:** We may disclose your information to a third party as part of a merger, business transfer, acquisition or sale, or in the event of bankruptcy.
- **Other Parties with Your Consent or at Your Direction:** In addition to the disclosures described in this Privacy Policy, we may share your information with third parties in specific instances where you have given your prior consent or upon your explicit request.

### **How Is Your Data Protected?**

We take data protection seriously and implement physical and technical safeguards to protect the information we collect. However, despite these efforts, no website, computer system, internet transmission, or wireless connection is entirely secure.

### **Where Is Your Data Transferred or Stored?**

Your use of our services may involve the transfer, storage, and processing of your personal data both within and outside your country of residence, including but not limited to France. Data may also be transferred to countries such as those in the European Economic Area, the United States, the United Kingdom, Switzerland, and Hong Kong. Some of these countries are recognised by the European Commission

as offering an adequate level of protection. For the full list, visit:

[https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en)

### **What Are Your Rights?**

Your personal data belongs to you. In accordance with applicable legislation, you have the right to access, correct, delete, or restrict the processing or sharing of your data. You may also exercise your right to data portability, meaning you can request your data in a machine-readable format for personal use or to transfer to another provider. You may object to data processing and withdraw your consent at any time. If you request the deletion of your data, you may lose access to some or all services. Please note that we cannot delete information required to be retained by law.

To exercise your rights or make an enquiry, contact us at: [contact@smart2move.com](mailto:contact@smart2move.com)

### **How Long Is Your Data Retained?**

We retain personal data only as long as necessary for the purposes for which it was collected. This means data will be deleted or removed from our systems once it is no longer needed.

We ensure data is stored and processed under the following conditions:

1. For at least the duration of service provision;
2. For the period required under any applicable contract or legislation;
3. For as long as necessary for the collection or processing purposes, or longer if contractually or legally required, or for statistical purposes, with appropriate safeguards in place.

### **Cookies, Tags, and Similar Technologies**

We use technologies such as cookies, tags, and pixels (collectively, "technologies") that send information from your device to a server. These technologies may be embedded in content, videos, or ads, and allow servers to read certain data from your device, determine when and what content was viewed, and collect device-related information such as your IP address.

#### **Cookies**

Cookies are small files that store information on your computer, television, mobile phone, or other device. They enable the entity that places the cookie on your device to recognize you across websites, services, and devices you use, as well as from one browsing session to another. Cookies serve a variety of useful purposes. For example:

- Cookies can remember your login credentials so you don't have to enter them every time you access a service.
- Cookies help us, and third parties, understand which parts of our Services are the most popular by showing us which pages and features are accessed and how long users spend on them. By analyzing this information, we can better tailor our Services and improve your user experience.
- Cookies assist our third-party providers and us in determining which advertisements you have already seen, preventing repetition.
- Cookies help us, and our partners, deliver personalized content and advertising by collecting information about your use of our Services and your activity on other websites and applications.

We use the following types of cookies in our Services:

- **Essential Cookies:** These enable you to access services you request through our website. Without them, the requested Services cannot be provided. For example, essential cookies may be used to authenticate your login attempt. These cookies are enabled automatically and cannot be disabled, as they are essential to the proper functioning of our Services.
- **Performance Cookies:** These allow us to analyze the performance and design of our Services and to detect errors. For instance, this type of cookie helps us recognize that you have previously used a service and informs us about the most visited applications by identifying the most frequently accessed pages and the time spent on each. We use tools such as Google Analytics, Matomo Analytics, and similar analytics cookies for this purpose.
- **Functionality and Profile Cookies:** These facilitate your use of our Services. For example, this type of cookie may store your preferences so that the information displayed during your visit reflects your previously configured settings or logs you into the account you used last time.
- **Advertising or Targeting Cookies:** These allow us, and our carefully selected partners, to personalize our website, display advertisements, or contact you directly (if you have given consent), based on your interests—such as your access to our Services through our apps. We may use and combine cookie-related data with other information we collect about you from various sources to enhance your experience. For example, we may use these cookies to send you personalized direct marketing messages, subject to your prior consent.

Along with our carefully selected business partners, we may place cookies in advertisements for our products or services that appear on third-party websites. When you click on such advertisements, we may be able to identify which websites

you visited and which ads you viewed. Like our partners, we only use these cookies with your prior consent granted to the third-party website publisher. You can save your cookie preferences directly on those third-party sites. If applicable, we will retain this type of cookie for a maximum period of 13 months.

### Tags and Pixels

Like certain third parties, we may use technologies known as tags or pixels, which transmit information from your device to a server. These tags may be embedded in online content, videos, or emails and may allow a server to read specific types of information from your device, identify when you have viewed particular content or emails, and determine the date and time of viewing as well as your device's IP address. Like certain third parties, we use these tags for various purposes, including analyzing how our Services are used or, in combination with other data, to deliver more relevant advertisements and content.

### Other Local Storage

Like certain third parties, we use other local storage technologies in connection with our Services, such as local shared objects (also known as "Flash cookies") and HTML5 local storage. These technologies function similarly to the cookies mentioned above. They are stored on your devices and may be used to retain information related to your activity and preferences.

Cookies are retained only for as long as necessary to achieve the intended purpose. This duration may vary depending on the Service. For example, a login authentication cookie may be retained longer than a cookie that simply allows items to be placed in a shopping cart on our website.

### How to Manage Your Preferences

In connection with the use of these technologies in our Services, you may withdraw your consent or manage your preferences at any time. However, certain technologies are essential or required for the proper operation of the Service and cannot be disabled. To learn more about how to manage these technologies, please refer to the cookie settings or preferences menu on the relevant Service or on your device.