

Alstom Data Privacy Charter



Ethics & Compliance

Alstom Data Privacy Charter – Transparency, Proportionality, Necessity

At Alstom, your **data privacy** is essential and a key principle of our Code of Ethics:

“Alstom and each of its employees must be particularly attentive to laws and regulations concerning privacy and protection of information concerning individuals, employees or third parties, and comply with them.

Alstom does not communicate personal information to third parties, except to the extent necessary and permitted by applicable laws or regulations.

As Alstom employees, you may have access to another person’s personal data only if your function and responsibility specifically include the handling of personal data. The right of access is restricted according to the nature and scope of the individual function and responsibility.”

– Alstom Code of Ethics

The protection of your personal data is a **fundamental right** set forth in the Charter of Fundamental Rights of the European Union.

As a normal part of our business activities, Alstom is required to collect and use some of your personal data. In doing so, Alstom is committed to protecting your privacy by preserving the confidentiality and the integrity of each individual’s personal data. Alstom strives to comply with all applicable data protection laws and regulations in all countries in which Alstom is present and doing business. In particular, Alstom ensures full compliance with the EU General Data Protection Regulation of 27 April 2016 and all applicable data protection laws.

“**Personal data**,” means any information relating to you as an individual (e.g., your first name, last name, email address).

As the “**data controller**” under applicable regulations, Alstom determines the purposes and means of the processing of your personal data. “**Processing**” means any operation which is performed on personal data, from the point of collection up to and including the final destruction or deletion of the data. The data controller for the Alstom Group is Alstom Transport SA (“ATSA”). It is responsible for all processing activity and serves as the main contact point with the data privacy supervisory authorities and will work with local Alstom affiliates for compliance with specific local rules related to local processing of your personal data.

Alstom’s guiding principles with regard to your personal data are:

Transparency	Alstom will always process your personal data lawfully, fairly, and in a transparent manner. You have the right to know who, where, what, and why Alstom is processing your personal data.
Proportionality	Alstom collects your personal data for specified, explicit, and legitimate purposes only or to comply with our legal obligations. Your personal data are not further processed in a manner that is incompatible with these purposes.
Necessity	Alstom will only collect and process your personal data limited to what is adequate, relevant, and necessary in relation to the business purpose.

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Ethics & Compliance – Data Privacy – 25 May 2018
LGL-WMS-026 – Rev A

Your personal data are kept accurate, up to date (where necessary), and in a form which permits your identification only for the period of time necessary for the purposes for which they are processed.

Alstom ensures that appropriate security, integrity, and confidentiality measures are implemented within Alstom to provide protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures.

Alstom also ensures that appropriate safeguards are duly implemented in order to provide an adequate level of protection to your personal data in case of international transfer.

You have the right to access, rectify, and/or, in certain circumstances, erase any of your personal data that could be held by Alstom and to restrict or object to the processing of your personal data. Should you wish to exercise these rights, please kindly contact the E&C Department at data.privacy@alstomgroup.com.

Effective date



V A – 25 May 2018

Drafted by

Verified By



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Distribution



The **Alstom Data Privacy Charter** must be communicated to every Alstom employee and be available on the alstom.com website, with a special care to people directly handling sensitive personal data.
It is available on Alstom Management System (AMS).