



## PRIVACY POLICY

AEROLIS ("Aérolis" or "We") makes every effort to protect your personal data in line with applicable European and French regulations.

This privacy policy ("Privacy Policy") is intended to inform you about the purposes and conditions involved when we process any personal data we collect through our various channels, such as our commercial departments; our website, [lebusdirect.com](http://lebusdirect.com); our social media, [facebook.com/LeBusDirect](https://facebook.com/LeBusDirect), [instagram.com/le.busdirect](https://instagram.com/le.busdirect), or our possible events.

Our Cookies Management Policy, available on [lebusdirect.com](http://lebusdirect.com), supplements this Privacy Policy to inform you of the purposes and conditions of use of cookie files or browser data that may be deployed on our websites and mobile applications.

We suggest that you read this Privacy Policy so that you have all the necessary information to understand the use made of your personal data and to freely and fully exercise the rights guaranteed to you by the applicable laws and this Privacy Policy.

### 1. General provisions

#### **Data controller**

The data controller for processing your personal data is AEROLIS, except when we act on instructions and on the exclusive behalf of our principals. In this case, we will inform you (i) either when we collect your personal data, (ii) or in this Privacy Policy, (iii) or when you wish to take steps with us to protect your personal data.

#### **General Terms and Conditions of Sale**

The Privacy Policy is an integral part of the General Terms and Conditions of Sale and must be read in conjunction with these (they are accessible via this link: [lebusdirect.com/legal-mentions.html](http://lebusdirect.com/legal-mentions.html)).

#### **Applicable law and competent administrative authority**

The Privacy Policy is governed by General Data Protection Regulation No. 2016/679 ("GDPR") and by the amended Data Protection Act No. 78-17 of 6 January 1978 ("Loi Informatique et Libertés"), under the regulatory control of the French personal data protection authority, the CNIL (Commission Nationale de l'Informatique et des Libertés – [www.cnil.fr](http://www.cnil.fr)).

#### **Links to third party websites**

Our site may contain or use links to websites, mobile applications, products or services that are operated by third parties (including advertising sites, our partners and the social media). We remind you that the Privacy Policy does not extend to these third parties, over which we have no control and for which we cannot be held responsible.

We encourage you to view the privacy policies, procedures and practices of these third parties.

#### **Protection of minors**

To provide AEROLIS products and services by digital means, we may collect personal data from minors under 16 years of age, under the control and with the consent of their legal representatives (parents or guardians). Users of our digital services who inform us that they are under 16 years of age have a discretionary right to delete their data (subject to our legal

obligations to store it as described in Article 7 below: "Collected data storage periods"), which they may exercise directly or through their legal representative at any time, without needing to provide a reason, by contacting us at [contact@lebusdirect.com](mailto:contact@lebusdirect.com)

## **2. The personal data we collect**

The Privacy Policy applies to personal data that we may collect from or about you (see below), from the following sources:

- The completion of our subscription or collection forms on paper or electronic media or during operations or events organised by AEROLIS in which you participate;
- A visit to one of our physical points of sale and/or the purchase of one of our services;
- A request for contact or exchanges with our customer relations departments;
- The validation of tickets, the control of access to our services (urban, interurban, public or individual transport, medical care, vehicle rental or parking, etc.) or the processing of infringements and recovery of fines;
- The use of our services, including our ticketing systems and applications;
- Browsing our [lebusdirect.com](http://lebusdirect.com) websites
- The receipt and dispatch of emails, text messages and other electronic messages between you and AEROLIS.

## **3. Use of your personal data**

We collect and use your personal data for the main purposes described below:

- To manage the issuing and use of tickets, and combat fraud;
- To manage our customer and prospect files, the provision of our services and the contractual, technical, financial and accounting management of relationships with our customers and users of our services;
- To securely process your payment details when you apply for a service;
- To keep you informed of the latest news on our network and any incidents and disruptions observed in the provision of our services;
- To better understand your needs and expectations so that we can provide you with suitable services and measure the use of our services in view of developing our offers;
- To process your requests, claims and the exercise of your rights;
- To comply with the law, regulations and legal requests and orders.

## **4. Data transmission**

If you have formally consented, your personal data may be communicated by AEROLIS:

### **Within the Keolis Group**

We may share your personal data with certain entities of the Keolis Group to ensure the continuity of our services and our relationship with our customers, prospects or users of our website;

### **To third party service providers**

We may share your personal data with trusted third parties, located in or outside the European Union, to help us operate our services and in particular to ensure the proper functioning of the websites and AEROLIS

### **To commercial partners**

We share certain pseudonymous data, not containing any direct identifiers, for the purposes described in Article 3 above, "Use of your personal data";

### **To third parties for legal reasons**

If we are required to comply with laws and regulations and legal requests and orders or if permitted by law (i.e. for the protection and defence of rights, in a situation that threatens life, health or safety, etc.).

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In any event, we always require these recipients to provide guarantees of confidentiality and sufficient security and to take the necessary physical, organisational and technical measures to protect and secure your personal data, in accordance with current legislation.

Any data transfers outside the European Union are governed by the mechanisms validated by the European Commission or the competent authorities.

## **5. Data Security**

AEROLIS secures your personal data by implementing appropriate physical, organisational and technical measures to prevent any unauthorised access, use, disclosure, modification or destruction, in accordance with current legislation.

These measures include:

- Storage on secure servers within the European Union;
- Securing your data, in particular through pseudonymisation processes, encryption of transmitted data and the implementation of means to guarantee the confidentiality, integrity and availability of your data;
- Limited access to your data on a "need-to-know" basis.

Although AEROLIS implements all possible measures to protect your personal data, we cannot guarantee the security of information transmitted on our websites or on one of our mobile applications when a security defect affects your device or browser.

## **6. Your personal data rights**

According to the GDPR and the Data Protection Act, you have various rights, including:

### **Access, modification, updating and deletion of your personal data**

You may request access to your personal data held and processed by AEROLIS, view them, obtain a printed or electronic copy and request that they be corrected, updated or deleted.

### **Opposition**

You may, at any time, request that some of your data no longer be processed.

### **Portability**

You may request that your data undergoing processing be communicated to you in an open and machine-readable format, either for your personal use or for their transfer to another data controller.

### **Restriction of processing**

In certain cases, you can ask for the processing of your data to be restricted.

### **Complaints to a Regulatory Authority**

Without prejudice to any other legal remedy, you have the right to file a complaint with the supervisory authority of the European Union country in which you reside or work or in which you consider that a violation of your rights has been committed.

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You can exercise all these rights by sending us a written request, with a copy of your identity papers, to the contacts indicated in article 9, "Contact Us".

We will endeavour to respond to requests as soon as possible, under the conditions provided for by the applicable regulations. However, in some cases, we may not be able to respond favourably because we have to comply with our legal or contractual obligations.

### **7. Collected data storage periods**

We store your personal data only for as long as necessary to fulfil the various purposes defined in Article 3 "Use of your personal data" above, except in cases where the law allows or requires us to retain them for longer.

The table below summarises the different maximum storage periods applicable or imposed on AEROLIS according to the purposes for which your personal data may be processed. These maximum periods apply unless you request the deletion or termination of use of your data before the expiry of these periods for a reason compatible with any legal obligations applying to AEROLIS.

Purposes	Storage periods
Customer management, prospecting, promotional and loyalty operations, dispatch of offers	3 years from the end of the commercial relationship or the last contact initiated by the customer or prospect.
Management, delivery and use of transport tickets (customer relationship management, distribution of media and transport tickets, management of sales channels and management of ticket validations).	Data relating to the customer relationship are kept for the entire contractual relationship and for 2 years after the end of this relationship for customers and prospects. Validation data may be stored for a maximum of 48 hours for the sole purpose of combatting technological fraud.
Answering your requests	Time required to process your request
Answers to satisfaction surveys	3 years from the last contact.
Management and logging of purchases and services, guarantees, recovery, claims management	10 years from the last event, except for data concerning means of payment, which are processed by AEROLIS payment service providers only for the duration of the limitation period of payment transactions.
Audience measurement and personalisation of websites, mobile applications and cookie management	13 months from the cookie deposit date
Management of requests for access to and correction of data	1 year from receipt of the request
Management of requests for opposing processing operations	3 years from the date on which the right of opposition is taken into account

## 8. Modification of the Privacy Policy

AEROLIS may make changes to the Privacy Policy.

We encourage you to visit this page regularly to take account of any changes and stay informed about the measures we are taking to protect your personal data.

Contacting us

To exercise your rights or ask any questions regarding the Privacy Policy, please contact us at [contact@lebusdirect.com](mailto:contact@lebusdirect.com) or at the postal address Lieu-Dit La Maladrerie, Rue de Paris, 77990 LE MESNIL AMELOT.

If you have any questions about the processing of your personal data, you can also contact our Data Protection Officer at [dpo.lebusdirect@keolis.com](mailto:dpo.lebusdirect@keolis.com)

## 9. Contacting us

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The Privacy Policy was updated on 1 February 2019.