



## CONFIDENTIALITY POLICY

*Updated on 19 January 2023*

### **1. INTRODUCTION**

Jost Group S.A. gives great importance to the confidentiality and security of your personal data and commits to protect them. As a data controller, it has drawn up this confidentiality policy (hereinafter the “policy”) in order to inform you, with complete transparency, of the way in which your personal data are collected and processed, as well as of your rights when you contact us or use one of our services.

In that regard, Jost Group S.A. determines all of the technical, legal and organizational means and purposes for the processing of your personal data, and commits to take all the necessary measures to ensure that your personal data are processed in accordance with European regulation n°2016/679 of 27 April 2016 regarding the protection of individuals in the processing of personal data and the free circulation thereof (hereinafter the “Regulation”), which Regulation was adopted in Luxembourg by the Act of 1 August 2018 regarding the organization of the National Commissions for Data Protection and the general system for data protection.

### **2. DEFINITIONS**

#### 2.1. PERSONAL DATA

Any information related to an identified or identifiable natural person. An “identifiable natural person” is one who can be identified, directly or indirectly, particularly by reference to an identifier, such as a name, identification number, location data, an online identifier, or one or more elements specific to his/her physical, physiological, genetic, psychological, economic, cultural or social identity.

#### 2.2. PROCESSING

Any operation or set of operations that is carried out, whether or not by automated means, on personal data or sets of personal data, such as the collection, recording, organization, structuring, storage, adaptation, alteration, extraction, consultation, use, communication by transmission, dissemination or any other form of availability, alignment or interconnection, limitation, deletion or destruction.

#### 2.3. DATA CONTROLLER

The natural person, legal entity, public authority, department or other agency that, alone or jointly with others, determines the purposes and means of the processing. When such purposes and means are determined by Union law or by the law of a Member State, the data controller may be appointed, or the specific criteria for such appointment may be specified, by Union law or by the law of a Member State.



### **3. PRINCIPLES RELATED TO THE PROCESSING OF PERSONAL DATA**

Personal data must be:

- a) processed lawfully, honestly and with transparency vis-à-vis the person involved;
- b) collected for specific, explicit and legitimate purposes, without any subsequent processing being incompatible with those purposes; with subsequent processing for archival purposes being in the public interest, for scientific or historical research or statistical purposes and not deemed to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary for the purposes for which they are processed;
- d) accurate and, if necessary, kept current; all reasonable steps must be taken to ensure that personal data which are inaccurate, with respect to the purposes for which they are processed, are promptly deleted or rectified;
- e) retained in a way that enables identification of the persons involved for no longer than is necessary for the purposes for which the data are processed ; personal data may be retained for longer periods insofar as they are processed only for archival purposes in the public interest, for scientific or historical research or for statistical purposes, to the extent that the appropriate technical and organizational measures required by the Regulation to protect the subject person's rights and freedoms are taken;
- f) processed in such a way as to ensure appropriate security of personal data, including protection against unauthorized or unlawful processing and against loss, destruction or accidental damage, through the application of appropriate technical or organizational measures.

### **4. DATA LIKELY TO BE PROCESSED AND THE PROCESSING OF PERSONAL DATA**

#### **4.1. DATA LIKELY TO BE PROCESSED**

Jost Group S.A. processes various types of personal data when you use its website hosted at the following address : <https://jostgroup.com>, when you use various communication channels or one of its services, and during the course of its business.

When you visit our website, the following personal data may be collected, stored and used:

- Technical information related to your computer such as the name of the Internet Service Provider (ISP), your IP address, your geographical location, the type and version of your browser, and your operating system.
- Information related to your navigation in the website, such as the pages read and the time spent thereon.



When you fill out your contact form or contact us by any other means of communication (Jost Group S.A.'s telephone, email and social networks – e.g. Facebook, Instagram, LinkedIn, Twitter and YouTube), the following personal data may be collected, stored and used:

- Data that enable us to identify and contact you, such as your name, email address and telephone number.
- Any other personal data that you transmit to us in that context.

When you apply for a job directly on our website, the following personal data may be collected, stored and used:

- Data that enable us to identify and contact you, such as your surname, given name, postal and email address and telephone number.
- Personal data found in your curriculum vitae, particularly those related to your professional background, education and areas of interest.
- Any other personal data that you transmit to us in that context.

When you negotiate, conclude and execute a contract with us, the following personal data may be collected, stored and used:

- Data that enable us to identify and contact you, such as your surname, given name, employer, position, signature, email address and telephone number.
- Any other personal data that you transmit to us.

In the course of using surveillance cameras on the group's various sites, the following personal data may be collected, stored and used in accordance with the intended purpose of surveillance cameras:

- Data that enable your identification, such as your face.
- Any other personal data collected by the surveillance camera.

In using double-face-onboard cameras during the course of our transport business in countries where that is allowed, the following personal data may be collected, stored and used in accordance with the intended purpose of double-face-in-vehicle cameras:

- Data that enable your identification, such as your face or license plate, ...
- Any other personal data collected by the onboard camera.

Before disclosing personal information regarding another person to Jost Group S.A., you must obtain that person's consent to the disclosure and processing of his/her personal data pursuant to the terms of this policy.

#### 4.2. PROCESSING OF PERSONAL DATA

All of the aforesaid situations may entail the transmission of personal data. The processing of such data by Jost Group S.A., as data controller, or by the service providers acting on behalf and for the account of Jost Group S.A., will comply with the Regulation.



## **5. PURPOSE OF PROCESSING PERSONAL DATA**

We process your personal data for a variety of purposes, especially to facilitate visits to our website and for communicating and collaborating with us. The purposes of processing personal data are as follows:

- For the administration of Jost Group S.A. and its website and social networks
- For informational purposes and for proper communication
- For commercial purposes
- For customer service, quality service and the handling of complaints
- For training purposes
- For the monitoring and security of the group's various sites
- For probative purposes

## **6. CONSENT**

Consent is given by ticking the box offering the confidentiality policy as a hyperlink. This consent is required for carrying out certain operations on the website and entering into a relationship with Jost Group S.A. via its contact form.

Consent is also assumed to have been given when a message is sent via an official social network of Jost Group S.A. or an email is sent to the address: [info@jostgroup.com](mailto:info@jostgroup.com) (or to any other business email address belonging to an employee of Jost group S.A.), or by a telephone call to: +352.27 00 27 27 240 (or to any other business telephone number belonging to an employee of Jost Group S.A.) regarding the data to be transmitted to us in the context of this message, email or call.

You agree that the data controller may process and collect the personal data you provide in the contact form (or by any other means of communication) or in connection with the services offered by Jost Group S.A. in accordance with the terms and principles specified in this confidentiality policy.

## **7. DURATION OF RETENTION OF PERSONAL DATA**

The data controller retains your personal data only for a reasonable period that is necessary for fulfilling the purposes for which they are processed.

Jost Group S.A. processes your personal data for as long as is necessary for the purposes specified in this policy or until you withdraw your consent to the processing.

## **8. SECURITY MEASURES FOR YOUR DATA**

Jost Group S.A. takes reasonable technical and organizational precautions to ensure that the servers hosting the processed data, to the extent possible, prevent:

- Unauthorized processing or modification of these data or the access thereto
- Improper use or disclosing of such data
- Unlawful destruction or accidental loss of such data.



In that regard, Jost Group S.A., and the employees under its direct or indirect authority who have access to such data, are subject to a strict obligation of confidentiality.

Nevertheless, Jost Group S.A. cannot be held liable for a third party's misappropriation of these data despite the security measures that were taken.

You acknowledge that the transmission of information via the Internet is intrinsically unsecured, and that Jost Group S.A. does not guarantee the security of your data sent via the Internet. Consequently, Jost Group S.A. disclaims any liability for the loss, corruption or theft of personal data caused, in particular, by viruses or following computer attacks.

## **9. ADDRESSEES OF DATA AND DISCLOSURE TO THIRD PARTIES**

Jost Group S.A. commits to refrain from selling or disclosing personal data that it collects to third parties, except in the situations described herein or, if applicable, in the situations communicated at the time of collection of said data.

The personal data collected by Jost Group S.A. may be shared with other entities of the group, with subcontractors when such is necessary for proper execution of the task entrusted thereto by Jost Group S.A., or with third parties responsible for the processing of data on our behalf, which cannot use or disclose the data in a way that is incompatible with the situations described herein.

As a matter of general policy, your data are never shared with third parties except in the aforesaid situations.

In the event that data are disclosed, the addressees thereof and those to whom the data has been disclosed are subject to this policy and must comply therewith. Jost Group S.A. ensures that they process the data only for the intended purposes, and in a discreet and secure manner.

In the event that data are to be disclosed to third parties for direct marketing or prospecting, you will be advised thereof in advance so that you can give your consent to the use of your personal data.

Your personal data may also be disclosed when we are required to do so by law or a public authority.

## **10. USERS' RIGHTS**

You may exercise your rights at any time by sending an email to [info@jostgroup.com](mailto:info@jostgroup.com); by calling +352.27 00 27 27 240; or by sending a letter by post to the following address: Am Hock 1, L-9991 Weiswampach, Luxembourg.

### 10.1. RIGHT OF ACCESS

Jost Group S.A. guarantees you the right to access your personal data. You have the right to obtain access to your data as well as to the following information:

- The purposes of processing.
- The categories of personal data involved.
- The addressees or categories of addressees to whom personal data have been, or will be, transmitted.



- When that is possible, the intended period of retention of personal data, or, if that is not possible, the criteria used to determine that period in accordance with this confidentiality Policy ;
- The existence of the right to ask for the rectification or deletion of data or for a limitation on the processing of data, or the right to oppose such processing.
- The right to file a complaint with a supervisory authority.
- When the data are not collected from the person involved, any available information regarding the source thereof.

The controller may require the payment of a reasonable fee based on administrative costs for any additional copies you may request.

You will receive a copy of the data within one month after receipt of the request.

#### 10.2. RIGHT OF RECTIFICATION

Jost Group S.A. guarantees you the right to rectify your personal data. Incorrect, inaccurate or irrelevant data may be corrected or deleted at any time at your request.

The data controller notifies each addressee to whom personal data were transmitted of any rectification of personal data, unless such communication cannot be effectuated or requires disproportionate effort. The data controller provides the person involved with information regarding these addressees upon request.

#### 10.3. RIGHT OF DELETION

You have the right to get your personal data deleted as promptly as possible.

When the data controller has made personal data public and is required to delete them by virtue of the foregoing paragraph, he takes reasonable steps -- taking into account the available technology and the costs of implementation -- including those of a technical nature, to inform the other controllers who process such personal data that the person involved has requested the deletion of any links to his/her personal data or copies or reproductions thereof.

The two preceding paragraphs do not apply when such processing is necessary for:

- the exercise of the right to freedom of expression and information;
- compliance with a legal obligation specified by Union law or Luxembourg law that requires the processing;
- the establishment, exercise or assertion of rights in court.

The data controller notifies each addressee to whom personal data were transmitted of any deletion of personal data, unless such communication cannot be effectuated or requires disproportionate



effort. The data controller provides the person involved with information regarding these addressees upon request.

#### 10.4. RIGHT OF RESTRICTION OF DATA PROCESSING

You have the right to have the processing of your personal data restricted in accordance with the Regulation.

The data controller notifies each addressee to whom personal data were transmitted of any restricted processing of personal data, unless such communication cannot be effectuated or requires disproportionate effort. The data controller provides the person involved with information regarding these addressees upon request.

#### 10.5. RIGHT OF TRANSFER OF DATA

You have the right to receive your personal data from Jost Group S.A. in a structured, commonly used and machine-readable format.

You have the right to transmit your data to another data controller without Jost Group S.A. objecting thereto in the situations specified by the Regulation.

The exercise of the right to transfer data is without prejudice to the right of deletion and does not affect the rights and freedoms of third parties.

#### 10.6. RIGHT OF OPPOSITION AND AUTOMATED INDIVIDUAL DECISION MAKING

You have the right at any time to oppose the processing of your personal data due to a particular situation, including the automation of your data by Jost Group S.A.

As of that time, Jost Group S.A. will no longer process your personal data, unless there are legitimate and compelling grounds to do so that prevail over your interests, rights and freedoms, or except for the establishment, exercise or assertion of rights in court.

When your personal data are processed for prospecting purposes, you have the right to oppose it at any time.

#### 10.7. RIGHT OF COMPLAINT

You have the right to file a complaint regarding the processing of your personal data by Jost Group S.A. with the National Commission for Data Protection (the data protection authority competent in the territory of Luxembourg).

### **11. COOKIES**

The Jost Group S.A. website uses cookies, which enables the storage of information to simplify the use of the website. You can manage or deactivate the use of cookies in your browser. In the latter case, your visit may be less smooth.



The acceptance of cookies through the browser may be necessary to access parts of our website that require your identification.

A cookie is a file that contains an identifier (a chain of letters and numbers) sent by a web server to a web browser and stored by the browser. The identifier is then sent back to the server whenever the browser requests a page from the server. Cookies may be “persistent” or “temporary”: a persistent cookie is stored by the browser and remains valid until its expiration date, unless the user deletes it before that date ; a temporary cookie expires at the end of the user’s session, when the browser is closed.

Cookies generally do not contain any information used to identify you personally, but the personal information we store about you may be linked to the information stored in the cookies and obtained through the cookies.

More information regarding the nature and purpose of cookies that Jost Group S.A. uses is given on the following website: <https://jostgroup.com/fr/parametrage-des-cookies>.

## **12. APPLICABLE LAW AND JURISDICTION**

The construing, validity and execution of this policy are governed by the laws of Luxembourg. The parties commit to try to resolve any dispute that might arise between them by amicable means, before pursuing any other recourse.

## **13. CONTACT**

If you have any further questions regarding this confidentiality policy, please send your request by email to [info@jostgroup.com](mailto:info@jostgroup.com); by calling +352.27 00 27 27 240; or by sending a letter by post to the following address: Am Hock 1, L-9991 Weiswampach, Luxembourg.