MICHELIN
A BETTER WAY FORWARD

THE FUNDAMENTALS

GENERAL PRIVACY POLICY

EDITORIAL

Michelin's ambition is to become the world leader in sustainable mobility and innovation by contributing to overcome the challenges of society and practicing the core values of respect for people.

The company accordingly attaches great importance to the protection of personal data and information and, in the interests of transparency and clarity, would like to inform you how it collects and processes the data of its employees, customers and suppliers around the world.

This policy strengthens Michelin's code of ethics and is a means of increasing public confidence in the company. The protection of data and personal information is not only the job of privacy specialists: it is equally the responsibility of every one of us on a daily basis.

Thank you in advance for your commitment to ensuring the protection of personal data and information in respecting the principles and guidelines set out in this policy.

The Group Personal Data Protection Committee

OBJECTIVE

This general Privacy Policy for the protection of personal data is based on the Group Directive on Personal Data and on the Compulsory Business Rules of Michelin which apply to all companies in the group that have joined it, Located within or outside the territory of the European Union.

SCOPE

This policy is intended to describe the rules of good conduct which are expected to be respected by Michelin employees throughout the world and has been applicable since 7 June 2017.

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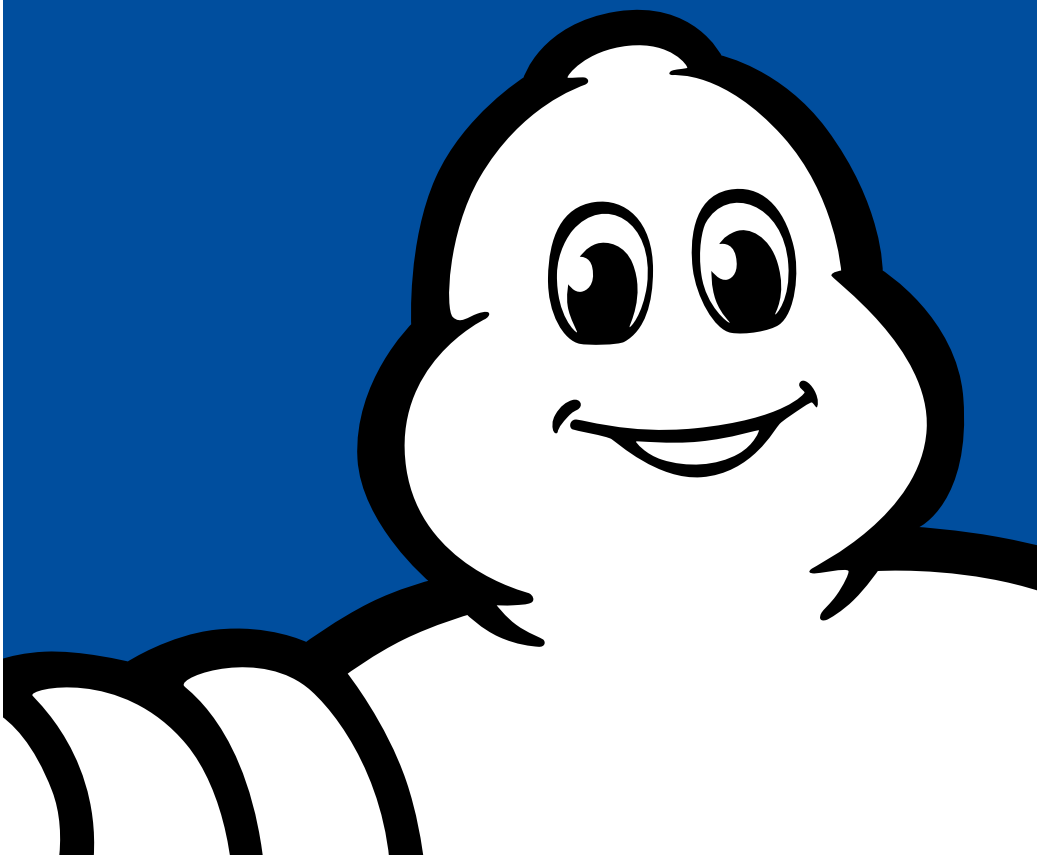
INTRODUCTION



Michelin is pursuing a policy of innovation and digital transformation that is built on respecting ethical values and developing a strong business culture. Confidence, integrity and personal and private data protection are at the heart of Michelin's concerns and represent a substantial challenge. Protecting such data provides a major competitive advantage and serves as a vector of confidence in our relations with business partners, clients and employees.

The present policy is designed to describe rules of conduct, the respect for which is expected of all Michelin employees throughout the world in order to ensure the protection of personal data and, as such, the protection of people's private lives, in particular those of Michelin's employees, clients and business partners.

The present policy builds upon Michelin's Binding Corporate Rules, which have been approved by the French National Commission on Informatics and Liberty (CNIL), as well as by all European data protection authorities. These rules must be respected whenever personal data (as defined below) is processed and when said data is then transferred within the Group for further processing. Michelin's Binding Corporate Rules apply to all the companies within the Group that have adhered to them, whether they are located within the European Union or not.

The present policy also sets forth the responsible and ethical behavior each employee must apply when collecting or processing personal data. This policy does not replace existing national laws but rather is intended to supplement national data privacy legislation. National law shall take precedence over this policy in case of a conflict between this policy and the relevant national law, or if a given national law contains stricter requirements.

The policy may need to be updated depending on the applicable legal and regulatory context.

1. CONCEPTS

In order to properly understand the regulations relating to personal data, it is important to fully understand the key concepts.

1.1. Personal Data

Personal Data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Personal Data is therefore data that, by itself or combined together, can be connected to an individual.

Example: Michelin ID, name, social security number, address, role, hobbies, localization data.

1.2. Sensitive Personal Data

Sensitive Personal Data is personal data that makes apparent, either directly or indirectly, an individual's race, ethnicity, political opinions, philosophical opinions, religious beliefs, union membership, criminal convictions and offenses, data that relates to an individual's health or sexual orientation or genetic and biometric data.

1.3. Data Subject

The individual to which the data being processed is related.

Example: a candidate whose job application is being considered, a client whose claim is being dealt with, an employee whose holiday leave is being managed, etc.

1.4. Data Controller

The individual or corporate entity, department or any other body who, either alone or in collaboration with others, determines the purpose and means of processing personal data.

Example: an establishment that sets up a video surveillance system, or a company that introduces a new system for managing business travel for its employees.

1.5. Data Processor

Generally speaking, any company that processes personal data for the Data Controller is considered a Data Processor.

Example: a data hosting service provider or a company managing a call center, a payroll service provider, an advertising firm managing a marketing database for client.

1.6. Processing of personal data

Processing of personal data (hereinafter called the "Processing Procedure") refers to any operation or set of operations using such data, whatever the method used, in particular for collecting, recording, organizing, storing, adapting or editing, extracting, consulting, using, communicating, circulating or any other way of making available, comparing or connecting, as well as blocking, deleting or destroying personal data.

2. PRINCIPLES FOR PROTECTING PERSONAL DATA

The regulations relating to personal data protection evoke several main principles that must be scrupulously respected. Not complying with such regulations means that you would be putting Michelin at risk of being heavily sanctioned.

2.1. Legality

Employees must refrain from Processing Personal Data which is illicitly collected, meaning any collection made unbeknownst to the individuals concerned and/or collection for which the processing purpose is illegal.

Before commencing any Processing Procedure, it is necessary to check that the Processing complies with all regulations applicable to our business sector.

It is also important to check with the DGD Data Privacy domain team and/or your country's Privacy Officer whether the Processing Procedure that is planned complies with all local applicable regulations.

2.2. Loyalty and transparency

Transparency regarding Data Subjects is important: Personal Data must be collected (with the consent of the data subject prior to collection if required) and Processed fairly and in a transparent manner in relation to Data Subjects..

Before implementing the Processing of Personal Data, Data Subjects must be informed and their consent obtained in accordance with the relevant local law of the following matters:

- any Personal Data Processed that concerns them;
- their rights (such as right of access, right of rectification, right to request deletion) and for citizens of the European Union the identity of the Data Controller, the purpose of the Processing, the recipients of the data, any transfer outside of the European Union, and retention period.

To obtain provide such information and obtain consent, it is necessary to prepare a statement in a form that can be accessed (such as on a website, displayed on a sign, in a contract, etc.).

Do not acquire Personal Data from any third party without having previously confirmed that the third party in question holds the necessary rights and authorizations if required to collect and transfer such data.

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2.3. Purpose and legitimacy

Clearly set out the objectives for the Processing of Personal Data: such data must only be collected for a purpose that is clearly defined, explicit, legitimate and compatible with the initial purpose.

Refrain from reusing data for any purpose that is incompatible with the initial purpose.

Examples : sending a newsletter to a candidate for a job vacancy without the individual having specifically asked to receive such material, sending a canvassing e-mail to clients who took part in a competition without having obtained their specific agreement, using images taken from video surveillance to calculate an employee's actual working hours.

2.4. Necessity and proportionality

Do not collect excessive amounts of data: remember that only Personal Data that is necessary to achieve the purposes of the Processing of Personal Data can be collected.

In particular, it is forbidden to collect and process Sensitive Personal Data if this data is not strictly necessary in relation to the purpose of the Processing of Personal Data. You should check with your local legal department of Privacy Officer that you are authorized to collect such data in view of applicable regulations in the country or region.

Before commencing any Processing of Personal Data, define the duration for which the data will need to be stored in order to achieve the purpose of the Processing. Put in place data purging procedures.

2.5. Quality

Ensure databases are kept up to date: regularly check that the personal data you are processing is exact and not out of date. If necessary, update the data.

Ensure that no excessive or subjective data appears in any free text boxes.

2.6. Respecting rights of individuals

Provide the individuals concerned with the means to exercise their rights.

The individuals whose data is being processed have a right to access the data that concerns them and, in some cases, to request that the data be rectified or deleted. They may also ask not to receive commercial prospection made by using their Personal Data.

Respect the rights of individuals concerned and help the company to respond as quickly as possible to any requests it receives by reporting such requests to the relevant data protection contact if there is one for your country/region and/or to the Privacy Officer or local law department for your country/region.

2.7. Security and confidentiality

Protect files and safeguard data: take care to comply with the defined security measures of the Group including pseudonymisation and anonymization appropriate to the risk, in particular for documents circulated at a local level such as the information systems charter.

The Processed Personal Data must remain confidential: take care never to divulge such data to other services or to a third party who is not authorized to access such information. Data must be stored and transferred securely, by using the Securitybox solution, for example.

Should a part or all of the Processing of Personal Data need to be outsourced, the sub-contractor must sign a contract containing robust requirements regarding data security and confidentiality. To do this will need to work with the local purchasing department in coordination with the responsible IT person and Privacy Officer for your country/zone to include the appropriate clauses in the contract.

Everyone is responsible for the protection of Personal Data. If an abnormal situation arises, such as a Personal Data breach or other abnormal publication of Personal Data, the teams in charge of protecting Michelin data should be alerted.

2.8. Transfers of Personal Data from the European Union outside of European Union countries

Manage the flow of Personal Data: do not transfer any Personal Data from the European Union to another country before having checked with your Privacy Officer if and under what conditions such a transfer would be authorized.

3. IN PRACTICAL TERMS

	DO	DO NOT
Data collection	Identify precisely the initial purpose for collecting the data to ensure it is established and explicit. Examine the formalities carried out for the Processing and the type of data collected to determine whether the purpose for collecting and processing the data is established and explicit.	Collect data for which the data processing manager does not know the origin. Process forbidden data (in particular on health, religion and political opinions) except in specific situations. Collect data without informing the individuals about the purpose of collecting and processing the data. Use a Processing Procedure for other purposes without thinking about the compatibility between the new purpose and the initial purpose. Collect more data than those needed for the processing.
Data quality	Periodically update personal data processing and files. Ensure only data required for the Processing Procedure is collected by way of the free text fields.	In free text fields: - Personal opinions, value judgments: abusive, unkind, hurtful comments. - Subjective comments about a person's behavior (e.g. "shy", "bad tempered", etc.). - Data regarding race, ethnicity, political opinions, religious beliefs, philosophical ideas, union membership, health, sexual orientation.
Duration of data storage	Check the duration of storage for each data category handled within the Processing Procedure. Estimate the duration of storage in relation to the intended purpose. Put in place appropriate purging procedures.	Export data to Excel from an application and keep it in this file without ensuring compliance with the initial duration of storage. Encourage or facilitate data extractions into Excel. Fail to define the duration of storage in the applications during the development phase.
Recipients of the Processing Procedure	Identify recipients of every Processing Procedure in particular by referring to the previously conducted formality.	Communicate data to a third party without checking their authorization.

	DO	DO NOT
Data transfers	Identify transfers made outside the European Union. Identify whether or not the transfers are made within the Group. Check the legal framework to which data transfers to the countries in question are subject.	Transfer data to countries outside the European Union that do not have adequate protection or any legal framework.
Security	Implement appropriate technical and organizational measures to protect the security and confidentiality of the personal data for the processing operated by the data controller and/or by the data processor.	Fail to implement and maintain appropriate measures to protect the security and confidentiality of personal data.
Data of individuals concerned	Ensure the individuals concerned have been properly informed and gave consent if the consent is required about the Processing Procedure that will be carried out. If necessary, inform individuals concerned by way of a statement.	Fail to include a statement regarding personal data collection and processing, or display it in a way so that it is not properly visible.
Respecting rights of individuals	In the event a request is received to access, rectify or oppose data, refer to the procedure for managing rights by getting in touch with your local data protection contact.	Fail to comply with the legal deadline for sending a reply. Refrain from replying or dealing with legitimate requests to access, rectify or oppose data. Charge expenses to the individual exercising his or her right to opposition, or charge fees greater than real costs in the event a copy is requested. Consider all requests by an individual for access to data concerning them as excessive.
Data Breach	In the event of a suspected data breach, notify the security correspondent.	Attempting to fix the problem locally without informing the DPO - ignoring the problem.

4. FOR FURTHER INFORMATION

4.1. People to contact

Should you have any difficulty in understanding or applying the rules outlined in the present policy, please get in touch with your local data protection contact. This list will be updated regularly.

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