

48 rue Albert Dhalenne 93400 Saint-Ouen (France) Tel.: 33 (0)1 57 06 90 00 Fax: 33 (0)1 57 06 96 66 www.alstom.com

### **Data protection and Privacy policy**

#### Introduction

The following summarizes the key measures implemented by Alstom in order to comply with its obligations under the ICANN registry agreement and the data and privacy protection law. These matters are subject to the exclusive French jurisdiction. As a French incorporated company, the primary relevant legislation is the French Data Protection law from 2004

Alstom is committed to protecting the privacy of those who register domain names ("Registrants"). Alstom will handle personal data provided by Registrar and Registrants in accordance with this policy.

Alstom reserves the right to modify this policy from time to time

#### Information collected and Whois Service

Alstom collects certain data that are deliberately given. Such data includes domain name registration information provided by Registrants to Registrars, including, but not limited to: registered domain name, nameserver, Registrant name, contact name, address, phone number, email address, and IP address ("Whois Data").

While Alstom will comply with all requirements related to the accuracy of Whois Data under its Policy with ICANN, Alstom cannot guarantee that all personal data received is accurate or up-to-date and will not, therefore, be responsible for any inaccuracies.

No transmission of personal data to a third party: the information collected through our website are not subject to external communication and are used for the sole TLD management requirements and according to the legal and regulatory obligations. This information shall not be transmitted, rented or sold to third parties.

The access and rectification right is respected and a person can be contacted for this purpose :

Email: Alstom-tld@nameshield.net

ALSTOM Société Anonyme au capital de 1 564 903 501 € Siège social : 48 rue Albert Dhalenne 93400 Saint-Ouen (France) 389 058 447 RCS Bobigny TVA Intra : FR58 389 058 447

## Protection of Personal Data

Alstom has endeavoured to put into place and maintain reasonable security measures in a best effort to protect the security of personal information while it is under Alstom control. Furthermore, Alstom is not provided the right under its agreement with ICANN to use or authorise the use of the personal data in a way that is incompatible with the French Data Protection law.

Personal data and any data provided or generated on our website constitute confidential data. According to legal requirements, ALSTOM retain such information in secure conditions and in limited in time proportional to the purposes.

# **Responsibilities of Alstom**

Alstom is responsible to ensure that personal data is kept secure from unauthorised access, disclosure, destruction or accidental loss.

To ensure appropriate security measures, a number of factors have been taken into consideration by Alstom:

- The current state of technological development and technical security measures; these measures are reviewed over time.
- The costs of implementing security measures.
- The harm that might result from any unlawful processing (such as access, disclose or use).
- The nature of the data concerned. For example, there will be a greater duty of care given to the
  processing of sensitive personal data (which is defined as including information as to race,
  physical or mental health, political opinions or religious or philosophical beliefs).

Alstom staff is aware of security measures and trained in an appropriate manner. Internal audit and review procedures can be implemented to ensure that staff complies with these measures. Alstom is not entitled to claim any intellectual property rights in data supplied by or through the Registrars. No ownership in the personal data passes to Alstom.

### Prevention of unauthorised access to Personal Data

Alstom have implemented the appropriate technical and organizational security measures to protect Personal Data, including internal security procedures that restrict access to and disclosure of Personal Data. Alstom also use encryption, firewalls and other technology and security procedures to help ensure the security of Personal Data and to prevent unauthorized access or improper use.

# **Correction of Registrants' information**

ALSTOM only accept registrant data from the relevant Registrar. In the case that you may wish to access, update, correct, rectify or delete Personal Data, please contact the relevant Registrar.