

## **Revised Privacy Policy Notice**

This privacy policy is effective from **February 21st, 2019** for all users of our On-Line Service.

If you want to receive a copy of the immediate prior version of this privacy policy dated June 30, 2014, please revert to section 14 below.

### **Introduction**

We have tried to write this privacy policy in an easy to read manner doing our best to move away from legalese dense prose that could be a challenge to understand. If you have any questions or if you believe that this policy can be improved, do not hesitate to contact us via e-mail at: [privacy@gemalto.com](mailto:privacy@gemalto.com).

In this policy,

- “user” or “you” means any person using the Service, whether by browsing our websites or using our mobile apps, purchasing products, subscribing to our Newsletter, to “Get in touch with us”, or participating in any other activities available through the Service.
- Gemalto or "we" or "us" or "our" or other similar pronouns means Gemalto S.A.

Please note that since the registrant of the domain name is Gemalto S.A. a company organized under the law of France, this Privacy Policy is based on the laws and regulations of France.

### **1- To whom does this privacy policy apply?**

This privacy policy covers our privacy practices with respect to the collection, use, and disclosure of information obtained via our (i) websites with the domain name “Gemalto.com”, (ii) landing page, (iii) mobile applications, (iv) community blog, (v) social networking, (hereafter individually or collectively referred to as the “On-Line Service”).

Note that by using our On-Line Service you are subject to the terms set forth in this privacy policy. If you are in disagreement with the terms of this privacy policy do not use our On-Line Service.

### **2- What information do we collect?**

- a) Technical information we obtain when you use our On-Line Service.**  
As you may know, when you access a website or use a mobile application there is some information that is automatically recorded.

Our On-Line Service is not different. These are the type of technical information we are recording:

- (i) When you visit, access or use our On-Line Service we automatically collect and retain information based on that usage. Website log data may contain your Internal Protocol address, the address of the webpage you visited, your browser type and settings, the date and time of your access, how you used the On-Line Service and other web tracking features (below we are providing you with a detailed explanation on the web tracking features we use).
- (ii) We may also collect information about the device (PC, MAC, mobile phone, tablet, etc.) you are using to connect to the On-Line Service. Such information may include the type of device, the operating system you are using, device settings, and unique device identifiers. The collection of this information depends on the device you are using and its settings. To learn about the information your device makes available you should check the policies of your device manufacturer or software provider.

**b) Information you voluntarily provide.**

- When you fill out a form on our On-Line Service we collect personal information, including without limitation, name (first and last), mailing address, email address and telephone number.
- When you post material to our On-Line Service, participate in bulletin boards, chat rooms, blogs, comment threads, forums or other interactive features of our On-Line Service, register, or request further information or services from us.
- When you enter a contest or promotion we sponsor.
- When you report a problem with our On-Line Service.
- When you contact us via our On-Line Service.
- When you complete our surveys.
- When you request a white paper.
- Other information you may submit to us related to your use of our On-Line Service.

### **c) Email subscriptions**

Email subscriptions of certain On-Line Service are managed and delivered by Google's Feedburner Service. Subscribers and users of the Feedburner service are subject to Google's terms and privacy policies, you can review their Privacy Policy and TOS (Terms of Services) before subscribing by email. Gemalto is not responsible or liable for the actions, service failures, security measures or policies and procedures of Feedburner.com.

### **d) Web tracking features we use.**

- (i) Cookie data.** We put in place a specific User Cookie Notice that you can view on the On-Line Service. The User Cookie Notice will provide you with more details on the cookies we use and why we use cookies. Please note, unless you choose to voluntarily identify yourself to us via our On-Line Service, cookies will not directly identify you. As you read in the User Cookie Notice you have the possibility to refuse cookies by configuring your browser to do so, if you do you may not be able to use some of the features of our On-Line Service and may not be able to access certain parts of our On-Line Service. To be more specific this is an explanation (this not an advice or recommendation of any kind) of the pros and cons of disabling cookies.
- (ii) Web Beacons:** Another online identification mechanism is called a web beacon, also known as a pixel tag or clear GIF. A web beacon is a clear graphic image of a 1x1 pixel that is delivered through a web browser or a HTML compliant e-mail client application to an end-user's device. We use web beacon to enable us to evaluate the usage of our On-Line Service, target campaigns, upgrade information we provide, and know whether you have visited a web page or received a message.
- (iii) Analytics collection.** We use cookies such as Adobe Analytics and Google Analytics to help us anonymously track and report your behavior information and standard log information to the On-Line Service. This information helps us analyze and evaluate how the On-Line Service is used as part of our ongoing efforts to improve our On-Line Service. Note that no personally identifying data (meaning data that permit to directly identify you as a unique person) is included in this type of reporting. Google Analytics and comScore may have access to your information only for the purposes of performing these tasks on behalf of Gemalto. If you wish to know more about the terms that govern Google Analytics, please visit the Google Analytics terms of service at [www.google.com/analytics/terms](http://www.google.com/analytics/terms). For comScore's privacy policy, visit [www.comscore.com/About-comScore/Privacy-](http://www.comscore.com/About-comScore/Privacy-)

Policy. We also use an analysis cookie from the Omniture SiteCatalyst software of Adobe Systems GmbH. The software writes a cookie on your system with a unique random ID. The cookie can never be associated with an individual person. Details on the measurement methods used by Omniture SiteCatalyst can also be found on the Omniture website.

### **3. How do we use the information we collect?**

#### **a) We use the information collected to undertake the On-Line Service.**

Only the information you have voluntarily provided as described in paragraph 2(b) above is used to:

**a) On-Line Service Provision:** To allow you to create and maintain a registered user account, respond to your inquiries, allow you to sign up in order to contribute to surveys, research, to deliver any other services that you may request, to download documents and information you have selected, for example if we offer a white paper you have to complete a registration form allowing you also to expressly opt-in to marketing messages. If you only decide to receive the white paper we will keep the data included in the registration form to send you transactional message (i.e., an email directed to you that completes a transaction or an exchanged of document that you have started with us) only;

**b) Regarding analytics collection (see paragraph 2(d) above)** please note that we will not (and will not allow any third party to) use the statistical analytics tool to track or to collect any of your personally identifiable information. We will not associate any of such data with any personally identifiable information (meaning data that permit to directly identify you as a unique person) from any source.

**c) Any and all information** which is voluntarily submitted in feedback forms on our On-Line Service or any survey we initiate that you accept to take part in is only used for the purposes of reviewing this feedback and improving our On-Line Service.

#### **d) Marketing Purposes:**

- For future marketing, promotional and publicity purposes, including to carry out direct marketing, market research and surveys, via e-mail, SMS, over the phone, through push notifications / pop-up banners, instant messaging, through an operator, through social media pages, regarding the our products and services.
- For future marketing, promotional and publicity purposes, by sending you direct e-mail marketing communications regarding our products and services and which are identical or similar to those you have previously purchased or requested.

- To create a profile of you as an On-Line Service user, through the use of profiling cookies and by collecting and analyzing information on the preferences you select and choices you make in the On-Line Service, as well as your general activities on the On-Line Service. This profile will be used to give you information about other websites / services that we believe you may be interested in, and to show you information and advertisements that may be relevant to you and your interests.

Thus in light of the above, you understand that you can receive marketing communications, in particular if you are located in countries that are not subject to prior opt-in conditions you will receive such type of communication from us. In any case all of our marketing communications contained an opt-out option that we will honor.

**Note:** Please read paragraph 4 below that gives you some choices in controlling our use of the information collected.

**e) We may undertake international transfer.** Indeed the personal information (meaning data that permit to directly identify you as a unique person) we have lawfully collected within our family of companies for the purposes described in this privacy policy may be subject to cross-border transfer to countries or jurisdictions around the world within the European Union or outside the European Union. In the case of transfer outside the European Union we put in place terms and conditions assuring the protection and security of such personally identifiable information.

#### **4. Your rights?**

As a data subject you may have certain rights regarding the personal information processed by us pursuant to the On-Line Service, such as the right to access, correct or update, erasure, restrict, portability, object and withdraw your consent.

With respect to marketing messages you can withdraw your consent by selecting the appropriate link included at the bottom of every marketing e-mail message received.

It is also possible that most of the personal information you provide to us can be changed at any time, including your e-mail preferences, by accessing, where applicable, your user profile created on the On-Line Service.

Aside from the above means, you can always exercise your rights described above by sending a written request to us at the following address: [privacy@gemalto.com](mailto:privacy@gemalto.com). A link to this page would also be found at the bottom of our e-mails pushing the information to you.

#### **5. With whom do we share information we collect?**

**a) We share or grant access:** We may grant access to the information collected with hosting partners (e.g., cloud service provider(s)) to provide the necessary hardware, software, networking, storage, and other technology and services required to operate and maintain the On-Line Service. Consequently we are making you aware that certain of the information collected may be transferred from your current location to our offices and servers as well as the hosting partner we indicate in this paragraph. We are careful to only permit the hosting partner to access the information that is necessary to assist us in providing the On-Line Service.

We also share the information collected:

- within our family of companies part of the Gemalto legal organization and that are located in different countries of the world for the purpose of communicating and / or updating the data collected;
- to service providers and subcontractors performing in or outside the European Union certain tasks related to the purposes described in the above bullet point;
- to organizations responsible for conducting surveys.

**b) We do not share:** We do not rent or sell any information about you with any third-parties.

**c) We may also share:** non-personal, summary or group statistics about the traffic patterns of our On-Line Service, and information covering the usage of our On-Line Service to reputable third-party, but these statistics will include no personal information (meaning data that could directly identify you as a unique person).

**d) We may disclose:** We may disclose the information collected if we believe such action is necessary to:

- i. comply with the law, or legal process served on us;
- ii. protect and defend our rights or property (including the enforcement of our agreements); or
- iii. act in urgent circumstances to protect the personal safety of users of our On-Line Service or members of the public.

## **6. Children's privacy**

The On-Line Service is not directed to anyone under 16 years of age. If you are under 16 years old do not use the On-Line Service.

## **7. Community blog**

The On-Line Service offer a voluntary community blog web page where we make message boards and forums available to you, you are solely responsible for the information and any other content you post on and through the community blog webpage and should be aware that when you voluntarily disclose personal information (meaning data that permit to directly identify you as a unique person) on or through the community blog webpage, such information is generally accessible to, and may be collected and used by, other users. This may result in unsolicited messages from third parties, and such messages are beyond our control. We do not exercise control over the users of the community blog webpage, and we are not responsible and do not accept any liability whatsoever, for any collection or use of information you may disclose through the community blog webpage. This privacy policy does not cover the disclosure of information via the community blog webpage. We encourage that you exercise discretion when providing personal information about yourself in and through community blog webpage. You are responsible for the content of any Information you put on the community blog webpage. We have no obligation to, and do not in the normal course, monitor or control any Information that is or becomes available on community blog webpage. We reserve the right to review any Information that is or becomes available on community blog webpage. We reserve the right to refuse to post or to edit or remove, in whole or in part, any Information that is, in our sole discretion, unacceptable, undesirable. We have no obligation to exercise such reservation of rights; however, we respect the copyright law and consequently we may terminate access for content providers or forum participants who are found repeatedly to provide or post protected material without necessary rights and permissions.

By submitting information through the community blog webpage, you grant us a perpetual, royalty-free, worldwide license to use, transmit, copy and display such information in any and all media now know or hereinafter devised and represent that you have all necessary rights in such posting.

Now that you have been warned, let us tell you about the community blog webpage. The community blog webpage (i) connects you with others to share your questions, insights, and views about the On-Line Service and Gemalto, (ii) read what others are saying about the On-Line Service and Gemalto, and (iii) get knowledgeable answers, and swap comments and ideas on the On-Line Service and Gemalto with others.

The community blog webpage is available only to individuals older than 18 years of age.

Please use the community blog webpage with respect as if you were interacting with your friends.

**Do not post:**

- Profane or obscene, inflammatory or spiteful comments
- Messages that abuse, denigrate or threaten others
- Text or articles written by someone else, even with attribution for the author, except for brief quotations from a book, article or other product related to the discussion
- Any personal information about person under 18.
- Descriptions that intrude on the privacy of another person, including revealing personally identifiable information such as their name or address
- Text that promotes illegal or immoral conduct
- Repeated posts that make the same point excessively
- Repeated unwelcome messages that harass or embarrass other participants
- Any form of "spam," including advertisements, contests, or other solicitations for other websites or companies; or any URL link that includes a "referrer" tag or affiliate code
- Do not impersonate another person.

## **8. Gemalto and social networking**

We may collect information about you in connection with social networking sites in several ways, such as:

- When you choose to join (or “like”) a Gemalto page on a social networking site (such as the Gemalto page on Facebook). In these situations, the social networking site may make some information about you available to Gemalto. Please see the privacy policy for the social networking site to learn more.
- When you interact with a Gemalto social networking page or content, we may use cookies to learn which links you clicked (please refer to the paragraphs 2 above about cookies and how we use the information collected).
- When you make use of the Social Sign-In feature to access content in lieu of submitting a web form. The Social Sign-In feature allows Web form visitors the opportunity to connect to your online programs using their social network identity. Visitors can use their existing social networking site such as Facebook, LinkedIn, Twitter, or Salesforce to bypass a registration or sign-up Web form. Social Sign-In captures visitors’ current contact information and stores the information directly into the database.

We use this information for purposes described in the paragraph 3 above.

Please note that when you interact with our social networking you are subject to this privacy policy and also to the privacy terms issues by the social network services permitting the deployment of our social networking such as Facebook for example. To learn more about the privacy practices of a social network services please refer to the privacy policy of each social network services.

## **9. Lawfulness of Processing**

The grounds on which the CSA relies on to process your Personal Data are as follows:

- Necessary to deliver the On-Line Service, to address a request made by you.
- Based on your opt-in (if and when applicable).
- On our legitimate interest in sending you direct electronic marketing communications regarding our products and services and which are identical or similar to those you have previously purchased or requested.
- Based on your consent collected by means of the cookie pop-up banner and/or a specific tick box.
- To comply with our legal obligations. When you provide your information to us, we must process it in accordance with the laws applicable to it, which may include retaining and reporting your information to official authorities for compliance with tax, customs or other legal obligations.
- To understand the performance of our On-Line Service and improve the On-Line Service accordingly, with the aim to provide a better user experience, as well as to troubleshoot any technical issues which users may encounter on the On-Line Service.
- On our interest in preventing and detecting fraudulent activities or misuse of the On-Line Service.

## **10. Retention of information Collected**

We keep your information until you request that we close your registration. The easiest way to close your registration is to revert to the explanation provided in Section 4 above.

If you close your registration, your personal information generally will be removed from our registration data base within thirty (30) business days. Please note that during such removal period you may receive electronic messages from us.

You will not be able to access your account or its contents after you close your account. However, your public profile may be displayed in search engine results until the search engines refresh their cache.

We retain your personal information even after you have closed your registration if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our user agreement, or fulfill your request to “unsubscribe” from further messages from us.

Personal information processed for preventing misuse/fraud, as well as for analytics purpose will be kept by us for as long as deemed strictly necessary to fulfil the purposes for which it was collected, unless you validly object to the processing of your personal information for these purposes (please see Section 4 above).

Information you have shared with others (e.g., through e-mail, updates or group posts) will remain visible after you closed your registration or deleted the information from your own profile, and we do not control data that other members copied out of our On-Line Service. Your profile may continue to be displayed in the services of others (e.g., search engine results) until they refresh their cache.

### **11. Business transaction**

In the event that we go through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of our assets, the information collected will likely be among the assets to be transferred in a lawful manner. As part of such a transaction we will require from the acquirer to commit to the same level of protection described in this privacy policy. We will post a notice on our website of any such change in ownership or control that could affect the On-Line Service.

### **12. Changes to this policy**

We reserve the right to amend or update this privacy policy at any time. You can always review the most current version of this privacy policy at any time at: [www.gemalto.com](http://www.gemalto.com). Pay attention to the effective date of the privacy policy appearing at the top of it since it indicates the privacy policy applicable. If we decide to modify the privacy policy, we will post an announcement on the On-Line Service. We could also send you an e-mail prior to the change becoming effective. Once the change is effective please understand that your continued use of the On-Line Service demonstrates your agreement to the changes to the privacy policy. If you do not want to be bound by the changes to the privacy policy you have to cease using the On-Line Service.

### **13. Do not track for resident of the state of California (U.S.A)**

Do not Track (or “DNT”) is a preference you could set in your browser (provided your browser permit such selection) to let the sites you visit know that you do not want them collecting certain information about you.

We do not respond to DNT signal. We do not treat differently the person whose browsers send a DNT signal differently from those without one.

Please note that except for our On-Line Service we do not collect personally identifiable information about you when you move across other websites.

#### **14. Contact information and Disclaimer**

Questions regarding this privacy policy have to be directed at [privacy@gemalto.com](mailto:privacy@gemalto.com).

The information provided in this privacy policy shall not be construed as giving business, legal, or other advice, or warranting as fail proof, the security of information provided through the On-Line Service.

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