

## Thalys Privacy Policy

July 2015

### 1. Objective

Thalys<sup>1</sup> cares about its clients' privacy and, whenever Thalys processes your personal data, it does so in accordance with the provisions of the Belgian Law of 8 December 1992 on the protection of privacy relating to the processing of personal data and its implementing decrees.

This Privacy Policy describes the measures taken for the protection of your privacy when using Thalys websites<sup>2</sup> and/or Thalys services and products, and the rights that you have in this respect as a user and/or client of Thalys.

You are invited to read this Privacy Policy carefully and familiarise yourself with its contents. Future adjustments are possible; any adjustment made will be published on this page. We therefore recommend you to regularly read the said Privacy Policy.

By accessing and pursuing your navigation on the Thalys websites and/or using Thalys products and services, you declare having read and having accepted this Privacy Policy, without restriction or reservation.

### 2. Consent

By using the Thalys websites and/or Thalys products/services, whether made available to you directly by Thalys or by its Partners, (the SNCF, the SNCB, the NS and the DB), you agree that Thalys may automatically collect and process your personal data in accordance with the purposes described below. Thalys is committed to keeping your personal data (that you supply occasionally there including any data that we collect when you use our websites and/or services) for a reasonable period limited to the accomplishment of the objective pursued at the time of their collection or for as long as the law requires.

In certain special circumstances, your consent may be requested after the collection of personal data, but before their use (for example, when we wish to use the personal data for a purpose that has not been determined in advance).

### 3. Processing of personal data

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<sup>1</sup> This Privacy Policy represents the policy adopted and followed by the companies THI Factory and Thalys International (see 11. "Definitions"), which shall be referred to as 'Thalys' throughout this document.

<sup>2</sup> Thalys.com

ThalysTheCard.com

ThalysInside.com

Thalysnet.com

Thalys mobile application

Thalys may request certain information from you in order to use its websites and/or for the offer of certain Thalys products and services, in particular search for transport tickets, registration for the Thalys TheCard programme or an application for a Thalys ThePass subscription. Furthermore, each time you visit one of the Thalys websites, Thalys' web server automatically recognises your IP address and/or your domain name.

#### Description of personal data

You are likely to send us the following types of personal data:

- Your personal and professional contact details (in particular your names, demographic data such as gender, language, age, profile – professional experience and interests, address, telephone number, mobile phone number and e-mail address),
- Financial information such as the number of your credit/debit card or other invoicing details,
- Other unique information: user ID, password, preferred products and services, preferred methods of communication,
- Geo-localisation data, in particular your IP address or your physical location when you request services based on geo-localisation.

We take all reasonable measures to ensure that your personal data in our possession is kept up to date and to delete any personal data that would prove to be incorrect or that is no longer necessary. We encourage you to access your account(s) (if applicable) to consult your personal data from time to time in order to ensure that it is up to date.

#### The processing of personal data

This personal data is processed for customer management purposes and allows Thalys to deal with your request, in particular for transport tickets, to continually improve the websites and the products and services offered to you and adapt them to your needs.

Furthermore, this data will allow Thalys to send newsletters to you electronically and/or by post ("*Newsletter*") and other marketing information on new products and services, promotions and benefits, etc.

Thalys may analyse this data, establish marketing and sales activities reports, the frequency of visits and establish marketing profiles. Thalys may also use your information for market and satisfaction studies or for the development of products and services and for strategic development purposes in order to develop new products and/or services and to make improvements to its communication plans in order to better fit with your profile. This personal data may also be used to allow you to take part in a competition and to inform you of the progress and the outcome of the latter.

Thalys shall not disclose any information on its users and/or clients in any context other than that established by this personal data Privacy Policy or unless under judicial or legal constraint.

#### **4. Transfer of personal data**

Thalys undertakes not to sell, lease or transfer your personal data to third parties unless otherwise provided in this Privacy Policy.

With regard to the supply of certain products and services, Thalys reserves the right to communicate your personal data to its Partners and to its subcontractors.

Furthermore, and where you have expressly consented to this, Thalys may communicate your personal data to Thalys' contracted service providers who are offering products or services likely to be of interest to you. For example, hotels, car rental companies, travel agents, etc.

Both these service providers and the subcontractors and Partners of Thalys are contractually bound to comply with the confidentiality of personal data received in the name of Thalys and cannot in any case use them for a purpose other than the performance of services for Thalys.

These Partners and service providers have and apply different privacy policies and practices than those of Thalys. We therefore recommend that you review the privacy policies of our Partners and service providers in order to acquaint yourselves with their procedures for the collection, use and disclosure of your information.

By accepting the terms of our Privacy Policy, you hereby authorise Thalys to transfer your personal data as described above.

## **5. Security and Confidentiality**

Thalys undertakes to keep your personal data confidential and has established security procedures in order to avoid any loss, abuse, alteration or disclosure of these personal data. We shall update security measures in line with technological progress, as required.

Security measures have been implemented to ensure that personal data is not accessible to unauthorised persons. In the context of security procedures implemented by Thalys, we may ask you for proof of identity before being able to provide you with any of your personal data.

All financial transactions that you perform on Thalys websites with your payment methods are made through a secure server ("*Secure Server Technology*") which provides:

- authentication that verifies your identity and guarantees secure browsing and secure access to your personal data,
- encryption which ensures the confidentiality of your personal data by modifying them so that they cannot be read by others,
- data integrity that checks that the transferred personal data has not been altered.

Personal data recorded by Thalys shall be destroyed by Thalys at the end of the legal or contractual period, or if Thalys no longer needs it for the accomplishment of the purpose pursued at the time of its collection.

## **6. Right of access, correction, deletion and objection**

In accordance with the legislation, you have the right to access, correct and delete any data concerning you. You also have the right to object to its processing, within the limits of the law of 8 December 1992 relating to the processing of personal data. These rights are guaranteed and may be exercised at any time.

You can exercise your rights:

- Either by sending a letter to:

Thalys

- for Thalys TheCard members: Service ThalysTheCard;
- for Thalys ThePass members: Service ThalysThePass;

- in all other cases, (in particular for users of the websites Thalys.com and ThalysInside, the mobile application Thalys.com and subscribers to the *Thalys Newsletter*):  
Service Clientèle (Customer Service)  
B.P. 14  
B-1050 Brussels
- Or, if applicable, by consulting “my Thalys account” on the Thalys.com website, or “your account” on the Thalys Thecard.com and/or the ThalysInside.com website.

Unsubscribe to commercial communications and « right to be forgotten »

- Unsubscribe (opt-out) :
  - You may at any time unsubscribe to Newsletters and other Thalys commercial communications by mail, telephone or by clicking the ‘unsubscribe’ link at the bottom of each email.
  - Please note that when you exercise your right to oppose receiving direct marketing, this objection only applies to the email address given. In case you receive advertisements on more than one email address, you will have to unsubscribe as many times, either by going to ‘My Thalys Account’/‘Your account’, either by clicking on the ‘Unsubscribe’ link on each communication. In the case that you unsubscribe per letter, it is important to clearly mention all email address to be deactivated.
- « Right to be forgotten » :
  - Any express request to completely delete your personal data must be addressed to : [customerdata@thalys.com](mailto:customerdata@thalys.com), providing your complete details (name, surname, email(s), complete postal address) and a copy of your ID.

## 7. Cookies

When you first connect to the Thalys websites, we place “cookies” on your computer in order to identify your country and if applicable your preferred language. These cookies enable sites to record data about your browsing to facilitate your visit and optimise your experience.

You may refuse the downloading of cookies onto your computer, but this may cause reduced performance, slower speed or even prevent access to some of the sites’ services.

For further information on cookies and the way in which you can remove them according to the type of browser used, we recommend that you read the following document: <https://www.thalys.com/be/en/cookies>

## 8. Links to other websites

Thalys websites may contain links to other websites over which Thalys has no control and which are not covered by this Privacy Policy. The privacy policies of these other websites may be different from this policy. Thalys declines any liability for the content of these third party company websites. Before authorising any company to collect and use your personal data , we recommend that you review their privacy policy.

## 9. Commission de la protection de la vie privée (Commission for the Protection of Privacy)

For any further information or any complaints concerning the processing of your personal data, you may contact the Privacy Commission at rue de la Presse 35, in 1000 Brussels, to which Thalys has declared the processing.

Link: [www.privacycommission.be/en](http://www.privacycommission.be/en)

## 10. Applicable legislation

- Law of 8 December 1992 on the protection of privacy in relation to the processing of personal data (Belgian State Gazette, 18 March 1993);
- Royal Decree implementing the law of 8 December 1992 on the protection of privacy in relation to the processing of personal data, dated 13 February 2001 (Belgian State Gazette, 13 March 2001);
- Law of 11 March 2003 on certain legal aspects of information society services (Belgian State Gazette, 17 March 2003);
- Royal Decree of 4 April 2003 regulating the sending of e-mail advertising (Belgian State Gazette, 28 May 2003).

## 11. Definitions

- “Thalys” means the high speed train service that runs in four countries, viz. Belgium, France, Germany and the Netherlands, as well as the different brands and distinctive signs used under the name Thalys.
- “THI Factory” means the Belgian public limited liability company, whose head office is located at Place Stéphanie, 20 in 1050 Brussels (VAT registration BE 0541.696.005, BTR Brussels), which holds a rail operating licence and a safety certificate valid in France and in Belgium, allowing it to operate lines on the Belgian and French rail networks in order to provide passenger transport services between France and Belgium. For the use of other rail networks, THI Factory relies on partner railway companies.
- “Thalys International” means the Belgian limited liability co-operative company whose registered office is located at Place Stéphanie, 20 in 1050 Brussels (VAT registration BE 0455.370.557, BTR Brussels) and which is the company responsible for developing and defining the implementation of policies for services offered to Passengers on Thalys high-speed trains in order to increase the economic activity of SNCF (Société nationale des chemins de fer français - French Railways) and SNCB (Société nationale des chemins de fer belges – Belgian Railways).
- Thalys “ Partners “:
  - o The Belgian Railways (SNCB) for the part of the journey carried out on Belgian Territory;
  - o The French Railways (SNCF) for the part of the journey carried out on French Territory;
  - o The Nederlandse Spoorwegen (NS) for the part of the journey carried out on Dutch territory;
  - o The DB Fernverkehr (DB) for the part of the journey carried out on German Territory.