

IGE+XAO Group Data Protection Policy

Changes made to this Data Protection Policy

IGE+XAO may change this Data Protection Policy if necessary.

IGE+XAO reserves the right to change this Data Protection Policy (the “Policy”) if necessary, in particular, in order to comply with legislative, regulatory changes or relating to IGE+XAO practices and procedures, a Group owned by Schneider Electric, and also to meet requests from the supervisory authorities.

In this case, IGE+XAO will inform the data subjects of substantial changes made to this Policy. IGE+XAO will publish the new versions on its website.

1. The purpose of this Data Protection Policy?

IGE+XAO is actively committed to protecting the right to privacy and data protection, as well as compliance with national and international laws on the protection of personal information.

This Policy describes how IGE+XAO processes and protects the personal data of the individuals who use its websites or other digital content, and participate in its offline business activities.

IGE+XAO has adopted an internal personal data protection policy at the international level, which applies to all its subsidiaries for the collection, processing, use, dissemination, transfer and storage of personal data. It imposes common rules on all its subsidiaries in all countries in which the Group is located, which aim to guarantee a high level of protection of personal information.

2. What is the scope of this Data Protection Policy? Who is responsible for data processing?

IGE+XAO is an international group, with legal entities, operational processes, management services and transnational technical systems. This Policy applies to all IGE+XAO data processing activities managed by its wholly-owned subsidiaries, including product and service offerings and digital content (i.e. websites, applications, tutorials, online training, newsletters, advertisements, communications). It may, however, be supplemented by an indication of a specific information item/declaration/policy (“policy”) or even replaced by another indication or policy specific to an IGE+XAO programme, product, service, content item or other entity.

The data controllers are IGE+XAO Group subsidiaries that have determined the means and purposes of the data processing. They may vary depending on the situation. In many cases, the companies Schneider Electric Energy Management Software France (mother company of IGE+XAO Group) and INFORMATIQUE GRAPHISME ENERGETIQUE, located at 16

Boulevard Déodat de Séverac – 31770 Colomiers – France, are responsible for processing international data performed at the Group level including the www.ige-xao.com website.

This Policy binds all IGE+XAO Group subsidiaries and their employees. All orders placed online are also subject to the general terms and conditions applicable to the websites in question.

3. Why does IGE+XAO collect and use personal information?

The main purpose of the collection of information is to provide better quality services to customers and other users and to provide a personalised, efficient and seamless experience when using IGE+XAO digital content.

IGE+XAO collects personal information for the following purposes:

- To process orders for products, services and digital content. This information is collected to deliver orders, receive payment, provide you with information regarding the status of your order and for contract management purposes.
- To process applications for job offers.
- To respond to requests for information. IGE+XAO keeps the records of correspondence or comments, including your personal information, in a file dedicated to you. IGE+XAO uses this information to provide a personalised service in future communications.
- To offer necessary technical assistance. This personal information is useful for identifying the systems, understanding product configurations, examining questions, and providing solutions.
- For relationship management. This includes communications, including through e-mail and newsletters, about the products, services and digital content acquired in order to optimise their use. For example, some geo-positioning data may be used in order to indicate to you the presence of products or assistance services near you.
- To conduct studies and surveys. Personal information is collected from individuals who volunteer to participate in studies or surveys.
- To improve the products, services and digital content.
- To learn of your search and navigation activity. Some personal information is collected when you view IGE+XAO digital content or click on links to products and services. This information is collected to improve your user experience for your future visits (e.g. country selection or targeted content), for the more efficient operation of our sites, to collect general demographic data to analyse website activity and performance and assess advertising effectiveness. IGE+XAO may use cookies and other identifiers or similar technologies (hereinafter referred to as “cookies”) to obtain information about the referring website, the type of browser used, the content visited, and the date and time of your access to the digital content.

- To manage your account. When you register, IGE+XAO uses your personal information to give you access to digital content and its services, as well as to authenticate and interact with you.
- IGE+XAO collects personal information from you when you sign up for a programme, promotional activity or prize contest, in order to carry out its promotional programmes and activities. This information is used to manage the programme or the activity, send you relevant emails about this programme or activity, notify the winners and make the list of winners public in accordance with the applicable regulations and laws.
- To enable IGE+XAO Group companies and certain carefully selected third parties to send you marketing information by letter, fax, telephone, SMS and e-mail, as well as electronic communications about promotions, information about the Group and new products or services that may be of interest to you, in accordance with the consent and consent withdrawal requirements.
- To offer you, through pop-up windows, banners, videos, e-mails and any other advertising format, certain communications and/or advertisements targeted at products and services.
- To combine the information obtained online and the data collected offline about you in order to create a profile used at a later time to offer you personalised services.
- To ensure the security of products, services as well as that of the digital content of IGE+XAO's activities and that of others, to guard against fraud and compliance with our general terms and conditions and this Policy. IGE+XAO may also investigate potential violations.
- To operate or administer its business, such as quality control and consolidated reporting.
- To facilitate corporate transactions or reorganisations in which IGE+XAO is involved.
- For business continuity and disaster recovery.
- To comply with the legal obligations to which IGE+XAO is subject, such as accounting and tax obligations.
- For any other purpose that has been communicated to you.

4. What types of personal information does IGE+XAO process?

Personal information (also referred to as personal data) is all information about an identified or identifiable individual. An identifiable individual is an individual who may be identified, directly or indirectly, including by reference to an identifier or to one or more specific factors, specific to their physical, physiological, psychic, economic, cultural or social identity.

The type of personal information we process includes:

- identity and contact information, such as your name, company, email address, phone number, contact details
- business information such as customer type, role, job title, decision-making power, purchase period; acquisition and use of IGE+XAO products, services and digital content; or, if you apply for a job offer, your training and your career path
- your preferences, such as preferences as regards products and services, contacts, marketing activity or for applicants responding to a job offer, your employment preferences
 - your interactions with IGE+XAO, such as your requests, orders, complaints, responses to surveys
- “traffic data”, such as IP addresses, device and system identifiers, your IGE+XAO user identifier and password, your login information, the referring website, the type of browser used, the content visited and your location determined from your IP address or from information transmitted by your mobile device.
- content that you have provided to us through online forums or in another way (see Article 5 “Your content” below).

Making certain personal information available will be required to enjoy digital content. If you do not provide it, you may not be able to enjoy some or all of this digital content.

This Policy does not cover personal information made anonymous, i.e. where individuals are no longer identifiable or can be identifiable only after disproportionate costs and efforts. If anonymous data becomes identifiable, this Policy will apply.

In most cases, this information is collected directly from you or your employer. Information may also be obtained through a reseller or business partner, through the purchase of customer lists from marketing agencies, from your online browsing, from social networks when you log in using the credentials of these networks and via cookies (See our Cookie notice). You can obtain more specific details about the third party (if any) that provided the personal information by contacting us at the e-mail address indicated in Article 9.

5. Your content

The content you provide to us must respect the rights and interests of others, including their rights to personal information protection and the right to privacy. It must not be offensive, disrespectful or harmful in any way. If you provide us with information about another person, you confirm that you have previously obtained consent for processing their personal information, including their sensitive personal information, and that you have informed them of our identity and the purposes for which (described above) their personal information will be processed. any information, comment, interest or personal information, including photos, that you share on a forum, social network, blog or other forum, may be read, viewed, collected or used by other users of those forums and may be used to contact you, send you unsolicited messages or for purposes over which neither you nor IGE+XAO have any control. IGE+XAO is not responsible for the personal information you choose to communicate on these forums.

6. With whom does IGE+XAO share personal information?

IGE+XAO shares personal information with the Group subsidiaries and service providers involved in its activities, as well as with marketing and advertising agencies, social networks if you log in with their login credentials, with third-party sites if you register with your IGE+XAO credentials, with supervisory bodies and authorities and the new corporate owners in the event of a merger, acquisition or sale of a business.

The information is shared as follows:

- For advertising purposes, IGE+XAO may share certain limited personal information (e.g. device identifiers and cookies) with advertising space trading platforms or agencies that manage advertisements on third-party applications and websites offering advertising.
- You can also access IGE+XAO's digital content and/or register using third-party website credentials (such as Facebook and LinkedIn). If you do so, IGE+XAO will be able to access certain information that you have recorded on these social networks in order to help you pre-fill your IGE+XAO digital content registration form. By using the login information of these third-party websites, you can simultaneously inform your contacts on those sites that you have created an account with IGE+XAO. For more details about information accessible to your contacts on these sites and how to limit their communication, please read their terms of use and data protection policies.
- When you log in to third-party websites with your IGE+XAO credentials, IGE+XAO may share your personal information with the publishers of these third-party sites (such as your name, specialisation, occupation and e-mail address, but excluding your IGE+XAO login credentials). Before logging in to such third-party sites with your IGE+XAO login credentials, it is recommended that you read the data protection policy of the website in question. If the data protection policy of these third party websites so permits, IGE+XAO may receive information about your use of this website and use it in accordance with this Policy.
- IGE+XAO may disclose personal information, if necessary, to potential purchasers and any beneficiaries in order to facilitate a merger, consolidation, transfer of control or any other business reorganisation in which IGE+XAO participates.
- IGE+XAO will disclose personal information to government agencies, regulators and competent authorities, if required by law or a judgement or to protect our rights.
- Other ways described in this Policy or to which you have consented.
- Aggregated with other information, so that your identity cannot be reasonably determined (e.g. the compilation of statistics).

IGE+XAO undertakes not to sell or rent personal information to any third party without permission.

7. How does IGE+XAO protect your personal information?

IGE+XAO complies with widely recognised data protection principles (fairness, limitation of the purpose, data quality, data retention, respect for the rights of individuals, security) and takes reasonable measures to ensure the security of personal information:

1. The processing of personal information must be fair and lawful.
2. Personal information is collected for specific and legitimate purposes, and is not subsequently processed in a way that is incompatible with these purposes.
3. The personal information collected is relevant and not excessive as regards the purposes for which it is collected and processed. The information may be made anonymous where possible and appropriate, depending on the nature of the data and the risks associated with the intended uses.
4. The personal information will be kept accurate and updated if necessary. Reasonable measures will be taken to correct or delete inaccurate or incomplete data.
5. The personal information will be retained for the necessary period given the purposes for which it is collected and processed.
6. Processing of the personal information will be performed in accordance with the rights of individuals.
7. Technical, physical and organisational measures will be taken to prevent unauthorised access, unlawful processing and the unauthorised or accidental loss, destruction or damage of personal information.
8. When processing sensitive personal information, we ensure that the appropriate information provided, consent granted and the processing will comply with the applicable law.

The IGE+XAO Group companies undertake to take commercially reasonable technical, physical and organisational measures to protect personal information against unauthorised access, illegal destruction, unlawful processing and accidental loss or damage.

Use of a secure server is offered to allow you to place your orders or access your account information. Measures to control access to our internal systems containing personal information are implemented. Authorised users have access to these systems through a unique login and password. Access to personal information is provided to IGE+XAO employees for the sole purpose of enabling them to perform their duties. IGE+XAO employees are made aware of the appropriate use and management of personal information. IGE+XAO also requires that its service providers take security measures similar to its own.

IGE+XAO implements security measures to determine the identity of registered users so that appropriate restrictions and rights can be respected. If you are a registered user, IGE+XAO uses both login identifiers and passwords to authenticate you. It is your responsibility to ensure your login information is kept securely.

By using IGE+XAO digital content or by providing personal information, you authorise IGE+XAO to communicate with you electronically or in another way with regard to the security, protection of personal information, use and management of such information. Despite efforts to implement all appropriate security measures, online navigation involves inherent risks. Risk-free navigation cannot be guaranteed under any circumstances.

8. Third-party websites and social networks

IGE+XAO recommends that you read the data protection policy for third-party websites and social networks, and then adjust the privacy settings according to your preferences. These websites are not covered by this Policy.

IGE+XAO websites or services may provide links to third party applications, products, services or websites to facilitate your navigation and for your information. If you follow these links, you leave the IGE+XAO website and IGE+XAO does not control these third-party sites or their practices in terms of confidentiality and data protection. IGE+XAO does not finance or represent any of these third-party websites and disclaims all liability for their content and practices as regards personal data protection. The personal data that you choose to provide through these websites or that is collected by such third parties is not covered by the IGE+XAO Personal Data Protection Policy. It is recommended that you consult the privacy policy of any website with which you interact before allowing your personal information to be collected and used.

IGE+XAO also provides links to social networks that allow you to share information with your own social networks and to interact with IGE+XAO on various social networks. When you use these links, information about you may be collected or shared. It is recommended that you peruse the privacy policies and settings of the social networks with which you interact, so that you know what information may be collected, used or shared by these websites and so that you can adjust these settings according to your preferences.

9. What are your rights?

IGE+XAO will respect your rights to access and rectify your personal information. You can enquire about the nature of the personal information which relates to you stored or processed by any IGE+XAO entity and obtain access to your personal information, regardless of where the data is processed and stored.

If personal information is inaccurate or incomplete, you can request that it be changed or erased.

Requests can be sent to the following address: info@ige-xao.com.

You always have the right to object to marketing communications. Your prior consent is required when it is required by the applicable law. To no longer receive emails, simply use the function at the bottom of each email you receive.

Country-specific articles may supplement this article.

10. Important information for persons within the European Economic Area (EEA)

If you are in the EEA, IGE+XAO also meets certain specific requirements of the GDPR, including those relating to the legal bases for data processing, cross-border data transfers, automated decision-making and profiling, data retention, additional rights and complaints and the Data Protection Officer's contact information.

10.1 On what legal bases does IGE+XAO rely for using personal information?

In accordance with the purposes previously mentioned in Article 3, the use of personal information is necessary for the following reasons:

- Performance of the contract concluded with IGE+XAO for use of digital products, services or content. This contractual performance implies knowledge of your identity, your specialisation, and the possibility of interacting with you to perform the contract. This also includes processing your requests for information and assistance, as well as your applications for job offers, managing your accounts and registering for our programmes as well as complying with the general terms and conditions and this policy.
- Compliance with the legal obligations to which IGE+XAO is subject. These may include tax and accounting obligations, as well as the obligation to respond to requests from regulatory bodies and regulators.
- Regarding:
- Surveys: some are carried out in IGE+XAO's legitimate interest because they are used to measure your satisfaction with regard to the services you have requested. For other surveys, your consent will be requested.
- The sending of targeted commercial prospecting and advertisements: these activities are carried out in IGE+XAO's legitimate interest. You will always be able to object to them and, when required by law, your prior consent will be requested.
- Use of geo-positioning data transmitted by your mobile phone or other mobile device: your prior consent will be requested whenever required by law.

IGE+XAO may also process personal information in its legitimate interest, provided that the processing does not interfere with your rights and freedoms, in particular to:

- Ensure your protection, its own or that of other persons against certain threats (such as threats to security or threats of fraud);
- Comply with the laws to which IGE+XAO is subject worldwide;
- Improve the products, services and digital content;
- Carry out profiling to deliver targeted content and advertisements based on your interests;
- Share information between IGE+XAO subsidiaries and service providers as described in Article 6;
- Understand and improve IGE+XAO's activity including online, its business, its customers and generally its relations with customers;
- Operate or administer its business, in particular in terms of quality control and consolidated reporting;
- Manage business transactions, such as mergers or acquisitions.

10.2 Will personal information be transferred abroad?

As IGE+XAO is an international company, the information processing teams may have international duties. They may be located anywhere in the world where IGE+XAO operates, even outside the European Union, in countries that do not share the same personal data protection standards as the country in which you are located. IGE+XAO may also transfer data to service providers outside the EU, including the United States of America. Where personal data is transferred to a country whose legislation has not been subject to an adequacy decision by the European Commission, IGE+XAO will ensure that the transfer complies with the applicable laws, such as the signature of standard contractual clauses or through its binding corporate rules (BCR) for transfers within the group in its capacity as the data controller. For more details on these transfers and, if applicable, copies of the guarantees given to authorise the transfer, you can contact: info@ige-xao.com.

10.3 Does IGE+XAO use profiling and does it make automated decisions about you?

Profiling may be used to provide you content online that appears to match your interests. Your registration information, such as your professional specialisation, is combined with information about your online activity to get to know you better and to offer you online content that matches your profile.

IGE+XAO will not make automated decisions about you that may affect you significantly, unless (1) the decision is required under a binding contract, (2) it has obtained your explicit consent, or (3) the law requires you to use this technology. In this case, you will be duly informed of them.

10.4 How long will personal data be retained?

IGE+XAO will retain your personal data for as long as necessary for the purposes stated in this Policy and for any additional period that may be required or permitted by law. More precise information is provided in the information notices applicable to specific digital content.

Data retention times are generally determined by taking into consideration the following:

- The duration of your relationship with IGE+XAO (i.e. the duration of the performance of the contract, deactivation of your account, your legitimate need to be recognised when you contact IGE+XAO)
- The legal requirements for data retention
- Limitation periods

IGE+XAO retains customer data for a three-year period after termination of the contract or the date of the last contact for commercial prospecting purposes. Contact data is also kept for a three-year period after the last contact for the same purposes.

10.5 What are your other rights?

In addition to the rights set out above in Article 9, you may request the erasure and portability of your personal information and object to its use. You also have the right to request limitation of the processing. Where processing of the information is based on your consent, you have the right to withdraw your consent at any time by sending your request to the following e-mail address: info@ige-xao.com. In the event of processing necessary for the performance of the contract or based on a legitimate interest, IGE+XAO may perhaps not accede to your request to end processing. However, if IGE+XAO accepts your request by stopping processing, you may perhaps no longer be able to access the online services or content.

10.6 Contact details for questions and complaints?

Questions or comments regarding IGE+XAO's personal information protection practices or this Policy may be sent to the Schneider Electric Group Data Protection Officer (DPO):

DPO@schneider-electric.com
DPO
35 rue Joseph Monier CS3023
92506 Rueil Malmaison-France

If you believe that IGE+XAO has processed your personal information in breach of the applicable law or this Policy, you may file a complaint with the Group DPO using the contact information above or with a supervisory authority.

Cookie notice

A cookie is an item of information in the form of a very small text file placed on a web user's hard drive. It is generated by a web page server, which is the computer that operates the website. The information contained in the cookie is set by the server and can be used by the server whenever the user visits the website. A cookie can be considered to be like a web user's identity card. It informs the website that the user has returned to the website ([Source](#)). IGE+XAO may also use other similar technologies (i.e., pixel tags, web beacons, etc.) when you visit the IGE+XAO website and use its mobile applications, which search for information stored on your devices. For the purposes of this notice, all of these technologies are referred to as "cookies".

Using cookies allows us to offer you certain features and information regarding visits to the IGE+XAO website or use of its applications. IGE+XAO may also use cookies to make applications and sites more user-friendly. Most browsers automatically accept cookies, but you do not have to accept them. You can generally modify your browser to prevent cookies being accepted while still being able to take advantage of most of the features available on websites. Your mobile device also provides tools to manage the application's ability to access the information stored on your device.

If you want to delete cookies already on your computer or to stop cookies being accepted in the future, you need to refer to the instructions of the publisher of your browser by clicking on "Help" in your browser menu.

- [Chrome](#)
- [Mozilla](#)

- [Internet Explorer](#)
- [Safari](#).

Third-party cookies used to perform analyses

To provide a better service to its visitors, IGE+XAO measures the number of page views, the number of visits, the different actions performed by visitors on our website, the geo-positioning of our visitors and the number of times they return to our website. For this purpose, we use three analysis software programs: Google Analytics.

Google Analytics information

This website also uses Google Analytics, a traffic analysis service provided by Google Inc. (“Google”). Google Analytics uses “cookies,” i.e. text files placed on your computer, to help the website analyse how people use the website. The information generated by the cookie regarding the use of the website will be transmitted to Google and stored by Google on servers in the United States.

If IP address anonymity is enabled on this website, your IP address will be truncated in the Member States of the European Union or other parties that have signed the Agreement on the European Economic Area. It is only in exceptional cases that the entire IP address will first be transferred to a Google server in the United States, and then truncated there. IP address anonymity is enabled on this website.

Google will use this information on behalf of the operator of this website to evaluate use of the website, compile reports on the activity of the website for operators, and provide other services related to the activity of the website and Internet use.

The IP address that your browser transmits to Google Analytics will not be associated with other data held by Google. You can refuse the use of cookies by selecting the appropriate settings in your browser, but please note that if you do so, you may not be able to use all the features of this website. You can also choose not to be tracked by Google Analytics in the future by downloading and installing the Google Analytics Opt-out extension for your current web browser: [Google Analytics Opt-out Browser Add-on](#).