

RALLY REGISTER PRIVACY POLICY

May 5th, 2025

Preamble: Our commitment to the protection of Your Data

Amaury Sport Organisation (hereinafter "A.S.O."), a public limited company with a capital of €61,200,240 registered with the Nanterre Trade and Companies Register under number 383 160 348, whose registered office is located at the Quai Ouest Building, 40 – 42 Quai du Point du Jour, 92100 Boulogne-Billancourt, collects and processes User Data by making available to Team Managers participating in Rallies (hereinafter "Rallies" or "Events") offered by various Organizers in the Platform (hereinafter "the Platform"), accessible at: <https://www.rallyregister.com/>

This Platform allows Managers to create their account and create their repository of individuals and vehicles that can participate in different Events, regardless of the Organizer of the Event.

By developing this secure Platform and making it available to the Managers and Organizers of the Rally, A.S.O. acts as an Independent Controller of the data recorded in the Platform by the Managers, in particular the Data relating to their account and those relating to the repositories created by the said Managers.

When the Manager selects an Event to register an individual or a vehicle, he is directed to the private area of the Rally Organizer who also acts as an Independent Controller as he is responsible for the processing of the data recorded by the Manager, the Co-Manager and/or the Payer when registering individuals and vehicles in the selected Rally.

By accessing the Platform, the Manager or Co-manager will be able to find out the number of registration files managed by them. On the other hand, if they wish to know the content, they must access the private area of the Rally concerned, made available to them by its Organizer.

A.S.O. understands that You value the way in which Your Personal Data is processed and recognizes the importance of protecting Your privacy.

This Privacy Policy (hereinafter "the Policy") explains how A.S.O. collects and processes Your Personal Data on the Platform. It contains information about the types of data we collect, how we process it, for which purposes, and the measures we implement to process it in the most secure way that suits Your needs and expectations.

The use of the Platform implies that You agree that Your personal data will be processed as indicated in this Policy and that You accept the General Terms and Conditions of Use (T&Cs) of Rally Register, which can be consulted [here](#).

The French version of this Policy is the only one that is authentic and prevails over any translation.

Definitions

In this Policy, capitalized words or expressions refer to terms as defined in Article 4 of the General Data Protection Regulation No. 2016/679 (hereinafter "GDPR").

Applicable regulations: Refers to Law No. 78-17 of 6 January 1978 relating to information technology, files and freedoms as amended by Law No. 2018-493 of 20 June 2018, Regulation (EU) No. 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter "GDPR"), and repealing Directive 95/46/EC, as well as any other applicable Personal Data Protection and Cybersecurity Regulations

Consent: Refers to any free, specific, informed and unequivocal indication of the data subject's wishes by which he or she agrees, by a statement or by clear affirmative action, to the Processing of Personal Data concerning him or her.

Cross-border Processing: Means Processing of Personal Data that takes place in the European Union in the context of the activities of establishments in more than one Member State of a Controller or a Processor where the Controller or Processor is established in more than one Member State; or Processing of Personal Data that takes place in the European Union in the context of the activities of a single establishment of a Controller or a Processor, but which materially affects or is likely to materially affect data subjects in more than one Member State;

Data Controller: Refers to the natural or legal person, public authority, department or any other body which, alone or jointly with others, determines the purposes and means of the Processing. In this case, A.S.O. will be considered as the Data Controller when it concerns the development of the Platform as well as the Data recorded by the Manager in the context of the creation of its account and its repositories.

Data Processing: Means any operation or set of operations which is performed on Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, the rapprochement or interconnection, the limitation, the erasure, the destruction.

Mandate: The power conferred on a person to act on behalf of another. In the case of this Policy, the Client/Payer, a natural or legal person paying the registration fees of one or more competitors, gives a Mandate to the Manager to proceed on his behalf with the payment of these registration fees and the management of this registration.

Personal data: Any information relating to an identified or identifiable natural person (hereinafter referred to as "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 specific elements specific to his or her physical, physiological, genetic, psychological, economic, cultural or social identity.

Platform or Rally Register: Website hosted in SaaS, allowing Managers to create an account and a repository of individuals belonging to one or more Teams as well as a repository of vehicles participating in one or more Events offered by the Platform.

Privacy by Design: This is a fundamental principle of the GDPR that requires that personal data protection principles be integrated into IT developments from their design phase to protect Users' privacy and give them greater control over their Data.

Processor: Refers to the natural or legal person, public authority, agency or any other body that processes Personal Data on behalf of the Data Controller.

Recipient: Refers to the natural or legal person, public authority, agency or other body that receives communication of Personal Data, whether it is a third party.

Security by Design: this is a fundamental principle of the protection and security of Personal Data, which must be integrated into IT developments from the design phase, increasing the security of your personal data.

Other capitalized words or phrases are used in this Policy:

Manager: The person who creates the various repositories of individuals and vehicles from his/her account, allowing them to participate in the creation of a common repository made available to the various Managers accessing the Platform.

Payer: The person who has mandated the Manager to be registered as the Payer of one or more teams of individuals participating in one or more Events. It is the Payer who will undertake to pay the registration fees to the Organizer for the files managed by the Manager mandated by him.

User: The Manager or the Payer

I. Data and information collected

By using the Platform, You are required to provide Us directly with certain information about You, when You create an account or create a repository of individuals or vehicles.

1.1. Mandatory Data collected by A.S.O.

1.1.1 Account creation, login and authentication data

When you create a Manager account in the Platform, You will be required to provide Us with authentication data for Your account:

- A valid email address that will serve as Your account ID.
- A password containing 15 characters including numbers, symbols, upper- and lower-case letters.

Communication of this Data is necessary and mandatory for A.S.O. to be able to make the RALLY REGISTER Secure Platform available to the Managers.

You will receive an email validating your account opening in which We will only remind you of your username but never your password.

1.2. Mandatory Data in the Repositories

The repositories created by the Managers will be used to create a common repository of individuals and vehicles made available to any User of the Platform. The Data recorded in this Platform makes it possible to avoid multiplying X times of registering the same individual and/or the same vehicle by a different Manager.

By providing Users of the Platform with a centralized common repository, A.S.O. promotes the rationalization and minimization of the Data collected as well as the security of the Data in compliance with the principles of Privacy by Design and Security by Design.

When creating the repository, you will only need to provide the data that is required for its creation. Nevertheless, a certain amount of optional data at this stage will be required from You when You register for individuals and vehicles in Your Reference for the Event that You select.

II. Purposes of Processing Your Personal Data

A.S.O. processes Users' Data to:

- To allow you to create a Manager account.
- To allow you to create a repository of individuals and vehicles, feeding a common repository, made available to any User of the Platform.
- To allow you to benefit from the use of a common repository of individuals and vehicles
- Centralize and secure Your Data and its processing
- Control the quality and consistency of the Data by avoiding its multiplication in different places and minimizing the Data to be entered into the Platform

III. Recipients of Personal Data

A.S.O. shares Your Data with the various service providers, in charge of developing or hosting the Platform, in charge of managing registrations for rallies.

Your Data is thus shared with:

- **Subcontractor developer of the Application: NIJI S.A.S.**
NIJI S.A.S. is a French development agency, specialized in digital transformation.
NIJI is in Rennes and has provided A.S.O. with all the guarantees in terms of security: ISO 27001 certification, PSSI and data protection policies reviewed annually, security standards regularly audited due to ISO 27001 certification.
- **Application hosting subcontractor: Platform.sh GmbH**
The host of the Application is German. It is fully compliant with the requirements of the GDPR, the German BDSG, the Canadian PIPEDA and the Australian Privacy Act. Platform.sh is PCI-DSS Level 1 and SOC 2 Type 2 certified. Their cloud meets the measures of environment and data partitioning, data and cloud encryption, strict access clearances, and more.
- **Other Platform Users:**
Only the Data entered by You on Your repositories of individuals and vehicles will be shared with other Users of the Platform.

IV. The legal bases for processing:

IV.1 Your Consent

We do not sell or rent any Data to third parties. We use Your data in strict compliance with applicable data protection law. You remain solely in control of our use of your Personal Data by giving or withdrawing Your consent at any time.

Note that a lack of Consent on Your side does not allow us to process Your Data, and therefore to give You access to the Platform.

IV.2 Legitimate interest

The data that You register for the creation of your repositories is processed based on the legitimate interest of the creation and provision to the Users of the Platform of a common repository of individuals and vehicles, benefiting the greatest number of Users of the Secure Platform.

V. Retention of Your Personal Data

V.1.1. The Life Cycle of Your Data

- 1) Your personal data:
Your Personal Data is kept for a period not exceeding three (3) years after the end of the Use of the Platform.
- 2) Data from the repositories:
Since the data in Your repositories is an integral part of a common repository, the data in the repositories will be kept in the Platform for the entire life of the Platform or if its Use is necessary for the Users of the Platform.

A soon as You leave the Platform to access an Organizer's private area, We invite You to refer to the Organizer's Privacy Policy to find out the Life Cycle of Your Data and the individuals and vehicles registered by You.

V.1.2. Where and how is Your Data stored?

The Data collected is kept by Niji, the developer of the Platform, and by Platform.sh Gmbh, the host of the Platform.

The servers hosting your data are located within the European Economic Area, specifically in Germany.

A.S.O. has ensured that the Data Processors who process Your Data present all the guarantees to protect Your Data in compliance with any applicable law in force regarding the protection of Personal Data and cybersecurity.

VI. What are Your rights regarding the protection of Your Data?

VI.1. Your rights in connection with the services provided by RALLY REGISTER

For any Rallye organized by A.S.O. or for any Data relating to the creation of an account by a Manager or a Payer and in application of the applicable regulations on the protection of personal data and in particular Law No. 78-17 relating to information technology, files and freedoms as amended by Law No. 2018-493 of 20 June 2018, and Regulation (EU) 2016/679, You have the rights of access, rectification, deletion, in accordance with Articles 15 to 21 of the GDPR.

You can also leave instructions relating to the Processing of Your data after Your death, asserting Your Post-Mortem Rights.

Right of access: Allows the User to request access to their Data and to obtain access to the Data that We hold on to them, in an accessible and readable form.

Right to rectification: The User has the right to request the modification, rectification or updating of their Data that is inaccurate or incomplete.

Right to erasure: The User may request the deletion or deletion of all or part of his or her Data free of charge, within the limits of the obligations to which We are subject in accordance with the applicable regulations.

Right to restriction of processing: You can temporarily freeze the use of some of Your data. Careful! If You ask Us to restrict the processing of Your Data, We will not be able to process it but we will have to keep it.

Right to object: You can object to Your Data being processed by Us for "reasons relating to your particular situation".

VI.2 How can the User exercise his/her rights over his/her data?

Any User of the Platform may exercise its rights with A.S.O. by filling in the form accessible [here](#) or sending an email to the address dpo@aso.fr

A.S.O. will respond to any request to exercise rights within the legal period of thirty (30) days following complete receipt of the request.

Finally, the User has the right to lodge a complaint with the Commission Nationale Informatique et Libertés (CNIL) if You consider that We are not respecting Your rights.

Where applicable, if You wish to exercise Your Rights with an Organizer, other than A.S.O., We invite You to read the Privacy Policy of the said Organizer in the private area of the Event. You will then be able to find out how You can exercise Your Rights with them.

VII. How do we protect Your data?

In compliance with the Applicable Regulations on the protection of Personal Data, We take all appropriate technical and organizational measures to guarantee the security of Your Data: partitioning of the data of each Independent Controller; strong passwords following the recommendations of the ANSSI and the CNIL, access to data according to a strict policy of rights authorizations, etc.

We impose the same level of security on our Data Processors. As a User, You are responsible for the confidentiality of the username and password You use, You are responsible for the confidentiality of

the Data You have provided. A.S.O. cannot be held responsible for the disclosure, by You, of Your Data.

VIII. Changes to the Privacy Policy

This Privacy Policy is subject to change. These changes will be effective immediately upon the publication of the new version of the Privacy Policy We recommend that You review it regularly to be aware of any changes.

IX. Contact

For any request relating to this Privacy Policy, We invite You to send an email to dpo@aso.fr or to send a letter to:

DATA PROTECTION OFFICER AMAURY SPORT ORGANISATION
40 – 42 Quai du Point du Jour
92100 Boulogne – Billancourt
FRANCE