

Privacy Policy

Effective date: 03/01/2026

This Privacy Policy, including the attached [Annex](#), is intended to inform you about the processing of personal data carried out by Rhône Energies Fos-sur-Mer, including its facilities located in Fos-sur-Mer and Toulouse (hereinafter collectively referred to as “**Rhône Energies**”). It also sets out the rights to which you are entitled under Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“GDPR”), as well as French Law No. 78-17 of 6 January 1978 on information technology, files and civil liberties (together referred to as the “**Data Protection Laws**”).

Scope of application

This Privacy Policy applies to any individual (hereinafter referred to as “**Data Subject**”) who is either (i) a visitor of the website available at <https://www.rhoneenergies.eu> (hereinafter the “**Website**”), or (ii) an applicant responding to a job offer published on the Website or submitting an unsolicited application to Rhône Energies, or (iii) an on-site visitor to one of Rhône Energies’ facilities; or (iv) for certain processing operations, an employee or other collaborator of contracting entities such as Rhône Energies’ clients, suppliers, partners or service providers (“**Contractor**”), whose personal data is collected and/or processed by Rhône Energies in its capacity of data controller as defined in [section 1](#) below.

This Privacy Policy covers all processing operations relating to personal data, whether or not carried out using automated processes, such as collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, disclosure by transmission, dissemination or any other form of making available, alignment or combination, limitation, erasure or destruction.

We understand “personal data” to mean any information relating to an identified or identifiable natural person; 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 factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The categories of personal data processed by Rhône Energies are listed in the attached [Annex](#), which also includes information on the purposes and legal bases of the processing.

Purpose of the Privacy Policy

The purpose of this Privacy Policy is to provide Data Subjects with information on:

- 1) [the data controller](#)
- 2) [Rhône Energies' compliance with personal data protection laws](#)
- 3) [the sources and categories of personal data, and the purposes of the processing](#)
- 4) [the recipients of your personal data](#)
- 5) [international transfers of personal data](#)
- 6) [the accuracy of personal data](#)
- 7) [security and confidentiality](#)
- 8) [the right of access, rectification and deletion, limitation of processing, opposition to processing and the right to data portability](#)
- 9) [the processing of special categories of personal data](#)
- 10) [the retention of personal data](#)
- 11) [your questions and complaints](#)

[Annex](#) – List of the different processing operations

Where necessary, specific notices will be provided by the data controller in addition to this Privacy Policy as explained in [section 3](#).

1. Data controller

The controller of your personal data is:

- Rhône Energies Fos-sur-Mer SAS
Address: 3 boulevard de Sébastopol, 75001 Paris
- or for some specific data processing such as the use of CCTVs, one of its facilities located at Fos-sur Mer - Fos sur Mer refinery, Route du Guignonnet, 13270 Fos-sur-Mer or at Toulouse - Toulouse depot, 28 avenue Fondreyre, 31200 Toulouse.

You may contact the Data Controller at any time by sending a letter or an email to Rhône Energies' data protection contact point, using the contact details provided below:

Email: France.Data.Privacy.Officer@rhoneenergies.eu

Postal address : Fos sur Mer Refinery, Route du Guignonnet, 13270 Fos-sur-Mer.

2. Rhône Energies' Compliance with Personal Data Protection Laws

Rhône Energies undertakes to process personal data lawfully.

Rhône Energies ensures that the processing of Data Subjects' personal data is carried out in compliance with applicable Data Protection Laws.

Under Data Protection Laws, Rhône Energies must in particular determine the legal basis for each of the personal data processing operations it carries out from among one of the following legal bases:

- the processing is necessary for the purposes of the legitimate interests pursued by Rhône Energies or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject; for example, in the context of direct marketing activities addressed to our clients, or when processing the personal data of members of contracting companies for the purposes of managing the commercial relationship and performing the contract with such contracting companies;
- the processing is necessary for the performance of a contract to which the Data Subject is party, or for the performance of pre-contractual measures taken at the Data Subject's request; for example, processing an application submitted in response to an online job offer, or collecting the information required to formalize the employment contract with the selected job-applicant;
- the processing is necessary for compliance with a legal obligation to which the controller is subject;
- the processing is necessary to protect the vital interests of the Data Subject or of another natural person;
- the Data Subject has consented to the processing of his or her personal data for one or more specific purposes.

When Rhône Energies obtains the consent of the Data Subject for the processing of his or her personal data, the Data Subject has the right to withdraw his or her consent at any time.

Each Data Subject also has other rights under data protection laws, including the right to object at any time to certain processing of personal data concerning them. Rhône Energies will consider and respond to such objections in accordance with data protection laws. For further information on the rights, you have regarding the processing of your personal data by Rhône Energies, please refer to [section 8](#) of this Privacy Policy.

The Annex to this Privacy Policy indicates the legal bases on which Rhône Energies relies for each processing. When Rhône Energies has determined that certain processing of personal data for the purposes identified in the Annex are necessary for the purposes of the legitimate interests pursued by Rhône Energies or a third party, Rhône Energies has ensured that they do not disproportionately and adversely affect the interests, freedoms and fundamental rights of the Data Subjects, in particular due to the nature of the personal data, the legitimate purpose of the processing and the security measures applied.

3. Sources and categories of personal data and purposes of processing

The personal data of the persons concerned may be collected by Rhône Energies:

- either directly from you, when you apply for a job at Rhône Energies or when you request to be contacted through the “Contact” section of the Website;
- or indirectly, for example through your browsing activity on the Website or during your on-site visits and movements within one of Rhône Energies’ facilities, or via one of our contracting companies that employs you or, for job-applicants, when references are obtained from former employers or information is collected from recruitment agencies.

This personal data is generally collected and processed for the following main purposes as further described in the [Annex](#) :

Personal Data of Website Visitors. Rhône Energies collects and processes personal data relating to visitors of the Website for the purpose of handling their online requests. The processing of their data for assessing their browsing activity on the Website for statistical analysis and for optimizing the content of the Website’s pages and the user experience is described in the Cookies Policy.

Personal Data of Job Applicants. Rhône Energies collects and processes personal data relating to job applicants for the purpose of assessing their application for a position within Rhône Energies and, where applicable, for proceeding with their recruitment.

Personal Data of on-site visitors to Rhône Energies’ facilities. Rhône Energies collects and processes the personal data of on-site visitors to Rhône Energies’ facilities, notably for security purposes at these sites.

Personal data of Contractors. Rhône Energies collects and processes certain personal data relating to Contractors, for the purposes of direct marketing, managing the commercial or contractual relationship, as well as ensuring the security of Rhône Energies’ sites where Contractors may need to visit us on site and carry out activities, where applicable.

The personal data of the Data Subjects may also be processed for other specific purposes. You will find in the Annex a detailed description of the processing purposes and, for each of these purposes, the categories of personal data processed by Rhône Energies. Rhône Energies has also determined, for each of these purposes, the legal basis applicable to the processing from among the legal bases listed in [section 2](#). These legal bases are listed in the Annex.

In certain circumstances, Rhône Energies may determine that, for a given purpose, other categories of personal data will be processed, or that it will be appropriate to process personal data for a purpose not listed in the Annex. In this case, Rhône Energies will ensure that adequate measures are implemented to duly legitimize the processing and will update this Privacy Policy or provide specific information notices prior to implementing the processing.

For each identified purpose, the categories of personal data listed in the Annex are deemed necessary to achieve the associated purpose. Failure to provide the specific data may result in Rhône Energies or the Data Subject being unable to obtain all the benefits of the stated purpose.

4. Recipients of your personal data

Your personal data is primarily intended for the relevant department(s) of Rhône Energies depending on the purpose of the processing in question.

Rhône Energies may also be required to disclose your personal data to third parties, whether:

- within the group of companies to which Rhône Energies belongs (internal third parties) including in particular its parent company located in Switzerland and/or its shareholder ENTARA in the context of the provision of certain shared services in support of certain functions such as Human Resources, IT, Security, Finance/Accounting and Legal or for group-level reporting or policy-setting or in the context of internal reorganization;

- or to companies outside the group (external third parties), such as IT service providers (for example, IT service suppliers, software providers, hosting service providers and other external service providers), as well as external advisors and auditors, bidders in the context of corporate transactions, etc.

“Disclosure” or “disclosing” personal data means providing access to or sharing all or part of the personal data with organizations other than the organization that originally collected the personal data, or even with the relevant authorities.

The disclosure of personal data to internal and external third-party recipients may occur in different contexts, for example: (1) when it is necessary for the performance of pre-contractual measures or for the establishment of the employment contract; (2) with the consent of the Data Subject; (3) to comply with a collective labor agreement; (4) when it serves the legitimate interests of Rhône Energies or said third party to the extent that these do not disproportionately and adversely affect the interests, freedoms and fundamental rights of the Data Subjects; (5) when it meets an operational necessity; (6) when it is authorized or required by law or legal procedure; (7) in the context of investigations into possible criminal behavior; or (8) in an emergency situation, for example when the life or vital interests of the individual are at stake.

These internal or external third parties may therefore act either as independent data controllers, as joint data controllers with Rhône Energies, or as subcontractors when they process your personal data on behalf of Rhône Energies. Before providing personal data to a subcontractor or allowing the latter to access it and in accordance with Data Protection Laws, we will enter into a written agreement with the subcontractor, by which it undertakes: (1) not to disclose said personal data without authorization; (2) to use said personal data only for the specified purposes, and only in the manner intended by Rhône Energies ; (3) not to retain personal data beyond the period necessary to achieve these purposes or to protect the interests of the company (e.g. until the expiry of the limitation period); and (4) to take adequate and appropriate security measures.

When disclosing personal data to a third party recipient located outside the territory of the European Economic Area, the conditions relating to data transfers (see [section 5](#) below) apply in addition to the requirements of this section.

5. International data transfers

As stated in [Section 4](#), your personal data may be disclosed to third-party recipients located outside the EEA in third countries not recognized by the European Commission as offering an adequate level of protection for personal data. The list of third countries recognized as adequate and those considered as not adequate can be requested from the Data Protection contact point identified in [Section 1](#). Please note that this list is subject to change based on periodic reviews carried out by the European Commission. As of the effective date of this Privacy Policy, Switzerland, the United Kingdom, and partly Canada are recognized as offering an adequate level of protection. Transfers to certain companies established in the United States and having self-certified under the adequacy decision of July 10, 2023, of the European Commission are also authorized.

In the event of transfer to non-adequate third countries, Rhône Energies relies on transfer mechanisms that comply with applicable laws, including (1) the "standard contractual clauses" adopted by the European Commission according to the appropriate module, and (2) the implementation of additional guarantees that may consist of additional contractual, organizational and/or technical measures, depending on the conclusions of the assessment of the transfer concerned.

For further information or to obtain a copy of the specific transfer mechanisms used for transfers to third parties, please contact the Data Protection contact point identified in [Section 1](#).

6. Data Accuracy

Rhône Energies strives to keep the personal data it collects accurate, complete and up to date, considering the purposes for which such data has been collected and is used. Website visitors, job applicants, on-site visitors to Rhône Energies' facilities and Contractors must contribute to maintaining the accuracy and completeness of their personal data and are required to inform us when their personal data changes. They also have the right to have their personal data rectified, in accordance with applicable Data Protection Laws (see [section 8](#)).

7. Security and Privacy

All Website visitors, job applicants, on-site visitors to Rhône Energies' facilities and Contractors must respect the confidentiality of personal data.

Rhône Energies maintains appropriate administrative, technical and physical measures to protect personal data against accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access, use and any other unlawful form of processing of personal data in its possession.

Rhône Energies uses a whole series of security measures designed to protect personal data; these are administrative measures (for example, policies that deal with the creation, handling, storage, retention and destruction of protected information, the identity and access management policy, internal self-assessments and independent audits); technical measures (such as authorization management (access rights to resources), the use of passwords to protect documents, the protection of workstations and the network, the encryption of connections with third-party service providers in certain cases, the backup of data from external service providers); and finally physical measures (storage of personal files in locked cabinets and safes, locking of archives, restriction of access to servers).

As stipulated in [Section 4](#) above, third parties may process personal data only if they contractually agree to comply with binding security and confidentiality clauses.

8. Rights of access, rectification and deletion, limitation of processing, opposition to processing and right to data portability

The Data Subjects whose personal data is processed by Rhône Energies have the right to know the purposes for which Rhône Energies processes their personal data and to access their personal data held by Rhône Energies, as permitted by Data Protection Laws.

They also have the right to obtain rectification of personal data concerning them that is inaccurate or incomplete; to restrict the processing of their personal data, in certain circumstances; to object to the processing of their personal data, in light of the given circumstances and for reasons relating to their particular situation, or, where the processing is carried out for direct marketing purposes, to object at any time and without the need to provide any justification; or to request the erasure of their personal data when such data is no longer necessary in relation to the purposes for which it was collected, in accordance with Data Protection Laws.

In certain circumstances, they also have the right to request the portability of their personal data, which will allow them to obtain and reuse their personal data for their own purposes without hindrance from the controller.

In addition, in accordance with Data Protection Laws, any Data Subject may define guidelines relating to the retention, erasure and communication of their personal data after their death.

Data Subjects may exercise their rights by contacting Rhône Energies' Data Protection contact point, as indicated in [section 1](#).

9. Processing of special categories of personal data

Certain categories of personal data are considered sensitive by Data Protection Laws and as such are subject to a higher level of protection and security. Data protection laws classify the following categories of information as special categories of data: (1) racial or ethnic origin ; (2) political opinions; (3) religious or philosophical beliefs; (4) trade union membership; (5) data concerning sexual life; (6) data concerning health; (7) genetic data and biometric data for the purpose of uniquely identifying a natural person. Other data may also be subject to stricter supervision in view of their sensitivity without being classified as special categories of data. This is particularly the case in France for the social security number.

Rhône Energies only collects and processes sensitive personal data in very limited circumstances as identified in the [Annex](#), and to the extent that Rhône Energies is able to justify, in addition to a lawful legal basis, that their processing is based on one of the exemptions provided for by the Data Protection Laws and authorizing the processing of such data, for example:

- when the Data Subject has given explicit consent;
- where the processing of such data is necessary for the performance of obligations and the exercise of rights of the controller or the Data Subject relating to employment, social security and social protection law, insofar as such processing is authorized by Union law, by the law of a Member State or by a collective agreement concluded under the law of a Member State which provides appropriate safeguards for the fundamental rights and interests of the Data Subject;
- where processing is necessary to protect the vital interests of the Data Subject or of another natural person, where the Data Subject is physically or legally incapable of giving consent;
- when the processing is necessary for the establishment, exercise or defense of legal claims;

- the processing is necessary for the purposes of preventive or occupational medicine, or for the assessment of the worker's capacity to work.

10. Retention of personal data

Rhône Energies retains personal data to fulfill the purposes for which the data was collected or to ensure compliance with applicable law or to protect the company's legitimate interests (e.g., limitation periods). In particular, the applicable retention periods are those defined in the document retention policy and/or the register of processing operations. Rhône Energies, or other periods if required by applicable national legislation.

11. Questions and complaints

Rhône Energies is committed to protecting your personal data as described in this Privacy Policy and in accordance with Data Protection Laws. If you have any questions regarding this Privacy Policy or the way in which Rhône Energies processes your personal data, or if you wish to exercise any of your rights, you may contact the Data Protection contact point identified in [section 1](#).

You can also contact the National Commission for Information Technology and Civil Liberties (CNIL) using the contact details on its website www.cnil.fr, to ask about your rights or to file a complaint.