



# Privacy notice clients

The terms “we”, “us”, “our” or “CMA CGM” used throughout this privacy notice, shall designate CMA CGM S.A. (“CMA CGM”) and CMA CGM’s direct or indirect subsidiaries worldwide.

Please click [here](#) for a list of subsidiaries and brands of the CMA CGM Group.

## How do we use your personal data?

| Purpose  | Type of data   | Legal base   | Recipients  |
|--|--|--|---|
| <b>Transportation of goods:</b> To execute the shipping instructions for the transportation of goods from one place to another.  | <ul style="list-style-type: none"> <li>a) Identity &amp; contact data.</li> <li>b) Shipping data.</li> <li>c) Accounting data.</li> </ul>  | Our legal obligation to comply with the shipping instructions. | <p>The consignee and the notified parties.</p> <p>Our departments, affiliates and subsidiaries involved in the transportation of goods.</p> <p>Our partners and any third party involved in the transportation of goods.</p>                |
| <b>Value added services:</b> To provide you with added-value services, such as insurance coverage.   | <ul style="list-style-type: none"> <li>a) Identity &amp; contact data.</li> <li>b) Shipping data.</li> <li>c) Accounting data.</li> </ul>  | The contract we have with you.                                 | <p>Our departments, affiliates and subsidiaries involved in valued added services.</p> <p>Our partners and third parties who collaborate with us to provide the value-added services (e.g. Traxens).</p>                                    |
| <b>Commercial relationship monitoring:</b> For maintaining a routine administrative flow and a routine contractual relationship with our customer and their representatives “business contacts”. | <ul style="list-style-type: none"> <li>d) Identity &amp; contact data.</li> <li>e) Professional information.</li> <li>f) Commercial data.</li> <li>g) Customer service history.</li> </ul> | Our legitimate interest to develop business relationships.     | <p>The organisation for which you work.</p> <p>Our departments, affiliates and subsidiaries involved in the monitoring of the commercial relationship.</p> <p>Our partners and any third party involved in the transportation of goods.</p> |

| Purpose   | Type of data   | Legal base   | Recipients   |
|---|--|--|--|
| <p><b>Compliance check:</b> For conducting compliance check, security screening, background check (e.g. anti-corruption, politically exposed persons check, economic sanctions, due diligence, conflict of interest)</p> <p>To fight against fraud and illicit traffic.</p> | <ul style="list-style-type: none"> <li>a) Identity &amp; contact data.</li> <li>b) Shipping data.</li> <li>c) Public data</li> <li>d) Conflicts of interests</li> <li>e) Cyber security data</li> </ul>  | <p>Our legal obligation to comply with laws and our legitimate interest to prevent the stoppage of operations.</p>   | <p>Our departments, affiliates and subsidiaries involved in compliance check.</p> <p>The employees who have a need to know the information.</p> <p>Government bodies, local authorities where required.</p>  |
| <p><b>Customer relationship management (CRM):</b> to improve service operations, solve customer problems and drive sales growth.</p>  | <ul style="list-style-type: none"> <li>a) Identity &amp; contact data.</li> <li>b) Professional information.</li> <li>c) Service data.</li> <li>d) Customer service history.</li> </ul>  | <p>Necessary for our legitimate interest to develop our business.</p>  | <p>Our departments, affiliates and subsidiaries involved in the CRM.</p>   |
| <p><b>Facilitate shipment:</b> To facilitate the provision of our services or to facilitate the exchange of information.</p>  | <ul style="list-style-type: none"> <li>a) Shipping data.</li> </ul>  | <p>Necessary for our legitimate interest to develop our business.</p>  | <p>Our departments, affiliates and subsidiaries involved in the facilitation of the shipment (Port community systems, INTTRA or TradeLens, GT nexus, Clear Metal, Buy co etc.).</p>  |
| <p><b>Litigation management:</b> To prepare, to follow-up on, to exercise or to respond to an administrative legal or judicial claim/proceeding.</p> <p>To enforce a judgement.</p>   | <ul style="list-style-type: none"> <li>a) Identity &amp; contact data.</li> <li>b) Professional information.</li> <li>c) Service data.</li> <li>d) Customer service history.</li> <li>e) Shipping data.</li> <li>f) Commercial data.</li> <li>g) Accounting data.</li> <li>h) Litigation data</li> </ul> | <p>Necessary for the purpose of or in connection with claims handling and legal proceedings.</p> <p>Establishing/exercising or defending legal claims.</p> <p>Necessary for exercising a right or complying with an obligation arising in connection with an insurance contract.</p> | <p>Our departments, affiliates and subsidiaries involved in the management of the claim.</p> <p>Our professional advisors and third parties who collaborate with us to manage the claim.</p> <p>Government bodies, Regulators, Courts, local authorities where required.</p> |
| <p><b>Payment:</b> To ensure that we receive payment.</p>   | <ul style="list-style-type: none"> <li>a) Identity &amp; contact data.</li> <li>b) Accounting data.</li> </ul>   | <p>Necessary for our legitimate interest to conduct our business.</p>  | <p>Our departments, affiliates and subsidiaries involved in the payment.</p> <p>Our partners and any third party involved in the payment or the collection of the debt.</p>  |

| Purpose  | Type of data   | Legal base  | Recipients  |
|--|--|---|---|
| <p><b>Network Intermediation Services (NIS):</b> We use your personal information to recommend business relationships and services that may be of interest to you, identify your preferences and personalize your experience in our marketplace.</p> | <ul style="list-style-type: none"> <li>a) Identity &amp; contact data.</li> <li>b) Professional information.</li> <li>c) Service data.</li> <li>d) Customer service history.</li> <li>e) Shipping data.</li> <li>f) Commercial data.</li> <li>g) Accounting data.</li> </ul> | Your consent  | <p>Our departments, affiliates and subsidiaries involved in NIS.</p> <p>Customers that may of interest to you.</p>  |
| <p><b>Customer survey:</b> To evaluate client experience, assess client satisfaction, understand client's requirement and the level of service expected.</p>   | <ul style="list-style-type: none"> <li>a) Identity &amp; contact data.</li> <li>b) Professional Information.</li> <li>c) Service Data.</li> <li>d) Specific interest &amp; Engagements.</li> <li>e) Customer service history.</li> </ul>                                     | Your consent.   | <p>Our departments, affiliates and subsidiaries involved in the customer survey.</p>  |
| <p><b>Marketing &amp; communication:</b> To inform you on services, offers, operational matters (e.g. notice of arrival) and rates offers/changes that may be of interest to you.</p>  | <ul style="list-style-type: none"> <li>a) Identity &amp; contact data.</li> <li>b) Professional Information.</li> <li>c) Service Data.</li> <li>d) Marketing data.</li> <li>e) Specific interest &amp; Engagements.</li> </ul>   | Your consent.   | <p>Our departments, affiliates and subsidiaries involved in Marketing.</p>  |
| <p><b>Corporate news:</b> To keep you up to date with our latest news and to organize events (e.g. Newsletter).</p>  | <ul style="list-style-type: none"> <li>a) Identity &amp; contact data.</li> <li>b) Professional Information.</li> <li>c) Specific interest &amp; Engagements.</li> </ul>   | Your consent.   | <p>Communication department.</p>  |
| <p><b>Ethics hotline:</b><br/>This service is a web and phone-based intake for reporting suspected violations of laws or regulations, our Code of Conduct or company policies.</p>   | <ul style="list-style-type: none"> <li>a) Identity &amp; contact data</li> <li>b) Professional information</li> </ul>  | Our legal obligation to comply with anti-bribery regulations. | <p>Ethics &amp; Business integrity team and Investigation team.</p> <p>Fraud team, HR team, finance team, legal team, audit team on a need-to-know basis (only for cases assigned to them).</p> |

| Purpose   | Type of data  | Legal base  | Recipients   |
|---|---|---|--|
| <p><b>Cyber security management:</b></p> <p>To ensure the security, the availability of the business services and the secure functioning of applications and networks.</p> <p>To ensure the integrity of the monitoring data.</p> | <p>a) Identity &amp; contact data.</p> <p>c) Cyber security data.</p> | <p>Necessary for our legitimate interest to manage and secure our information system.</p> | <p>Our departments, affiliates and subsidiaries involved in the management and the security of our information systems.</p> <p>Our partners and any third party involved in the cyber security management.</p> |

## What personal data do we collect about you?

| Types of data  | Sources   |
|--|---|
| <p><b>Identity &amp; contact data:</b> e.g. name, surname, email address, phone number, birth date, passport references.</p>                             | <p>Directly from you when you fill in a form in our website or if you are part in a commercial relationship with us.</p>  |
| <p><b>Professional information:</b> e.g. organisation name, quality or function.</p>   | <p>Directly from you from you when you fill in a form in our website or if you are part in a commercial relationship with us.</p>   |
| <p><b>Service:</b> e.g. details of the services and products that you have requested or that we have provided to your company.</p>                       | <p>Directly from you when you fill in a form in our website or if you are part in a commercial relationship with us.</p>  |
| <p><b>Customer service history:</b> e.g. call center details, tickets, customer survey.</p>  | <p>Directly from you when you log request in our customer relationship portal.</p>  |
| <p><b>Shipping data:</b> e.g. postal address, place of delivery, place of loading, driver location.</p>  | <p>Directly from you when you fill in a form in our website or if you are part in a commercial relationship with us.</p>  |
| <p><b>Commercial data:</b> e.g. commercial relation between us (Contact data, order, purchase, usage history, service and products, communications).</p> | <p>Directly from you when you fill in a form in our website or if you are part in a commercial relationship with us.</p>  |
| <p><b>Accounting data:</b> invoices, payment data, etc.</p>  | <p>Directly from you when you fill in a form in our website or if you are part in a commercial relationship with us.</p>  |
| <p><b>Public data:</b> e.g. press release, certificate of incorporation, court judgement, Specially Designated National (SDN) list.</p>                  | <p>Indirectly from public source like the chamber of commerce, national registration office, National department of Justice, press, third parties that collect this information for us.</p> |
| <p><b>Conflict of interest:</b> e.g. competing professional or personal interests.</p>   | <p>Directly from you when you fill in a form.<br/>Indirectly when one of your relatives fill in a form with your information.</p>   |

| Types of data   | Sources   |
|---|---|
| <b>Marketing data:</b> e.g. preferences of communication channels (email, sms), type of communication or frequency of communication.  | Directly from you when you fill in form in our website or if you are part in a commercial relationship with us.                               |
| <b>Specific interest &amp; Engagements:</b> e.g. professional and personal interests, interactions and engagement with us, attendance at events.  | Directly from you when you fill in form in our website, if you are part in a commercial relationship with us or when you register for events. |
| <b>Litigation data:</b> e.g. Identification data for suspects, victims, witnesses and court workers; disputed facts; information, documents and evidence collected with a view to establishing the facts likely to be reproached; characteristics of the litigation.  | Directly from you.  |
| <b>Cyber security data:</b> e.g. active directories to define access authorizations to applications and networks, connection data, system and network devices logs, application logs, use of services (duration, start and end date and time, volume and nature of the data exchanged excluding the content thereof). | Directly from you when you use systems or when you request an access to a system.   |

## How long do we keep your data?

| Type of data   | How much time we keep it  |
|--|---|
| <b>Identity and contact data, professional information, service data, customer service history, shipping data, commercial data, accounting data.</b> | 10 years in compliance with the French trade law, or such other longer or shorter period as may be adjusted to comply with any relevant local regulations.          |
| <b>Conflict of interest, public data, litigation data.</b>   | We keep the data as long as necessary to comply with any relevant local regulation, to answer to authorities or government bodies' requests or to defend ourselves. |
| <b>Marketing data, Specific interest &amp; Engagements.</b>  | As long as your company is in business with us and up to 3 years starting from the end of the commercial relationship.  |
| <b>Cyber security data.</b>  | Connection and application logs are generally kept for 6 months. This duration may occasionally be extended to the life span of the system.                         |

## International transfers

CMA CGM is a global company which carries out its activity in more than 160 countries around the world. Hence, in some instances your personal data may be transferred outside the European Economic Area. These international transfers are allowed only if there are regulated by mechanisms that ensure an adequate level of protection.

Intra group transfers are done in accordance with the binding corporate rules which governs the international transfers and processing of Personal Data within the Company around the world. For more details, access to our [Binding Corporate Rules](#).

International transfers of personal data between us and a company located in a third country are governed by safeguards approved by the European Commission such as [Standard contractual clauses](#).

## What are your rights?

At any time, you may:

- request to see your personal data;
- request to correct or delete your personal data;
- object to our processing of your personal data;
- request an electronic copy of your personal data;
- lodge a complaint with a supervisory authority;
- revoke or withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

## Non-Discrimination

We will not discriminate against you for exercising any of your rights. Unless permitted by the law, or unless the exercise of your rights interferes with contractual requirements we will not:

- deny you goods or services;
- charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- provide you a different level or quality of goods or services;
- suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## How to contact us?

Contact the CMA CGM's data protection officer by mail at [ho.dpo@cma-cgm.com](mailto:ho.dpo@cma-cgm.com) or by mail to the attention of data protection officer, 4 quai d'Arenc, 13002 Marseille, France.

Your request must:

- Provide sufficient information that allows us to verify that you are the data subject or an authorized representative.
- Provide sufficient details to allow us to properly understand, evaluate, and respond to it.

Once verified, we will evaluate your request and answer it within one month.