PRIVACY POLICY

MYSODEXI AND CRITICAL

Version 3 - Updated: 12/10/2026

1. Purpose of this policy

SODEXI attaches particular importance to protecting personal data and respecting the privacy of users of the MySodexi and Critical services.

This policy explains how personal data is collected, used, retained, secured and, where applicable, shared when these services are used.

It has been prepared in accordance with Regulation (EU) 2016/679 of 27 April 2016 (the "GDPR"), the amended French Data Protection Act, and the rules applicable to cookies and other trackers.

MySodexi is a service provided to SODEXI customers to track and manage shipments. Critical is an Air France product offered to its customers. When a customer selects Critical, the order required to perform the service is sent to SODEXI, which carries out the operational processing and shipment tracking steps on behalf of Air France Cargo.

2. Who is involved in processing your data?

Whether an entity acts as a controller or processor depends on the service used and the purpose of the processing.

Service / situation	Main entity	Role in processing	Description
MySodexi	SODEXI	Data controller	SODEXI determines the purposes and means of processing necessary to provide and secure MySodexi.
Critical	Air France	Data controller for the Critical service	Air France offers the Critical product to its customers and entrusts SODEXI with operational performance of the service.
Critical – operational performance	SODEXI	Processor for Air France	SODEXI processes data necessary to perform and track the service on Air France's instructions.
SODEXI's own obligations	SODEXI	Independent data controller	SODEXI may process certain data for its own legal, regulatory, customs, safety, security and legal defence obligations.

For processing activities for which SODEXI is responsible, the data controller is: SODEXI - Société pour le Développement du Fret Express International, 2 rue des Voyelles - Zone Cargo 6, BP 16041 Roissy CDG, 93290 Tremblay-en-France.

For questions about processing carried out under SODEXI's responsibility, or to exercise your rights with SODEXI, contact its Data Protection Officer (DPO) at: dpo@sodexi.fr.

Where a request concerns processing performed by SODEXI on behalf of Air France in connection with Critical, SODEXI cooperates with Air France in accordance with applicable obligations and the instructions received.

3. What data may be processed?

3.1 Identification and professional data

- first and last name;
- business email address;
- company or organisation;
- access profile or role assigned in the application;
- for SODEXI users, the associated application group or profile (e.g. Agent, TCO or another business profile);
- for customers, an access role suited to the service used (e.g. Customer or CSO);
- user account identifier;
- information needed to create and manage the account.

3.2 Shipment and service-use data

- shipment references and related information;
- air waybill (AWB) number;
- shipment characteristics;
- flight and routing information;
- shipment statuses and associated events;
- shipment-related documents;
- exchanges and comments made as part of tracking;
- photographs associated with shipment tracking when this feature is used.

3.3 Technical and connection data

- IP address;
- user-agent and browser or device information;
- date and time of events or connections;
- technical logs required for application operation, security and diagnostics.

This information may be used, in particular, to detect and analyse technical anomalies, secure applications and investigate incidents.

4. Why do we use your data?

Purpose	Service concerned	Legal basis / framework
User account creation and management	MySodexi / Critical	Performance of the contractual relationship or SODEXI's legitimate interest in administering accounts and access required to provide the service, depending on the user's status

Purpose	Service concerned	Legal basis / framework
Authentication and access management	MySodexi / Critical	SODEXI's legitimate interest in protecting services, preventing unauthorised access and securing accounts and access
Service provision and shipment tracking	MySodexi	Performance of the contract / service
Performance and tracking of the Critical service	Critical	Processing on behalf of Air France as part of the service entrusted to SODEXI
Provision of shipment information and documents	MySodexi / Critical	Performance of the service
Management of exchanges and support requests	MySodexi / Critical	Performance of the service and/or SODEXI's legitimate interest in providing support, handling requests and ensuring service continuity
Application security and prevention of unauthorised access	MySodexi / Critical	SODEXI's legitimate interest in protecting its information systems, preventing unauthorised access and ensuring service continuity and proper operation; applicable security obligations
Logging, diagnostics and technical error resolution	MySodexi / Critical	SODEXI's legitimate interest in ensuring service availability, diagnosing and correcting anomalies and maintaining system security
Compliance with legal, regulatory, customs and security obligations	Depending on processing	Legal or regulatory obligation
Tracking certain email interactions, where enabled	Depending on service	Consent where required; exemption only where legally applicable

5. Who can access your data?

Personal data is accessible only to persons or organisations that need to know it in connection with their duties and the relevant service.

- authorised SODEXI personnel;
- teams involved in shipment processing and tracking;
- personnel responsible for application administration, support and security;
- for Critical, authorised Air France personnel where necessary to manage the service;
- technical service providers acting for SODEXI or, as applicable, Air France;
- partners involved in shipment processing or transport where necessary;
- administrative, judicial, customs or security authorities where required by law.

Access rights are granted according to users' duties and the need-to-know principle.

6. Service providers and processors

SODEXI may use technical service providers for hosting, maintenance, security, support or operation of digital services.

Where a service provider processes personal data on behalf of SODEXI, it is governed by Article 28 of the GDPR and may process data only on documented instructions from the controller, subject to legal obligations directly applicable to it.

In connection with Critical, SODEXI itself acts as a processor for Air France for processing required to perform the operational service entrusted to it, without prejudice to processing carried out by SODEXI to meet its own obligations.

7. Hosting, infrastructure and international transfers

MySodexi and Critical use a shared technical infrastructure and are accessible through two separate URLs corresponding to each service. This shared technical arrangement does not mean that the purposes, GDPR responsibilities or access rights are identical for the two services.

The application services run on Microsoft Azure. The architecture may use resources located in France and Germany, among other places, and requests may pass through Azure Front Door before being redirected to the relevant application resources.

SODEXI favours processing personal data within the European Economic Area. Depending on technical configuration and the services actually used, certain processing operations or technical access may nevertheless involve transfers of personal data outside the European Economic Area. Where such a transfer occurs, it is governed by a mechanism provided for under the GDPR, such as an adequacy decision or standard contractual clauses supplemented, where necessary, by additional safeguards.

Further information about the safeguards applicable to these transfers and, where relevant, how to obtain a copy may be requested from the SODEXI DPO at dpo@sodexi.fr.

8. How long is data retained?

Personal data is retained for no longer than necessary for the purposes for which it is processed, subject to retention periods imposed by law or required for the establishment, exercise or defence of legal claims.

Where a uniform retention period cannot be set in advance, it is determined using objective criteria, including the duration of the relationship with the user, performance and tracking of the service, security and traceability needs, and applicable legal, regulatory or evidentiary obligations.

Data category	Retention principle
User account	For the period of service use, then for the time needed to close the account and comply with applicable obligations.
Shipment-related data and documents	For the time required to perform and track the service, then according to applicable legal, regulatory or evidentiary periods.
Photographs and tracking-related exchanges	For the time needed to process and track the service, unless longer retention is required.
Technical and security logs	For the time required for security, diagnostics, traceability and incident management purposes.
Email tracking data (opens and clicks)	Up to 12 months where tracking is enabled, unless a shorter period is configured or consent is withdrawn where it is the legal basis.
Email sending log	Up to 12 months, with automated deletion at the end of this period.

At the end of the applicable periods, data is deleted, anonymised or archived in accordance with applicable regulations.

9. Data security

SODEXI implements appropriate technical and organisational measures to ensure a level of security appropriate to the risks associated with processing.

- management of accounts and authorisations;
- user authentication;
- restriction of access on a need-to-know basis;
- secure communications;
- logging of certain events;
- infrastructure protection;
- data backups;
- vulnerability and security incident management;
- awareness training for persons authorised to access information.

The use of a shared technical infrastructure for MySodexi and Critical does not make data freely accessible between the two services: access remains subject to authorisations and corresponding operational needs.

10. Cookies, local storage and other trackers

As MySodexi and Critical are accessed through two distinct URLs, cookies and local storage mechanisms are managed according to each service's domain and configuration. The fact that the two services share a technical infrastructure does not necessarily mean that cookies are shared between the two URLs.

Mechanisms strictly necessary for operation of the service may be used without consent where they meet the conditions set by applicable regulations. Non-essential trackers, where used, are activated only after consent has been obtained when required.

10.1 Technical mechanisms identified on MySodexi

Item	Function	Known duration
sessionid	User session management	2 weeks
csrftoken	Protection against certain attacks and request security	1 year
django_language	Storage of language preference	1 year
messages	Technical management of certain application messages / fallback mechanism	Session duration; deleted after display
LocalStorage	Storage of certain user preferences	Until deleted by user, browser reset or configuration change

Mechanisms used on Critical may differ depending on the configuration of the Critical URL. Where a non-essential mechanism is used, information and, where applicable, consent are provided or obtained in accordance with applicable regulations.

10.2 Technical diagnostics tool - Sentry

Sentry may be used to identify and analyse technical errors affecting application operation. Its configuration aims to limit data collection to what is strictly necessary for diagnostics, troubleshooting and service security. SODEXI uses a self-hosted Sentry instance to strengthen control over hosting and the technical data processed for these diagnostics.

11. Tracking email opens and interactions

Where an email tracking feature is used, it may identify whether an email was opened, the date and time of opening and, where applicable, whether certain links in the email were used.

Independently of open and click tracking, an email sending log is retained to ensure technical traceability of mailings. It may include the recipient, message subject and sending status. This log is purged after a maximum of 12 months.

Where user consent is required, the feature is disabled by default and is enabled only after clear information has been provided about the data collected, the purpose of tracking, the retention period, recipients and how consent may be withdrawn.

Users may enable or disable this feature from their user profile when the option is available. Refusing or withdrawing consent does not prevent use of the service's main features.

Where processing is based on consent, consent may be withdrawn at any time and as easily as it was given, without affecting the lawfulness of processing carried out before withdrawal.

12. Your rights

Depending on the processing concerned and its legal basis, you have, in particular, the following rights:

- right of access to your personal data;

- right to rectification;
- right to erasure where the conditions are met;
- right to restriction of processing;
- right to object where applicable;
- right to data portability where the conditions under the GDPR are met;
- right to withdraw consent at any time where processing is based on consent.

The exercise of these rights may be subject to conditions and limitations provided for by law.

13. How can you exercise your rights?

For questions about processing for which SODEXI is responsible or to exercise your rights with SODEXI, contact the SODEXI DPO:

- by email: dpo@sodexi.fr;
- by post: DPO SODEXI, 2 rue des Voyelles - Zone Cargo 6, BP 16041 Roissy CDG, 93290 Tremblay-en-France.

Where a request concerns Critical processing carried out by SODEXI on behalf of Air France, SODEXI cooperates with Air France so that the request is handled by the competent controller.

Proof of identity may be requested only where necessary to verify the requester's identity.

You also have the right to lodge a complaint with the French data protection authority (Commission nationale de l'informatique et des libertés – CNIL).

14. Changes to this policy

This policy may be amended to reflect changes to MySodexi or Critical features, data processing, technical architecture, service providers, regulations or recommendations from competent authorities.

Where a material change affects the conditions under which personal data is processed, users will be informed by appropriate means.

The date of the last update appears at the beginning of this policy.