

SADE Group

Personal Data Protection Policy

INTRODUCTION

The SADE Group makes strong commitments in favour of personal data protection that it plans to place at the heart of its concerns.

This Personal Data Protection Policy (the "Policy") aims to inform any natural person data subjects (employees or applicants, clients, suppliers or partners and their employees) of such measures implemented when SADE collects personal data ("Data") in the course of its business.

This policy is part of a strategy of transparency and loyalty, describes how we collect, use and manage personal data, and describes the rights of data subjects as well as the way in which we meet our legal obligations.

1. WHO COLLECTS YOUR DATA? – THE DATA CONTROLLER

The SADE Group ensures the compliance of the collection and processing of personal data with the applicable regulations (the "Regulations"), i.e. on French soil:

- Regulation (EU) 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 (GDPR); and
- French act 78-18 of 06 January 1978 (French Data Protection Act), amended.

The SADE Group has put in place an organisation responsible for the proper implementation of and compliance with this Policy.

Furthermore, the SADE Group takes measures to raise awareness among its staff of the need to protect personal data so it is only collected or processed if this is necessary with regard to the planned purposes and if these purposes are defined, guaranteeing that they are lawful, predetermined, explicit and legitimate. The SADE Group trains its staff in practices complying with the Regulations currently in force and progressively provides them with office automation and IT tools complying with the principle of confidentiality by design.

Personal data processing activities carried out by the SADE Group are recorded in a processing form integrated into a "record of processing activities".

A Data Protection Officer has been appointed. They are entitled to be made aware of all issues relating to personal data protection. In case of questions regarding use of personal data by SADE, data subjects may contact the Data Protection Officer by e-mail: dpo@sade-cgth.fr, or by postal mail: Délégué à la Protection des Données Personnelles - SADE, 23-25 avenue du Docteur Lannelongue 75014 Paris.

2. GOLDEN RULES

The SADE Group has established six fundamental golden rules, so that anyone required to collect and process personal data on the Group's behalf:

1. complies with the GDPR, ensuring that personal data is collected, used and shared in accordance with the rights of data subjects and the principle of confidentiality, by design of the processing activity;
2. is transparent and clear with data subjects regarding the purposes of the planned processing activity, on the purpose and terms and conditions of its implementation as well as regarding recipients with whom this data may be shared; seeks the consent of natural persons when required and acts without their consent only in cases stipulated by the GDPR or French law or when their prior consultation is impossible or poses a particular risk;
3. takes the decision to collect, use or share personal data taking account of the interest of the natural person to process only data that it necessary, relevant, appropriate, proportionate, fair, opportune, and secure, for a period limited to the needs of processing;
4. ensures that personal data is shared only with persons for whom access is necessary to render the expected service and achieve the purpose of processing;
5. ensures that risk-proportionate security measures have been taken with a view to preserving the availability, confidentiality and integrity of data subjects' personal data;
6. seeks an opinion in case of doubt regarding the way in which personal data is processed, discusses the matter with other specialists, requests a legal opinion or seeks the opinion of the relevant regulatory authority and keeps a record of its decisions.

Based on these golden rules, the SADE Group implements internal mechanisms and procedures to:

- demonstrate compliance with data protection rules;
- process personal data lawfully, loyally and transparently (lawfulness, loyalty and transparency);
- collects personal data for predetermined, explicit and legitimate purposes, with regard to previously identified legal grounds, and does not process it subsequently in a manner incompatible with these purposes (restriction of purposes) or these legal grounds;
- retains only appropriate, relevant personal data, restricted to what it necessary with regard to the purposes for which it is processed (data minimisation);
- ensures that personal data is accurate, updated and that all reasonable measures are taken so that inaccurate data, with regard to the purposes for which it is processed, is deleted or corrected without delay (accuracy).

Internal control measures are put in place progressively to ensure the efficiency of these internal mechanisms and procedures. An audit to ensure compliance of the system with the Regulations is conducted annually.

3. INFORMING OF NATURAL PERSON DATA SUBJECTS

In accordance with the GDPR, the SADE Group endeavours to inform natural person data subjects of their guaranteed rights, informing them of:

- the data controller's identity;
- the purpose of processing;
- the lawful grounds of processing;
- the mandatory or optional nature of responses and the consequences of failing to respond;
- the recipients of the data;
- their right to access, query, modify and correct information concerning them, their right to object on legitimate grounds;
- the retention period of the categories of data processed.

4. DATA RETENTION

Data collected and processed by the SADE Group or on its behalf is retained by SADE or by its service providers, particularly on cloud storage platforms.

Subject to exceptions, mainly due to technical reasons or the SADE Group belonging to an international-scale Group, personal data covered by the GDPR is not retained or processed outside the European Union of the European Economic Area. Where appropriate, data subjects are informed of such a transfer and technical data protection solutions, at a level compatible with the requirements of the GDPR, are defined on a case-by-case basis (e.g. sovereign cloud), with assistance from the SADE Group Information Services Security Officer and Data Protection Officer, in order to ensure the availability, confidentiality and integrity of transferred data.

Data is retained for a restricted period based on the purposes for which it was collected, with regard to regulations currently in force and in accordance with legal, contractual, fiscal and social obligations and to defend the SADE Group's legitimate interests.

5. DATA RECIPIENTS

The SADE Group is liable to share personal data collected with other recipients, in strict accordance with the purpose of the processing activities that it has determined.

SADE ensures that its service providers and partners act in accordance with applicable personal data protection laws and regulations, but also that they pay special attention to its confidentiality.

6. SECURITY AND ALERTS

The SADE Group takes measures to ensure that the security of the personal data it processes is suited to its sensitivity and the related risks. To this end, it ensures:

- identification of cyber risks;
- implementation of suitable network protections, via filtering systems;
- maintenance in secure condition of different infrastructural and application components, particularly implementation of security updates and upgrading of components to avoid use of non-maintained components;
- hardening of infrastructural components such as servers or workstations;
- regular checking of infrastructural or application vulnerabilities via monitoring and use of technical or application vulnerability scanners;
- encryption of data at rest and in transit when necessary;
- use of good security practices when developing applications;
- allocation of users rights in accordance with the rule of least principle and the right to know;
- protection of access via the implementation of strong authentication mechanisms, particularly via the setup of Single Sign-On (SSO), a complex password policy and 2-step verification;
- regular review of accounts and access rights;
- retention of evidence of implementation of the above measures.

In case of any breach of personal data in its possession, the SADE Group undertakes to react within appropriate time limits as soon as it becomes aware of the event to, firstly, inform the French Data Protection Authority (Commission Nationale Informatique et Libertés - CNIL) and, where appropriate, data subjects and, secondly, to identify failures and set up appropriate security measures.

7. RIGHTS OF DATA SUBJECTS

In accordance with Data Protection Regulations and restrictions established by law, data subjects particularly enjoy:

- a right to access their Data, particularly to verify its accuracy and exhaustiveness;
- the right to obtain correction of their Data;

- the right to obtain deletion of their Data;
- the right to object to or request restriction of processing of their Data;
- the right to portability of Data they supplied;

For processing of their personal data based on consent, data subjects enjoy the right to withdraw their consent at all times. Withdrawal of consent does not compromise the lawfulness of processing based on consent carried out before this withdrawal.

Data subjects may exercise their rights by contacting the SADE Group Data Protection Officer by e-mail to dpo@sade-cgth.fr, or by postal mail to DPO SADE - Département de la Conformité, 23-25 avenue du Docteur Lannelongue 75014 Paris.

Requests will be processed as quickly as possible. When submitting their request, data subjects must include a photocopy of an identity document to verify their identity.

8. AMENDMENT OF THIS POLICY

This Policy reflects the SADE Group's current confidentiality standards, which may be amended. Any change will take effect from publication of the latest updated version of this confidentiality policy.

These changes will be published on the media deemed most appropriate to the purpose and scale of changes made.

SADE Group subsidiaries are entitled to adapt and add to this policy to take account of the state of local regulations in the country in which they are based. In this case, they will publish their own statement on their website.

9. CONTACT

For any requests for information on the personal data protection policy, you can contact the SADE Group Data Protection Officer by e-mail to dpo@sade-cgth.fr, or by postal mail to DPO SADE - Département de la Conformité, 23-25 avenue du Docteur Lannelongue 75014 Paris.

Data subjects may also contact the French Data Protection Authority (Commission Nationale d'Informatique et des Libertés - CNIL), which is responsible for ensuring compliance with personal data protection regulations in France, by internet <https://www.cnil.fr/fr/agir> or by mail to the following address: Commission Nationale de l'Informatique et des Libertés, 3 Place de Fontenoy - TSA 80715, 75334 PARIS CEDEX 07.