



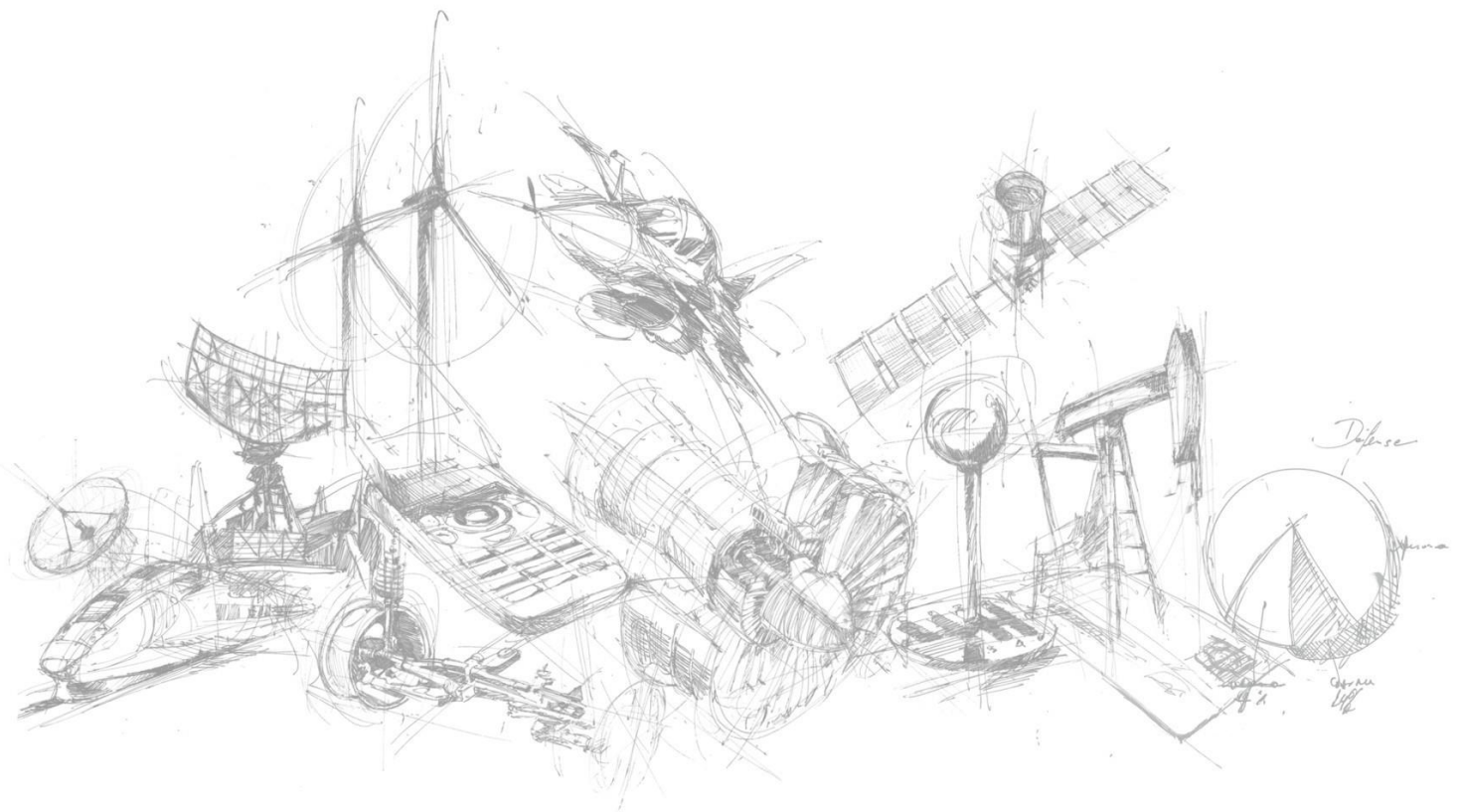
POLICY FOR THE PROTECTION OF PERSONAL DATA

[EPO-GRI-023]version 3

Confidentiality C0 : Public

Applicable 2021/07/01

POLICY FOR THE PROTECTION OF PERSONAL DATA





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1. Validation cycle

This policy has been validated by the management of ALTEN.

2. History of changes

Version	Nature of changes	Date
1	Original document	2018/05/25
2	Modification of the document: addition of sections	2019/02/12
3	Update of the document	2021/07/01

3. Object

The privacy Policy constitutes the reference framework for the protection of personal data of the ALTEN Group (hereinafter "ALTEN").

It specifies the rules and expresses the governance principles relating to the protection of ALTEN's personal data.

4. Scope

This document applies to the whole ALTEN Group.



5. Related documents

Reference	Description
EPO-GRI-003	General Information Systems Security Policy (OPISS)

6. Definitions

Word	Definition
Data controller (DC)	Means within the ALTEN Group, the entity that determines the purposes and means of processing personal data, controls the data and is responsible for it.
Data processor (DP)	Means within the ALTEN Group, the entity that processes personal data on behalf of the Data Controller in the frame of the provision of services.
Data Protection Coordinator (DPC)	Means the Data Protection Coordinator (DPC). The DPC is an internal position, which replaces the DPO, if a DPO is not mandatory as per the GDPR.
Data Protection Officer (DPO)	Means the person (employee or external provider) appointed by an entity and who is in charge of the protection of Personal Data as well as the relationships with the data protect authority where he/she is registered.
Data subjects	Pertain(s) to a natural person whose Personal Data is collected or processed by ALTEN or by an ALTEN subcontractor.
Employees	Pertain(s) to any internal member of ALTEN, whether an employee, intern, student apprentice, temporary employee or any other
GDPR	Means the General Data Protection Regulation.
Joint Controller (JC)	Means two or more Data Controllers who jointly determine the purposes and means of processing.
Personal Data	Pertains to any information that relates to a natural person, identified or identifiable, directly or indirectly, most notably through reference to an identifier such as an identification number, localisation data, an online identifier, or to one or more specific elements pertaining to his or her physical, physiological, genetic, psychic, economic, cultural or social identity.
Registers	Means the “record of processing activities” (Reference: Article 30 of GDPR) in which personal data processing are inventoried. This includes: <ul style="list-style-type: none"> • Identity of the parties • Category of data processed • Purpose of the data, who has access to them and to whom are they communicated • Retention duration of the personal data • Security measures applicable
Sensitive data	Pertains to Personal Data which, directly or indirectly, indicates racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, along with the processing of genetic data, biometric data for the purposes of identifying a natural



	person in a unique way, data pertaining to health or data relating to the sex life or sexual orientation of a natural person.
Service provider(s)	Pertain(s) to any person outside ALTEN but who carries out activities for ALTEN.

7. Introduction

In the course of its business activity, the ALTEN company (hereinafter "ALTEN") needs to process Personal Data (as defined hereinafter) concerning the company's Employees, Service Providers, Suppliers and current and prospective Customers.

Firmly resolved to comply with all legal and regulatory obligations and recommendations regarding the protection of privacy and personal data, ALTEN has laid down, in the present Policy for the Protection of Personal Data (hereinafter the "Privacy Policy"), the principles and guidelines that govern all processing of Personal Data carried out directly or indirectly by ALTEN and the company's subcontractors.

ALTEN is bound by all applicable regulations when it comes to the protection of Personal Data and undertakes to comply with the applicable rules in this area, most notably Law No. 78-17 of 6 January 1978 relating to IT, data files and liberties (hereinafter the French Data Protection Act) and the (EU) regulation 2016/679 of the European Parliament and Council of 27 April, 2016 (hereinafter the "GDPR").

8. Governance

To ensure its compliance with GDPR, ALTEN has set up a specific organization. ALTEN has nominated a Data Protection Officer (DPO) or a Data Protection Coordinator (DPC) in each entity of the Group. The role of the DPO or DPC is to manage the conformity of ALTEN. The Group DPO reports directly to the Head of Compliance and therefore to the Legal department. ALTEN has also nominated GDPR support in each department. We call them GDPR ambassadors.

9. Collection and processing of personal data

The rules described hereinafter must be respected by ALTEN Employees and Service Providers when they are required to collect and process Personal Data.

ALTEN shall ensure that all current and future Employees and Service Providers are informed of the content of this Policy and receive regular and appropriate training on the topics addressed herein.

This Policy will be published on the ALTEN Intranet site.

10. Collection for specific, explicit and legitimate purposes

European rules applying to the protection of Personal Data require that said Personal Data be collected for specified, explicit and legitimate purposes.

ALTEN Employees and Service Providers must therefore make sure that the purpose for which Personal Data is collected is:

- Regulated and sufficiently specific;

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- Relevant to ALLEN's business;
- Communicated to those concerned in a clear manner;
- Legally authorised.

Likewise, if Personal Data is collected for a specific purpose, it cannot be used in any way that is incompatible with this initial specific purpose.

The purposes for which ALLEN collects and processes Personal Data are primarily as follows:

- Administrative management of human resources;
- Payroll management;
- Career management and HR development;
- Recruitment management;
- General accounting;
- Management of current and prospective customers;
- Management of service providers;
- The provision of IT tools for personnel;
- Access control.

11. Existence of a legal basis for the processing of personal data

Before beginning the collection and processing of Personal Data, ALLEN Employees and Service Providers must ensure that the following prior conditions have been met:

- The person concerned has given his or her consent to the collection and processing of his or her Personal Data; or
- The processing of Personal Data is necessary for the performance of a contract to which the person concerned is party; or
- Under certain special circumstances, ALLEN has a legitimate interest to process Personal Data (for example the prevention of fraud), unless overridden by the interests or rights of the person concerned; or
- The processing of Personal Data is necessary to protect the vital interests of the person concerned (for example a situation of life or death); or
- The processing of Personal Data enables ALLEN to meet a legal obligation to which it is bound; or
- The processing of Personal Data is necessary to perform an assignment in the public interest.



Should the collection or processing of Sensitive Data be envisaged at ALLEN, the Employees or Service Providers must refer to Point 8 of this Privacy Policy.

12. Minimisation of collected personal data

In view of the persons concerned, together with the context and purpose of processing, ALLEN Employees and Service Providers must be sure that processing is confined only to the Personal Data that meet the following conditions:

- Appropriate;
- Relevant;
- Confined to what is necessary with regard to the purpose(s) of processing.

Moreover, said Employees and Service Providers must keep this Personal Data updated to ensure that it is as accurate and as comprehensive as possible.

13. Retention of personal data

ALLEN Employees and Service Providers must make sure that Personal Data are not retained for longer than necessary with regard to the purpose for which they were collected and the nature thereof. Accordingly, they must set a period of retention over a limited period of time, taking full account of these instructions.

For further details regarding the Retention of Personal Data, ALLEN Employees and Service Providers must refer to their general management.

14. Collection of sensitive data

Generally speaking, the collection and processing of Sensitive Data at ALLEN is prohibited.

However, such collection or processing of Sensitive Data may be authorised if the following conditions are met:

- The collection or processing of such data is necessary and relevant in relation to ALLEN's business activities; and
- At least one of the following conditions is also met:
 - ALLEN has obtained the explicit consent of the person concerned for the collection and processing of his or her Sensitive Data, or
 - The person concerned has previously made public his or her Sensitive Data, or
 - The collection and processing of Sensitive Data is necessary to meet a legal obligation, particularly regarding labour or social security law, or
 - The processing of Personal Data is necessary to protect the vital interests of the person concerned (for example a situation of life or death), or
 - Processing is necessary for the recognition, exercising or defence of a right in a court of law.



Before collecting or processing Sensitive Data, Employees and Service Providers must request authorisation from their line manager or from the company Data Protection Officer (DPO).

15. Information of data subjects

ALLEN Employees and Service Providers must ensure that those concerned have effectively received clear and comprehensive information, written in an understandable and easily accessible manner, which specifies how and by whom their Personal Data will be used.

When Personal Data is collected indirectly (for example from a business partner or recruitment agency), said Employees and Service Providers must ensure that the necessary statement of information relating to indirect data collection has been effectively forwarded to the person concerned.

16. Respect for the rights that persons concerned may exercise

In compliance with applicable regulations, a data subject whose Personal Data is collected or processed by ALLEN must be able to exercise his or her right to portability for Personal Data, together with rights of access, correction, erasure, limitation and opposition for legitimate reasons.

The person concerned also has the right to issue instructions relating to the fate of his or her Personal Data in the event of death.

ALLEN Employees and Service Providers must ensure that the possibility of exercising these rights is effectively mentioned in information for the person concerned, as provided for in Section 9.

17. Automated decisions having a negative effect on the person concerned

European legislation for the protection of personal data aims to prevent decisions affecting people from being made solely on the basis of the automated processing of personal data with no human presence or intervention, as such decisions may have a significant negative effect on the persons concerned.

When decisions are made by automated means, ALLEN Employees and Service Providers must ensure that the persons concerned are made aware of the rationale behind any such decision.

Said Employees and Service Providers must take the necessary steps to protect the legitimate interests of those concerned, specifically the possibility for them to request human intervention or to contest the decision.

At ALLEN, a decision made by automated means may not be based on Sensitive Data.

18. Security and privacy of personal data

ALLEN has introduced appropriate technical and organisational measures to ensure the security and privacy of the Personal Data it collects and uses.

To this end, ALLEN Employees and Service Providers must firstly respect the security measures described in ALLEN's "General Policy for the Management and Security of Information Systems (PGSSI)".

More specifically, when Personal Data is processed, said Employees and Service Providers must implement appropriate security measures in order to prevent:

- The accidental or unauthorised destruction of Personal Data;

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- The impairment of Personal Data;
- Accidental access to or unauthorised disclosure of Personal Data;
- Illicit processing of Personal Data.

These appropriate measures will be taken with full consideration given to the nature of Personal Data and to the risks incurred by the processing thereof.

When ALLEN wishes to assign the processing of Personal Data to a subcontractor, Employees or Service Providers must ensure that a written contract has been established in which:

- The subcontractor undertakes to process the Personal Data assigned to him only when instructed to do so by ALLEN; and
- The subcontractor undertakes to implement the appropriate technical and organisational security measures in order to protect the security and privacy of the Personal Data entrusted to them.

19. Transfert of personal data to countries outside the European Union

In cases where the processing of Personal Data carried out by ALLEN may involve a transfer of said data to a third country (located outside the European Union or not having an appropriate level of protection within the meaning of the European regulation), or to an international organisation, ALLEN undertakes to provide the appropriate guarantees as required by the GDPR, and to ensure said guarantees are respected by Employees and Service Providers.

20. Changes to this privacy policy

ALLEN reserves the right to modify this Privacy Policy.