

PERSONAL DATA MANAGEMENT POLICY

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1°) Preamble

SETEC CONSULTANTS, registered with the French Trade and Companies Registry in Paris under number 412 736 639 and subsidiaries (hereinafter "**SETEC Group**") is likely to collect and process personal data as part of its activity, i.e. any information that may identify, directly or indirectly, a natural person (hereinafter "**Personal Data**"), within the meaning of EU Regulation 2016/679 known as the General Data Protection Regulation (hereinafter "**GDPR**"), which came into force on the 25th of May 2018.

Accordingly, the purpose of this general policy on the protection of personal data (hereinafter the "**General Policy**") is to define and share the SETEC Group's orientation with regard to the protection of Personal Data.

The terms "controller", "processor" and "data subject" refer to the definitions set out in Article 4 of the GDPR.

2°) Background

The SETEC Group, like any company established within the European Economic Community or which directly targets European residents through its activity, is subject to the GDPR, as well as to the French Data Protection Act (*Loi n°78-17 du 6 janvier 1978 relative à l'informatique, aux fichiers et aux libertés*, known as the "*Loi Informatique et Libertés*").

In this context, the SETEC Group pays close attention to the protection of Personal Data and its compliance with the GDPR.

This approach is in line with the concerns of the SETEC Group's Clients and the risks associated with the processing of their Personal Data.

The SETEC Group will therefore endeavour to comply with the provisions of the GDPR at all times, while continuing to promote ongoing innovation within its services and thereby maintaining the trust it has built up among Clients.

3) Areas of application

3.1. Definition of the scope of the General Policy

This General Policy applies to all Personal Data collected or processed by the SETEC Group,

- both as data processing manager for the management of human resources or commercial relations with prospective clients and suppliers,
- as a data processor, when collecting and/or processing Personal Data on behalf of subsidiaries and, in certain cases, on behalf of clients.

This Policy applies to all media on which Personal Data is stored: servers and computer systems, paper media or databases, including any professional device regularly used for e-mail, web access or other professional tasks.

All users who interact with SETEC's IT resources are also subject to this General Policy.

3.2. Outside the field of application

Data that does not directly or indirectly identify a natural person is excluded from this General Policy.

4°) The fundamental principles at the heart of the SETEC Group's approach

In order to ensure the protection of Personal Data, the SETEC Group relies on six main principles set out in Article 5 of the GDPR and promoted by the *Commission Nationale de l'Information et des Libertés (CNIL)*, namely:

- **The principle of legality, loyalty and transparency of processing (5.a):** the SETEC Group ensures for each collection and/or processing that it is carried out in accordance with the basis set out in Article 6 of the GDPR, in complete transparency and loyalty for the data subject.
- **Compliance with the purpose of processing (5.b):** any Personal Data collected must be collected for an explicit and legitimate purpose, determined either by the SETEC Group or one of their subsidiaries, or by the data controller for whom the SETEC Group processes the said Personal Data as a sub-contractor.
- **The principle of minimisation and relevance of Personal Data (5.c):** for each collection and/or processing, SETEC Group ensures that only Personal Data that is necessary for the processing and relevant in the context thereof is processed.
- **Accuracy of Personal Data (5.d):** SETEC Group takes all reasonable steps to ensure that all data collected and processed is accurate and kept up to date.
- **Definition of and compliance with an appropriate conservation period for the purpose (5.e):** SETEC has a strict data conservation policy to ensure that all Personal Data is conserved in accordance with its purpose, then archived or deleted according to the circumstances.
- **The principle of security and confidentiality (5.f):** SETEC has established high security standards and strict organisational measures to guarantee the security and confidentiality of the Personal Data it holds.

Furthermore, SETEC pays particular attention to respecting the rights of the persons concerned in the context of any collection and/or processing of Personal Data.

5°) The SETEC Group is organised to ensure that all subsidiaries and subcontractors comply with the GDPR

The SETEC Group has appointed a group-level Data Protection Officer (DPO) to ensure compliance with the GDPR and to act as a qualified contact for data subjects and the authorities.

The DPO has been appointed and registered with the CNIL under the number DPO-118110.

In each subsidiary, a representative is appointed to ensure compliance with the GDPR and protect the rights of the individuals concerned.

The common basis for compliance with the GDPR and applicable regulations, as well as technical and organisational measures, are established by the SETEC Group for all subsidiaries.

The main principles and measures are validated by a committee made up of the DPO and the GDPR representatives of each subsidiary, at least once (1) a year.

The SETEC Group may also process Personal Data on behalf of its subsidiaries. In this context, the General Policy applies in full; the SETEC Group is considered to be a subcontractor of the subsidiary, within the meaning of the GDPR, and must comply with all obligations within the context of the missions assigned to them, on the same basis as with their clients.

In addition, at an individual level, each employee, collaborator, partner or service provider who has access to Personal Data confided to the SETEC Group and/or to one of their subsidiaries, must be fully involved in the protection of this Personal Data and undertakes to respect the measures required of them, in particular by submitting to a reinforced obligation of confidentiality for the employees and collaborators of the SETEC Group;

Lastly, the SETEC Group ensures that subcontracting agreements (Personal Data Supplier Subcontractor Charter) are signed with all subcontractors of the SETEC Group, in compliance with Article 28 of the GDPR, as well as with certain subsidiaries when the SETEC Group is considered as a subcontractor.

6) Organisational and technical security measures in place

In order to guarantee the security and confidentiality of Personal Data collected and/or processed by the SETEC Group, whether as data controller or subcontractor, the SETEC Group has implemented appropriate technical and organisational measures, in accordance with the provisions of the GDPR, described below:

ORGANISATIONAL MEASURES	Description
Managing people's rights	<p>The persons concerned by the processing of their Personal Data have rights set out in Articles 15 et seq. of the GDPR, allowing them to retain control of the information concerning themselves (right of access, deletion, etc.). These rights may be asserted by sending an e-mail to the e-mail address provided for this purpose or by writing by registered letter with acknowledgement of receipt to the postal address of the SETEC Group and/or its subsidiary concerned.</p> <p>A register for managing requests for rights is also kept by the SETEC Group / by each of the subsidiaries.</p>
Access control	<p>Access to group applications is by name and requires a password. Password rules are strict and comply with the NIS directive. Access is tracked.</p>
Physical and environmental safety for end users	<ul style="list-style-type: none"> • Workstations lock automatically after a maximum of 15 minutes of inactivity. Unlocking requires authentication (password, biometrics, etc.). • Remote VPN/SSL access to networks and network services when travelling or remote working • Software installation requires local administrator access

Employees' duty of confidentiality	All employees of the SETEC Group and all subsidiaries sign a binding confidentiality clause as part of their employment contract.
Signing of subcontracting agreements with clients and partners	The SETEC Group concludes subcontracting agreements with clients, and partners where applicable, in order to provide a contractual context for the collection and processing of Personal Data.
TECHNICAL MEASURES	Description
Data backup	Regular back-ups of production data and applications are carried out
Dealing with technical vulnerabilities	Regular information system audits are carried out by external service providers
Protection against malicious software	A antivirus is functional and set automatically on all workstations

7°) The introduction of demanding additional measures

In addition to the objectives of technical and organisational security measures, Personal Data protection objectives are defined and documented. These objectives are based on the main principles set out above.

Definition of roles and responsibilities

Roles and responsibilities are defined and documented within the SETEC Group:

- Strategic orientations in terms of information security are defined and validated by SETEC Group management. Regular committees are scheduled to monitor the compliance of the SETEC Group and subsidiaries.
- As mentioned above, the Group has a Data Protection Officer ("DPO"). He ensures that the processing of Data complies with the GDPR and any other applicable regulations.

- Each entity has a GPDR representative, who is responsible for monitoring compliance with the GPDR.

Continuous improvement of the data protection management system

- The DPO, accompanied by the SETEC Group's legal department, analyses, controls and carries out regular audits (at least once (1) a year) of the Personal Data protection management system in order to ensure that compliance is maintained in the long-term.

Training and awareness campaigns required for SETEC Group employees and collaborators

- A support plan for GPDR representatives has been implemented to help subsidiaries achieve compliance.
- A communication plan has been put in place to inform employees and users of their obligations and good practice when it comes to the protection of Personal Data.

Documentation

The actions and documents carried out to comply with the GPDR are regularly analysed and updated to ensure ongoing protection of Personal Data in line with the latest recommendations and regulations in force. This documentation is sent to the employees concerned to keep them informed.

8°) Review

The SETEC Group's General Policy will be reviewed in the event of major changes in order to ensure its relevance with regard to the applicable regulations and remains applicable over the long term.

Version	Revision date	Author	Description of changes
V0	25/04/2022	Ghada AOUICHAOU	Initial version
V1	31/01/2023	DAJ - DPO	Version reviewed with assistance of ITEANU AVOCATS