



GDPR POLICY

The purpose of this policy is to define the main principles which govern the protection of personal data and the implementation of the **General Data Protection Regulation – “GDPR”** within the Camusat Group.



In order to define its policy for the protection of personal data collected, the Camusat Group relies, among other things, on the “*Data processing and individual liberties*” Law Act No. 78-17 of January 6, 1978, on the “*Confidence in the digital economy*”, Law No. 2004-575 of June 21, 2004 and on the “*General Data Protection Regulation*” No. 2016/679 of April 27, 2016.

By this policy, Camusat Group reiterates and reinforces its commitments regarding the **respect for private life** and the **protection of personal data** collected, held and processed. Said policy concerns the Camusat Group and its sites, applications, software and services published by the Group and/or using its interface or functionalities.

The Camusat Group:

- Collects and processes personal data within the performance of its activities in order to ensure the quality of services in a secure environment. Only the data necessary and relevant with regard to the goals pursued are collected, in compliance with the principle of proportionality,
- Informs about the procedures for collecting personal data, their use and the options available to the data subjects,
- Guarantees the right of access, rectification and the right to object to the processing by the holders of such personal data.

The Camusat Group also guarantees:

- The **right to restriction of processing**: in addition to the other rights (of rectification, to object, etc.), this right entitles the data subject to contest the accuracy of personal data used by Camusat or to object to the processing of personal data concerning him or her. The law enables Camusat to verify or check the request of the data owner during a certain period of time. During this period, the data owner shall have the possibility to request Camusat to restrict the use of data concerning him or her.
- The “**right to be forgotten**” or to **erasure of personal data**: the data subject shall have the right to obtain the erasure of personal data concerning him or her, as soon as possible, and the data controller shall have the obligation to erase this personal data as soon as possible.
- The **right to data portability**: the data subject shall have the right to receive a part of his or her personal data, in a commonly used and machine-readable format.

The Camusat Group intends to observe all rights regarding the processing of personal data concerning the employees:

- The right to be informed about the use of personal data,
- The right to access the personal information collected from Group employees,
- The right to request the rectification of inaccurate, incomplete, ambiguous, outdated personal data for the Group employees,

- The possibility to request the transfer (the right to data portability) of the data to another service supplier/user,
- The right to determine guidelines concerning the processing of personal data after his/her death.

The Camusat Group undertakes:



- To be as exhaustive as possible in the communication to data subjects of the information concerning the processing of their personal data,
- To collect only personal data which are adequate, relevant and strictly necessary for the purpose of the processing,
- Not to keep obsolete data and to perform regular updates.

The personal data collected by the Camusat Group shall in no case be transferred or leased to, nor exchanged with third parties, with the exception of the partners and subsidiaries of the Group, unless this was clearly specified during the collection of personal data concerned.

However, the personal data may be disclosed under a law, regulation or subject to a decision of a competent regulatory or judicial authority or, if necessary, for the purpose of preserving one's rights and interests. In addition, the Camusat Group shall, if necessary, have the right to transmit information if it acquires another company or is the subject of a merger, absorption, takeover or reorganisation of any kind.

The Camusat Group undertakes to keep in locked cabinets all paper documents containing personal data and to secure servers containing personal computer data. Providers also undertake to protect their servers.

All Camusat Group employees with access to personal data shall be bound by a duty of confidentiality and are liable to disciplinary measures and/or other sanctions if they do not comply with these obligations.

The owners of the personal data held may, at any time, file a request to the Camusat Group (ethics.alert@camusat.com) in order to know what data concerning them are held by the Group, to oppose to the processing thereof, to have such data rectified or erased.

This policy may be subject to modification by the Group in the event of regulatory, jurisprudential or technical changes.

Richard THOMAS
Chairman