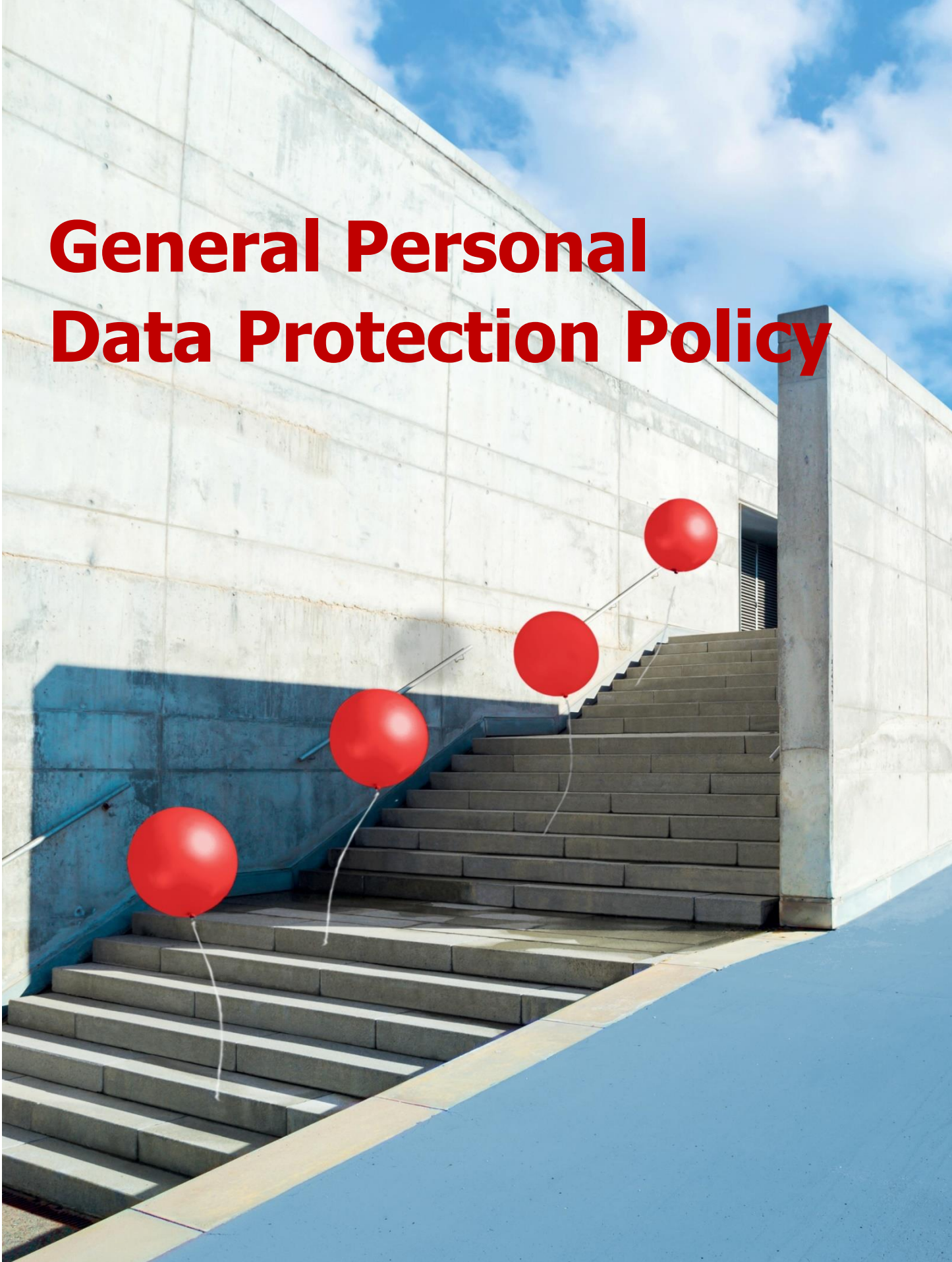


General Personal Data Protection Policy



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Introduction

Given the nature of its activities, which are focused on new and digital technologies, Sopra Steria has always recognised the importance of the human element, which must remain at the centre of its action. As such, Sopra Steria attaches great importance to privacy and personal data ("**Personal Data**") protection, which constitutes a major asset for developing the trust of its employees, partners and customers.

With the adoption of the General Data Protection Regulation (**GDPR**), Member States of the European Union (EU) now have a common set of rules which are equally applicable to all Sopra Steria entities established therein. These rules may be supplemented by specific provisions required by local law.

This General Personal Data Protection Policy (the "**Policy**"), drawn up on the basis of the GDPR, thus describes the general principles implemented by Sopra Steria and its affiliated companies ("**Sopra Steria**", "**we/us**", "**our**") in order to ensure adequate protection of the Personal Data of Data Subjects ("**You**", "**Your**") each time a processing of such data is required in the context of Sopra Steria's activity. It therefore applies by default to all processing of Personal Data carried out by Sopra Steria in the conditions defined in this Policy.

1. What is the scope of application of this Policy?

This Policy applies to all processing of Personal Data carried out by Sopra Steria (mainly when Sopra Steria processes Personal Data on its behalf and, to the extent applicable under the Personal Data Regulation, when Sopra Steria processes such data on behalf of its customers) in any form whatsoever (e.g.: digital or paper documents), and all types of processing operations, be these manual or automated, in all the geographical zones in which Sopra Steria operates, within or outside of the European Economic Area. Personal Data may include information concerning employees or casual workers, customers, suppliers, partners and information communicated by its customers to Sopra Steria, and in general all contacts of professionals and other third parties with a relationship with Sopra Steria.

This Policy also applies to all third-party service providers acting on behalf of or in the name of Sopra Steria, which are also required to comply with the principles set down in this Policy, to the extent applicable under the Personal Data Regulation.

In the event that a national regulation requires a higher level of protection of Personal Data than that provided for in the GDPR, such national regulation shall prevail over the provisions of this Policy, which would provide less protection.

2. A few definitions to help understand this Policy

- **Personal Data** refers to any information which makes it possible to identify a natural person, directly or indirectly, in particular by reference to an identification number or to one or more specific elements of their physical, physiological, mental, economic, cultural or social identity. Data are considered personal when they allow anyone to link the information to a particular person, even if the person or entity holding the information is unable to make this link.
- **Standard Contractual Clauses (SCC)** refer to model contracts for the transfer of Personal Data, drawn up by the European Commission and considered to provide an adequate level of protection for Personal Data being transferred to a Third country.
- **Special Categories of Personal Data** refer to (i) data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic data and biometric data processed for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation and (ii) Personal Data concerning criminal convictions and offences which, due to their nature, have been classified by law as deserving increased protection in terms of confidentiality and security.
- **Non-EEA country** refers to a country outside the European Economic Area that does not benefit from an adequacy decision by the European Commission, and to which Personal Data cannot be transferred without first establishing appropriate safeguards.
- **Data Subject** refers to any identified or identifiable person whose Personal Data are processed by Sopra Steria.
- **Personal Data Regulation** refers to (i) the General Data Protection Regulation 2016/679 (GDPR) (ii) the Personal Data protection law applicable in the Member States, integrating the GDPR, or (iii) any law or regulation applicable to a Sopra Steria entity and governing the processing of Personal Data.
- **Sopra Steria** refers to the Sopra Steria holding company and/or to each of the different affiliated companies of Sopra Steria, which are part of the Sopra Steria Group.
- **Data Controller** refers to Sopra Steria holding company and its subsidiaries processing Personal Data on their own behalf and determining the purpose and means of such processing.
- **Data Processor** refers to Sopra Steria holding company and its subsidiaries processing personal data on behalf of a Data Controller.
- **Third party** means any third party or business partner which receives from Sopra Steria or to whom Sopra Steria entrusts Personal Data, such as suppliers, contractors, sub-contractors or other service providers.
- **Process / Processing** refers to any operation or set of operations which is performed on Personal Data, whether or not by automated means, such as collection, recording, organisation, storage, access, adaptation, modification, retrieval, consultation, use, disclosure, dissemination or otherwise making available, alignment, combination, restriction, erasure or destruction.

3. Personal Data processed by Sopra Steria and the principle of minimisation

The Personal Data we process may be collected:

- directly from You when You provide them within the framework of Your relationship with Sopra-Steria (contractual relationship with Sopra Steria and professional contact information, subscription to a newsletter or a white paper, etc.). These Personal Data can make a person directly identifiable (e.g. surname, first name, address) or indirectly identifiable (e.g. job role, telephone number, etc.)
- through the different digital technologies that Sopra Steria may use in the context of its business activity, via its Websites or other on-line services. These technologies may include cookies (a small text file that is stored either temporarily or permanently in the user's computer when, for example, viewing a Website, reading an email, installing or using a software or mobile application, on any type of terminal) or other technical means. These Personal Data are technical data including Your authentication data, IP addresses, data concerning Your browser, etc.
- indirectly from our customers when they provide us with their Personal Data necessary for the provision of our services or from our partners in the context of our relationship with them (collection during common events, collection of data in the context of the services provided, etc.).

When we act as Data Controller:

- we ensure that the Personal Data we collect are relevant, adequate and do not exceed what is necessary for the purposes of processing (management of the contractual relationship, payment, market knowledge, marketing, promotion, etc.).
- we collect Special Categories of Personal Data only within the limits permitted or required by the applicable Personal Data Regulation.
- we do not carry out any profiling activities based on an automated decision, unless such decision is based on one of the following legal grounds: compliance with a legal obligation, performance of a contract to which the Data Subject is party, consent of the Data Subject. In addition, such activities are performed only on the condition that appropriate safeguards have been put in place to protect the rights of the Data Subjects.
- we encourage Data Subjects to help us keep their Personal Data up-to-date by exercising their rights according to the conditions defined in Article 12 below.

When Sopra Steria processes Personal Data on the basis of customer instructions

- this processing is performed according to the conditions defined in the Data Processing Agreement (DPA) signed between the customer and Sopra-Steria.

4. The purposes for processing Personal Data are specified, explicit and legitimate (principle of purpose limitation)

When Sopra Steria acts as Data Controller, Sopra Steria ensures that Personal Data are collected and processed only for the purposes with the following characteristics:

- The purposes for processing are specified, explicit and legitimate (these may be multiple depending on the circumstances of the collection), so that Personal Data cannot be further processed for a different purpose which is incompatible with the initial one, unless consent or a new legal basis has been obtained.
- These purposes are brought to the attention of the Data Subjects in the information notice provided to them before the processing activity starts.
- These purposes are specified and specifically include the following:
 - human resources management, recruitment, security of premises and access to Sopra Steria networks, access management to computer tools, implementation of digital solutions or collaborative platforms, IT support, customer relationship management, supplier relationship management, payment management, sales and marketing management, procurement management, internal and external communication and events management, data analysis, management of group Websites, management of mergers and acquisitions, etc.;
 - compliance with any legal or regulatory requirements;
 - the necessity to respond to requests from the administrative or legal authorities in compliance with the applicable law;
 - protection of Sopra Steria's rights and interests: internal audits, system control, protection against fraud, data collection to ensure the defence of Sopra Steria's rights in the course of a dispute, etc.

For each new project that requires the collection of Personal Data, these purposes are analysed prior to its launch to ensure that the processing complies with the Personal Data Regulation from the project's conception phase and to ensure the protection of Personal Data by default, in particular with regard to access and security measures, the minimisation of Personal Data collected and the retention period, in relation to the purpose pursued.

5. Lawfulness of Personal Data processing

When Sopra Steria acts as Data Controller, Sopra Steria ensures that it has a valid legal basis for every processing activity as required by the Personal Data Regulation.

We process Personal Data only when such Processing is necessary:

- for the performance of a contract with the Data Subject (for example, with our employees, customers, suppliers, etc.) or the performance of pre-contractual measures taken at its request;
- for the compliance with a legal obligation imposed on Sopra Steria;
- for the purposes of the legitimate interests pursued by Sopra Steria (for example, to gain better knowledge of its customers, security needs) after balancing the interests of Sopra Steria against the freedoms and fundamental rights of the Data Subjects;
- for the safeguarding of the vital interests of the Data Subject or another natural person;
- for the performance of a task carried out in the public interest or in the exercise of public authority by Sopra Steria.

Finally, Sopra Steria relies on the consent of the Data Subject before starting the processing activity when such consent is specifically required by the Personal Data Regulation or other applicable laws (for example, to send marketing information via electronic communication or to place cookies)

6. Loyalty and transparency regarding processing conditions

When Sopra Steria acts as a Data Controller, processing activities are carried out according to the conditions described in the information notices provided to the Data Subjects.

- We ensure that the Data Subjects receive sufficient information about the processing of their Personal Data at the time of collection of the Personal Data and at the latest at the time of communication with the Data Subject or prior to any communication to a Third Party (in case of indirect collection), unless it is impossible to communicate this information or it would require disproportionate efforts.
- This Policy defines the guiding principles according to which Sopra Steria processes Personal Data and applies by default when an information notice could not be provided due to physical impossibility.
- This Policy is completed by:
 - specific information notices in a format that provides concise, transparent, intelligible and easily accessible information. These information notices shall indicate the Sopra Steria entity in charge of the processing and shall take into consideration the distinct categories of Data Subjects (employees, applicants, customers, suppliers, etc.), the specific purposes for the processing of Personal Data relating to these individuals (e.g., human resources management, customer management, supplier management) and, where applicable, the mandatory information resulting from local law. They shall be written, where applicable, in a language accessible to Data Subjects in the country of the entity.
 - If You are a customer, prospect, supplier or partner of Sopra Steria, You can access [the customer information notice](#) or the supplier information notice [here](#).
 - If You are a Sopra Steria employee, the intranet dedicated to "Personal Data Protection" on the Sopra Steria network will enable You to access all the information notices and procedures that concerning You.

7. Which security and confidentiality measures have been implemented?

We protect all Personal Data collected and processed in the course of our business in accordance with appropriate and adequate security standards, taking into account the state of the art, costs of implementation and the nature, scope, context and purposes of the processing, as well as the risk to the rights and freedoms of the Data Subjects and the results of the privacy impact assessment we carry out when required by the Personal Data Regulation.

Technical and organisational measures are adopted to restrict access to Personal Data to those persons who need to know it for the specific processing purposes and to prevent accidental or unlawful destruction, loss, alteration, disclosure or unauthorised access, or any other form of unlawful or unauthorised processing.

In compliance with Group's security rules, Sopra Steria's information systems include automatic traceability of all security events in order to be able to identify, prevent or minimise the impact of any event likely to affect Personal Data and to enable us to comply with our obligations in relation to Personal Data breaches.

Where Sopra Steria acts as a Data Controller, Sopra Steria selects service providers with sufficient guaranties to implement appropriate technical and organisational measures, to ensure that the processing meets the requirements of the Personal Data Regulation.

We regularly assess the technical and organisational measures in place at Sopra Steria and at our Sub-contractors.

The IT security measures implemented at Sopra Steria are described in the Sopra Steria Charter for Use of Sopra Steria's Information System and in the Sopra Steria Group Security Policy.

8. How long do we store Personal Data?

Personal Data processed by Sopra Steria on its own behalf are kept only for the period necessary for the purpose of processing (and any purposes compatible with the main purpose).

However, we may retain Personal Data for a longer period to meet our legal and regulatory obligations and to comply with legal requirements or if necessary to protect our rights and interests.

Once the retention period is over, we anonymise or delete such Personal Data.

You can find more specific information on the retention period of Your Personal Data in the relevant information notice or by using the contact details provided in Article 12 below.

9. The rights of Data Subjects

We are open to questions or requests from Data Subjects about the conditions of processing of their Personal Data, in the context of the exercise of their rights, which are recalled below and in all applicable information notices:

- **Right of access:** upon simple request, we will provide You with a copy of the Personal Data we hold about You, unless such Personal Data have already been provided to You by other means (including through Your account). In this case, we will inform You.
- **Right to portability:** we may also provide Data Subjects with a copy of the Personal Data in our possession, in a structured, commonly used and readable format as required by applicable law (if processing is based on the performance of a contract or consent).
- **Right to rectify:** Data Subjects can request to correct or modify any incomplete, outdated or inaccurate Personal Data.

- **Right to erasure / right to be forgotten:** Data Subjects may request the erasure of their Personal Data if (i) they are no longer necessary for the specific purpose of processing, (ii) the Data Subject has withdrawn his or her consent for processing that was exclusively dependent on such consent, (iii) the Data Subject has objected to the processing and Sopra Steria cannot derogate from this right of objection, (iv) the processing is unlawful, (v) the Personal Data must be erased in order to comply with a legal obligation on Sopra Steria. Sopra Steria will take all reasonable steps to inform other Sopra Steria entities processing such Personal Data of such deletion.
- **Right to restriction:** Data Subjects may request a restriction of processing (i) if the accuracy of the Personal Data is disputed to allow Sopra Steria to verify such accuracy, (ii) if the processing of the Personal Data is unlawful and the Data Subject prefers restriction rather than erasure of his/her data, (iii) if the Data Subject wishes Sopra Steria to retain his or her Personal Data because it is required for his or her defence in legal proceedings, (iv) the Data Subject has objected to the processing but Sopra Steria has carried out an analysis to verify whether its legitimate grounds for processing override the Data Subject's rights.
- **Right to withdraw consent:** if the processing of Personal Data depends on the consent of the Data Subject, the Data Subject has the right to withdraw such consent at any time without prejudice to the lawfulness of the processing carried out prior to such withdrawal.
- **Right to Object: the Data Subject may object at any time to the processing of his/her Personal Data:**
 - where the data is used for direct marketing or profiling purposes for the sending of targeted advertisements, or
 - when processing is based on the legitimate interests of Sopra Steria, it being understood that Sopra Steria will not be able to comply with this objection if there are compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject, or when the processing is necessary for the establishment, exercise or defence of legal claims of Sopra Steria.

To exercise these rights, please use the contact details provided in Article 12 below.

10. Disclosure of Personal Data

For the purposes of processing related to its activities, Sopra Steria may transfer the Personal Data it processes to Third Parties, under the following conditions:

- We will only disclose Personal Data within Sopra Steria Group or to Third Parties for the purposes described in this Policy or in the applicable specific information notices.
- When Personal Data are disclosed, their disclosure is strictly limited to those persons who have a need to know by virtue of their position or when required by law or by a judicial or administrative decision. These persons have restricted access according to the clearances defined by the Sopra Steria security policy. They are required to comply with the Personal Data Regulation and may only use Personal Data for the purposes defined in this Policy or in the applicable specific information notice.
- The categories of recipients who may have access to Personal Data vary according to the nature and purpose of the processing and are made known to Data Subjects in the applicable specific information notices.
- These categories of recipients include the following:
 - Sopra Steria Holding and the subsidiaries of Sopra Steria Group when the internal organisation of the Group requires the sharing of Personal Data;

- Our partners and service providers processing Personal Data in accordance with our instructions for Personal Data that we process on our own behalf (suppliers of IT and digital technology solutions and equipment messaging systems or HR management solutions, suppliers of anti-fraud services, cyber-security services, suppliers of any services that enable Sopra Steria to comply with its regulatory obligations (anti-corruption, money laundering and anti-terrorism funding), etc.;
- Duly authorised service providers that we call upon for the purposes <of our own services to our customers;
- Administrative or judicial authorities and any other interested parties duly authorised to access Personal Data under the applicable law;
- All purchasers, investors or other parties with a need to know in the event of a merger or restructuring of any kind (acquisition, joint-venture, divestiture, total or partial transfer of assets or divestiture).

11. International transfers of Personal Data

Sopra Steria will not transfer Personal Data to non-EEA countries which do not guarantee adequate protection of Personal Data, unless appropriate safeguards for such transfer are in place.

The recipients described in Article 10 above may be located in different geographical areas, which may lead Sopra Steria to transfer Personal Data to non-EEA countries.

These transfers to non-EEA countries are only made when strictly necessary for the purpose of the processing, e.g. for technical reasons (storage, hosting, technical support, maintenance, etc.) or for general purposes (directory management, etc.). The conditions for these transfers are brought to the attention of the Data Subjects in the applicable information notices.

We do not initiate any international transfers of Personal Data to a non-EEA country without ensuring that appropriate transfer safeguards as required by the Personal Data Regulation have been implemented. Intra-Group transfers are governed by an intra-group contract based on the European Commission's Standard Contractual Clauses (SCCs). For transfers to entities located in non-EEA countries which are not part of Sopra Steria Group, Sopra Steria establishes SCCs with each of the entities concerned. Where necessary, Sopra Steria shall obtain additional guarantees from the recipient of the Personal Data, if the SCCs need to be integrated due to risks under the local law of the country of the recipient of the Personal Data.

12. Processing requests or complaints concerning Your Personal Data

Sopra Steria has implemented a governance system for the protection of Personal Data protection by appointing a Data Protection Officer at Group level and Data Protection Officers at local level.

If You have any questions or requests for information regarding this Policy, you may contact the Group Data Protection Officer or the Data Protection Officer of the entity concerned.

For requests concerning the exercise of your rights as defined in Article 9 above, You may contact Your local Data Protection Officer whose contact details are provided in the specific information notice concerning the processing of Your Personal Data. You may also contact the Group DPO by using the contact details above.

We invite You to contact us first, but You may also, if You are a Data Subject, submit Your complaint directly to the competent supervisory authority: for France, this is the CNIL, 3 Place de Fontenoy, 75007 Paris, France.

13. Policy update

Due to the nature of our business and the regularly changing regulatory environment, this General Personal Data Protection Policy is subject to change. You are therefore invited to consult it regularly.

Last updated: 07/07/21