

INFORMATION NOTE FOR CLIENTS

1. Why issue an information note?

Sopra Steria Group, S.A. with a capital of € 20,547,701, registered under RCS Annecy n° 326 820 065, with its registered office established at: PAE Les Glaisins 3 rue du Pré Faucon, Annecy Le Vieux, 74940 Annecy, France (hereafter “**Sopra Steria**” or “**us/we**”) values the privacy of its Clients and Prospects (hereafter “**Clients**” or “**You**”, which includes prospects).

This information note (also referred as “**Note**”) is intended for our Clients. It describes the conditions that govern how we process personal data that is collected when you interact with Sopra Steria as part of the services we provide and more generally when managing our professional relationships.

Concerning processing of data inherent to the general use of Sopra Steria websites, please refer to our Personal Data Protection Charter, which is available [here](#).

Please be aware that this Note may be updated at any time by Sopra Steria. The most recent update will be mentioned on this page. We invite you to check this page regularly.

2. What type of personal data is concerned?

We only process data that is strictly essential to processing, as described in this Note, or any other purpose that will be specified at the time when we collect any additional data, as required.

We also collect personal data that is necessary, or that you agree to share with us when contacting us, for example via email or as part of meetings, or trade events, when you subscribe to our services or exchange with us on said services (for example for quotations, maintenance, support), as part of any call for tenders we may answer, and more generally, as part of the processing and management of our professional relationship.

We need to process the following categories of personal data:

- Identification details (name, first name, contact details such as postal and email postal address, Clients’ phone numbers, including their authorised representatives),
- Information concerning the entity that employs you, as well as your function within said entity: identity of the entity, client reference number, function and/or position,
- Commercial data (for example, list of services we have provided, history of our exchanges and your requests),
- Technical and connection data (for example, as part of the use of our services), and
- Content data.

Any information we collect that is essential to process your requests and manage our professional relationship is identified with an asterisk on the forms that are available in print, and online on our websites. If you fail to fill in the mandatory fields, we will not be able to process your requests. Where information essential to processing is missing, Sopra Steria reserves the right to contact you to obtain said missing information.

3. Why do we need to process your personal data?

Personal data is collected as part of the purposes described hereafter. For each of these purposes, we also detail the reasons (or legal basis) why we need to process your personal data:

Purpose of the processing	Reasons / Legal Basis
Answer your questions and requests, regardless of the communication means used.	Sopra Steria has a legitimate interest in answering the queries to better serve its Clients.
Manage our professional relationships and provide you with the service(s) you have subscribed to.	Such processing is required so that we may carry out the contract that we have entered with the Client. Sopra Steria also has a legitimate interest in managing its relationship and exchanges with its Clients, where necessary.
Propose customised surveys or quotations, as per the information you provide to this effect. Better understand your preferences and propose products or services adapted to your centres of interest.	Sopra Steria has a legitimate interest to propose tailored offers and quotations, in line with Clients manifest interest for our services, where applicable.
Ensure the safety and security of our services and sites, including our premises where applicable.	Sopra Steria has a legitimate interest in ensuring the safety and security of our services and sites.
Send you information about our services, offers, news, events, polls and surveys (for example, newsletters, invitations and other publications).	Your explicit agreement resulting from a positive approach, in particular your subscription, to receive such information or subscription to the Services concerned. Sopra Steria also has a legitimate interest in promoting and developing its services and those of the businesses in the group.
Perform statistical analyses on our services and their usages.	Sopra Steria has a legitimate interest to improve performance for its website.
Propose competitions and promotional operations.	Your explicit agreement, as the result of your participation and the execution of the general terms and conditions that govern these operations.
Satisfy our legal obligations and defend our rights and interests in case of litigation or prelitigation.	Sopra Steria may be subject to legal and regulation related obligations that require processing of data, and may have a legitimate interest in using said data for its defence in case

	of litigation or prelitigation, including before the courts
Share your personal data with third parties who need to process it, in the case where our activities come to be reorganised.	Sopra Steria has a legitimate to share Clients' data with potential buyers in case of transfer of reorganisation of its business activities.

4. Who are the recipients of your personal data and where are they transferred?

Within Sopra Steria, your personal data is available only to the employees who need to access it as part of their respective functions.

These persons are as follows:

Internally:

- Sopra Steria commercial and operational teams
- Sopra Steria Financial Department staff
- Sopra Steria staff from Legal and Compliance Departments; and
- Sopra Steria IT Department and other technical departments, for maintenance and support purposes.

Externally:

- Sopra Steria subsidiaries depending on the services provided or to be provided,
- Sopra Steria external consultants, for example layer firms, accountancy firm, auditors, and
- Sopra Steria providers of technical services (for instance IT, web hosting, subcontractors, etc).

Moreover, please note that, should part or all Sopra Steria activities be transferred to a third party, your personal data, as collected and stored by Sopra Steria, may be transferred to said party, subject to the applicable legal provisions.

Sopra Steria may also be required by law to disclose certain details, including to satisfy a court order, or to defend our rights if such measures are necessary to prevent fraud and/or cybercrime, or to ensure the safety of Sopra Steria or any other person, when requested or permitted by applicable legal provisions.

Given the international scope of the Group Sopra Steria, your personal data may be transferred outside the European Union and European Economic Area to countries that do not offer the same personal data protection as the European Economic Area. Where applicable, the transfer will follow all applicable regulations, based on the relevant and appropriate guarantees. You can obtain a copy of said guarantees by sending a request via email to: acces-cnil@soprasteria.com

5. Data retention (How long is the personal data kept?)

We only retain your personal data for the period required to fulfil the aforementioned purposes, or to allow us to satisfy our legal obligations.

The retention period of personal data collected by Sopra Steria is as follows:

- For as long as your Client account is active or as long as the contract between us is active, and five (5) years following its termination, or
- For as long as we remain in contact with you as part of our professional activities, and three (3) years after the last exchange with you, unless you notify us of your refusal upon receiving a prospection message from us.

We may be required to retain your personal data in the form of archives beyond the abovementioned period to comply with our legal obligations, or where necessary, mindful of applicable requirements, to exert our rights.

Once the personal data is no longer necessary to fulfil the purposes it was collected for, or for archival purposes to satisfy our legal obligations or to comply with the requirements, we ensure that they are fully destroyed or anonymised.

6. What rights do you have?

You have the following rights with respect to your personal data:

- You can request a copy of said personal data as well as the details of their processing and legal basis
- Rectify your personal data if they are incorrect, and complete them if they are incomplete
- Delete your personal data once they are no longer necessary to fulfil the purposes they were collected and/or processed for
- Limit processing of your personal data when:
 - their accuracy is disputed
 - their processing is illicit, but you oppose their deletion
 - we no longer require your personal data, but they are still necessary for the purposes of potential disputes, and exercising or defending rights before the courts
- Request portability of your personal data in a format that can be read by a machine, if our processing is based on your consent or the performance of a contract with us
- Specify general or specific instructions concerning the use and processing of your personal data after your death
- Withdraw your consent with regards to processing of your personal data, where said processing requires your consent, for example newsletters. Said withdrawal does not affect the legitimacy of any processing based on agreement performed prior to the withdrawal of consent, and
- Oppose any processing for prospection purposes.

In addition to the above-mentioned rights, you have the right to oppose any processing of personal data based on Sopra Steria's legitimate interest, except where Sopra Steria has prevailing legitimate and duly motivated reasons to justify said processing.

You also have the right to lodge a complaint with your local control authorities in charge of data protection: CNIL 3 Place de Fontenoy, 75007 Paris, France. To exert said right, please contact us using the details presented hereunder in the section "Who to contact to exercise your rights or if you have any questions?"

7. Who to contact to exercise your rights or if you have any questions?

If you have questions concerning this Note, or if you wish to exert a right or contact our Data Protection Officer (DPO), please contact us via email at: acces-cnil@soprasteria.com

or by post to the following address:

Sopra Steria Group, Group Data Protection Officer
6 avenue Kleber
75116 Paris (France)

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