
Notice

Subject: _____

Sopra Steria Group General Data Protection Notice

1. 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 personal data ("**Personal Data**") protection, which constitutes a major asset for developing the trust of its employees, partners, and clients.

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

This General Data Protection Notice (the "**Notice**"), drawn up in accordance with applicable Data Protection Laws, thus describes the general principles implemented by Sopra Steria and its Subsidiaries ("**Sopra Steria**", "**we/us**", "**our**") to ensure adequate protection of Personal Data of Data Subjects ("**You**", "**Your**") each time a processing of such data is necessary in the context of Sopra Steria's activity. It therefore applies by default to all processing of Personal Data carried out by Sopra Steria when it acts both as Data Controller and Data Processor under the conditions defined in this Notice.

2. What is the scope of application of this Notice?

This Notice applies to all processing of Personal Data carried out by Sopra Steria in any form (e.g., digital or paper documents), whether manual or automated, in all geographic areas in which Sopra Steria operates, inside or outside the European Economic Area (EEA). Personal Data may include information concerning employees or freelancers, clients, suppliers, partners, and information communicated by clients to Sopra Steria, and in general all contact details of professionals and other third parties that have a business relationship with Sopra Steria.

This Notice 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 out in this Notice, to the extent applicable under applicable Data Protection Laws.

If a national law requires a higher level of protection of Personal Data than that provided for in the Regulation, such national law shall prevail over the provisions of this Notice, which would provide less protection.

3. A few definitions to help understand this Notice

- **Data Controller** refers to Sopra Steria Group SA and its Subsidiaries processing Personal Data on their own behalf and determining the purposes and means of such processing.
- **Data Processor** refers to Sopra Steria Group SA and its Subsidiaries processing personal data on behalf of a Data Controller.
- **Data Protection laws** refer to (i) the General Data Protection Regulation 2016/679 (GDPR) (ii) Data protection laws applicable in the EU Member States, implementing the GDPR, or (iii) any law or regulation applicable to a Sopra Steria Subsidiary and governing the processing of Personal Data.
- **Data Subject** refers to any identified or identifiable person directly or indirectly whose Personal Data are processed by Sopra Steria.
- **Intra-group International Data Transfer Agreement (IDTA)** refers to a framework agreement which governs arrangements under which Sopra Steria subsidiaries transfer personal data between them where the transfers might otherwise be restricted by Applicable EEA and UK Data Protection Laws, and which establishes Data Processing terms meeting the requirements of Article 28 GDPR/UK GDPR where one Subsidiary processes personal data on behalf of another Subsidiary.
- **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.
- **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.
- **Restricted Data** consist of any information which, due to its nature, has been classified by supervisory authorities as deserving additional privacy and security protections. The following is usually considered to be Restricted Data:
 - All government-issued identification numbers (including social security numbers, social insurance or similar numbers in other countries, driver's license numbers, passport numbers and national identification numbers);
 - Individual financial account numbers (bank account numbers, credit card numbers, other information if that information would permit access to an individual's financial account);
 - Account login credentials (such as usernames and/or passwords);
 - Employment background screening reports and other similar information; and
 - Data related to criminal convictions or offenses.

- **Sopra Steria Group** refers to Sopra Steria Group SA and Sopra Steria Subsidiaries.
- **Sopra Steria Subsidiary** refers to any company owned or controlled by Sopra Steria Group SA within the meaning of Article L 233-3 of the French Commercial Code.
- **Special Categories of Personal Data** refer to any information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
- **Standard Contractual Clauses (SCC)** mean the EU Standard Contractual Clauses set out in the Commission Implementing Decision (EU) 2021/914 of 4 June 2021 on standard contractual clauses for the transfer of personal data to third countries pursuant to the GDPR.
- **Third Country** refers to a country outside the European Economic Area that does not benefit from an Adequacy decision of the European Commission, and to which Personal Data cannot be transferred without first establishing appropriate safeguards.
- **Third party** means any third party or business partner which receives Personal Data from Sopra Steria or to whom Sopra Steria entrusts Personal Data, such as suppliers, contractors, sub-contractors, or other service providers.

4. Categories of 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 (business or contractual relationship with Sopra Steria, subscription to a newsletter, download of a white paper, etc.).
 - via automated technologies or interactions. As You interact with our Website, we may collect automatically Technical Data about Your equipment, browsing actions and patterns. We collect these Data by using cookies, servers' logs and other similar technologies. Please see our Cookie Policy for further details.
 - indirectly from our clients or partners when they communicate to us Personal Data about You that they hold and control and which are necessary in the context of our business relationship with them (collection during events or 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 analysis etc.).
 - we collect Special or Restricted Categories of Personal Data only when strictly necessary and within the limits permitted by applicable Data Protection laws.
 - we do not carry out any profiling activities based on automated decisions, 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 Section 10 below.

- When Sopra Steria processes Personal Data on behalf of other Controllers and based on their instructions (therefore acting as Data Processor), the processing operation is performed according to the conditions defined in the Data Processing Agreement (DPA) signed between the Controller and Sopra Steria.

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

When acting as Data Controller, Sopra Steria ensures that Personal Data are collected and processed only for the identified purposes which are:

- specified, explicit and legitimate, so that Personal Data cannot be further processed for a different purpose which is incompatible with the initial one, unless consent has been collected or a new legal basis has been established.
- brought to the attention of the Data Subjects in the information notices provided to them before the processing activity starts (and which vary depending on the categories of relevant Data Subjects, e.g. employees, candidates, clients, suppliers, etc.).
- clearly identified and may be one of 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 during a dispute, etc.

For each new project/activity that requires the collection of Personal Data, these purposes are analysed prior to its launch to ensure that the processing complies with applicable Data Protection laws as of the project's design 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 identified purpose.

6. 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 applicable Data Protection laws.

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, external consultants etc.) or the performance of pre-contractual obligations;
- 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 clients, 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 Data Protection laws or other applicable laws (for example, to send marketing information via electronic communication or to place cookies).

7. Loyalty and transparency regarding processing conditions

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

- We ensure that Data Subjects receive sufficient information about the processing of their Personal Data at the time of collection and at the latest at the time of communication with the Data Subject and prior to any communication to a Third Party, unless it is impossible to communicate this information, or it would require disproportionate efforts.
- This Notice defines the guiding principles according to which Sopra Steria processes Personal Data.
- This Notice 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 Subsidiary in charge of the processing and shall address the diverse categories of Data Subjects (employees, candidates, clients, suppliers, etc.), clarify the specific purposes for the processing of Personal Data relating to these individuals (e.g., human resources management, client relationship management, supplier relationship 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 Subsidiary.
 - If You are a client or prospect of Sopra Steria, You can access the Client Information Notice on the Sopra Steria website.
 - If You are a supplier or partner of Sopra Steria, You can access the Supplier Information Notice on the Sopra Steria website.
 - If you are a candidate applying for a job at Sopra Steria, You can access the Candidate Information Notice on the Sopra Steria website.
 - 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 applicable to You.

8. Which security and confidentiality measures have been implemented to protect Your Personal Data?

- We protect all Personal Data collected and processed in the context 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 data protection impact assessments (DPIAs) or data transfer impact assessments (DTIAs) we carry out when required by applicable Data Protection laws.
- Technical and organisational measures are adopted to grant access to Personal Data on a need-to-know basis and to prevent accidental or unlawful destruction, loss, alteration, disclosure or unauthorised access to Personal Data, 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 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 Data Controller, Sopra Steria selects service providers with sufficient guarantees to implement appropriate technical and organisational measures and ensure that the processing meets the requirements of applicable Data Protection laws.

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

9. How long do we store Personal Data?

- Personal Data processed by Sopra Steria as Data Controller are kept only for the period strictly necessary for the identified purpose of processing (and any further purposes compatible with the initial 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 the Personal Data at stake.
- You can find more specific information on the retention period of Your Personal Data in the specific information notice applicable to You or by using the contact details provided in Section 13 below.

10. 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 request, we will provide You with information about the Personal Data we hold and process about You and a copy thereof, unless such Personal Data have already been provided to You by other means (including through Your account). In this case, we will inform You accordingly.
- **Right to portability:** we may also provide You with a copy of the Personal Data in our possession, in a structured, commonly used and readable format as required by applicable Data Protection laws (if processing is based on the performance of a contract or consent).
- **Right to rectify:** You can request to correct or modify any incomplete, outdated, or inaccurate Personal Data.
- **Right to erasure / right to be forgotten:** You may request the erasure of Your Personal Data if (i) they are no longer necessary for the specific purpose of processing, (ii) You have withdrawn Your consent and the processing was exclusively dependent on such consent, (iii) You have 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 imposed on Sopra Steria. Sopra Steria will take all reasonable steps to inform other Sopra Steria subsidiaries processing such Personal Data of the deletion.
- **Right to restriction:** You may request a restriction of processing (i) if you have challenged the accuracy of Your Personal Data and asked to rectify it while we are considering Your rectification request, (ii) if the processing of Your Personal Data is unlawful and You opt for restriction instead of erasure, (iii) if we no longer need Your Personal Data for the purposes of the processing, but You ask us to retain Your data for the establishment, exercise or defence of legal claims; (iv) if You have exercised Your right to object, while we are considering Your objection request.
- **Right to withdraw consent:** if the processing of Personal Data depends on Your consent, You have 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:** You may object at any time to the processing of Your Personal Data:
 - where the data are 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 Section 13 below.

11. Disclosure of Personal Data

Being part of an international group, Sopra Steria's subsidiaries may need to transfer Personal Data between them, and this intra-group transfer may take place within or outside the EEA.

Similarly, Sopra Steria may transfer Personal Data to third parties based in the EEA or in third countries.

Such transfer of Personal Data will take place under the following conditions:

- We will only disclose Personal Data within the Sopra Steria Group or to Third Parties for the purposes described in this Notice 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 applicable Data Protection laws and may only use Personal Data for the purposes defined in this Notice 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 Group SA 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 hold and control (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 the provision of services to our clients;
 - 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).

12. International transfers of Personal Data

- Sopra Steria will not transfer Personal Data to Third Countries which do not guarantee adequate protection of Personal Data (meaning that they do not benefit from an Adequacy Decision of the European Commission) unless appropriate safeguards for such transfer are in place.
- The recipients described in Section 11 above may be located in different geographical areas, which may lead Sopra Steria to transfer Personal Data to Third Countries.
- These transfers to Third Countries are only made when strictly necessary for the identified purposes, 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 Third Country without ensuring that appropriate transfer safeguards as required by applicable Data Protection laws have been implemented. Intra-Group transfers are governed by the Intra-group International Data Transfer Agreement (IDTA) which integrates the European Commission's Standard Contractual Clauses (SCCs) and establishes Data Processing terms meeting the requirements of Article 28 GDPR/UK GDPR where one Subsidiary processes Personal Data on behalf of another Subsidiary within the EEA. For transfers to entities located in Third Countries which are not part of the Sopra Steria Group, Sopra Steria establishes Data Transfer Agreements incorporating the SCCs of the European Commission with each of the entities concerned. Where necessary, Sopra Steria shall obtain additional guarantees from the importer of the Personal Data, in case of risks associated with the transfer due the local law applicable in the importer's country.

13. Data Subjects' requests

- Sopra Steria has implemented a governance system for the protection of Personal Data by appointing a Data Protection Officer at Group level and Data Protection Officers or SPOCs at local level.
- If You have any questions or requests for information regarding [this Notice](#), You may contact the Group Data Protection Officer by sending your request to support.privacy@soprasteria.com.
- For requests concerning the Processing of Your Personal Data or the exercise of Your rights as defined in Section 10 above, You may contact Your local Data Protection Officer/SPOC 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 can also, if You are a Data Subject, lodge your complaint directly with the competent supervisory authority.

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

Last updated: [19/06/2023]