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# Notice

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**Subject:** \_\_\_\_\_

**Client Data Protection Notice**

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## 1. Purpose

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Sopra Steria Group S.A. with a capital of € 20,547,701, registered with the Annecy Company Register under n° 326 820 065, with headquarters located at PAE Les Glaisins 3 rue du Pré Faucon, Annecy Le Vieux, 74940 Annecy, France, (hereinafter referred to as "**Sopra Steria**" or "**we**" or "**us**") attaches great importance to the protection of personal data of its Clients and prospective Clients (hereinafter referred to as "**Clients**" or "**You**", which also includes prospective Clients).

The purpose of this Client Information Notice (also referred to as the "**Notice**") is to provide You with information on the processing of Your personal data that we may collect when You interact with Sopra Steria in the course of a business relationship.

Concerning the processing of personal data inherent to the general use of Sopra Steria Websites, please refer to our Personal Data Protection Charter, which is available on Sopra Steria Websites.

Please note that this Notice may be updated from time to time by Sopra Steria. The date of the most recent update will appear on this page. We therefore invite You to consult it regularly.

## 2. What kind of personal data do we process about You?

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We only process personal data that is strictly necessary for the purposes described in this Notice, or any other purpose that will be communicated to You at the time of collection.

The personal data we process may be provided directly by You when You contact us, e.g. electronically or at meetings or trade fairs, when You subscribe to our services or contact us about these services (e.g. in connection with requests for quotations, maintenance, support), in the context of tenders in which we participate and, more generally, in the context of our business relations.

We may process the following categories of personal data about You:

- Client's representatives contact data (last name, first name, postal and e-mail address, telephone number);
- Professional information such as title and/or position within the Client's organisation;
- Business data (e.g. list of services You are using or have used, history of our business exchanges and Your requests);
- Technical and connection data (e.g. in connection with the use of our services).

Any information we collect via both paper and electronic forms which is essential to process Your requests and manage our business relationship is marked with an asterisk (\*). If You do not fill in the mandatory fields (\*), we may not be able to process Your request. In that case, Sopra Steria reserves the right to get back to You to collect the missing information.

### 3. What are the purposes of the processing of Your personal data?

Personal data is collected for the purposes described below. Alongside the purposes, we have also specified the legal bases for the processing:

Purposes of the processing	Legal basis
Respond to Your questions and requests, regardless of the means of communication used.	Sopra Steria has a legitimate interest in processing questions or requests submitted by its Clients in order to maintain a good business relationship with them.
Manage our business relationship and provide You with the services You have requested.	Sopra Steria has a legitimate interest in managing the contractual relationship with its Clients.
Send You personalised offers or quotes, according to the information You provide to us for this purpose.  Better understand Your preferences and offer You products or services tailored to Your interests and needs.	Sopra Steria has a legitimate interest in providing targeted offers and quotations based on Client's interest in its services.
Ensuring the safety and security of our services and sites (e.g. creation of temporary name badges to manage access to our premises).	Sopra Steria has a legitimate interest in ensuring the safety and security of its services and sites.
Send You information about our services, offers, news, events, surveys and polls (e.g. newsletters, invitations to events and other publications).	Your explicit consent, resulting from a positive action, such as Your registration to receive such information, Your registration to an event or Your subscription to the services in question.  Also, Sopra Steria has a legitimate interest in promoting and developing its products and services.
Organise competitions and promotional activities targeting Clients.	Your explicit consent resulting from a positive action, such as Your participation and the execution of the general conditions governing these promotional activities.

Meet our legal obligations and ensure the defence of our rights and interests in the event of litigation or pre-litigation.	Sopra Steria may be subject to legal and regulatory obligations requiring the processing of personal data and may also have a legitimate interest in processing it to defend itself in the event of pre-litigation or litigation.
Share Your personal data with third parties on a need-to-know basis in the event of a business reorganisation.	Sopra Steria has a legitimate interest in sharing Client's personal data with potential acquirers in the event of a sale or reorganisation of its business.

## 4. Who are the recipients of Your personal data?

Your personal data is accessible only to those who need to know it in the context of their respective functions. In particular, the categories of recipients of personal data processed by Sopra Steria are the following:

### Internally:

- Members of Sopra Steria's business and operational teams;
- Members of Sopra Steria's accounting and finance department;
- Members of Sopra Steria's communication and marketing department;
- Members of Sopra Steria's Legal and Compliance departments; and
- The IT Department and other technical departments of Sopra Steria, for maintenance and technical support needs.

### Externally:

- Other Sopra Steria Group subsidiaries in the context of the provision of services;
- Sopra Steria Group's external advisors, e.g. our lawyers, accountants, auditors, statutory auditors; and
- Sopra Steria's service providers who assist Sopra Steria in the provision and management of services (e.g. our technical and hosting providers, subcontractors).

In addition, please note that in the event that all or part of Sopra Steria's activities are sold or transferred to third parties, Your personal data, as collected and stored by Sopra Steria, may be transferred to such third parties, subject to applicable legal provisions.

Sopra Steria may also disclose information if required by law, including pursuant to a court order or to enforce its rights, if such measures are necessary to prevent fraud or a cybercrime, or to ensure the security of Sopra Steria or any other person, where required or permitted by applicable legal provisions.

Given the international dimension of the Sopra Steria Group, Your personal data may be transferred to recipients outside the European Union/European Economic Area (EEA: EU Member States and Iceland,

Liechtenstein and Norway), to countries that do not offer a level of protection up to the EU standard of essential equivalence. International transfers of personal data may be necessary for the performance of Sopra Steria's business activities and for its internal administrative management. Sopra Steria ensures that restricted transfers take place lawfully, using the transfer tools provided for by applicable regulations and providing appropriate safeguards and protection measures. You can obtain a copy of these guarantees by sending an email to the following email address: [support.privacy@soprasteria.com](mailto:support.privacy@soprasteria.com) or [acces-cnll@soprasteria.com](mailto:acces-cnll@soprasteria.com).

## 5. How long do we store Your personal data?

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We will only keep Your personal data for as long as is necessary to fulfil the above purposes or to enable us to comply with our legal obligations.

The retention periods applicable to Your personal data are as follows:

- for as long as Your Client account remains active or the contractual relationship between us is in force, and for five (5) years from the end of the contract; or
- for as long as we remain in contact with You through our business activities, and three (3) years after Your last interaction with us, unless you notify us of your refusal upon receiving a prospection message from us.

We may need to retain Your personal data in archival form beyond the period indicated above in order to comply with our legal obligations or, if necessary, in view of applicable limitation periods, to enforce our rights. Once personal data is no longer needed for the above purposes, we ensure that it is completely destroyed or anonymised.

## 6. What rights are granted to You?

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Sopra Steria recognises the importance of data subject rights and enables individuals to exercise them in the simplest and most effective way. Accordingly, we are open to Your questions on the conditions of processing of Your personal data and to Your requests to exercise the following rights:

- Right to access and obtain a copy of Your personal data and information on how Your personal data is processed and its legal basis;
- Right to rectify Your personal data if it is incorrect and the right to complete it if it is incomplete;
- Right to delete Your personal data when it is no longer required for the purposes for which it was collected or processed;
- Right to restrict the processing of Your personal data: (i) if you have challenged its accuracy 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 request the portability of Your personal data in a machine-readable format if our processing is based on Your consent or the performance of a contract You have entered into with us;
- Right to give general or specific instructions on how Your personal data will be processed and used after Your death;
- Right to withdraw Your consent to the processing of Your personal data if such processing is based on Your consent, for example in the context of newsletters. Such withdrawal will not affect the lawfulness of the processing based on consent carried out before the withdrawal of consent; and
- Right to object to any processing for canvassing purposes.

In addition to the above rights, You have the right to object to any processing of Your personal data based on Sopra Steria's legitimate interests, unless Sopra Steria has compelling legitimate grounds to do so.

You also have the right to lodge a complaint with Your local data protection supervisory authority.

To exercise these rights, please contact us using the contact details specified below under 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?

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If You have any questions about this Notice or if You wish to exercise any of Your rights or contact our Data Protection Officer (DPO), please contact us at the following email address: [support.privacy@soprasteria.com](mailto:support.privacy@soprasteria.com) or [acces-cnil@soprasteria.com](mailto:acces-cnil@soprasteria.com).

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