
Notice

Subject: _____

Supplier Data Protection Notice

1. Purpose

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 Suppliers including, where applicable, temporary workers, partners and subcontractors acting on a one-off or regular basis on behalf of Sopra Steria (hereinafter referred to as "**Suppliers**" or "**You**").

The purpose of this Supplier 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 (e.g. Your participation in our tenders, the supply of Your products and/or services).

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?

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 send us offers about Your products or services (e.g. in the context of calls for tenders in which You participate) and, more generally, in the context of our business relations.

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

- Supplier'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 Supplier's organisation;
- Business data (e.g. list of products and/or services provided, history of business exchanges and requests).

Any information we collect via both paper and electronic forms which is essential to process Your requests and to manage our business relationship is marked with an asterisk (*). When the form is available on our website, please refer to our Personal Data Protection Charter. The form may also be available on online portals implemented on behalf of Sopra Steria by our service providers. If You do not fill in the mandatory fields (*), we may not be able to process Your requests or Your entries, e.g. in the context of a call for tender. 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
Manage our business relationship including the products and services You provide to us.	Sopra Steria has a legitimate interest in managing the contractual relationship with its Suppliers.
Process Your offers in response to our calls for tenders.	This processing is necessary in a pre-contractual phase and is based on the legitimate interest of Sopra Steria to manage the relationship with its potential Suppliers.
Send You information/questionnaires about our service requirements, newsletters, invitations to events, surveys and polls etc.	Your explicit consent, resulting from a positive action, such as Your subscription to a newsletter or Your registration to an event etc. Also, Sopra Steria has a legitimate interest in conducting surveys to improve its supplier panel.
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.
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.

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 and duties and who are subject to an obligation of confidentiality.

In particular, the categories of recipients of personal data processed by Sopra Steria are the following:

Internally:

- Members of Sopra Steria's procurement teams;
- 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 products or 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).

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 cyber crime, 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 or acces-cnll@soprasteria.com.

5. How long do we store Your personal data?

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 Supplier 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 for three (3) years after Your last interaction with 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?

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;

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- 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?

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 or acces-cnil@soprasteria.com.

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