



PROTECTION OF PERSONAL DATA
SIA PARTNERS - PERSONAL DATA
PROTECTION POLICY

GROUP POLICY

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- **Version history table**

Version	Date	Author	Title
V1	17/11/2020	BU Compliance	Creation

- **Communication**

Diffusion modalities
Publication on Sia Partners' website (GDPR page)

- **Reference documents**

Name of the document
Personal data protection policy
Record of data processing activities
Data processing risk-assessment procedure
Management procedure for data subjects' rights

Preamble

Sia Partners is committed to offering the highest level of security for the services we deliver. By ensuring personal data protection and by bringing simplicity, clarity and transparency, Sia Partners aims to process personal data in a respectful manner and set an example of trusting relationships. Our strategy is to develop our services in a fast-changing environment, both on a technical and a regulatory level. Data protection is therefore a priority for Sia Partners. With our sound understanding of the constant evolution of threats and risks to security, we place security at the heart of our daily operations. This policy applies to all of Sia Partners' offices.

Table of Content :

How do we collect your personal data?	3
What kind of personal data do we collect?	3
How do we use your personal data?	4
Who are the recipients of your personal data?	4
Who is responsible for your personal data in case of a link to a third-party website?	5
Where is your personal data stored and processed?	5
How long is your personal data retained?	5
How is your personal data protected?	5
What are your rights?	6
How can you exercise your rights?	6
How can you lodge a complaint?	7
How are cookies managed?	7

How do we collect your personal data?

For the purposes of carrying out its activities, Sia Partners collects and processes some of your personal data. Communicating your data is voluntary and does not form a condition for using our website. Personal data is collected directly from you or indirectly through other means.

For example, Sia Partners collects information about you:

- When you browse our website, including through the mobile version;
- When you subscribe to newsletters, turn on notifications or sign up to contests;
- When you sign up to conferences or events;
- When you request the download of a study on the website;
- When you sign up to apply to positions through Sia Partners' recruitment portal.

What kind of personal data do we collect?

The data we collect is, by way of example:

- Information relating to your identification: last name, first name, title;
- Information in order to contact you: address, phone number, e-mail;
- Professional information: workplace, position;
- Information submitted through job applications;
- Information that you have not yourself directly submitted: IP addresses, http protocol elements, browsing experience on the website, cookies.

Should it become necessary for us to collect or use particular categories of personal data ('sensitive data'), we would require your express consent.

We observe caution regarding the protection of minors' private life. We do not intentionally collect minors' personal data.

How do we use your personal data?

We only use personal data if this use relies on at least one of the legal grounds specified below:

- The respect of a legal obligation falling on Sia Partners;
- The protection of Sia Partners' legitimate interests;
- The performance of a contract entered into or pre-contractual measures taken as requested by the data subject;
- Consent given by the data subject.

We process your data in order, namely, to:

- Respond to your requests for information;
- Publish your comments;
- Manage your requests for signing up to conferences or events;
- Assess applications and recruit employees;
- Circulate newsletters, articles, information and notifications;
- Improve our service quality;
- Issue B2B business proposals.

Personal data processing in the context of our missions:

We may also process personal data during the performance of the services we provide for our clients, in compliance with our contractual commitments. In this instance, data is exclusively processed within the limits of the defined scope of the mission. We put organizational and technical security measures in place to limit access to data and ensure the confidentiality of the data processed within the specified framework inherent to the performance of our services.

Who are the recipients of your personal data?

Your data is intended for the performance of Sia Partners' services. It can also be transmitted to third parties who will process this data, such as subcontractors to whom we delegate the performance of certain services (managing job applications, for example).

Sia Partners can be solicited by the authorities to transmit personal data.

Sia Partners ensures that it has adequate guarantees (including with its partners and data processors) to protect personal data for each data transfer.

Who is responsible for your personal data in case of a link to a third-party website?

If, during online browsing, Sia Partners provides a link to a third-party website, the rules and policies applicable to that website will apply. Under no circumstances can Sia Partners be held accountable for the processing of your personal data by a third-party website.

Where is your personal data stored and processed?

As the laws on regulating data can differ from country to country, Sia Partners made the decision to favour the hosting and processing of data on French territory. Where this decision would prove difficult, Sia Partners would favour a European Union country or enter into a contract with a firm who complies with the Standard Contractual Clauses of the European Commission.

How long is your personal data retained?

Your data concerned by processing is retained in compliance with a set of rules. Sia Partners only processes adequate, pertinent data, limited to what is necessary with regards to the objective for which it is being processed. This notably means that Sia Partners guarantees that data is retained for the strict minimum amount of time. This amount of time is variable and depends on the nature of the data, its purpose and the legal and regulatory requirements to which it is subject.

How is your personal data protected?

Sia Partners ensures that the processing of personal data benefits from the highest security level. Sia Partners guarantees the execution of “appropriate technical and organizational measures”, taken according to the nature of the data, the purposes of processing and the associated risks. Should there be an incident leading to a violation of personal data, Sia Partners will notify the correct Supervisory Authority and will inform the data subjects affected at the earliest possible date, if necessary.

What are your rights?

In compliance with the applicable data protection regulations, you possess the following rights:

- A right of access and communication of your personal data and the associated data processing;
- A right to request rectification with the possibility of completing and updating your data;
- A right to data portability in order to request transmission of personal data to a third-party where that is technically possible, it being understood that this right is only applicable to the data directly provided by the individual;
- A right to the determination of the fate of your data in case of death;
- A right to request the erasure of data;
- A right to restrict the processing of your personal data;
- A right to object to the processing of data;
- A right to withdraw consent for the use of your personal data.

We bring to your attention the fact that, in exceptional cases, Sia Partners reserves the right to not honorate certain requests (such as a request for erasure, restriction or objection). This will be when required by regulation, when respecting contractual commitments and when serving public interest or Sia Partners' legitimate interests.

Additionally, in the case of clearly groundless or excessive requests, particularly because of their repetitive nature, Sia Partners can either:

- Demand the payment of reasonable fees including administrative costs to provide the data, communicate or take the requested measures;
- Refuse to respond to these requests.

The responsibility, however, falls upon Sia Partners to prove the clearly groundless or excessive nature of these requests.

How can you exercise your rights?

You can exercise your rights by sending a copy of a proof of identity along with your request either:

- By post, to: Sia Partners DPO, 21 rue de Berri, 75008 Paris, France ;
- By e-mail : sia-partners-conformite-rgpd@sia-partners.com

Sia Partners has a delay of a month to respond to your request. Should your request be complex or should we experience a large number of requests, this delay may be extended to three months. In this case, Sia Partners will notify you.

How can you lodge a complaint?

If despite all the attention that Sia Partners brings to the processing of your data, you are still not satisfied with the response to your request, you can lodge a complaint with the CNIL (Commission Nationale de l'Informatique et des Libertés) : www.cnil.fr ; 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07.

How are cookies managed?

During your browsing experience on the website, cookies can be stored on your computer, with your consent when required. Generally, a cookie is a small file of text sent to your internet browser and serves as proof of online connection.

During your first connection on the website, you will have the possibility to accept or to refuse cookies as well as to choose in a detailed manner what kind of cookie you accept or refuse. You also have the option to configure your browser to ensure no cookies are stored on your hard drive.