



POLICY REGARDING THIRD-PARTY PERSONAL DATA

Principia SAS reserves the right to modify this privacy policy at any time, in particular:

- To add a new data processing operation or significantly modify an existing processing operation, involving a new purpose
- To add new additional information that may be required by regulatory authorities.

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1. FOREWORD

EU Regulation n° 2016/679 of the European Parliament and Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, otherwise known as the General Data Protection Regulation (hereinafter GDPR), establishes the legal framework applicable to the processing of personal data.

The GDPR strengthens the rights and obligations of data controllers, processors, data subjects and recipients. In the framework of its business, PRINCIPIA is required to process personal data.

For a clear understanding of this policy, it is specified that:

- The "controller" refers to the natural or legal person who determines the purposes and means of processing personal data. For the purposes of this policy, the controller is PRINCIPIA, with its registered office at 215 Voie Ariane – 13600 LA CIOTAT – France.
- The "processor" refers to any natural or legal person who processes personal data on behalf of the data controller.
- "Data subjects" or "third parties" refer to individuals who can be identified, directly or indirectly, and whose personal data is collected by the data controller. Under this policy, "data subjects" or "third parties" are:
 - The various natural persons who act as PRINCIPIA's contacts among its customers, contacts and partners in their capacity as legal persons,
 - Applicants for a position at PRINCIPIA,
 - Users of the PRINCIPIA website.
- The "recipients" of the data are natural or legal persons who receive personal data from PRINCIPIA. The recipients of the data may therefore be either internal or external recipients.

Article 12 of the GDPR requires that data subjects be informed of their rights in a concise, transparent, understandable and easily accessible manner.

2. PURPOSE

The purpose of this policy is to satisfy PRINCIPIA's obligation to provide information under the GDPR and to formalize the rights and obligations of data subjects with regard to the processing of their personal data.

3. SCOPE

This personal data protection policy is intended to apply in the context of the processing of personal data relating to all third parties of PRINCIPIA, which includes natural persons who are its contacts with each of its clients, partners and contacts, candidates for a position with PRINCIPIA, as well as visitors to its website.

This policy only covers processing for which PRINCIPIA is the data controller and therefore does not apply to processing that is not created or operated by PRINCIPIA (so-called "unauthorized" processing).

The processing of personal data may be managed directly by PRINCIPIA or through a subcontractor specifically designated by PRINCIPIA.

This policy is independent of any other document that may apply between PRINCIPIA and its customers, partners, contacts or candidates.

4. GENERAL PRINCIPLES

All processing carried out within PRINCIPIA concerning the data of persons covered by this policy relates to personal data collected by or for PRINCIPIA's services or processed in connection with its services and complies with the general principles of the GDPR.

A list of existing personal data processing operations is attached as an appendix to this policy. Any new processing, modification or deletion of existing processing will be brought to the attention of the persons concerned by means of an amendment to this policy.

5. TYPES OF DATA COLLECTED

The data collected is listed in the appendix to this policy.

6. DATA SOURCES

Data relating to data subjects is generally collected directly from them (in the case of job applications) or from customers, partners and contacts (direct collection).

In certain specific cases, data may also be collected indirectly via other PRINCIPIA partners and/or suppliers, in which case PRINCIPIA takes the utmost care to ensure that the data communicated to it is relevant and appropriate for the processing in question (principle of minimization).

7. PURPOSES AND LEGAL BASES

Depending on the case, PRINCIPIA processes data for the following purposes, among others:

- Customer and partner relationship management (including contract monitoring, accounting, service provision, invoicing, etc.);
- Management of contact relations;
- Updating PRINCIPIA's CV database with the CVs of candidates who have given their consent and the CVs of employees;
- Populating PRINCIPIA's ERP system with the contact details of its representatives for customers, contacts and partners;
- Newsletter management;
- Sending greetings;
- Responding to public or private calls for tenders;
- Controlling access to PRINCIPIA's premises (security of property and people, identification of perpetrators of theft, damage or assault)

These purposes are based on the following grounds:

- The performance of a contract concluded between PRINCIPIA and its client or partner;
- The performance of pre-contractual measures for the benefit of a candidate at PRINCIPIA;
- PRINCIPIA's legitimate interest in having data concerning its users and contacts and in responding to requests made by internet users via the online contact form on its website.

Outside of the aforementioned bases and when necessary, PRINCIPIA obtains the consent of the individuals concerned.

8. DATA RECIPIENTS – AUTHORIZATION AND ACCESSIBILITY

PRINCIPIA ensures that the data is only accessible to authorized internal or external recipients.

Internal recipients	External recipients
<ul style="list-style-type: none">○ Authorized personnel from departments responsible for customer and partner relations and prospecting, such as the sales department, departments responsible for recruitment, administrative departments, IT departments and their line managers;○ Authorized personnel from departments responsible for control (departments responsible for internal control procedures, etc.);	<ul style="list-style-type: none">○ The ARTELIA Group○ The PRINCIPIA subsidiary;○ Organizations, court officials and public officers, within the scope of their duties;○ Auditors;○ Duly authorized external service providers.

Recipients within PRINCIPIA of the personal data of data subjects are subject to a confidentiality obligation. PRINCIPIA decides which recipients may have access to which data in accordance with an authorization policy.

PRINCIPIA is in no way liable for any damage of any kind that may result from unlawful access to personal data by external recipients.

9. RETENTION PERIOD

The data retention period is defined by PRINCIPIA in accordance with the legal constraints imposed on it and, failing that, according to its needs.

At the end of the retention periods set by PRINCIPIA, the data is either deleted or retained after being anonymized, in particular for statistical purposes. It may be retained in the event of pre-litigation and litigation. Data subjects are reminded that deletion or anonymization are irreversible operations and that PRINCIPIA will subsequently be unable to restore the data.

10. RIGHT OF CONFIRMATION AND RIGHT OF ACCESS

Data subjects have the right to ask PRINCIPIA for confirmation as to whether data pertaining to them are being processed.

Data subjects also have a right of access, subject to the following conditions:

- The request must come from the individual themselves and be accompanied by a copy of a valid identity document;
- The request must be made in writing to the following email address: delegue.rgpd@principia.fr

Data subjects have the right to request a copy of their personal data being processed by PRINCIPIA. However, in the event of a request for an additional copy, PRINCIPIA may require the data subjects themselves to bear the cost.

If the persons concerned submit their request for a copy of the data electronically, the information requested will be provided to them in a commonly used electronic form, unless otherwise requested.

Finally, data subjects are informed that this right of access cannot apply to confidential information or data, or to information or data for which the law does not authorize disclosure.

The right of access must not be exercised abusively, i.e. on a regular basis for the sole purpose of destabilizing the service concerned.

11. UPDATING – REVISING – CORRECTING

PRINCIPIA complies with requests to update personal data made by the persons concerned upon written request from the person concerned, who must provide proof of their identity.

12. RIGHT TO ERASURE

The right to erasure of data subjects shall not apply in cases where processing is carried out to comply with a legal obligation.

Outside of this situation, data subjects may request the erasure of their data in the following limited cases:

- The personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- Where the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
- The data subject objects to processing necessary for the purposes of the legitimate interests pursued by PRINCIPIA and there are no overriding legitimate grounds for the processing;
- The data subject objects to the processing of their personal data for marketing purposes;
- The personal data has been unlawfully processed.

In accordance with personal data protection legislation, data subjects are informed that this is an individual right that can only be exercised by the data subject in relation to their own information: for security reasons, the department concerned will therefore need to verify their identity in order to prevent any confidential information being disclosed to anyone other than the data subject.

13. RIGHT TO RESTRICTION

Data subjects are informed that the right to restriction does not apply insofar as the processing carried out by PRINCIPIA is lawful and all personal data collected is necessary for the performance of its services.

14. RIGHT TO DATA PORTABILITY

PRINCIPIA grants the right to data portability in the specific case of data communicated by the data subjects themselves and for purposes based solely on the consent of the data subjects. In this case, the data will be communicated in a structured, commonly used and machine-readable format.

15. AUTOMATED INDIVIDUAL DECISION-MAKING

PRINCIPIA does not make automated individual decisions concerning data subjects.

16. POST-MORTEM RIGHTS

Data subjects are informed that they have the right to formulate guidelines concerning the storage, erasure and communication of their data after death. Specific post-mortem guidelines and the exercise of their rights may be communicated by email to delegue.rgpd@principia.fr, accompanied by a copy of a signed identity document.

17. RIGHT OF USE

PRINCIPIA is granted by the persons concerned the right to use and process their personal data for the purposes set out in the appendix.

However, enriched data resulting from PRINCIPIA's processing and analysis remains the exclusive property of PRINCIPIA.

18. SUBCONTRACTING

PRINCIPIA informs data subjects that it may engage any subcontractor of its choice in the processing of their personal data.

In this case, PRINCIPIA shall ensure that the subcontractor complies with its obligations under the GDPR. PRINCIPIA undertakes to sign a written contract with all its subcontractors and imposes the same data protection obligations on subcontractors as it does on itself. In addition, PRINCIPIA reserves the right to audit its subcontractors to ensure compliance with the provisions of the GDPR.

19. SECURITY

It is PRINCIPIA's responsibility to define and implement the technical, physical or logical security measures it deems appropriate to combat the accidental or unlawful destruction, loss, alteration or unauthorised disclosure of data.

These measures mainly include:

- Management of authorisations for access to data;
- Internal backup measures;
- Identification processes;
- Conducting security audits;
- Adoption of an information systems security policy;
- Adoption of continuity/disaster recovery plans where applicable;
- Use of a security protocol or solutions.

20. DATA BREACH

In the event of a personal data breach, PRINCIPIA undertakes to notify the competent supervisory authority in accordance with the conditions set out in the GDPR.

If the breach poses a high risk to the data subjects, PRINCIPIA will:

- Notify the data subjects;
- Provide the data subjects with the necessary information and recommendations.

21. GDPR REFEREE

PRINCIPIA has appointed a GDPR representative, who is the sole point of contact for matters relating to personal data protection.

He can be contacted at the following email address: delegue.rgpd@principia.fr

In the event of new personal data processing, PRINCIPIA will first consult the GDPR representative.

If the persons concerned wish to obtain information or ask a specific question, they may contact the GDPR representative, who will respond within a reasonable time frame in relation to the question asked or the information requested.

22. PROCESSING REGISTER

PRINCIPIA, as the data controller, undertakes to keep an up-to-date register of all processing activities carried out.

This register is a document that lists all the processing operations carried out by PRINCIPIA, as the data controller.

PRINCIPIA undertakes to provide the supervisory authority, upon first request, with the information enabling said authority to verify the compliance of the processing with the data protection regulations in force.

23. RIGHT TO LODGE A COMPLAINT WITH THE COMPETENT SUPERVISORY AUTHORITY

Data subjects are informed of their right to lodge a complaint with a supervisory authority if they consider that the processing of their personal data does not comply with data protection regulations.

The contact details of the supervisory authority are provided in the appendix to this policy.

24. CHANGES

This policy may be amended or modified at any time in the event of changes in the law, case law, decisions and recommendations of the supervisory authority or practices.

Any new version of this policy will be brought to the attention of the persons concerned by any means defined by PRINCIPIA, in particular on its website.

25. FOR FURTHER INFORMATION

For further information, please contact the GDPR representative at the following address: delegue.rgpd@principia.fr

For more general information on personal data protection, please visit the website of the supervisory authority mentioned in the appendix.

APPENDIX 1 - LIST OF PROCESSING OPERATIONS

Processing	Details
Contact details of PRINCIPIA's customers and partners	Processing of personal data of PRINCIPIA's contacts with its various customers and partners via its ERP system in order to maintain commercial relations with them (conclusion of contracts, organisation of meetings, etc.).
Applications	Analysis of the application documents sent by the candidate (CV and/or other documents containing personal data) by email or via the contact section of the PRINCIPIA website, and selection of the candidate whose profile best matches the position in question. Addition of the candidate's CV to the CV database implemented by PRINCIPIA, <u>subject to obtaining their prior consent.</u>
Internet users on the PRINCIPIA website	Processing of personal data of visitors to the PRINCIPIA website: collection of connection data and processing of their data if they fill in the contact form.
Access to the building	Recording of entries and exits in the building access logbook

APPENDIX 2 - TYPE OF DATA COLLECTED

Type of data	Details
Non-technical data	<ul style="list-style-type: none">○ Identity and identification (surname, first name, date of birth);○ Contact details (e-mail address, postal address, telephone number);○ Personal and/or professional life where necessary (personal life for candidates);
Technical data	<ul style="list-style-type: none">○ Identification data (IP address)○ Connection data (logs in particular)

APPENDIX 3 - CONTACT DETAILS OF THE SUPERVISORY AUTHORITY

CNIL – Complaints Department

3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07

Tel: 01 53 73 22 22