



PERSONAL DATA PROTECTION POLICY

Why do we collect your personal data?

At OBERTHUR FIDUCIAIRE, the protection of your personal data is a subject of great importance. We have formally defined our commitments in this regard particularly within the framework of this policy. You can also find a reminder of the key provisions of this policy in the various documents or applications we provide to you.

OBERTHUR FIDUCIAIRE can be contacted at: 7, avenue de Messine CS 30003 - 75384 Paris Cedex 08, France - Tel. +33 (0)1 42 99 77 00.

Regulations define personal data as "*any information relating to an identified person or a person who can be identified, directly or indirectly, particularly by reference to an identifier such as a name, an identification number, or location data*".

Please note that you may not be concerned by all the situations mentioned in this policy as it is designed to provide an overview for all the types of relationships that OBERTHUR FIDUCIAIRE may have.

OBERTHUR FIDUCIAIRE is required to collect and process personal data insofar as such data are necessary to perform the contracts it signs, to comply with regulatory obligations or when the company has a legitimate interest in collecting them (particularly the promotion of our business).

When the processing of your personal data requires your consent, OBERTHUR FIDUCIAIRE implements a specific system to obtain your freely given, specific, informed and unambiguous consent.

The table below summarises the purposes for which OBERTHUR FIDUCIAIRE processes personal data and the legal bases of such processing:

Purpose of processing	Legal basis
Managing commercial contracts (including the management of purchase orders, payments and any disputes)	Our legitimate interest and the performance of contracts between us
Carrying out direct marketing actions	Our legitimate interest or your consent where it is required by regulations
Recruitment	Fulfilment of pre-contractual obligations and our legitimate interest
Managing contact requests	Our legitimate interest
Managing suppliers and intermediaries	Performance of the contract between us and our legitimate interest
Evaluating third parties	Compliance with regulatory obligations
Monitoring centres of interest	Our legitimate interest or your consent where it is required by regulations
Managing customer opinions and satisfaction surveys	Our legitimate interest
Managing litigation	Our legitimate interest and the performance of contracts between us
Managing calls for tenders	Fulfilment of pre-contractual obligations and our legitimate interest

OBERTHUR FIDUCIAIRE has appointed a Data Protection Officer whose contact details are:

- Email: dpo@fcof.com
- Postal address: Délégué à la Protection des Données - 7 avenue de Messine 75008 Paris.

Which data do we process?

The data processed are identification data (last name, given name, contact details, nationality, etc.), data relating to your centres of interest, email address, information about your work life, payment-related data and data concerning the qualifications and experience of job applicants.

Your data are collected directly by OBERTHUR FIDUCIAIRE or may have been sent to us by our business partners (opinion leaders, recruitment agencies, etc.).

The information collected by OBERTHUR FIDUCIAIRE and which is essential to meet the abovementioned purposes is identified by an asterisk on collection forms. If you do not complete these mandatory fields, OBERTHUR FIDUCIAIRE will not be able to provide the relevant service.

Who has access to your personal data?

Your personal data are mainly disclosed/accessible to the following departments of OBERTHUR FIDUCIAIRE:

- Human Resources (for recruitment)
- Finance and legal (for budgets and accounting for example)
- Sales
- Legal
- Information Systems

Within the framework of contract management, your data may also be disclosed to:

- Companies involved in contract management (for instance to debt collection agencies, etc.)
- The statutory auditors of OBERTHUR FIDUCIAIRE
- Your personal data may also be disclosed to processors of OBERTHUR FIDUCIAIRE (external service providers for IT maintenance for example) for the purposes referred to herein. Processors acting according to the instructions provided by OBERTHUR FIDUCIAIRE will be required to implement appropriate measures to protect these personal data.

If certain third parties are located in countries whose regulations do not necessarily provide the same level of protection as those of European Union Member States, OBERTHUR FIDUCIAIRE shall ensure that such transfers are carried out in accordance with the stipulations of French regulations (such as by implementing the contractual clauses adopted by the European Commission). You may contact OBERTHUR FIDUCIAIRE to obtain more information on these matters and a copy of the relevant documents.

How long do we keep your data for?

OBERTHUR FIDUCIAIRE retains the personal data collected in accordance with data protection regulations and for the legal periods of limitation. For example:

- Data concerning contract management are retained for the term of the contract in question and the period of limitation,
- Data concerning prospects are retained for three years after the last commercial contact,
- Data concerning job applicants who are not selected are retained for 24 months.

What are your rights?

- You have the right to request access to your data and to have them corrected.
- You have the right to ask to restrict the processing of your personal data, (i) if you contest the accuracy of your data, for the period enabling us to check the accuracy thereof, (ii) if you consider that we process your data unlawfully and you request a restriction of their use rather than erasure, (iii) if we no longer need your data for the above purposes but they are still required for you to establish, exercise or defend your legal claims, (iv) if you have exercised your right of objection, pending the verification of whether our legitimate grounds override your own.
- You have the right to request the erasure of your personal data. If you make such a request, OBERTHUR FIDUCIAIRE may nonetheless retain them in the form of intermediate archives, for the period necessary to fulfil its legal, accounting and tax obligations.
- You have the right to request, at any time, to exercise your right to object to processing on grounds relating to your particular situation.
- You also have the right to object to direct marketing, without having to provide any reason.
- You may exercise your right to the portability of your data, which allows you to obtain a copy of your personal data or to transfer them to a third party in a structured, commonly used and machine-readable format.
- You also have the right not to be subject to a decision made exclusively on the basis of automated processing and having legal effects concerning you or significantly affecting you.
- You have the right to withdraw your consent at any time.
- You also have the right to define directives concerning the post-mortem storage, erasure and disclosure of your personal data.

These rights may be exercised at any time by sending an email to dpo@fcof.com or writing to: Délégué à la Protection des Données - 7 avenue de Messine 75008 Paris.

You may also lodge a complaint with the French data protection authority, the Commission Nationale de l'Informatique et des Libertés (CNIL). Further information is available on its website www.cnil.fr.