



# PERSONAL DATA PROTECTION GENERAL POLICY

## **APL DATA CENTER**

106 avenue Marx Dormoy  
92120 MONTROUGE

Tél : 01 46 94 91 00

# PREAMBLE

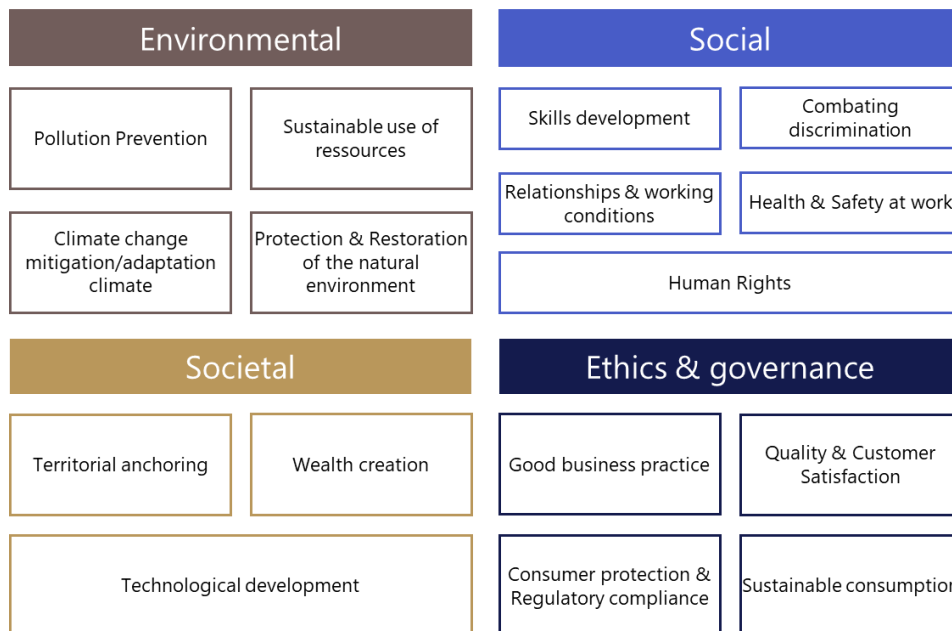
APL Data Center’s CSR challenges are based on 4 pillars :

- Environmental
- Social
- Societal
- Ethics & Governance

These CSR issues are at the heart of APL Data Center's strategy, with a dual approach in all situations:

- Direct impact of APL Date Center due to its own operations
- APL Data Center's indirect impacts: how to meet the CSR challenges and expectations of our own customers and stakeholders.

## The 4 pillars of CSR at APL Data Center



It is within the framework of the 4th pillar of its CSR strategy that APL Data Center has drawn up and adopted this personal data protection general policy.

APL Data Center undertakes to comply with the European regulation of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and with the law of 20 June 2018.

APL Data Center is committed to building a relationship of trust and transparency with its stakeholders (customers, suppliers, partners, etc.) with regard to the protection and security of the personal data that the company processes in the course of its activities.

It is in this context that the present policy, adopted by APL Data Center, informs its stakeholders of the methods and purposes of processing your personal data.

## I. SCOPE OF PERSONAL DATA PROTECTION GENERAL POLICY

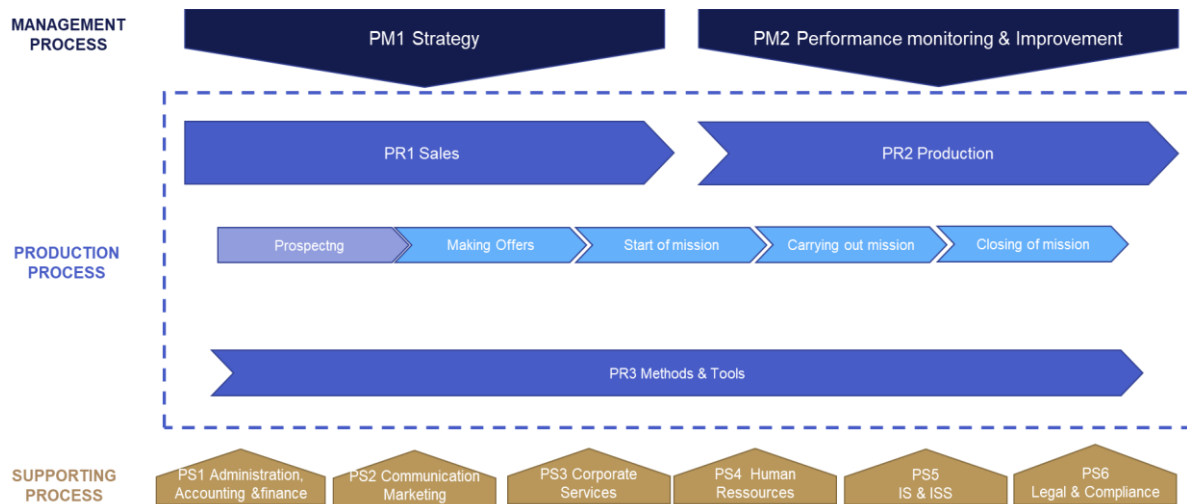
The general data protection policy is applicable to APL Data Center both for its internal needs and as part of its activities as :

- Project Management Assistance
- Design Project Management
- Project Management & Execution
- Turnkey
- Operation & Maintenance
- Training



This policy is also applied to all processes :

- Strategy Management
- Performance Monitoring & Improvement
- Sales
- Production
- Méthods & Tools
- Administration, Accounting, Finance,
- Marketing et communication,
- Corporate Services,
- Information System,
- Legal & Compliance



## II. COMPLIANCE WITH THE FUNDAMENTAL PRINCIPLES OF THE EUROPEAN DATA PROTECTION REGULATION

In the course of its activities, APL Data Center undertakes to comply with the 10 fundamental principles of the General Data Protection Regulation:

- Licéity of Treatment
- Purpose of Processing
- Minimisation
- Accuracy
- Limiting conservation
- Integrity & confidentiality
- Transparency
- Loyalty and rights of data subjects
- Accountability
- Privacy by design and by default

### III. INFORMATION ON THE COLLECTION OF PERSONAL DATA AND PURPOSES OF PROCESSING

In the course of its activities, APL Data Center may need to collect personal data such as surname, first name, address, professional/personal e-mail address, possibly a photography and any other personal data strictly necessary to meet the needs of :

- Prospecting and commercial management (including newsletter),
- Contract management (customers, suppliers, partners) and order processing,
- Managing the quality of our services,
- Recruitment management,
- Administrative management of staff and career paths, relations with staff representative bodies,
- Management of our legal reporting obligations (particularly accounting), checks and payments,
- Pre-litigation and litigation management,
- Protecting people and property.

APL Data Center also has a personal data protection policy specific to its website.

### IV. RECIPIENTS OF PERSONAL DATA

APL Data Center may share personal data with third parties. In this case, these third parties are required to process the data in accordance with the law and, in the case of APL Data Center' suppliers, in accordance with APL Data Center's instructions.

### V. RETENTION PERIOD FOR PERSONAL DATA

Personal data is kept for as long as is necessary to fulfil the purposes for which it is processed, and may vary depending on the length of time for which it is required.

A retention period is defined for each category of personal data.

## VI. PROCEDURES AND TOOLS TO ENSURE COMPLIANCE WITH THE GENERAL REGULATION ON THE PROTECTION OF PERSONAL DATA

### VI.1. Risk anticipation (via third party assessment) and monitoring

Employees who work with third parties (customers, intermediaries, suppliers and service providers, etc.) must ensure that they not only have the necessary qualifications, but also that they comply strictly with the principles of the General Data Protection Regulation.

The procedures for assessing these third parties (proposed internally by APL Data Center) must therefore be implemented as far upstream as possible by employees, in order to assess and qualify the risks of non-compliance with the General Data Protection Regulation. Subsequent checks must also be put in place.

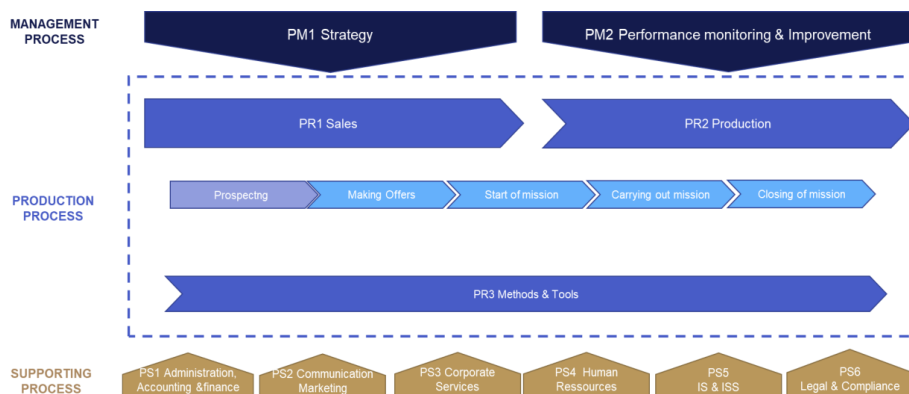
### VI.2. Record keeping

APL Data Center maintains and regularly updates its registers of data controllers and sub-contractors.

### VI.3. Risk Mapping

APL DATA CENTER met en place une cartographie des risques, ayant pour but d’analyser de manière objective et structurée notamment les risques de non-conformité réglementaire, par rapport au règlement général de protection des données personnelles, auxquels la société et ses salariés sont exposés dans le cadre de leurs activités, selon une approche dite par les processus :

APL Data Center is putting in place a risk map, the aim of which is to analyse, in an objective and structured manner, the risks of regulatory non-compliance with the General Data Protection Regulation to which the company and its employees are exposed in the course of their activities, using a process-based approach:



## VI.4. Training and awareness-raising

A training programme on personal data protection issues has been set up within APL Data Center for all employees. The aim is to enable all employees to regularly review best practices and methods with a view to anticipating and eliminating the risks associated with high-risk situations.

## VI.5. Appointment of a Data Protection Officer

APL Data Center has appointed a Data Protection Officer who can be contacted at any time at the following address : [dpo@apl-datacenter.fr](mailto:dpo@apl-datacenter.fr)

## VII. EXERCISING YOUR RIGHTS

In accordance with the regulations in force, and in particular Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data, you may exercise your rights:

- access
- rectification
- limitation,
- of opposition,
- erasure,
- portability,

of your personal data.

You may exercise your right to rectify any inaccuracies or incompleteness in your personal data.

Your request for the right to erasure of your personal data must specify precisely the data for which you wish to exercise your right to erasure.

You also have the option of defining directives concerning the fate of your personal data after your death.

In accordance with the law, you have the legal right to lodge any complaint with a supervisory authority: [www.cnil.fr](http://www.cnil.fr)

You may exercise all these rights at any time by sending an e-mail to the following address: [dpo@apl-datacenter.fr](mailto:dpo@apl-datacenter.fr)

**Done in Montrouge, 19th December 2023**