

# **GENERAL PERSONAL DATA PROTECTION POLICY**

## **APL DATA CENTER**

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## PREAMBLE

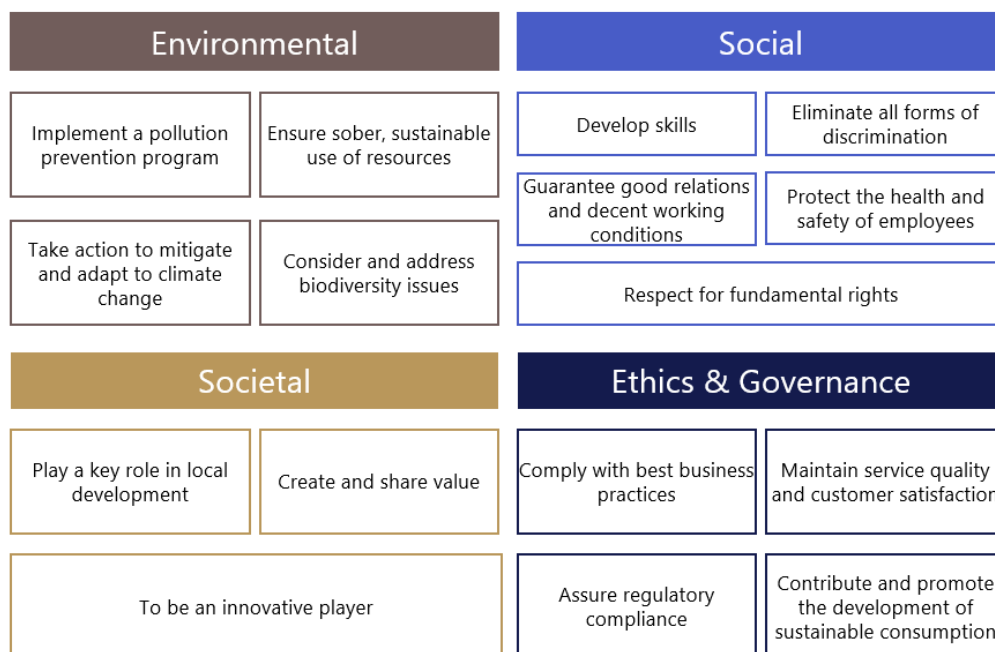
APL Data Center's CSR challenges are based on 4 pillars:

- Environmental
- Social
- Societal
- Ethics & Governance

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

- Direct impact of APL Data 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.

### APL Data Center's CSR pillars



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

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

APL Data Center is committed to building a relationship of trust and transparency with its stakeholders (customers, suppliers, partners, etc.) regarding 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 ways and purposes of processing your personal data.

## I. SCOPE OF THE GENERAL PERSONAL DATA PROTECTION POLICY

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

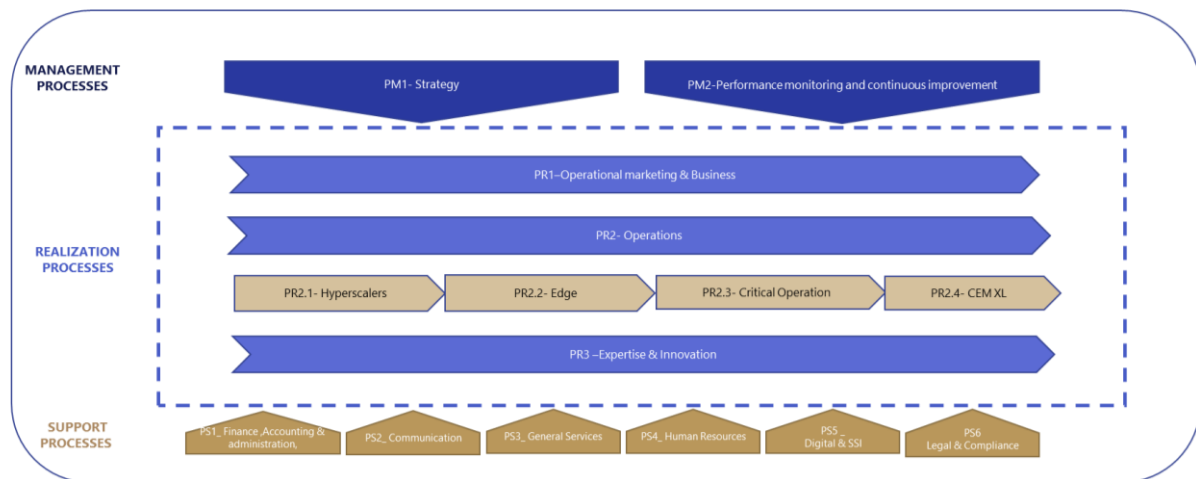
- Project Management Assistance
- Design Project Management
- Project Management & Execution
- Turnkey
- Operation & Maintenance
- Training



This policy also applies to all processes:

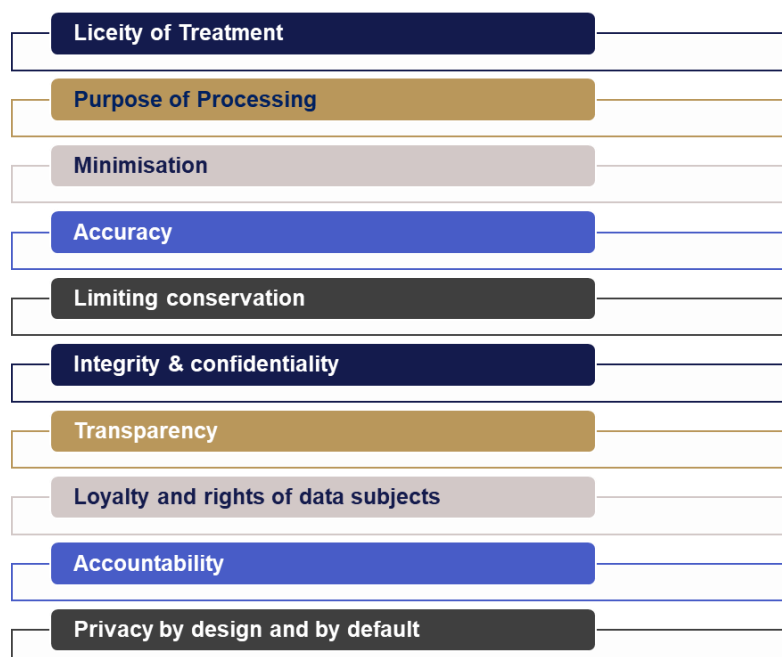
- Strategy Management
- Performance Monitoring & Improvement
- Operational marketing and business
- Operations
- Expertise and innovation
- Administration, Accounting, Finance,
- Communication,
- General Services,
- Information System,

## — 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:



### 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's suppliers, in accordance with APL Data Center's instructions.

### V. DATA TRANSFERS OUTSIDE THE EUROPEAN UNION

We are committed to processing and storing your personal data exclusively within the European Union to ensure a high level of protection in accordance with the requirements of the GDPR.

If it becomes necessary to transfer personal data outside of the European Union, we ensure that such transfer complies with the conditions set out by the regulation. This includes, but is not limited to, the application of appropriate safeguards, such as standard contractual clauses, or the use of transfer mechanisms approved by the competent authorities to ensure the security and confidentiality of your data.

## VI. 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 statute of limitations.

For each personal data processing, the specific retention periods are outlined in the privacy notices and internal monitoring tables.

## VII. PROCEDURES AND TOOLS TO ENSURE COMPLIANCE WITH THE GENERAL DATA PROTECTION REGULATION

### VII.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.

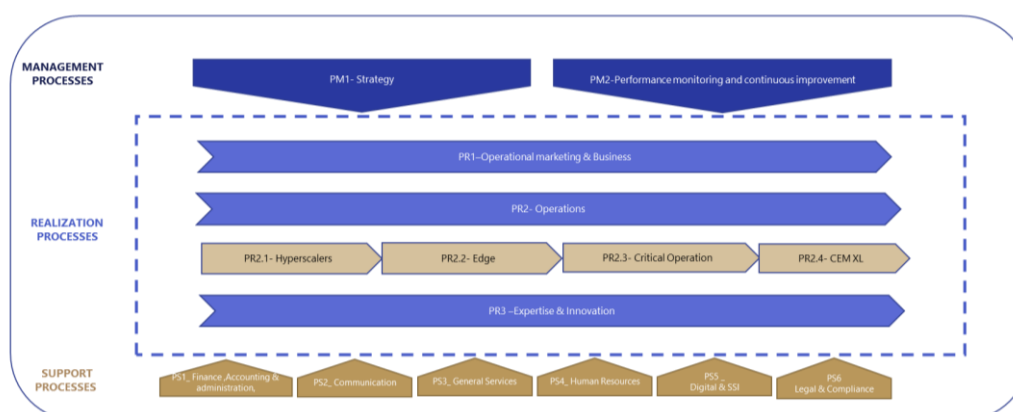
The procedures for assessing these third parties (proposed internally by APL Data Center) must therefore be implemented as far upstream as possible by employees, to assess and qualify the risks of non-compliance with the General Data Protection Regulation. Subsequent checks must also be put in place.

### VII.2. Record keeping

APL Data Center maintains and regularly updates its data controller and data processor records of processing activities.

### VII.3. Risk Mapping

APL Data Center implements a risk mapping process, 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:



## VII.4. Training and awareness-raising

A training program on personal data protection issues and principles 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 in order to anticipate and mitigate the risks associated with each situation.

## VII.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)

## VIII. EXERCISING YOUR RIGHTS

In accordance with the regulations in force, and in particular the GDPR, you may exercise your rights:

- of access
- to rectification
- to restrict processing,
- to object,
- to erasure,
- to data portability,

of your personal data.

You may exercise your right to rectify your personal data when you notice that their processing is inaccurate or incomplete.

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

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)

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