

CODE OF CONDUCT PERSONAL DATA PROTECTION

1. Purpose of the Code of Conduct

Its purpose is to implement consistent and adequate standards across the MANE Group regarding the protection and security of personal data in order to ensure that the applicable data processing and dissemination obligations are met worldwide, in alignment with the requirements of the European General Data Protection Regulation ("GDPR").

2. Scope of the Code of Conduct

This Code of Conduct sets common rules applicable to all processing of personal data concerning the MANE Group's employees, customers, subcontractors, suppliers, service providers and other partners or contractors.

3. Definitions

- Personal data: any information relating to an identified or identifiable natural person.
- Processing of personal data: any operation or set of operations performed on personal data, such as collection, recording, organisation, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

4. Prerequisites for processing personal data

The MANE Group and its employees undertake to process only personal data collected lawfully and fairly in accordance with the purpose of the data recording and processing which determine both the conditions under which the personal data are collected and the rights that ensue.

4.1 Categories of authorised personal data and conditions for processing:

The MANE Group and its employees undertake to comply with the below key principles relating to the processing of personal data: lawfulness, transparency, storage limitation, accuracy, security and confidentiality. They further undertake to be able to demonstrate at all times their compliance with these principles as follows:

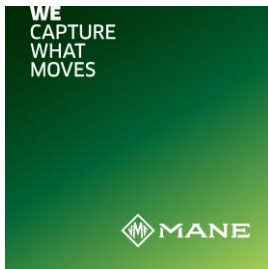
- Personal data may only be processed on the basis of a legitimate interest, if explicitly allowed by law or if the express consent of the data subject is obtained.
- Personal data may only be processed for the purpose for which they were originally collected and on which the legitimate interest, legal justification or consent of the data subject are based.

Examples where the principles underpinning the processing of personal data are applied:

- The consent of individuals for the collection of behavioural data (such as cookies) must be positively and explicitly granted, and proof thereof should be retained.
- Personal data must be accurately recorded and, if necessary, updated.
- Only employees whose area of activity involves the use of personal data may have access to such data; access must be restricted according to the nature and scope of the area of activity in question.
- Data no longer serving the purpose for which it was originally collected and stored must, if applicable, be erased in compliance with applicable law.
- Personal data may not be sold, shared or rented without the explicit consent of the data subjects.

4.2 Categories of prohibited sensitive personal data processing, collection and/or retention :

The processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or the health and sexuality of the data subject is inherently unlawful and thus prohibited, unless the processing is rendered lawful by specific authorisation of the competent authorities or a legal necessity.



4.3 Information to data subjects

The MANE Group undertakes, where one of the Group's companies is responsible for the processing of personal data, to provide all residents of the European Union ("EU Residents") whose data is being processed with comprehensive and detailed information on the purposes for which the personal data concerning such EU Residents is being collected and processed.

5. Conditions on the transfer of personal data outside the European Union

In addition to the prerequisites for processing personal data as set out in paragraph 4, transfers of personal data outside the European Union must meet the following requirements:

- Intra-group transfers: if a MANE Group company transmits personal data to another MANE Group company outside the European Union, said transferring MANE Group company must prove either that the data subject has expressly consented to the transfer of his/her personal data or that the transfer is necessary for the performance of a contract between the transferring MANE Group company and the data subject.
- Transfers to a third party: if a MANE Group company transmits personal data to a non-EU company external to the MANE Group, the MANE Group company must prove either that the data subject has expressly consented to the transfer of his/her personal data or that the transfer is necessary for the performance of a contract between it and the data subject. Any such transfer to the external company must also be subject to appropriate safeguards and technical and organisational measures to ensure the protection of personal data.

6. Dissemination and application of the Code of Conduct

The MANE Group and its employees undertake to comply with this Code of Conduct with effect from 25 May 2018.

Each employee of the MANE Group undertakes to provide information on an ongoing basis to the competent persons identified in paragraph 7 below regarding personal data protection issues with which they may have to deal in the performance of their duties.

7. DPO and DP Coordinators

The MANE Group undertakes to appoint one of its employees as a Data Protection Officer (DPO), contactable via the e-mail address dpo@mane.com, in addition to a coordinator, where warranted within each local branch or department, tasked with centrally administering all issues relating to personal data protection for and on behalf of the branch or department concerned (DP Coordinators).

The DPO will maintain a record of the MANE Group's personal data processing activities as well as a record of processing incidents in accordance with the requirements of the GDPR.

The DP Coordinators are required to assist the DPO and provide him/her with all relevant and necessary information to ensure within the scope of their responsibilities that personal data are protected.

8. Protection for individual rights in respect of personal data

The MANE Group undertakes to ensure in the course of its business that the following rights in relation to the processing of personal data are effective as to the relevant data subject:

- Right to data access, rectification and deletion, right to data erasure (right to be digitally forgotten);
- Right to transmit data to a third party (right to data portability) for personal data processed on a lawful basis or for the performance of a contract.

The MANE Group shall endeavour to expedite, through its DPO and DP Coordinators, in compliance with the applicable law, this Code of Conduct and with all other applicable procedures within the MANE Group, all requests made to it by each of its employees, customers, suppliers, subcontractors, service providers, partners or other contractors in the exercise of such data subject's rights concerning the processing of their personal data (such as the right to rectification and the right to deletion), and to provide proof thereof.

9. Data breach notification

All employees of the MANE Group, via the DP Coordinators, and all customers, suppliers, subcontractors, service providers, partners or other contractors of the MANE Group who become aware of a breach of the obligations arising under this Code of Conduct (such as destruction, loss, disclosure, unauthorised access, theft of personal data), must notify the DPO within 24 hours via e-mail to dpo@mane.com.

The DPO shall take the necessary measures to inform the competent authority within 72 hours and the data subject, if appropriate, of any incident and will simultaneously take the necessary steps to resolve the incident and/or personal data breach.