Deliberation SAN-2021-010 of July 20, 2021 National Commission for Computing and Liberties Nature of the deliberation: Sanction Legal status: In force Date of publication on Légifrance: Thursday July 22, 2021 Deliberation of the restricted committee n°SAN-2021-010 of 20 July 2021 concerning the company xLa Commission nationale de l'informatique et des libertés, meeting in its restricted formation composed of Mr Alexandre LINDEN, president, Mr Philippe-Pierre CABOURDIN, vice-president, Mr Bertrand du MARAIS, Mrs Christine MAUGÜE and Mr Alain DRU, members; Having regard to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 relating to the protection of personal data and the free movement of such data; Having regard to Law No. 78-17 of 6 January 1978 relating to data processing, files and freedoms, in particular its articles 20 and following; Having regard to decree no. January 1978 relating to data processing, files and freedoms; Having regard to deliberation no. 2013-175 of July 4, 2013 adopting the internal regulations of the National Commission for Data Processing and Freedoms; Having regard to decision no. 2019-164C of September 26, 2019 from the President of the National Commission for Computing and Liberties to instruct the Secretary General to carry out or to have carried out a mission to verify the processing carried out by Group Y or on its behalf; decision of the President of the National Commission for Computing and Liberties appointing a rapporteur to the restricted committee, dated November 12, 2020; Having regard to the report of Mrs Sophie LAMBREMON, rapporteur commissioner, notified to company X on April 26, 2021; Having regard to the written observations submitted by company X on May 26, 2021; Having regard to the oral observations made during the session of the restricted committee; Having regard to the other documents in the file; present, during the restricted committee meeting of June 17, 2021: Mrs. Sophie LAMBREMON, auditor, heard in her report; As representatives of company X, having spoken during the meeting:[…] Company X having spoken last;The Restricted Committee adopted the following decision:I. Facts and procedure Company X is a mutual insurance company […]. Its head office is located […] in Paris […]. Company X belongs to group Y, a French social and asset protection organization fulfilling, on the one hand, a mission of administrative management of supplementary pensions for private sector employees and, on the other hand, an insurance activity. The group insures approximately […] people in France, individually or collectively, and supports […] companies. The group employs about […] people. Within group Y, company X is responsible for coordinating the insurance activity of provident, long-term care, health, savings and supplementary retirement. It has several subsidiaries, including in particular the companies […] and […]. In 2019, the turnover generated by the insurance activity carried out by company X amounted to […] for a net result of […]. In 2020, its turnover amounted to […] for a net profit of […]. On October 29, 2019,

pursuant to decision no. 2019-164C of September 26, 2019 of the President of the Commission, a CNIL delegation carried out an on-site inspection operation within the premises of group Y. This mission had for the purpose of verifying compliance by Group Y with all the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter the Regulation or the GDPR) and of Law No. 78-17 of January 6, 1978 amended relating to data processing, files and freedoms (hereinafter the amended law of January 6, 1978 or the Data Protection Act). The control more specifically targeted the processing of personal data of the group's customers and prospects. The checks carried out focused in particular on the retention periods of personal data and on the information brought to the attention of the persons concerned with regard to the processing carried out by the company X. At the end of the check, the report no. 2019-164/1 was notified to company X, by letter dated October 30, 2019. On November 12, 2019, the company sent the CNIL the additional documents requested during the inspection. Following additional requests made by the services of the Commission, the company provided new elements and documents on December 9, 2019, January 17 and February 10, 2020. For the purposes of examining these elements, the President of the Commission , on November 12, 2020, appointed Mrs Sophie LAMBREMON as rapporteur, on the basis of article 22 of the amended law of January 6, 1978. Following her investigation, the rapporteur, on April 26, 2021, notify company X of a report detailing the breaches of the GDPR that it considers to have occurred in this case and indicating to the company that it had a period of one month to communicate its written observations in application of the provisions of the article 40 of decree no. 2019-536 of May 29, 2019. The letter notifying the report specified to the company that the file had been registered for the restricted training session of June 17, 2021. This report proposed to the restricted training of the p commission issue an injunction to bring the processing into compliance with the provisions of Articles 5-1-e), 13 and 14 of the GDPR, accompanied by a penalty payment for each day of delay at the end of a period of three months following the notification of the deliberation of the restricted committee, as well as an administrative fine. He also proposed that this decision be made public, but that it would no longer be possible to identify the company by name after the expiry of a period of two years from its publication. On May 3, 2021, via of its counsel, the company asked to consult the file of the procedure in the premises of the CNIL. On May 6, 2021, a consultation was held at the CNIL premises, during which the company's board took a copy of the requested documents. On May 26, 2021, through its board, the company produced observations in response to the penalty report. On May 11, 2021, the company made a request that the session before the restricted committee be held behind closed doors. By letter dated May 20, 2021, the chairman of the Restricted Committee rejected this request. The

company and the rapporteur presented oral observations during the Restricted Committee meeting of June 17, 2021. II. Grounds for the decisionA.On the failure to keep the personal data for a period not exceeding that necessary for the purposes for which they are processed pursuant to Article 5-1-e) of the GDPR Under the terms of Article 5-1 e) of the Regulation, personal data must be kept in a form allowing the identification of the persons concerned for a period not exceeding that necessary with regard to the purposes for which they are processed. ; personal data may be stored for longer periods insofar as they will be processed exclusively for archival purposes in the public interest, for scientific or historical research purposes or for statistical purposes in accordance with Article 89 , paragraph 1, provided that the appropriate technical and organizational measures required by this Regulation are implemented in order to guarantee the rights and freedoms of the data subject (limitation of storage). On the retention of personal data of prospectsThe rapporteur first noted that, during the inspection on October 29, 2019, the company had indicated to the delegation that the companies of group Y had a reference system setting the retention periods personal data of prospects (from rented third-party files) and customers (persons holding an individual insurance contract with the company or its subsidiaries). Nevertheless, the company declared during this same check that the retention periods defined in this reference system were not actually implemented within its information systems, with the exception of processing relating to the fight against money laundering. , local actions and health data. She specified that a plan for implementing the confidentiality policy was planned and should have started during the first half of 2020. The rapporteur then noted that the guidelines relating to retention periods and the group's processing register , for prospecting aimed at the distance selling network, the retention of prospects' personal data for a maximum period of three years after registration in the database or the last contact at the initiative of the prospect. However, by letter dated November 12, 2019, the company provided the delegation of control with an extraction from the application dedicated to commercial prospecting for distance selling, showing the presence of data from prospects who had not had contact with the company for more than three years, sometimes for more than five years. and prospects having been well defined, no breach could be attributed to it in respect of the definition of retention periods. Then, the company explained that it had taken action to comply with the maximum retention period for personal data of prospects such as as defined both in its reference framework and in the group's processing register. The Restricted Committee notes that, with regard to the definition of the retention periods applied icable to the data of the company's prospects, it should first be noted that on the day of the inspection, a reference system relating to the retention periods for the data of customers and prospects had indeed been established for the companies of group Y, but that the

retention periods defined therein were not, according to the declarations made by the company during the inspection, actually implemented in the company's information system, except with regard to processing relating to the fight against money laundering , local actions and health data . The Restricted Committee then notes that, during the inspection of October 29, 2019, the delegation noted the presence, in the active database, of the personal data of 1,917 prospects who had not had contact with the company for more than three years, including 1,405 prospects who have not had contact with the company for more than five years, without the company being able to justify the need to apply retention periods longer than the maximum duration of three years that it had itself fixed. The Restricted Committee notes that the three-year period constitutes a proportionate retention period and complies with the recommendations made by the CNIL in the context of simplified standard no. NS-056 (deliberation no. 2013-213 of July 11, 2013) concerning the automated processing of data relating to the commercial management of customers and prospects implemented by insurance, capitalization, reinsurance, assistance organizations and by insurance intermediaries. If since the entry into force of the GDPR on May 25, 2018, simplified standards no longer have any legal value, they still constitute a point of reference for data controllers, allowing them to ensure their compliance. Training also notes that the company certifies, since the control, having formulated and executed requests for the deletion of prospect data and implemented monthly purges of prospect data in the database underlying the application dedicated to commercial prospecting for distance selling. Therefore, if the restricted committee takes note that company X now implements the retention periods defined in the aforementioned reference system and the group's processing register, thus allowing the data of a personal nature of prospects are not kept for periods exceeding those necessary with regard to the purposes for which they are processed, it notes that uon the day of the inspection, the retention periods that the company had defined, and which correspond to the periods necessary to achieve the objectives pursued, were not respected. The company thus kept the personal data of its prospects for excessive periods of time, in the absence of any specific justification, and when they had shown no interest in the products and services offered by the company for more than three, or even five years. On the retention of customers' personal data its customers and prospects, which was however not implemented within its information systems, except with regard to processing relating to the fight against money laundering, local actions and health data. her report, the rapporteur underlined that account should be taken of the specificity of the insurance field when assessing the proportionality of the retention period of customer data by an insurance company. 'insurance. In particular, the retention periods for customer data in insurance matters must allow compliance with the legal deadlines provided for, in particular, by

the Insurance Code and the Commercial Code. However, in this case, the rapporteur noted that by letter dated November 12, 2019, the company had provided documents showing the retention in the active database of the personal data of a large number of customers, after the end of the contract. insurance, for periods longer than those fixed by the applicable legal provisions. The data stored related, in particular, to identity, personal, professional and bank details, personal and professional life, insurance, as well as, under certain contracts, people's health. defence, the company indicated that it had taken corrective action since the inspection and produced justifications in order to certify its steps to bring it into compliance. after the inspection of October 29, 2019, that the data of thousands of customers holding fire, accident and miscellaneous risk type contracts, which may be kept for two years after the end of the contract (article L. 114-1 of the insurance code , setting the limitation periods for actions arising from an insurance contract, no other purpose having been put forward by the company to justify retention at the end of the period. expiry of contracts) and ten years for certain accounting documents (Article L. 123-22 of the Commercial Code), were for periods exceeding ten years and sometimes exceeding thirty years. Then, the Restricted Committee notes that the data of a personal nature of nearly one hundred thousand customers holding savings, asset savings, supplementary pension, funeral and provident insurance contracts, which can be kept for variable periods of up to thirty years after the end of the contract for management purposes disputes (article L. 114-1, last paragraph, of the insurance code), were for a longer period. In addition, no other purpose had been put forward for post-contract processing. In addition, the Restricted Committee notes that the personal data of more than two million customers, collected within the framework of health contracts, have been kept for periods exceeding the legal period of five years following the termination of the contract (period modeled on that of article 2224 of the civil code, included in the company's reference system). It also notes that the retention period for the data of 1.3 million customers holding a health contract exceeds ten years, while that of thousands of customers exceeds thirty years. Finally, the Restricted Committee notes that, except for data concerning healthcare services, on the day of the inspection, there was no archiving mechanism allowing the retention of customer data for accounting, tax or litigation purposes within the limitation periods, whether by transferring them to the within a dedicated archive database or by setting up restrictions on access to these data so that they can only be consulted by specially authorized persons who have an interest in knowing about them because of their functions (for example, the department in charge of litigation). The Restricted Committee also observes that in defence, the company did not provide any elements likely to justify such data retention periods. Conversely, it indicated that it had initiated a broad compliance plan. In this regard, the company explained in particular that an

IT project had been initiated in 2017 in order to achieve effective and full implementation of the retention periods for data relating to its customers. The company clarified that the deployment of the IT project should have been completed in May 2018, but that the schedule could not be met due to the complexity of Group Y's information systems and the interdependence of applications. The company has thus indicated that it has defined a new strategy for the deletion of customer data over three years, based on an approach based on risks and the life cycle of data, according to the following timetable: 2020: scope of sensitive processing (social action, fight against money laundering); 2021: health and personal protection scope; June 2021: completion of the anonymization process for data linked to savings products; 2022: savings and supplementary pension scope (longer data life cycles - actions prescribed by thirty years). The Restricted Committee notes that the company has provided, in support of its commitments, proof of the deletion of customer data already carried out, in 2020 and 2021, in accordance with the defined IT project, on several applications attached to the Health and Welfare scope. In addition, the company provided a document dated May 2021 showing that the process of anonymizing customer data related to savings products was underway. Therefore, if the Restricted Panel takes note that company X has provided evidence of the steps taken to guarantee that the personal data of its customers are no longer kept for periods exceeding those necessary with regard to the purposes for which they are processed, it considers that on the day of the inspection, these data were retained for excessive periods. The Restricted Committee also notes that the breach partially persists to this day, insofar as the implementation of the retention periods for customer data is not fully deployed in the company's information systems. In particular, it appears from the documents provided by the company that almost all of the Health and Provident scope would be in compliance by the end of 2021 and that the work relating to the retirement savings scope would continue in 2022. The company has specified in its observations in defense and confirmed during the restricted training session that the compliance work relating to the implementation of customer retention periods in its information systems would be completed at the end of the year 2022.In view of all of these elements, the Restricted Committee considers that the breach of Article 5-1-e) of the GDPR is clear.B.On the breach relating to the obligation to inform persons pursuant to Articles 13 and 14 of the GDPRArticles 13 and 14 of the GDPR require the data controller to provide the data subject with various information relating in particular to their identity and contact details, to the purposes of the processing implementation, its legal basis, the recipients or categories of recipients of the data, the fact that the controller intends to transfer data to a third country. In addition, the regulations impose, when it appears necessary to guarantee fair and transparent processing of personal data in this case, to inform people about the

duration of data retention, the existence of the various rights enjoyed by people, the existence of the right to withdraw consent at any time and the right to lodge a complaint with a supervisory authority. Article 14 of the GDPR, which concerns the situation in which personal data is not collected directly to the data subject, provides that the latter must also be informed of the categories of personal data concerned and, if necessary to ensure fair and transparent processing, of the source from which this data originates. In addition, it specifies that this information must be communicated to the data subject within a reasonable period of time after obtaining the personal data, but not exceeding one month, having regard to the particular circumstances in which the personal data is processed or if the personal data is to be used for the purpose of communication with the data subject, at the latest at the time of the first communication to said person. The rapporteur noted, as emerged from the findings made during the on-site inspection of 29 October 2019, that company X entrusted its subcontractors […] and […] with part of the telephone prospecting operations to be carried out with of its customers and prospects. In this context, the CNIL delegation was informed that call scripts were established by the company or its subsidiaries and that 30% of outgoing telephone conversations carried out by its two subcontractors were recorded for the purpose of improving the quality of service from company X. The rapporteur noted that listening to a sample of the last fifty telephone calls made by these two subcontractors revealed the absence of information from the people contacted, either in principle even of the recording of the call, or of their right to oppose it. In addition, the rapporteur also underlined that, in the context of these recordings, individuals were not made recipients of any information, even summary, relating to the processing of their personal data or to the other rights they have at the time. regarding their data. Finally, these people were not offered the possibility of obtaining more complete information relating to the protection of their personal data, for example by sending an email or activating a key on their keyboard In defence, the company indicated that it had made immediate corrections, as soon as the on-site inspection was completed, in order to provide the persons concerned with information in accordance with the requirements of the GDPR. It thus stated that, since the end of 2019, written instructions relating to the information of the persons concerned were given to the subcontractors […] and […], as well as updated telephone call scripts containing most of the information required by Articles 13 and 14 of the GDPR. The company specified that said scripts had been completed with final missing mentions in 2021. Finally, the company indicated that an information notice dedicated to the processing implemented in the context of the recording of outgoing telephone calls was now provided in the data protection section of Y's website, indicating the legal basis of the processing and specifying the recipients of the recordings as well as the procedures for exercising the rights. The

company specified that persons contacted by telephone were henceforth informed, by the teleoperator, of the fact that they could consult this information notice by visiting the Y website. The Restricted Committee notes that on the date of control, the persons contacted by telephone by the companies […] and […] on behalf of the company X were not correctly informed of the processing of personal data implemented, in disregard of the applicable provisions of the GDPR. Indeed, on the one hand, the essential information relating in particular to the very principle of recording the call or, depending on the case, the right to oppose it, the purposes of the recording and its duration of conservation, were not communicated to the persons concerned by the subcontractors of company X. On the other hand, the Restricted Committee underlines the absence of instructions given by company X to its subcontractors in order to bring to the knowledge of the persons concerned the mandatory information provided by the GDPR. In addition, it notes that the telephone call scripts intended for the subcontractor […] did not contain any mention relating to the provision of any information relating to the protection of their personal data to the persons concerned. the foregoing, the Restricted Committee considers that on the day of the inspection, the company did not comply with the provisions of Articles 13 and 14 of the GDPR. The Restricted Committee nevertheless notes that, since the inspection, the company has complied with the requirements arising from Articles 13 and 14 of the GDPR. In this respect, the Restricted Committee observes that the telephone advisers of service providers […] and […] effectively deliver information to persons contacted by telephone concerning the identity of the data controller, the principle and the purpose of recording the conversation, the recipients of the recordings, their retention period, the existence of the rights available to the persons concerned, as well as the possibility of obtaining additional information relating to the processing of personal data implemented by the company by consulting the data protection section of the Y website (where the information notice dedicated to the processing implemented in the context of the recording of outgoing telephone calls is available). Therefore, the Restricted Committee considers that the aforementioned facts constitute a breach of Articles 13 and 14 of the GDPR, but that the company has justified its compliance by providing, on the closing date of the investigation, complete information to persons canvassed by telephone within the meaning of the aforementioned provisions.III. On corrective measures and their publicity Under the terms of III of article 20 of the law of January 6, 1978 as amended: When the data controller or its subcontractor does not comply with the obligations resulting from regulation (EU) 2016/679 of 27 April 2016 or of this law, the president of the National Commission for Computing and Liberties may also, if necessary after having sent him the warning provided for in I of this article or, if necessary in addition to a formal notice provided for in II, seize the restricted formation of the commission

with a view to the pronouncement, after adversarial procedure, of one or more of the following measures: […] 2° An injunction to bring the processing into conformity with the obligations resulting from Regulation (EU) 2016/679 of 27 April 2016 or from this law or to satisfy the requests presented by the person concerned in order to exercise their rights, which may be accompanied, except in cases where the processing is put e n implementation by the State of a penalty payment, the amount of which may not exceed €100,000 per day of delay from the date set by the restricted committee; […] 7° With the exception of cases where the processing is implemented by the State, an administrative fine not exceeding 10 million euros or, in the case of a company, 2% of the turnover total worldwide annual business for the previous fiscal year, whichever is greater. In the cases mentioned in 5 and 6 of Article 83 of Regulation (EU) 2016/679 of April 27, 2016, these ceilings are increased, respectively, to 20 million euros and 4% of said turnover. The restricted committee takes into account, in determining the amount of the fine, the criteria specified in the same article 83. Article 83 of the GDPR provides that Each supervisory authority shall ensure that administrative fines imposed under this Article for breaches of this Regulation referred to in paragraphs 4, 5 and 6 are, in each case, effective, proportionate and dissuasive. , before specifying the elements to be taken into account to decide whether to impose an administrative fine and to decide on the amount of this fine. Firstly, the company argues that if a fine were to be imposed, the restricted training should take into account the measures adopted in the direction of compliance. With regard to the retention periods for prospect data, the company points out that corrective actions were quickly deployed to delete prospect data whose maximum retention period has been reached and that regular purges are now carried out. With regard to retention periods for customer data, it recalls that the complexity of Group Y's information systems has delayed the full and complete implementation of the legal retention periods, which is however in progress and already partially carried out. During the restricted training session, the company indicated that it had invested in total […] for several years. In addition, the company points out that the information provided to people canvassed by telephone now meets the requirements of Articles 13 and 14 of the GDPR. Finally, the company invites the Restricted Committee to take into account its full cooperation during the procedure and underlines a reduction in its turnover and its net result. The Restricted Committee recalls that it must take into account, for the pronouncement of an administrative fine and for the determination of its amount, of the criteria specified in Article 83 of the GDPR, such as the nature, gravity and duration of the violation, the measures taken by the controller to mitigate the damage suffered by the persons concerned, the degree of cooperation with the supervisory authority and the categories of personal data concerned by the violation. in Articles 5-1-e), 13 and 14 of the Regulations, the maximum amount

of the fine that may be withheld is 20 million euros or 4% of the worldwide annual turnover, whichever is higher being retained. The Restricted Committee considers first of all that the company has shown gross negligence with regard to the infringement of the fundamental principles provided for by the GDPR, namely the principle of limiting the duration of data retention. and the obligation to inform the data subjects of the processing of their personal data. The Restricted Committee then notes that the breach relating to retention periods concerned a very large number of people, in particular the company's customers. In fact, the storage in an active database for periods longer than the authorized legal periods, which may exceed thirty years, concerned the personal data of more than two million customers collected during the conclusion of insurance contracts. The Restricted Committee also points out that, among the customer data kept for excessive periods of time, there are data of a sensitive nature, bank details and information relating to the personal life of customers. The Restricted Committee also notes that the compliance measures put in place following the inspection have not made it possible to fully remedy the breach relating to the retention periods of data as it concerns customers, which still partially persists. nowadays. In any event, the compliance measures adopted do not exonerate the company from its responsibility for the past. In addition, the Restricted Committee considers that the investments made by the company to achieve the implementation of the conservation defined in its information systems are not disproportionate with regard to its turnover, the size of the group and the scope of the work to be carried out taking into account the complexity of the said information systems underlined by the company it -even, which existed before the entry into application of the GDPR. The Restricted Committee considers that it is precisely the lack of anticipation that has contributed to failures in the implementation of retention periods for the company's customer data within its systems and, therefore, to the lack of compliance with the GDPR more than three years after its entry into force. Finally, the Restricted Committee recalls that administrative fines must be dissuasive but proportionate. It considers in particular that the activity of the company and its financial situation must be taken into account for the determination of the sanction and in particular, in the event of an administrative fine, of its amount. It notes in this respect that the company reports a decrease in its turnover, which fell from […] in 2019 to […] in 2020, as well as in its net profit, which fell from […] in 2019 to […] in 2020. If the restricted committee notes the net result has decreased quite significantly, it underlines that it remains largely positive. In view of these elements, the Restricted Committee considers that the imposition of a fine of 1,750,000 euros appears justified, in particular given the need to sanction breaches of basic principles of the GDPR, committed by […], concerning several million people and relating to data of a sensitive or specific nature, such as bank details. Consequently, the Restricted Committee

considers that an administrative fine of 1,750,000 euros should be imposed with regard to the breaches of Articles 5- 1-e), 13 and 14 of the GDPR.Secondly, an injunction to bring the processing into compliance with the provisions of Articles 5-1-e), 13 and 14 of the GDPR was proposed by the rapporteur in her report. penalty. In defence, the company maintains that the actions it has taken with regard to all of the breaches identified must lead to the non-compliance with the rapporteur's proposal for injunctions. With regard to the breach to the obligation to define and respect a retention period for personal data proportionate to the purpose of the processing pursuant to Article 5-1-e) of the GDPR, the company indicates that it has undertaken numerous actions and has carried out the substantial investments mentioned above to achieve compliance on this point. The Restricted Committee notes, with regard to prospect data, that the company now implements the retention periods defined by the company in its reference system, which are proportionate to the purposes pursued and moreover in accordance with the recommendations made by the CNIL in this area. With regard to customer data, the company testifies that it has embarked on a serious process of compliance. In this regard, the Restricted Committee also notes that the company documents that it has successfully implemented a significant part of the implementation of these retention periods in these systems, with only a residual part of the Health and Personal Protection scope remaining to be covered, as well as the savings and supplementary retirement scope, and that the company has undertaken to complete its compliance by December 31, 2022. With regard to the breach of the obligation to inform persons pursuant to Articles 13 and 14 of the GDPR, the Restricted Committee takes note of the compliance of the company on this point. Indeed, the company demonstrates that it has sent written instructions to its service providers so that full information is provided to the people canvassed by telephone on its behalf, and that it has attached call scripts supplemented with the mandatory information. In addition, listening to the samples of telephone calls communicated by the company attests to the effective delivery of this information to the persons concerned. In addition, an information notice dedicated to this processing and containing additional information has been inserted into the privacy policy. The person is now systematically informed by the teleoperator, at the beginning of the telephone call, of the fact that he can read this notice by visiting the Y website. In view of the foregoing, the restricted training considers that there is no longer any reason to maintain the proposed injunctions.Thirdly, the Restricted Committee considers that the publicity of the sanction is justified in view of the fact that the breaches of the basic principles of the GDPR noted in this case concern an actor […] that manages the personal data of millions of people. The Restricted Committee notes that in this context, the publicity of the sanction makes it possible to inform the persons concerned of the nature and extent of these breaches. FOR THESE

REASONS The Restricted Committee of the CNIL, after deliberation, decides to: impose an administrative fine on company X in the amount of 1,750,000 (one million seven hundred and fifty thousand) euros; make public, on the CNIL website and on the Légifrance website, its deliberation, which will no longer identify the company by name at the end of a period of one year from its publication. Chairman Alexandre LINDEN This decision may be subject to appeal before the Council of State in a period of two months from its notification.