

Altran Privacy Notice for Employees

18.09.2018

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History of revisions

| Date | Version | Description | Author |
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1. Introduction

ALTRAN TECHNOLOGIES (hereinafter collectively referred to as “Altran”, “the Group”, “we”, “us”, “our”) is committed to protecting the privacy and security of your Personal data. This privacy notice aims at providing you with clear and transparent information notably on how, where, why, for which duration and with whom we share your Personal data. This during and after your employment relationship with us, in accordance with the regulation 2016/679 of the European Parliament and of the Council, of 27th April 2016, on the protection of natural persons with regard to the processing of Personal data and on the free movement of such data (hereinafter referred as “GDPR”).

Because legislation concerning privacy and Personal data varies from country to country, and because Altran is present internationally, the Group has adopted a global privacy notice concerning human resources personal data processing operations. Please note that local regulations may also contain additional specific provisions. The privacy notice may thus be subject to specific amendments.

This notice applies to any person, regardless of their status, working for Altran (including direct employees, external/temporary workers, interns...).

It is important that you read this privacy notice together with any other Altran policies and any specific processing notice we may provide on specific occasions when we are collecting or processing personal data about you. This privacy notice supplements the other notices and is not intended to override them.

2. Key terms regarding data protection

Automated individual decision-making: decision based solely on technological means using Personal data without human involvement

Consent: a freely given, specific, informed and unambiguous indication of agreement. The consent will only cover processing for the specific purposes stated in the information notice; processing for additional purposes will have to be covered by other specific expressions of consent.

Data controller: an individual, an organization or a public authority who exercises overall control over the 'why' and the 'how' of a data processing activity. The data controller is responsible for the compliance to GDPR.

Data processor: any person (other than an employee of the Data controller) who processes the data on behalf of the Data controller and under its control.

Data protection officer (DPO): person with expert knowledge of data protection law and practices assisting the Data controller to monitor internal compliance with the GDPR. The DPO informs and advises Altran and its employees about their obligations and rights.

Data recipients: natural or legal person, public authority, agency or another body, to which the Personal data are disclosed, whether a third party or not. However, public authorities which may receive Personal data in the framework of a particular inquiry shall not be regarded as recipients.

Employee: refers to any individual in an employment relationship with Altran, regardless of whether this relationship is based on an employment contract (e.g. interns, freelances, interim contract, etc.).

Lawfulness of processing: data processing may only be executed if it is lawfully based. Amongst other basis, the GDPR provides that data processed (i) on the basis of Consent of the data subject, (ii) in relation to the performance of a contract, (iii) in execution of legal obligations, (iv) public interest, (v) vital interest, or (vi) on legitimate interest, are lawfully based.

Personal data: any information related to a person who can be identified, directly or indirectly.

Personal data breach: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal data.

Processing: Any operation performed on Personal data via any means (such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction).

Sensitive Personal data: race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. In some countries, the national security number may be assimilated as sensitive data.

3. Who is responsible for processing your Personal data

3.1 Identity and contact details of the Data controller

ALTRAN TECHNOLOGIES whose registered office is at 96 avenue Charles de Gaulle, 92200 Neuilly-sur-Seine, represented by Mr. Dominique Cerutti, is the Data controller. We are responsible for the management of employment relationships and for deciding how we hold and use your Personal data in accordance with the Data Protection Legislation.

3.2 Contact details of the Data Protection Officer

We have a group DPO, Jérôme GOLASZEWSKI, appointed to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal data, please contact him at: dpo.group@altran.com.

The primary point of contact for all issues arising from the processing of your Personal data by the local Altran subsidiary employing you, and for all requests to exercise your rights, is the local DPL, Data Privacy Leader, please review the appended list of the local DPL.

4. Why we process your Personal data

As your employer, we need to keep and process information about you for the following purpose:

- General administration of Employees: Employee file, Employees listing, professional equipment and credit card allocations, professional elections, social and cultural actions, directory and organization chart, meetings of Employee representative bodies, contractual and post-contractual relationship management.
- Provision of IT tools: professional electronic mail, networks, electronic calendar, computer and other devices, management of active directory, IT systems maintenance, security and availability of IT, limiting abuses related to personal use of the Internet and electronic mail by monitoring computer and telephone use, as detailed in our Computer/telephone/electronic communications/expenses policy, available in the company intranets and portals.
- Management of career and mobility: professional appraisals, professional skills management, professional mobility (internal/external).
- Training: management of training requests, training organization and assessments.
- General administration of payroll and allowances: calculation and payment of Employees' remuneration and deductibles, completion of necessary declarations before administrations, calculation of Employees' participation, completion of financial/accountancy duties, completion of impersonal (non-identifying) statistics, management of expenses, transfer of Employees' information to the affiliation organizations
- Ensuring the safety and security of equipment and persons: control camera, monitoring of IT systems-management of electronic access passes within the workplace: monitoring the entrance to premises by Employees and visitors, monitoring Employees' times and attendance, catering management via electronic badges.

We will only use your Personal data for the purposes for which we collected it. If we do need to process it for other purposes, we will inform you of this new processing and may either ask for your Consent or provide you with the legal basis which allows us to do so.

5. What categories of Personal data do we collect about you?

We will collect, store, and use the following categories of Personal data about you. Please note that this list is provided as information only, hence not exhaustive.

| Purposes | Categories of Personal data collected |
|--|--|
| Employee identification | Name, surname, photograph, sex, date and place of birth, nationality, personal and professional contact details, personnel number (e.g. public tax, social security, pension administration...), passport references, serial number and copy of work permit for foreign employees, contact details of emergency contact (your family/surrounding's data), honors |
| Administrative management of employees | <ul style="list-style-type: none"> • <u>Management of occupational accident and ill health declarations</u>: occupational health contact details, accident date or first medical report of the occupational ill health, date of last date of work, date of work return, reason for work stoppage, work non-return, certificate of medical leave and other absence. • <u>Work assessment/appraisal</u>: appraisals dates, appraiser identity, professional skills, professional objectives, assessment results, professional skills assessments based on objective criteria and with direct and necessary link to the position, employees' observations and wishes, planned career development. • <u>Validation of acquired experience</u>: date of the validation request, diploma, title or qualification certification certificate, professional experience subject to validation, validation (yes/no), decision date. • <u>Administrative follow-up of employees' medical examinations</u>: examinations date, ability to fill the position (fit for work/unfit for work/adaptation or assignment proposal). • Type of driver's license • Specific reasons granting rights of special leave or hours to be dedicated to other activities (e.g. elective or representative trade union mandate, volunteer fire brigade missions, etc.), records of holiday. • Your application form and references, employment contract and any amendments to it, correspondence with or about you (e.g. letters to you about a pay rise or, at your request, a letter to your mortgage company confirming your salary; information needed for equal opportunities monitoring policy when applicable. • <u>Work organization</u>, internal directories and organization chart identification, position, professional contact details, training and professional achievements, professional agendas, Employee tasks, individual allocations of supplies, professional equipment |

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| | <p>and payment cards.</p> <ul style="list-style-type: none"> • <u>Social action and staff representation</u>: <ul style="list-style-type: none"> - social and cultural activities: identity of the Employee and their beneficiaries, income, benefits and entitlements - professional elections: voters identity, age, seniority, electoral college, candidatures (identity, mandate requested, elements related to eligibility requirements and results - management of meetings of staff representative bodies: convocations, preparatory documents, minutes/records). • Management of elements related to the execution and termination of the employment contract: identification data, professional data and information aiming at justifying the contract termination. |
| Administration of employees career and mobility | Hiring date and conditions, date and purpose related to the modifications of employees' professional status, career simulation, employment wishes and disciplinary sanctions excluding those resulting from amnesties. |
| Personnel training | Diploma, certificates and attestations, foreign languages, training requests, training completed training and knowledge assessments, training records. |
| Provision of IT tools | <p>Computer directories defining access authorizations to applications and networks, connection logs.</p> <p>Electronic mail: address book, individual accounts</p> <p>Virtual private networks data (intranet): internal administrative forms, organization charts, discussion spaces, information spaces.</p> |
| Employee payroll | <p>Identity: surname, marital name, forename(s), sex, date and place of birth, social security number (NIR), address, identification number assigned by social insurance, pension and providence institutions, nationality</p> <p>Family situation: marital status, dependent children, other elements related to the allowance of additional remuneration</p> <p>Professional life: place of work, internal identification number, date of entry, seniority, position and hierarchical coefficient, nature of employment contract, rate disability, other categories of beneficiaries (disabled pensioner, war veteran)</p> <p>Compensation elements: compensation package and basis of calculation, nature, rate and basis of social security contributions, leaves and absences, professional expenses, method of payment, bank account number or postal.</p> <p>Financial information: your professional debit or credit card information and other banking information.</p> |
| Management of electronic badges | Identification and professional information badge status, entrance date, company department etc... |

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|--|---|
| Management of telephone, computer use | <p>Identification data, MAC address and line number.</p> <p>Professional situation.</p> <p>Telephone use: device make / model, IMEI number, service used, operator called, nature of the call (local, departmental, national, international), duration, date, start and end time of the call, billing elements (number of charges, volume and nature of data exchanged excluding the content thereof and cost of the service used).</p> <p>Computer use: connection logs, Internet traffic, downloaded/uploaded files ...</p> |
| Premises monitoring by CCTV (where applicable and required for security reasons) | Identity |
| Videos, photos ... | The Company reserves the right to use photograph/video taken at any marketing event in case of participating to workshops, showrooms... |

We may, in restrictive circumstances listed in section 7, collect Sensitive Personal data about you and information related to convictions and offences.

We will only access information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so as part of the recruitment process or in the course of our work relationship.

Please, be ensured that we will solely process your data if necessary and comply with minimization requirement.

6. How may your Personal data be collected?

We may collect or receive Personal data about Employees in the following ways:

6.1 Directly from you

We collect the data you have provided us during your application, recruitment process and the on-boarding process by filling in forms on our site/on-site or by corresponding with us by phone, e-mail or otherwise.

When we collect data, we indicate the mandatory fields via asterisks where such data is necessary for us to comply with legal requirements. If you do not provide this data, we may be unable in some circumstances to comply with our obligations.

6.2 From third parties

We collect your data from employment agencies, employment business or background check providers, former employers, credit reference agencies or other background check agencies. If you consent, as stated in our recruitment policy, we may also collect your Personal data publicly available on websites such as jobs boards, social networks, security vetting. For further information, please, refer to our [recruitment policy](#).

7. What is our legal basis for processing your Personal data?

In order to ensure the Lawfulness of data processing, as your employer, we will notably process your Personal data on the following grounds:

- Where we need to perform the **employment agreement**, which we have entered into with you (e.g. payroll creation, insurance contracts)
- Where we need to comply with a **legal obligation** (e.g. tax authorities, social security, work inspection)
- Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests (e.g. workplace monitoring to ensure the safety of personnel, providing adequate safeguards)
- Where it is necessary to protect your **vital interests** or those of another person (e.g. travel, health & safety...)
- Where it is needed in the **public interest** or for official purposes (e.g. exposure to NATO or EU classified activities).
- Your **Consent**, requested in very limited cases only (e.g. photography capture and/or audio-visual recordings)

Less commonly, we may process Sensitive Personal data in the following circumstances:

- Where we need to carry out our **legal obligations** or exercise specific rights (either yours or ours) related to employment, social security and social protection law and in line with our data protection policy (e.g. we collect your social security number to comply with our legal obligation related to payroll such as the social contributions calculation)
- Where it is needed in the **public interest**, such as for equal opportunities monitoring, in relation to our occupational pension scheme, and in line with our data protection policy
- Where processing is necessary for purposes of preventive or occupational medicine for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems
- Where processing is **necessary for the establishment, exercise or defence of legal claims** (e.g. employment or criminal litigation)
- In limited circumstances, with your explicit written **Consent**. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for Consent from us

8. Will Altran be able to make automatic decisions about your Personal data?

No, we inform you that we will not take any kind of automatic decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

All decisions that can be taken by Altran will be made by the intervention of our human resources team and any other department that can be involved (HR, IT, Legal...).

9. Who do we share your Personal data with?

9.1 Sharing your Personal data with Altran's entities

We will share your Personal data with the human resources department. Your supervisors will also have access to the data necessary to the performance of their mission such as your annual appraisals and assessments or data related to your remuneration once required.

Please, note that the Employees and their representatives have access to the personnel register (such as name, surname, nationality, job title, entrance date).

Employee representative bodies shall be allowed to access your data on your Consent (employee representative committee, union organizations).

We may also share the limited Personal data with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganization or group restructuring exercise. The list of the Altran companies is available online at "Altran Worldwide".

9.2 Sharing your Personal data with third-party service providers acting as Data Processors

We rely on third-party service providers, acting as Data processors, to help us to administer our obligations and for any specific purposes listed in section 4. We only provide them with the information they need to perform the mission we assigned to them and make sure that they do not process your data for any other purposes. We do not permit our Data processors to use your Personal data for their own purposes.

All our Data processors are required to take appropriate security measures to protect your Personal data in line with our policies.

As a way of example, our Data processors may be:

- [IT service providers for distance and on-site services (e.g. software companies for maintenance and support, hosting services, platform providers as these services may imply access to your data
- [Service providers that help us in the general administration of payroll]
- [Telecom operators, car-leasing companies, travel agencies...]

9.3 Sharing your Personal data with third parties, legitimate recipients

We will share your Personal data with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. For instance, those third parties may be social organizations [*Social care, life insurance, pension companies, unemployment insurance, health insurance, health mutual*].

We may also need to share your Personal data with legal and administrative authorities or to otherwise comply with the law.

We may share your Personal data with other third parties, for example in the context of the possible sale or restructuring of the business, we may disclose your data to potential buyers, providing adequate safeguards such as appropriate technical and organizational measures to ensure appropriate security and confidentiality (pseudonymization, anonymization, encryption, restricted access, contractual obligation of confidentiality). We do not disclose data which might not been necessary regarding the contemplated transactions.

9.4 Transfers outside the EU and the safeguards in place

We may transfer your Personal data for the purposes set out in section 4 to the following countries outside the EU: the list of the Altran companies is available online at "Altran Worldwide".

As some of those countries may not warrant an adequate level of protection, we have put in place the following appropriate measures ensuring that your Personal data are processed in a way that is consistent with and which respects the EU laws on data protection:

- organizations to which your Personal data is sent outside of the EU have a legally binding contract with us, referring to the standard contractual clauses issued by the European Commission, governed by French Law, requiring them to comply with French legislation relating to data protection and the GDPR
- all Personal data is kept strictly confidential and can only be disclosed as required by the contract; and
- only those staff who need to have access to Personal data for the performance of their contractual obligations are permitted to have access to it.

10. Data security

We have put in place appropriate security measures to prevent your Personal data from being lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your Personal data to those Employees, agents, contractors and other third parties who have a need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Data security breach and we will notify you and any applicable regulator and supervisory data protection authorities of a breach where we are legally required to do so.

11. How long will your information be held?

We will only retain your Personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal data, we consider the amount, nature, and sensitivity of the Personal data, the potential risk of harm from unauthorized use or disclosure of your Personal data, the purposes for which we process your Personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

As a way of example:

| Purposes | Retention period |
|---|---|
| Employees management | Employee presence within the company and five (5) years after, apart from longer period which may be justified by legal limitation periods. |
| Payroll management | Pay slip are retained five (5) years after payment |
| Social and cultural actions | Employee presence within the company |
| email box | Six (6) months from the recording |
| Monitoring the entrance to premises by Employees and visitors | Three (3) months from the motion |
| Management of telephone and computer use | Six (6) months from the recording |
| Video monitoring | One (1) month from the recording |

In some circumstances, we may anonymize your Personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

We will retain and securely destroy your Personal data in accordance with applicable laws and regulations.

12. What are your duties and rights?

12.1 Your duty to inform us of changes

It is important that the Personal data we hold about you is accurate and up to date. Please keep us informed if your Personal data changes during your working relationship with us.

12.2 Your rights in connection with Personal data

| Individual rights | What are you allowed to request? |
|--|---|
| Right to be informed | You have the right to be informed of any processing of your data in clear, transparent and easily understandable means. |
| Right of access | It enables you to receive a copy of the Personal data we hold about you and to receive all information about the data processing operated. |
| Right to rectification | You have the right to have your data rectified if it is incomplete or inaccurate. |
| Right to erasure/right to be forgotten | <p>It enables you to ask us the deletion of your Personal data where there is no good reason for us continuing to process it, but only where:</p> <ul style="list-style-type: none"> - it is no longer needed for the purposes for which it was collected; or - you have withdrawn your consent (where the data processing was based on consent); or - following a successful right to object request; or - it has been processed unlawfully; or - to comply with a legal obligation which Altran is subject to. <p>Such right could be exercised simultaneously with your right to object to processing.</p> <p>Please note that your right to erasure/to be forgotten may be limited in several circumstances (e.g. for exercising the right of expression and information, compliance with a legal obligation, public interest in the area of public health, archiving/statistical/scientific or historical research purposes, the establishment, exercise or defense of legal claims).</p> |
| Right to object to the processing | You have the right to object to the processing based (i) on legitimate interests, as listed in section 7, if you believe your fundamental rights and freedoms outweigh our legitimate interests or (ii) on the public interest or (iii) on the exercise of our official authority. |
| Right to restriction | <p>You may request the restriction of your Personal data processing when:</p> <ul style="list-style-type: none"> - your Personal data accuracy is contested to allow us to verify its accuracy; or - the processing is unlawful, but you do not want it erased; or - your Personal data is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or - you have exercised the right to object, and verification of overriding grounds is pending. |

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| Right of portability | You can ask us to provide you with your Personal data in a structured, commonly used, machine-readable format or to have it ported to another Data controller, providing the following cumulative criteria: (i) when the processing is based on your Consent or the performance of a contract with you; (ii) the processing is carried out by automated means. Your portability request will be analyzed on a case by case basis. |
| Right to withdraw your Consent | You may withdraw your prior Consent to processing based on it, at any time. Once we have received notification that you have withdrawn your Consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we have another legitimate basis for doing so in law. |
| Right to lodge a complaint with a supervisory authority | If you are unhappy with the way in which your Personal data has been processed, please, contact our local DPO whose contact details have been listed in Section 1.2. If you remain dissatisfied, you have the right to lodge a complaint with the leading supervisory authority, the Commission Nationale de l'Informatique et des Libertés (CNIL), the French supervisory authority for data protection, 3 Place de Fontenoy - 75007 Paris via their online form available at: www.cnil.fr/fr/plaintes . |

12.3 How to exercise your rights?

You can exercise the above-mentioned rights either by sending a letter or an email, including the reference “data protection”, to our local DPL, whose contact details have been mentioned in the attached appendix.

In order to ensure that your Personal data is not disclosed to any person who has no right to receive it, please provide us with a copy of your ID.

You will not have to pay a fee by exercising your rights. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive.

12.4 Reply to your request

We will answer your request as soon as possible and, in any case, in the period of one (1) month from reception of the request. Under some circumstances, this period could be extended to two (2) months, and in this case we will properly inform you within the period of one (1) month upon reception of your request.

However, we may reject your request if it is unfounded or excessive.

13. Changes to this Privacy Notice

We may make changes to this privacy notice from time to time, in particular to keep it up to date with legal requirements or changes in the way we operate our human resources processes. You will be notified of any significant changes before they enter into force and of the possibility to exercise your rights.

If you have any questions about this privacy notice, please contact the Group DPO whose contact details have been mentioned in section 3.2.

14. Appendix – List of Local DPOs

| Business Unit / Country | email |
|-------------------------|-------------------------------------|
| Aricent | nichola.andrews@aricent.com |
| Belgium | dpo.belgium@altran.com |
| Cambridge Consultants | dpo@cambridgeconsultants.com |
| China | dpo.china@altran.com |
| France | dpo.france@altran.com |
| Germany Cluster | christine.loew@altran.com |
| India | dpo.india@altran.com |
| Italy Cluster | dpo.italy@altran.com |
| Middle East | alfonso.cabas@altran.com |
| Morocco | salma.bouayad@altran.com |
| Netherlands | privacy.netherlands@altran.com |
| North America | steve.ferretti@altran.com |
| Portugal | dpo.portugal@altran.com |
| Scandinavia | se-dataprotection@altran.com |
| Spain | dataprotection.spain@altran.com |
| Switzerland | rebeca.good@altran.com |
| Tunisia | ayada.hassine@altran.com |
| Ukraine | roman.stebnytsky@altran.com |
| United Kingdom | dpo.uk@altran.com |
| WCC Analytics | subject-access-request@tessella.com |

