



Protection of Personal Data policy

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I. Purpose of the procedure

This procedure outlines the conditions under which Financière Humens and its subsidiaries (hereinafter the “**Humens Group**”) and its subcontractors¹ proceed with the collection, use, storage, transfer, disclosure and destruction of any personal data in connection with the activities of the Humens Group in compliance with the rules defined by Regulation (EU) 2016/679 of 27 April 2016 - General Data Protection Regulation or GDPR and the French Data Protection Act (Act no. 78-17 of 6 January 1978).

The Humens Group undertakes to conduct its activities in compliance with the laws and regulations applicable to the protection of personal data as well as the ethical rules of the Humens Group on the management of internal and external relations.

Personal data is any information related to a specific or identifiable individual (hereinafter the “**Personal Data**”). This Personal Data must be protected, which means that strict data management processes must be implemented. Any operation, or set of operations, relating to Personal Data, regardless of the process used (collection, recording, organisation, storage, adaptation, modification, extraction, consultation, use, communication by transmission or dissemination or any other form of making available, reconciliation, etc.) is considered to be processing of Personal Data (hereinafter “**Personal Data Processing**”).

The entity that makes decisions on the use of this data is considered to be the data controller (hereinafter the “**Data Controller**”).

The Humens Group and each of its subsidiaries taken individually may be Data Controller, depending on the situation (uniform processing at Group level or specific processing at subsidiary level).

Each Data Controller ensures that its Personal Data Processing comply with the rules set out in this procedure and expects all its employees and subcontractors to respect this commitment.

Failure to comply with these rules may expose the Humens Group to legal sanctions.

Any violation may result in disciplinary action or liability on the part of the person or company that fails to comply with this procedure.

II. Scope of application

This procedure generally applies across all companies in the Humens Group, including companies or establishments located outside the European Union that process, transfer or receive Personal Data pertaining to activities within the European Union.

¹ Subcontractor refers to any company acting on behalf of the Humens Group to process Personal Data for which the Humens Group is responsible.

It cannot be enforced in the event of conflicts with the laws and regulations of countries outside the European Union where the Humens Group carries out its activities.

III. Personal Data processing principles

1. Fairness and accuracy

The Humens Group processes Personal Data solely for the purposes of its activities in accordance with the following principles:

- Personal Data is collected fairly, lawfully and for a specific purpose
- All actions will be taken to ensure the accuracy of Personal Data
- Personal Data is used solely for the purpose for which it was originally collected. Any alternative use must be regarded as a new processing operation and the data subjects must be notified beforehand.
- Personal Data is kept for a specified duration, which varies depending on prescription periods, legal or recommended retention periods.

2. Limitation of collection and use for specified purposes

Prior to implementing a new Personal Data Processing or altering an existing one, the Humens Group will ensure that the planned processing complies with the GDPR.

Only data that is relevant, adequate and not excessive in relation to the purpose is collected.

This mainly concerns data related to customers, suppliers and employees of the Humens Group, within the framework of contractual relationships, human resources management and work organisation, as well as users of the Humens website.

The following categories of data may be collected:

- Identification details: surname, first name, ID, etc.
- Contact details: company, postal address, e-mail, phone number, etc.
- Personal Data related to establishing and executing employment contracts for Humens Group employees
- Connection and usage data for the Humens Group website

3. Transparency

The Humens Group collects Personal Data either directly from the persons involved or through the use of regulatory databases created by third party companies specialised in this type of service (CV libraries, etc.).

The Humens Group may also receive data collected from data subjects by a third party.

4. Consent to data processing

Data subject information outlines the type of data collected, the purpose of processing, the Data Controller, the data recipients and the rights that data subjects can exercise over their data.

The data subjects are informed of this, and their consent is obtained where necessary, before the data is collected.

Consent is obtained in writing or electronically for documentation purposes. Under certain circumstances, consent may be given verbally, in which case the Humens Group will formalise in writing the framework within which consent has been given.

5. Deletion

The Humens Group does not store Personal Data for any longer than necessary. Retention periods may vary depending on the categories of data and processing.

At any time:

- The Humens Group processes and uses this data in accordance with the law and will keep Personal Data:
 - only for as long as necessary to fulfil the stated purposes ;
 - the time needed to address any requests of deletion from the data subject;
 - for as long as required by operational, regulatory and legal constraints and in accordance with the applicable limitation periods;
 - for as long as necessary to ensure the rights of the defence.

To fulfil this commitment and comply with Article 17 of the GDPR, the Humens Group undertakes to respond to any request to delete Personal Data collected in one of the following cases:

- When the data subject's information is used for marketing purposes;
- When the Personal Data to be deleted no longer serves its original collection purposes;
- When the data subject withdraws his/her own consent to the processing of the said data, unless the Processing of Personal Data is compulsory;
- In instances of unlawful use or processing of the data concerned;
- When legal obligation requires the deletion of Personal Data.

6. Accuracy and updating

Personal Data must be accurate, complete and kept up to date. Appropriate measures are taken to ensure that inaccurate or incomplete data is deleted, corrected, completed or updated.

7. Confidentiality and security

Personal Data is treated as confidential and protected through suitable organisational and technical measures to prevent unauthorised access, unlawful processing or distribution, as well as accidental loss, alteration or destruction.

IV. Personal Data Processing

1. Personal Data Processing as part of a contract

The Humens Group may need to process the Personal Data of any partners and employees (prospects, customers, employees) to establish, execute or terminate a contract.

2. Consent of data subjects

When the collection of Personal Data is based on the consent of the data subjects, the information provided to these persons aims to ensure their free and informed consent. Data processing related to website use

The Humens Group may collect Personal Data through a contact form available on the Humens website.

User data and the Internet: cookies

Humens Group websites and services may use cookies. These allow the respective terminal to be identified whenever it accesses digital content with cookies from the same source.

The Humens Group only uses these cookies for statistical analysis and to enhance user navigation across its website.

Before placing or reading a cookie on a user's computer, the Humens Group:

- Informs Internet users of the purpose of cookies;
- Obtains their consent when required;
- Informs users on how to reject cookies.

Users of the Humens website may reject the use of cookies at any time by adjusting their browser settings. Such settings may, however, alter the conditions of access to products, content and services requiring the use of cookies.

3. Data processing in compliance with legal and regulatory obligations

When Humens Group processes Personal Data to fulfil regulatory obligations, the nature and scope of data processing will adhere to the relevant legal requirements and provisions.

4. Data processing for a legitimate interest

Personal Data may also be processed if this is necessary to protect the legitimate interests of the company. Legitimate interests may include pre-contractual, contractual or legal obligations, etc. (e.g. prospecting, contract performance, defending the company's interests, etc.).

Measures to manage employee data can only be implemented if there is a legal obligation or a legitimate reason to do so. If there is a legitimate reason, the proportionality of such control measures must also be examined.

5. Retention period

The following table defines the standard retention periods for Personal Data of employees adopted by the Humens Group in accordance with the laws and regulations in force.

Longer retention periods may be required to protect the Humens Group's interests. In such cases, individuals whose personal information is collected and processed will be provided with specific information. Where necessary, data will be minimised to the strict minimum and access to it will be restricted.

6. Summary: purposes, legal basis, data and retention periods

Purposes	Legal basis	Personal Data collected	Retention periods
Management of the relationship with commercial partners (processing purchase orders or sales)	Legitimate interest	Identity Professional contact details (phone, e-mail, postal address). Position in the company	10 years from the last interaction
Identifying potential partners	Consent	Identity Professional contact details (phone, e-mail, postal address). Position in the company	3 years after the last contact
Application management	Consent	Identity Personal information (phone, e-mail, postal address). Details regarding professional experience (CV, cover letters, skill sets, career aspirations); Training	2 years unless the data subject agrees
Sending newsletters and satisfaction surveys	Consent	E-mail address	3 years by default
Analysing connection data (including site usage measurement cookies) to generate anonymous usage indicators for the apec.fr website and mobile applications	Legitimate interest	Navigation traceability	2 years
	Consent	Cookies	13 months

V. Transfer of Personal Data

Personal Data may be accessible to specific employees or partners of the Humens Group located in countries outside the European Union, contingent upon the provisions outlined below. For recipients located outside the European Union, transfers are limited to countries designated by the European Commission as providing adequate protection for Personal Data, or to recipients who adhere either to the standard contractual clauses proposed by the CNIL (French supervisory authority) or to the Humens Group's Personal Data protection rules.

Any transfer of data outside the European Union is subject to prior approval by the data protection referent (hereinafter the "**Data Protection Referent**").

VI. Data processing by a subcontractor

Personal Data Processing is subcontracted whenever a service provider is engaged in Personal Data Processing for which the Humens Group bears responsibility, whether this involves data collection, storage or processing implementation.

In all cases, each Humens Group company responsible for processing maintains full responsibility for ensuring that the Personal Data Processing adheres to GDPR regulations.

In such cases, the Data Controller must verify prior to any contractual agreement that the selected subcontractor possesses the requisite capacity to address the required technical and organisational aspects.

When formalising the contractual agreement, the customer department, in collaboration with the Data Protection Referent, ensures that the contract satisfies the following conditions:

- The subcontractor will only act in accordance with the instructions given by the Humens Group;
- The subcontractor must be chosen based on its ability to satisfy the technical and organisational aspects required by Personal Data protection measures;
- The contract must emphasise the subcontractor's obligation to comply with the regulations on the protection of Personal Data, especially ensuring that its own subcontractors comply with GDPR regulations;
- The service provider's compliance with regulations should be substantiated by certificates of compliance and/or any documentation demonstrating the strength of its security systems. This capacity should be subject to monitoring and evaluation by the Humens Group throughout the contract's duration.

VII. Confidential processing

For the purposes described above, Personal Data may be sent to:

- An employee of the Humens Group who, as part of their duties, is involved in processing Personal Data;
- The subcontractor's staff responsible for processing Personal Data (e.g. payroll, reception, marketing operations, IT, etc.) as part of specific tasks outlined by the Humens Group in collaboration with the subcontractor. Where data is subcontracted, the Humens Group enters into agreements with its subcontractors governing the use of such data and guaranteeing its protection;
- The Humens Group will disclose Personal Data (i) if required by law, regulation or judicial decision (ii) to the relevant authorities (e.g. police, magistrates, etc.), within the bounds of applicable law or (iii) when the Humens Group deems disclosure necessary or appropriate to prevent physical harm or financial loss, or for the investigation of illegal activities or suspected illegal activities, subject to applicable law.

VIII. Security and confidentiality

The Humens Group enforces and upholds suitable technical and organisational measures to mitigate unauthorised or inadvertent access, collection, processing, disclosure, duplication, modification, availability or any similar risks.

- Technical measures include protecting networks, servers and terminals against external attacks, as well as intrusion and/or recovery testing;
- Organisational measures are based on assigning identifiers and passwords that grant personalised access to data;
- Monitoring connection histories helps to detect unauthorised access attempts.

In the event of a Personal Data breach, the Humens Group will notify the supervisory authority and, if necessary, the affected individuals.

IX. Processing audit

To guarantee compliance with the regulations and rules established by the Humens Group, specific audits may be carried out on processes and information systems. These audits will be conducted by internal teams and any other external parties required to complete them, under the supervision of the Data Protection Referent.

These compliance audits will assess, at minimum:

- Allocation of responsibility for Personal Data Processing;
- Awareness of the procedure among various stakeholders;
- Training for people involved in the processing of Personal Data Processing;
- Effectiveness of Personal Data Processing operations;
 - Respect for people's rights, including prior information;
 - Compliance of Personal Data transfers;
 - Incident management;
 - Complaint management;
 - Accuracy and updating of processed Personal Data.

X. Incidents and breaches

The Humens Group and its employees are required to notify the Data Protection Referent or his designated representative within the relevant structure in case of a breach of the principles outlined in this policy.

The Humens Group must therefore prepare a file if any of the following situations arise:

- Unauthorised transmission of Personal Data to a third party;
- Unauthorised access to Personal Data by a third party not accredited for this category of data;
- Loss, alteration or destruction of Personal Data.

In the event of violations or incidents, the Humens Group identifies the incident, analyses its repercussions and records the event in a violations register.

If there is a risk to the individual, the Humens Group will notify the supervisory authority of the file documenting the breach within the legal deadline.

If there is a significant risk to the individual, the Humens Group will promptly and within the legal framework inform the affected individuals of the Personal Data breach.

XI. Updates to the Humens policy

This internal policy may be updated to reflect changes in how Humens Group manages Personal Data. Any major changes will be communicated internally.

The current version is the one displayed on the intranet site of each entity within the Humens Group and on the Humens Group's official website.

XII. Data protection by design

The Humens Group ensures that all its projects are GDPR-compliant from the earliest stages of their design.

To guarantee that all Personal Data protection requirements are recognised and addressed when designing new systems or processes, or when reviewing existing ones, the Data Protection Referent must be involved in the project when it concerns a system or process that directly or indirectly relates to or has an impact on the Personal Data Processing.

XIII. Respecting people's rights

Every individual whose Personal Data is held by the Humens Group possesses the following rights regarding the collection and processing of their Personal Data. These rights may be exercised under certain circumstances.

- Right to access Personal Data, including the right to receive information about the Personal Data Processing;
- Right to rectify Personal Data (it is important that Personal Data held by the Humens Group is up to date);
- Right to have Personal Data deleted;
- Right to restrict the processing of personal data;
- Right to data portability;
- Right to object to the processing of their Personal Data (particularly when Personal Data is processed for marketing purposes).

Exercising these rights is free of charge. No fee may be charged for this. However, the Humens Group reserves the right to impose reasonable fees if the exercise of these access rights is deemed clearly unfounded or excessive.

A response will be provided within the legal deadline of one month following the receipt of a complete request.

Alternatively, the Humens Group may, where appropriate, refuse such a request.

To exercise these rights, the data subjects may send their request by e-mail to privacy@humens.com, or by post to:

Humens

Bertrand Jacque

Data Protection Referent

34 rue Gilbert Bize

54410 LANEUVEVILLE DEVANT NANCY

To verify the identity of the requester and ensure that Personal Data is not disclosed to unauthorised individuals, a copy of a signed identity document will be requested.

Each person also has the right to file a complaint with the CNIL or any competent supervisory authority.