

GENERAL PERSONAL DATA PROTECTION POLICY

Introduction

The Ortec Group recognizes the fundamental nature of the protection of individuals with regard to the processing of their personal data and undertakes to respect and protect personal data (hereinafter the “Data”) to which its employees have access, in any capacity whatsoever, and to do so in accordance with European Regulation 2016/679 adopted on April 27, 2016 and all laws of European Union Member States that have been adopted in application of this regulation, and in particular French law No. 2018-493 of June 20, 2018. This document is supplemented by the Personal Data Protection Policy for Ortec Group Employees.

Definitions

“Personal data” means any information relating to a natural person who is identified or identifiable, directly or indirectly, by reference to an identification number or to one or more factors specific to that person (location data, online identifier, physiological, genetic, economic, cultural, social, etc.).

CNIL refers to the Commission Nationale de l’Informatique et des Libertés (National Commission for Informatics and Liberties), the French Supervisory Authority competent for any person residing in France who is affected or likely to be affected by a Processing operation. For individuals residing in any other European country, the contact details of the competent supervisory authorities can be found here: https://edpb.europa.eu/about-edpb/about-edpb/members_en.

“Applicable Regulation” means the European Regulation 2016/679 adopted by the European Parliament on April 27, 2016 as well as all the laws of the European Union Member States that have been adopted in application of this regulation and in particular the French law No. 2018-493 of June 20, 2018. For individuals residing in any other European country, the references to the Applicable Law are available from the competent Supervisory Authorities : https://edpb.europa.eu/about-edpb/about-edpb/members_en.

The terms “Processing”, “Data Controller”, “Subcontractor”, “Transfer, Cross-Border Transfer”, “Third party”, “Recipient”, “Supervisory Authority” and “Data Protection Officer (DPO)” have the meaning given to them by European Regulation 2016/679 adopted on April 27, 2016, which can be found on the CNIL website: <https://www.cnil.fr/fr/glossaire>. For individuals residing in any other European country, please refer to the definitions provided by the relevant Supervisory Authority, whose contact details can be found on the website: https://edpb.europa.eu/about-edpb/about-edpb/members_en.

Ortec Group refers to all companies owned and/or controlled by ORTEC EXPANSION SA within the meaning of Article L.233.3 of the French Commercial Code.

Scope of application

This policy and the commitments it entails apply to Data relating to customers, suppliers, subcontractors, partners, prospects, job applicants or any party outside the Ortec Group, who must be able to trust in our ability to protect their Data and to respect their rights under the Applicable Regulations.

This policy also applies to job applicants, whether they contact the Ortec Group directly or whether their details are sent to us by a recruitment agency or by an employee as part of the co-optation procedure.

Data categories

This includes Data transmitted to us in the context of the Ortec Group's business relations with its customers, suppliers, subcontractors, partners or a prospect, or Data communicated to us by visitors to our physical sites in the context of hiring, or Data received by us in our dealings via our websites.

The Data categories concerned are mostly identification data (last name, first name, photograph, etc.), data relative to professional life (positions, qualifications, email address, etc.) and bank details for payment purposes.

Our commitments

We are committed to ensuring the protection, confidentiality, non-alteration, availability and security of the Data entrusted to us, whether hosted physically or on computerized applications, or received via our communication channels (websites).

We take all necessary measures to comply with the Applicable Regulations:

- To provide you, upon request, with clear and transparent information on how your Data will be Processed,
- To set up all the technical and organizational measures necessary to protect your Data against disclosure, loss, alteration or access by an unauthorized Third Party,
- To keep your Data only for as long as is required and solely for the purposes of the specified Processing,
- To enable you to access and modify your Data at any time, should you so request.

To achieve these objectives, we implement the appropriate technical and organizational measures to ensure that when we act as Data Controller(s), these measures comply with the Applicable Regulations and in particular, we undertake to inform you :

- Of the existence and terms of the Data Processing that we carry out,
- Of your rights concerning your Data and by carrying out the operations that the exercise of these rights implies,
- Of the existence of any Cross-Border Transfers of your Data and transfers outside the European Union as well as the identity of the Recipients of your Data,
- Of the length of time we keep your Data of the security measures we have put in place.

The Ortec Group

When the Ortec Group carries out Data Processing operations, it is the EIG ORTEC SERVICES, through its various departments and divisions, which acts as Data Controller.

EIG ORTEC SERVICES - 550 rue Pierre Berthier - 13799 Aix en Provence - CS8034 - France

Tel.: + 33 4 42 12 12 12

Depending on the Processing involved, the contact person will be: the Communication & Marketing Division (websites, business prospecting, etc.), the IT Department for IT developments (internal and external) and maintenance, the “Non-Production Purchasing” and “Industrial Purchasing” departments for purchasing, the managers of the various business divisions for data inherent to the Ortec Group’s business activities, the Recruitment and Mobility department for the missions assigned to it, Accounting and Finance, etc.

The Ortec Group has appointed a Data Protection Officer whose contact details are:
Email : dpo@ortec.fr

Postal address: EIG ORTEC SERVICES – Data Protection Officer – 550 rue Pierre Berthier – 13799 Aix en Provence – CS8034 – France

Tel.: + 33 4 42 12 12 12

The purpose of our data processing

Our Processing operations are listed and their respective purposes are defined, legitimate, explicit and compatible with the pursuit of our activities and missions. Here are the main ones:

| Purpose | Legal basis |
|---|---|
| Managing responses to tenders and letters of consultation received by the Ortec Group | Our legitimate interest (responding to customer and prospect requests) |
| Managing contracts with our business partners | Execution of the contractual relationship between us |
| Managing suppliers and service providers | Execution of the contractual relationship between us or our legitimate interest in data that goes beyond that which is strictly necessary for the execution of the contractual relationship (managing and improving our relationship) |
| Third-party appraisal | Compliance with regulatory requirements |
| Customer management | Execution of the contractual relationship between us or our legitimate interest in data that goes beyond that which is strictly necessary for the execution of the contractual relationship (improving our customer relations) |

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| Managing invoices, payments and outstanding invoices | Execution of the contractual relationship between us or our legitimate interest in data that goes beyond that which is strictly necessary for the execution of the contractual relationship (managing outstanding invoices) |
| Litigation management | Our legitimate interest (defending our interests) |
| Managing customer reviews and satisfaction surveys | Our legitimate interest (promoting and improving our offers) |
| Business prospecting initiatives | Our legitimate interest (promoting our offers) or your consent if required by regulation |
| Recruitment management | Our legitimate interest (hiring) or your consent if required by regulation (CV-library) |
| Controlling access to premises | Our legitimate interest (protecting people and premises) |
| CCTV | Our legitimate interest (protecting people and premises) |
| Visitor Wi-Fi access management | Our legitimate interest (IT security) |
| Management of professional alert systems (alerts, related investigations and follow-up of decisions taken as a result) | The fulfillment of regulatory obligations for companies required to set up such systems, or our legitimate interest (protecting the Group's interests) |
| Carrying out statistical analyses | Our legitimate interest (improving our reporting) |

Data Transfer

The purpose defined allows us to determine the relevance of the Data we collect. Only Data that are suitable and strictly necessary to achieve the defined purpose are collected and Processed by duly authorized persons of the Ortec Group.

Within the Ortec Group, this may include:

- The Communication & Marketing Division (websites, business prospecting, etc.),
- The IT Department for IT developments (internal and external) and maintenance,
- The purchasing departments (“Non-Production Purchasing” and “Industrial Purchasing”),
- Employees within each business division who participate in the Group’s business activities at any level (costing, execution),
- The Recruitment and Mobility department,
- Accounting and Finance,
- The Legal Department,
- Internal audit.

Insofar as the Ortec Group is established in various countries, nominative data concerning you may be transferred – for the various purposes (objectives) referred to in this Charter – to entities of the Group.

Access rights are defined in the Information Systems Security Policy implemented by the Ortec Group, which provides for the implementation of the necessary means to protect the Processing of your Data in order to prevent any access by an unauthorized Third Party and to prevent any loss, alteration, deterioration or unauthorized disclosure of your Data.

The following Third Parties may have access to Data:

- The Group's IT service providers (responsible for maintenance, IT hosting, paperless data management and electronic signatures),
- Subcontractors involved in business prospecting (routing, etc.),
- Partners involved in contract management: debt collection agencies, etc.,
- Partners involved in hiring processes (recruitment agencies, etc.).

Transfers outside the European Union

As a general rule, your Data are kept within the European Union.

However, we may transfer some of your Data outside the European Union. In this case, we ensure that the Transfer is carried out in compliance with the Applicable Regulations and guarantees you an adequate level of protection. Although some of these countries do not offer the same level of protection as the European Union Member States, the Ortec Group will ensure that these Transfers are carried out in accordance with the provisions imposed by the regulations, such as the implementation of contractual clauses adapted to the risks identified. Further information and a copy of the relevant documents relating to these Transfers may be requested by post or email from the following addresses:

By email sent to dpo@ortec.fr and/or by postal mail addressed to :

EIG ORTEC SERVICES - 550 rue Pierre Berthier - 13799 Aix en Provence - CS8034 - France

Tel.: + 33 4 42 12 12 12

Security measures

We undertake to implement appropriate technical and organizational measures in order to guarantee a level of security appropriate to the risks that may threaten the protection of individuals in connection with the Processing of their Personal Data.

These measures are defined taking into account current knowledge, implementation costs and the nature, scope, context and purposes of the processing, as well as the risks identified.

Retention period

Your Data are gathered and stored by the Ortec Group for only as long as necessary to carry out the Processing, for example :

- 1 month for CCTV footage,
- 3 years for data relating to prospects,
- 5 years after termination of contract for data relating to the employment contract,
- 3 months after consideration for a job application, or 2 years if the candidate agrees.

Information and individual rights

In accordance with the Applicable Regulations and at your request, whenever the Ortec Group collects Data, it will provide you with important information about the Processing that is envisaged and, in particular, will allow you to :

- Request access to your personal data,
- Request the rectification of your Data,
- Request the restriction of processing of your Data,
- Request the deletion of your Data,
- Exercise your right to object for reasons relating to your particular situation or without reason, to oppose business prospecting campaigns,
- Change your subscription settings or unsubscribe from newsletters we publish,
- Formulate specific and general guidelines concerning the retention, deletion and communication of your Data following your death (France only),
- Exercise your right to data portability,
- Withdraw your consent to the processing of data on this legal basis,
- Not to be the subject of a decision based exclusively on automated processing and producing legal effects concerning you or significantly affecting you,
- Lodge a complaint with the relevant Supervisory Authority at any time.

More detailed information on this procedure can be obtained from the relevant Supervisory Authority.

To exercise your rights, please send your request (indicating your email address, last name, first name, postal address and a copy of your identity card) to the Data Protection Officer (DPO) of the Ortec Group by email to dpo@ortec.fr and/or by postal mail addressed to :

EIG ORTEC SERVICES - 550 rue Pierre Berthier - 13799 Aix en Provence - CS8034 - France

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Reviewing and updating the policy

This policy will be updated as necessary and will be supplemented by procedures specific to certain processing.

Dated 01/10/2024

Approved by the Ortec Group's Legal Division and DPO.

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