

PERSONAL DATA PROTECTION POLICY FOR ORTEC GROUP EMPLOYEES

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 this 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.

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.

“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.

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>.

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. See organization chart in appendix.

Scope of application

This policy and the commitments it entails apply to Data relating to employees of the Ortec Group who must be able to have trust in our ability to protect their Data and to respect the rights conferred on them by the Applicable Regulations.

Data categories

The Data categories concerned are mostly identification data (last name, first name, registration, etc.), data relative to private and family life (postal address, emergency contacts, residence permit, etc.), data relative to professional life (qualifications, languages spoken, etc.), social security number and bank

details for payment purposes, health data (in the event of a declared disability, for example), trade-union membership data for the sole purpose of managing professional elections.

The Group may also need to collect and process personal data relating to your family and friends (e.g. identification data), in particular for the purpose of identifying persons to contact in the event of an emergency, for granting special leave in the event of marriage, for membership of mutual insurance and provident schemes, etc.

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 amend 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 Processing in question involves Data that concerns you personally as an employee, your employer is the Data Controller.

EIG ORTEC SERVICES - through its various departments and divisions - acts as Joint Data Controller.

EIG ORTEC SERVICES – 550 rue Pierre Berthier – 13799 Aix en Provence – CS8034 – France
Tel.: + 33 (0)4 42 12 12 12

Depending on the type of Processing involved, the main contact will be the Human Resources Department, the Recruitment and Mobility Department or the Security Department.

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
- Numéro de téléphone : + 33 (0)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:

- **HR management of staff**

Purpose	Legal basis
Managing employees' professional files	The performance of the contract between us or our legitimate interest in data that goes beyond that which is strictly necessary for the performance of our contractual relationship.
Career & Performance Management	Our legitimate interest (improving our knowledge of our staff members, their skills and expectations)
Career interviews (senior employees, end of career, return from long-term absence, etc.)	Fulfillment of the contract between us
International mobility management (expatriates)	The performance of the contract between us or our legitimate interest in data that goes beyond that which is strictly necessary for the performance of our contractual relationship.
Paperless handling of certain documents	Our legitimate interest (facilitating the safekeeping of documents) or compliance with regulatory obligations, depending on the type of document
Electronic safe	Our legitimate interest (facilitating and securing the communication and safekeeping of documents)
Employee training (including training provided by the Group)	The fulfillment of regulatory obligations or our legitimate interest for data that would exceed that which is strictly necessary for the fulfillment of regulatory obligations (better understanding your needs and expectations and assessing training courses)
Professional assessment of employees	Our legitimate interest (improving our knowledge of our staff members, their skills and expectations)
Managing professional elections	Fulfilling regulatory obligations
Managing relations with employee representative bodies	Fulfillment of regulatory obligations or our legitimate interest for data that goes beyond that which is strictly necessary for the fulfillment of regulatory obligations (maintaining a peaceful social environment)
Management of compensation and benefits	The fulfillment of regulatory obligations or the execution of the contract between us for data that goes beyond that which is strictly necessary for the fulfillment of regulatory obligations
Fulfillment of reporting obligations to administrative authorities (accounting, tax and social security obligations)	Fulfilling regulatory obligations

Management of working hours	Fulfillment of regulatory obligations when employees work on an hourly basis Our legitimate interest for other employees (harmonizing our practices)
Management of directories and organization charts	Our legitimate interest (facilitating exchanges within the Group)
Provision of vehicles	The performance of the contract between us (company vehicles) or our legitimate interest (service vehicles)
Management of the recovery of traffic fines in connection with the provision of vehicles by employers to their employees	Fulfilling regulatory obligations
Geo-tracking of vehicles	Our legitimate interest (preserving our interests)
Tachographs installed on road transport vehicles	Fulfilling regulatory obligations
Management and monitoring of professional and defense authorizations	Our legitimate interest (preserving our interests)
Planning and monitoring activities	Our legitimate interest (meeting organizational and regulatory requirements)
Delegation of powers/signature management	Fulfillment of the contract between us
Management and follow-up of litigation/disciplinary sanctions	Our legitimate interest (preserving our interests)
Managing social problems	Your consent
Business travel management (one-off trips, expatriates, etc.)	Our legitimate interest (protecting individuals)
Use of image rights	Your consent
Carrying out satisfaction surveys/polls	Our legitimate interest (to get to know you better) or your consent, depending on the survey/poll
Carrying out statistical analyses	Our legitimate interest (facilitating reporting and evaluating existing systems)

• **Provision of IT resources:**

Purpose	Legal basis
Managing access rights to applications and networks	Our legitimate interest (ensuring IT security)
Implementation of systems to ensure the security and smooth operation of IT applications and networks	Our legitimate interest (ensuring IT security)
Electronic signature	Our legitimate interest (facilitating signatures)
Managing expenses related to the use of telephony services	Our legitimate interest (contributes to financial management)
Professional email and voicemail management	Our legitimate interest (ensuring IT security)
Management of collaborative tools (corporate social networks, videoconferencing, etc.)	Our legitimate interest (ensuring IT security and facilitating communications)
Management of professional agendas	Our legitimate interests (facilitating work organization and ensuring IT security)

Monitoring internet and email use	Our legitimate interest (ensuring IT security and compliance with the IT Charter)
Carrying out statistical analyses	Our legitimate interest (facilitating reporting and evaluating existing systems)

• **Health in the workplace:**

Purpose	Legal basis
Management and monitoring of occupational health (medical leave, workplace accidents, occupational illnesses)	Fulfillment of regulatory obligations or our legitimate interest for data that goes beyond that which is strictly necessary for the performance of contractual relations (protecting employees' interests and those of the Company)
Smartphone geolocation for isolated workers	Our legitimate interest (ensuring the safety of isolated workers)
Monitoring medical check-ups (occupational medicine)	Fulfilling regulatory obligations
Accidentology management: analysis of causes and consequences	Our legitimate interest (avoiding the risk of accidents)
Managing alcohol and drug testing campaigns	Our legitimate interest (risk prevention)
Carrying out statistical analyses	Our legitimate interest (facilitating reporting and evaluating existing systems)

• **Protection of people and premises:**

Purpose	Legal basis
CCTV	Our legitimate interest (protecting people and premises)
Access control using badges	Our legitimate interest (protecting people and premises)
Carrying out statistical analyses	Our legitimate interest (facilitating reporting and evaluating existing systems)

• **Professional alert systems:**

Purpose	Legal basis
Management of 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 (facilitating reporting and evaluating existing systems)

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, these may include:

- The human resources division, in particular the people in charge of staff and payroll (e.g. for the management of your professional file) of your employing company and the EIG,
- Finance division (e.g. for budgeting) of your employer company and the EIG,
- The IT division (e.g. for equipment maintenance) of your employing company and the EIG,
- People in charge of security and reception (e.g., managing access to the premises) within your employing company and the EIG,
- People in charge of internal communications and events and travel organization,
- People in charge of EIG internal inspections and audits,
- People in charge of dealing with professional alerts at your employing company and at the EIG,
- Line managers (e.g. for appraisal management),
- Employee representative bodies,
- For your identification data, all employees (e.g. for directories, intranet, internal communications, etc.),

Dans la mesure où le groupe Ortec est implanté dans différents pays, les données nominatives vous concernant peuvent être transférées – pour les différentes finalités (objectifs) visées dans la présente Charte – à des entités du groupe.

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.

Your personal data may be communicated to third parties:

- IT subcontractors, for instance, for the purpose of hosting and maintaining IT applications or devices that process personal data,
- Service providers responsible for security and/or reception on the premises,
- Customers within the framework of regulatory due diligence obligations or access to their premises,
- Investigation and clearance authorities for Secret clearance,
- Organizations managing the various social security, unemployment insurance, pension and provident schemes,
- Testing laboratories that analyze screening tests,
- Auditing bodies in the performance of their assignments,
- Statutory auditors in the performance of their duties,
- External investigators involved in the handling of professional alerts,
- Parties involved in a litigation,
- Administrative or judicial authorities and authorized third parties to comply with a legal obligation or for the exercise of legitimate interests,

Transfer 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

Tél : + 33 (0)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
- 5 years for data relating to reasons for absence
- 5 years for information used to prepare pay slips
- 3 months for vehicle geo-tracking data
- 1 month for screening test results
- 5 years after termination of contract for data relating to the execution of the employment contract
- Duration of appeals for professional elections
- 6 to 12 months for connection logs
- The duration of the procedure plus the length of time for appeals in litigation cases

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 planned Processing 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
- 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 processes.

Dated 01/10/2024

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

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