

# DATA PRIVACY POLICY

## for Customers and Suppliers



The purpose of this Privacy Policy is to provide Axens' customers, suppliers and their employees as much information as possible on the collection and processing of their personal data by Axens. Axens applies the principle of *Privacy by default*, i.e. it implements appropriate technical and organizational measures to ensure, by default, that only data strictly necessary for the purposes of each processing operation are processed. This principle applies to the quantity of data collected, the extent of their processing, their retention period and their accessibility.

All Axens employees, when they define or implement data processing as part of their activities, must respect this principle of *Privacy by default*.

### > What are personal data?

Personal data are any type of information that can be used to identify an individual, directly or indirectly. For example, not only your last name, first name and picture undeniably constitute personal data but also your social security and phone numbers and even your parking space.

### > Which personal data about me can be processed by Axens, for which purpose and on which legal basis?

Processed Data	Purpose of the processing operation	Legal Basis
Company name, corporate name, address (head office, place of invoicing), accounting identification code, telephone, fax, e-mail address, SIREN number, profession, economic category, activity; products or services provided, payment terms and conditions (means of payment, bank or postal references, discounts, deposits, rebates), credit terms, duration; unpaid, assets, receipts; deductions or objections	Supplier relationship management: contracts, orders, deliveries, stocks, payments, statistics, evaluation	Processing operation necessary for the performance of the contract
Last name, first name Professional life: Job title, company, full address, telephone, fax, sector of activity, professional e-mail address, answer to survey questions	Customer relationship management and information on Axens products	Consent / legitimate interests of Axens
Last name, first name, e-mail address, physical address, telephone, fax, mobile, website, contact details and billing terms	Management of the company's contracts	Processing operation necessary for the performance of the contract

Processed Data	Purpose of the processing operation	Legal Basis
<p>Last name, first name, whether or not you need a letter of invitation to obtain a visa.            Job title, company, business address, professional phone number, business e-mail address            Company code, billing details of the company (if applicable)            Images (photos taken during the visit used for Axens' communication purposes)            Clothing size (for safety equipment)            Spouse's name            Food constraints            IP address</p>	<p>Registration for Axens customer events and Q&amp;A and satisfaction questionnaires management following these events</p>	<p>Processing operation necessary for the performance of the contract / consent / Axens' legitimate interests</p>
<p>Arrival times            Visitor's name            Name of his company            Return of identity document            Photos            Number and name of the badge given to the visitor who defines for whom the visitor came            Name of the contact on the site</p>	<p>Reception of visitors on the company's worksites</p>	<p>Consent / legitimate interests of Axens</p>
<p>Last name, first name, company name            Date and place of birth            Personal address            Photos            Electronic copy of passport, family status            Last name, first name, profession, nationality, date and place of birth of parents and spouse if applicable. In some cases, income of the traveler to obtain a visa.            Places and travels (location of the mission, via which countries, airports etc...). Some countries may request additional information such as religion or medical data (vaccinations...).</p>	<p>Organization of business trips</p>	<p>Processing operation necessary for the performance of the contract / consent</p>

Please note that not all the data mentioned are used for each processing operation corresponding to the purposes mentioned above.

## > Who has access to my personal data?

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Axens adheres to the *Privacy by Design* principles defined by the General Data Protection Regulation (GDPR) and tries to limit access to personal data as much as possible, in order to ensure that each person, whether an Axens employee or a third party within the company, who can access your data really needs to do so in order to perform their duties.

The main recipient of your personal data are Axens' commercial, accounting and financial, purchasing, HR, communications, marketing departments and IT. The legal and internal control departments also have access to some personal data in the exercise of their missions, as well as the company's statutory auditors. In the course of its business, Axens may also transfer some of your personal data to companies within its group.

In addition, some third parties who provide services to Axens may have access to some of your data, solely to enable Axens to process the data for the purposes indicated to you:

- For payments: our bank;
- For travel planning services: CWT France;
- For some services: the technical service providers MailChimp, Etouches, SurveyMonkey, PowerVote and Google Form;
- For hosting data stored by Axens: Cegid;
- For the reception of visitors and the security of our premises: Engie Energie Services.

Please note that this list of recipients is not exhaustive and is subject to regular changes, depending on legislative development and Axens' contractual policy.

## > How long does Axens keep my data?

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The length of time Axens keeps your data depends on the purpose of their processing. In accordance with the principle of *Privacy by Default*, Axens tries to minimize the duration of data retention and undertakes to erase or archive them (on separate media and with very limited access) as soon as they are no longer necessary for the processing in question.

You will find below a summary table of the retention periods applicable to each kind of data before their erasure or archiving, according to the main purposes of the processing operations carried out by Axens:

Retention period	Processing operation purpose
6 months after the event	Clothing size, food preferences, spouse's name, IP address
2 years after the completion of the study	Market studies.
2 years after the last contact by the customer	Customer relationship management
4 years after the event	Organization of Events (participant contact details, visa information, photo)
10 years after the end of the contract	Customer/supplier contract management

## > Are my data transferred outside the European Union?

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Axens and its data processors may need to transfer your data outside the European Union in order to process it. Together with all the companies of its group, Axens has set up a Data Transfer Agreement based on the standard clauses issued by the European Commission, to ensure that any company in the Axens group that imports your data outside the European Union complies with the principles of the General Data Protection Regulation. When concluding contracts with its data processors, Axens takes particular care to ensure that they only transfer your data outside the European Union (or countries whose level of protection has been recognized as equivalent) if this transfer is made under binding company rules, data transfer agreements in accordance with European Commission decisions or other mechanisms that may be defined by the authorities in charge of personal data protection. You can obtain a copy of the mechanisms put in place to ensure the security of the transfer of your data abroad by contacting our Data Protection Officer at the address indicated below.

## > What security measures are implemented by Axens to protect my personal data?

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Access to the data and recorded information you have provided us with is protected by passwords and access to these passwords is limited. Firewall technology is used to prevent unauthorized access and servers are backed up daily, via archives stored in a secure location.

Laptops allocated to Axens employees are encrypted so that the data they contain cannot be used by third parties in the event of theft.

## > What are my rights to my personal data?

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In accordance with the General Data Protection Regulation, you have the following rights regarding your personal data processed by Axens:

- Obtain a copy of your data;
- Obtain the rectification of inaccurate data, as well as, when appropriate, the completion of such data if the data are incomplete for the purpose of the processing;
- Obtain the erasure of your data if they are no longer necessary for the purpose for which they were collected, if you withdraw your consent (where consent is the legal basis for the processing operation), if the data have been unlawfully processed or if such erasure is necessary to comply with a legal obligation to which Axens is subject;
- Obtain the restriction of the processing if (i) you contest the accuracy of the data (pending verification of accuracy), (ii) the processing is unlawful without this limitation and you do not wish to oppose this processing, (iii) Axens no longer needs this data for the purposes of the processing but it is necessary for the establishment, defense or exercise of legal rights;
- Receive your data in a structured, commonly used and machine-readable format for their transmission to another controller, if the processing operation is based on your consent, is necessary for the performance of your employment contract or is carried out using automated processes;
- File a complaint before the CNIL, the French Data Protection Authority.

You also have the right to determine the fate of your data after your death.

If you wish to exercise these rights, you may contact Axens' Data Protection Officer at the following email address: [dpo@axens.net](mailto:dpo@axens.net).