



Data Protection Policy - **SONAMIA**

SONAMIA is committed to a strong privacy policy in order to protect personal data processed as part of its business activities.

SONAMIA has established this Data Protection Policy to keep all relevant parties informed of this commitment. All commitments and practices undertaken by **SONAMIA** can therefore be consulted at any time by any natural person, whether they work for the company or not.

1. Preamble and general policy statement

SONAMIA is committed to processing all collected data in accordance with the relevant legislation on data protection (French Law N°78-17 of 6 January 1978, as amended, and the General Data Protection Regulation (EU) 2016/679 of 27 April 2016, hereafter referred to jointly as “the Legislation”).

This Data Protection Policy applies to:

- Recipients of services provided by **SONAMIA**;
- Professionals partnered with **SONAMIA**;
- Natural persons who are clients or prospects of **SONAMIA**;
- Employees of **SONAMIA**;
- Applicants seeking to join **SONAMIA**;
- Users of the **SONAMIA** website.

2. In the interest of ensuring understanding of this policy, SONAMIA sets out the following definitions:

- ‘Processing’ personal data means any operation or set of operations which is performed on
- ‘personal data, such as collection, structuring, storage, alteration, or disclosure.
- ‘Personal data’ means any information relating to an identified human being (natural person), who can be identified, directly or indirectly, by reference to an identifier such as a name, phone number or e-mail address.

- 'Data subject' means a person who can be identified by processed data.
- 'Controller' means the entity which decides how personal data are to be used by determining the purposes and the means of the processing of personal data.
- 'Processor' means the entity which processes personal data on behalf of the controller. The specific tasks entrusted to the processor are set out in a written contract, which also verifies the processor's technical and organisational safeguards allowing it to process the personal data entrusted to it, in accordance with the Legislation. 'Recipient' means an entity to which personal data can be disclosed.

3. SONAMIA's commitments as a controller

SONAMIA is a controller of data collected via its business activities and, as such, undertakes the following commitments:

- Personal data are processed only for explicit and legitimate purposes determined by the relevant business activity, as stated explicitly each time data are collected and in accordance with Article 29 of the EU Regulation. In order to apply the principle of data minimisation, personal data collected and processed are only those deemed absolutely useful. **SONAMIA** thereby applies the concept of privacy by default, which protects data subjects from excessive data collection.
- Personal data are kept no longer than is necessary for the operations for which it was collected, taking into account the nature of these operations as well as all legal requirements and stipulations.
- **SONAMIA** does not disclose or sell personal data to third parties, except for legitimate recipients and for predefined purposes only, as determined when the data were collected.
- **SONAMIA** entrusts personal data to processors chosen based on appropriate technical and organisational safeguards, in order to guarantee the protection of all personal data entrusted to them as per its instructions.
- **SONAMIA** provides clear and transparent information to all data subjects, prior to data collection and on a regular basis, in particular on how data are to be processed, whether questions on forms are required or optional, what data protection rights they have and how they can effectively exercise these rights, and who the recipients are.
- Whenever required by the Legislation, explicit, informed, active, and unambiguous consent to personal data collection will be requested of the data subject. Appropriate technical, logistical, organisational, and legal security measures have been defined based on a risk analysis of the different data processing categories. **SONAMIA**, its support services and contracted processors have

implemented these measures in order to ensure the protection of your personal data.

- Whenever required by the risks related to data processing, **SONAMIA** will carry out a private life and data protection impact assessment for the data subjects in order to take appropriate measures to counter these risks.
- **SONAMIA** and its processors are committed to the development of tools and systems that insofar as is possible comply with the Legislation and can best protect the privacy of all data subjects. Respect for these principles is integrated right from the design and development stage.
- **SONAMIA** and its processors are committed to monitoring any and all possible violations of your data privacy. In the event of such a violation, **SONAMIA** and its processors will take all protective and corrective measures and inform without undue delay the French National

Commission on Information Technology and Liberties (the 'CNIL') as well as, where applicable, the data subjects in question.

All **SONAMIA** staff have been or are in the process of being trained on the personal data protection principles as defined in the Legislation, through regularly scheduled training sessions adapted to their work and responsibilities.

Staff can access only the data necessary for their work. Access to sensitive data requires specific authorisation and additional checks.

4. The Data Protection Officer (DPO)

The Data Protection Officer, when one is designated, ensures that:

- All personal data processing operations performed within the company are logged and kept up to date;
- All practices comply with the Legislation, including when the Legislation is modified;
- All **SONAMIA** staff are trained on legal requirements and good practices in personal data protection;
- Data subjects can effectively exercise their rights.

The Data Protection Officer can be contacted at the following addresses:

- E-mail address: donnees.personnelles@sonamia.fr
- Postal address:
 - o **SONAMIA**
 - CS 82432
 - 44124 Vertou Cedex
 - France

5. Purposes of data processing

SONAMIA processes personal data for the following main purposes:

- Managing its client portfolio and prospect list;
- Providing online services to professionals (B2B) via its company website, partner websites or mobile apps;
- Managing human resources and recruitment;
- Managing external professional contacts, including informational content for professionals and the general public;
- Conducting statistical analyses of business operations;
- Prospecting professionals or other natural persons, provided **SONAMIA** has secured their consent.

The abovementioned processing operations are necessary to carry out contracts between data subjects and **SONAMIA**, to pursue legitimate interests including meeting legal requirements. or to keep professional contacts informed of **SONAMIA**'s activities. In some cases, processing is a direct consequence of the explicit consent of a data subject.

6. Recipients of personal data

SONAMIA determines specific recipients on a case-by-case basis for each processing operation outlined in "5. Purposes of data processing". Recipients are chosen based on their

roles and their authorisation to receive personal data in view of the predetermined purposes.

Access to personal data is allowed only on a "need to know" basis whenever possible, in order

to apply the principle of data minimisation.

7. Storage period for personal data

SONAMIA will store your personal data for the necessary duration of the business relationship only.

After this period, in accordance with the Legislation, personal data may, as appropriate:

- Be deleted;
- Be rendered irreversibly anonymous;
- Be archived.

8. Security measures and personal data protection

Data security relies on protective measures to prevent the following:

- Destruction, loss, alteration or unauthorised disclosure of processed personal data, and unauthorised access to such data, either intentionally or accidentally.

In order to ensure the security of your personal data, **SONAMIA** and its processors have implemented appropriate technical and organisational measures, taking into account the state of the art, cost, type, scope, context, and purposes of processing in order to ensure a risk-adapted security level.

In particular, and whenever necessary, the following security measures are taken:

- Deploying the necessary resources to ensure continuous confidentiality, integrity, availability, and resilience of our systems and processing operations;
- Deploying the necessary resources to restore availability and access to personal data without undue delay in case of physical or technical incidents;
- Implementing a process to regularly test, assess and evaluate the effectiveness of technical and organisational measures that ensure security of processing.

SONAMIA and its processors have developed appropriate security features consistent with the state of the art and binding standards to ensure the protection of your personal data.

Additional enhanced security features protect web pages from which your data is collected.

9. Rights of data subjects

As per the General Data Protection Regulation, data subjects have the following rights:

- Right of access: the right to obtain from **SONAMIA** confirmation as to whether or not personal data are being processed, and access to this personal data;
- Right to rectification: the right to obtain the rectification of inaccurate personal data concerning the data subject. The right to rectification is complementary to the right of access.
- Right to erasure ('right to be forgotten'): the right to obtain the erasure of personal data concerning the data subject for a reason provided for in the Legislation;
- Right to restriction of processing: the right to obtain restriction of processing of personal data for a reason provided for in the Legislation;
- Right to data portability: the right to receive the personal data concerning the data subject provided to **SONAMIA**, or the right to request **SONAMIA** transmit those data to another controller for a reason provided for in the Legislation;
- Right to object: a data subject may also object to the processing of personal data based for any legitimate reason.

For more information about the meaning of your rights, please consult the dedicated section on the CNIL website: <https://www.cnil.fr/fr/comprendre-vos-droits> (in French), <https://www.cnil.fr/en/rights-and-obligations> (in English)

To exercise your rights as a data subject, you can contact the Data Protection Officer of **SONAMIA** at the following addresses:

- E-mail address: donnees.personnelles@sonamia.fr
- Postal address:
 - o *Délégué à la Protection des Données* (Data Protection Officer)
SONAMIA
CS 82432
44124 Vertou Cedex
France

To facilitate user requests and in particular to shorten processing times, **SONAMIA** asks each data subject, when sending a request to exercise their rights, to:

- Mention the right(s) they wish to exercise;
- Mention clearly their full name and contact details to use when responding;
- Include a copy of their ID.
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10. The strict boundaries of your consent

SONAMIA respects the strict boundaries of your consent when processing your personal data.

Your explicit consent will be requested in the cases stipulated by the Legislation. **SONAMIA** will request your explicit consent before any processing operation for which the Legislation requires it. Data subjects can withdraw their consent at any time by contacting **SONAMIA** or the DPO.

11. Lodging complaints with the CNIL

As a data subject, you may lodge a complaint with a supervisory authority for data protection.

In France, this supervisory authority is the National Commission on Information Technology and Liberties, or the CNIL. Here is how to contact them:

- Website: <https://www.cnil.fr/en/home>
- Telephone Number: +33 (0)1 53 73 22 22
- Postal Address:

- **CNIL**
3 Place de Fontenoy
TSA 80715
75334 Paris Cedex 07
France

12. Transfer of personal data outside the European Union

On principle, **SONAMIA** does not transfer personal data outside the European Union.

13. Cookie policy

Cookies are small pieces of data stored on your and other Internet users' browsers by specific websites to send to or collect information from the browser, such as session ids, language preferences or dates. When visiting **SONAMIA** websites, be advised that cookies may be stored on your browser. To find out more about cookies, including how to manage or block them, please consult the section "Cookies".

14. Changes to Data Protection Legislation

Data protection legislation may change over time. **SONAMIA** is committed to reflecting any change in the Legislation by a change in this Data Protection Policy and to informing data subjects before implementing any change that could impact personal data.

This Data Protection Policy was published on 25 May 2018