

1 PREAMBLE

The purpose of this document is to set forth the terms and conditions in line with which ORIAL undertakes to process your personal data in the capacity of data controller.

It is important that you take the time to read and store a copy of this document so as to know how and why ORIAL processes your data and what rights you have.

ORIAL notably undertakes to comply with the following provisions: (hereinafter referred to as the "Data Protection Provisions")

- law no. 78-17 of 6th January 1978 pertaining to Data Protection and Freedom of Information,
- the General Data Protection Regulation 2016/679 of 27th April 2016 (hereinafter referred to as the "GDPR").

2 DATA COLLECTED

a- Personal Data collected by ORIAL in performance of its activities

Where necessary for performance of its activities, ORIAL may be led to collect the following personal data:

- Personal identification data: name, title, private and professional address, telephone numbers, immigration status,
- Personal details: age, sex, date and place of birth, civil status and nationality, physical description,
- Family circumstances: number of children, marital situation,
- Identification data issued by public authorities: identity card number, passport number, driving licence number, pension, vehicle registration,
- Tax and financial data: tax number, tax status, bank account numbers,
- Information pertaining to training, professional activities and employment (e.g.: level of qualifications, job, post, and affiliation (including the existence of a public post or trade union membership), name of employer, terms of remuneration),
- Data pertaining to interactions between client and the office: meeting reports, emails,
- Data pertaining to emails and communication sent to you, such as date, time of receipt of emails, opening data, as well as information concerning your interactions with content issued.

DATA PROTECTION POLICY

Sensitive data

ORIAL does not collect any sensitive data aside for those required by legislation and regulations or which is necessary for performance of the assignment:

- National Register Number,
- Data pertaining to trade union or political membership,
- Legal information concerning legal measures,
- Data concerning vulnerable persons: children.

It should be indicated that the above data are not automatically collected by ORIAL. Data collected vary in line with the assignment.

b- Personal data collected by ORIAL via its website.

When using the orial.fr website, the following data may be collected: the URL links via which the user accessed orial.fr, the internet service provider and Internet Protocol (IP) address of the user.

Through its website, ORIAL may also receive applications. Consequently, the following information will be collected: surname, given name, professional email address, telephone number and Curriculum Vitae. Finally, ORIAL may collect the following data through its contact and event registration forms: Surname, given name and email address.

3 WHAT PROCESSING IS UNDERTAKEN WITH YOUR DATA

Personal data processing activities undertaken have the following legal basis:

- the legitimate interest sought by ORIAL when ORIAL has the following purposes:
 - prospection and coordination,
 - management of relations with you,
 - organisation, registration and invitation to events,
 - transfer of information concerning legal news,
 - improvement of services and customer relations,
 - transfer of customer satisfaction surveys.
 - recruitment.
- performance of pre-contractual or contractual provisions where ORIAL uses processing for the following purposes:
 - performance and supervision of the assignment requested,
 - management of customer relations including the issue of newsletters,
 - fee recovery.
- respect of legislative and regulatory obligations where ORIAL uses processing for the following purposes:
 - prevention of money laundering and funding terrorism as well as fighting corruption,
 - billing,
 - accounts.

In such instance as your personal data are processed for any different purposes, ORIAL will notify you and, as per legislation, ORIAL will request your prior consent.

4 PERSONAL DATA TRANSFER

ORIAL does not transfer any personal data to foreign countries (outside of the European Union). If ORIAL should be led to transfer data to a third country or international organisation, by virtue of European Union law or legislation in the Member State by which it is bound, ORIAL will notify you in advance.

5 TERM OF STORAGE OF PERSONAL DATA

Personal data are stored for the entire duration of our contractual relations, in line with recommendations indicated by virtue of the assignment taken out and/or in respect of legislative provisions and/or recommendations issued by the French National Data Protection Authority (CNIL) concerning all data collected in the framework of an offer of recruitment or data concerning a prospective client.

6 YOUR RIGHTS

In line with the terms and conditions set forth by the Data Protection and Freedom of Information Act and the General Data Protection Regulation, you have a right of access, rectification, limitation, portability and deletion of your personal data.

You also have a right of objection at any time, for reasons related to your personal circumstances, to processing of your personal data with the legal basis of the legitimate interests of ORIAL, as well as a right of objection to commercial prospection.

You also have a right to define the general and special directives defining how you intend for those rights indicated above to be exercised, following your death, by sending an email to the following address (for the attention of Quality Service): informatique-libertes@orial.pro or by using the form available at: www.orial.fr/donnees-personnelles-rgpd

Finally, you have a right to make a claim with a control authority.

7 DATA TRANSFER TO THIRD PARTIES

Data collected may be sent to ORIAL partners for those processing activities indicated in the engagement letter (auditor, chartered accountant, lawyer, banker, funding body, professional platforms for declarations and social security bodies, etc.).

Data collected by ORIAL following an application made on its website are shared with other recruitment partners of ORIAL.

Data collected using contact or event registration forms are intended for the ORIAL communication department and stored in an electronic file on our secure servers.

ORIAL may also use sub-contractors for specific processing activities. In this instance, ORIAL undertakes to ensure that its service providers have sufficient levels of guarantees as to implementation of appropriate technical and organisational measures fulfilling the requirements set forth under the European General Data Protection Regulation.

DATA PROTECTION POLICY

ORIAL undertakes not to send your data to commercial or advertising stakeholders: None of your personal data will be published without your knowledge, or exchanged, transferred, assigned, or sold on any medium whatsoever to third parties (other than those indicated hereinabove).

Only in the event of takeover of ORIAL and its rights would allow for transfer of said information to any potential buyer who in turn would be bound by the same obligation of storage and modification of your data.

8 SECURITY

ORIAL will take all necessary precautions so as to protect the security and confidentiality of your data and, notably, to prevent these from being damaged, harmed or accessed by any unauthorised third parties.

Data collected are stored on secure servers, hosted within the European Union.

9 LINKS AND USE OF OTHER SITES

The ORIAL website may propose links to internet sites such as Google+, Facebook, LinkedIn, Twitter as well as other sites of which ORIAL is a member.

It is hereby indicated that ORIAL does not have any control over the content of these sites nor their personal data protection practices.

Consequently, ORIAL declines all liability concerning processing of your personal data by these third parties.

10 APPLICABLE LAW

This data protection policy is governed by French law.