

Data Protection Policy

We want you to have complete trust in us when we work with you; to ensure this, in this policy we set out what we do in our capacity as data processor with the personal data of natural persons.

This document specifies to you what personal data we collect and you provide us with, the reasons why we collect them, the cases where we disclose them to third parties, the way in which we store and secure them and how people can exercise their recognised rights in relation to their data.

For any question about this policy, please do not hesitate to contact our Data Protection Officer (DPO) at dpo@apave.com.

1. Why do we collect and use personal data?

We collect personal data directly from you or through your employer or an authorised person to:

- ensure the performance of a contract or general conditions (contract follow-up, preparing and carrying out the intervention and the service, quality control);
- comply with our legal or regulatory obligations in accordance with our legitimate interests;
- carry out specific purposes after obtaining your explicit and positive consent.

A few examples: we can email you a reminder to renew your accreditation or your certification; we can inform you of new applications or services which are available.

In addition, if you contact us, we will keep a record of your request in order to allow us to process it properly.

2. What are the personal data that you provide us with or that we collect?

When you contact us, or ask us to contact you back for services that you are interested in, you agree to provide us with the following personal data: last name, first name, email address, phone number, information shared by you.

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To carry out our services, we collect personal and occupational identification - such as last name, first name, telephone numbers, date of birth (trainees and vocational training), email address, signature, position, photograph where appropriate; data regarding technical skills; financial data related to the billing. These data are necessary for the proper performance of the contract.

We also use the personal data generated from the training course: the attendance sheet, the date of issuance of the certificate, assessment of the training course, accreditations and qualifications. When you have undertaken a training course and to assist you in best maintaining your qualification, we inform you about the need to renew it.

When you want to access the online services you have registered for, you provide the following personal data: last name, first name, email address, telephone number.

We also store your consent to receive information, for example the newsletter to which you subscribe, as well as your withdrawal of consent to processing to which you previously consented.

To satisfy a specific purpose, we collect health data for certain services. Clarifications will be given if necessary.

3. In which cases do we disclose your personal data to third parties?

We only disclose your personal data to third parties in the following cases:

- **To the internal services of the Apave group** responsible for performing the purposes.
- **For external processing needs:** we transmit these data to trusted persons who process them on our behalf, according to our instructions, in accordance with the GDPR and compliance with any other appropriate security and confidentiality measure. In particular, we use service providers to store and host data.
- **For legal or regulatory reasons:** we may share personal data to comply with legal, regulatory or administrative obligations, detect, prevent or deal with fraudulent activities, security breaches or any problem of a technical kind or on the occasion of external assessments and audits by authorities (or their representatives).

4. How do we keep and secure your personal data?

We establish the organisational and technical security measures necessary and appropriate to guard against any unauthorised access, modification, disclosure or destruction of the data that we store.

These measures include the following:

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- We collect only the data necessary for the identified, explicit and stated legitimate purposes.
- Apave employees, subcontractors, service providers and interlocutors who need to access personal data to carry out their roles, positions and responsibilities:
 - are approved and have access that is strictly reserved to them;
 - are made aware and/or trained, according to their roles, positions and responsibilities;
 - have signed a non-disclosure undertaking and have been informed of the risks and penalties in the event of a breach of this obligation.
- We encrypt data when this is necessary.
- We carry out internal audits and audits of our suppliers processing personal data for APAVE.

We retain the personal data for the duration of the commercial relationship in order to perform the contract and then we archive or delete them. In some cases, we reserve the right to retain them for a longer period, in particular to prevent a possible disagreement and to meet our legal and regulatory obligations.

We do not transfer your personal data outside of the European Union if the service is sold in the European Union. Where, for the needs of a contract, this is necessary, we undertake to put the appropriate guarantees in place. In any event, we remain responsible for our commitments regarding these personal data.

5. How can you exercise your personal data rights?

In accordance with the transposition law of the general data protection regulation, you have rights that we must respect:

- A right to information about the processing of your data that is clear, fair and transparent;
- A right of access to the personal data you have transmitted: you have the right to obtain confirmation from us that your data are processed or otherwise and information regarding the processing purposes, the data recipient, any transfer of the data and any copy made of these data;
- A right of rectification of inaccurate or incomplete data: we will rectify your data if these prove to be erroneous or incorrect;
- A right of opposition to certain types of processing, in particular those which have a commercial prospecting purpose;
- A right to withdraw consent to particular data processing, without the effects of this withdrawal being retroactive;
- A right of erasure of your data that undergo an unlawful processing operation: you have a right to be forgotten only when the processing of your data does not concern the performance of the contract and you have terminated the said contract;
- A right to portability, whereby you can receive the data you have provided in a usable format in order to transmit them to another service provider. Data portability data applies only to the personal data that you have personally provided to us and only if the processing is based on consent or the contract;
- A right to limit the processing;
- A right to give instructions relating to the retention, erasure and communication of your data after death.

To exercise your rights, simply contact the DPO at the email address dpo@apave.com, or by postal mail to Apave to the attention of the DPO at 191 rue de Vaugirard 75738 Paris cedex 15. A complaint may also be lodged with a Data Protection Supervisory Authority, the CNIL in France.

6. How do we manage personal data breaches?

We take personal data breaches very seriously.

In the event of a breach of your personal data that may create a risk for your rights and freedoms, the Apave DPO will notify the breach to the CNIL as quickly as possible and, if possible, within 72 hours of having become aware of it. Apave will also inform the data subject, the person concerned, as soon as possible in accordance with the provisions of Article 34 of the GDPR.

7. Revision and update of our data protection policy

We undertake to process personal data in accordance with the legal provisions in force.

This policy will be reviewed as and when the legal texts are amended. You will be regularly informed of these updates.

Data Controller

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