



ASSESSFIRST
WE MAKE SUCCESS PREDICTABLE

PERSONAL DATA PROCESSING AND PROTECTION POLICY

for Clients / Contacts

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1. PREAMBLE

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, otherwise known as the General Data Protection Regulation (hereinafter referred to as GDPR) lays down the legal framework applicable to the processing of personal data.

The GDPR strengthens the rights and obligations of data controllers, processors, data subjects and recipients of the data.

As part of its business activity, AssessFirst processes personal data by collecting information concerning its clients and contacts.

For the correct understanding of this privacy policy, it is specified that:

- A "client" is any natural person or legal entity that is a client of AssessFirst.
- A "contact" is any natural person or legal entity in contact with AssessFirst but who is not a client (prospects, business contacts, partners, etc.).
- The "controller" is the natural person or legal entity who determines the purposes and methods of processing the personal data. Under this policy, the controller is AssessFirst.
- A "processor" is any natural or legal person who processes personal data on behalf of the controller. In practice, therefore, the processors are service providers with whom AssessFirst works and who may have access to the personal data processed by AssessFirst.
- "Data subjects" are persons who can be directly or indirectly identified from the data. They are herein referred to as "clients" or "contacts".
- "Recipients" are natural persons or legal entities who receive the personal data. The recipients of the data can therefore be internal recipients as well as external organizations (support service providers, the judicial administration and its auxiliary personnel, ordinal bodies, etc.).

Article 12 of the GDPR requires that data subjects be informed of their rights in a concise, transparent, understandable and easily accessible way.

2. PURPOSE

In order to meet its business needs, AssessFirst implements and processes personal data relating to its clients and contacts.

The purpose of this policy is to fulfil AssessFirst's obligation to provide information and thus formalize the rights and obligations of its clients and contacts with regard to the processing of their personal data.

3. SCOPE

This privacy policy applies to the processing of personal data of AssessFirst's clients and contacts.

This policy only covers data processing for which AssessFirst is responsible and data that is known as "structured" data.



The processing of personal data may be handled directly by AssessFirst or through a processor that AssessFirst specifically designates.

This policy is independent of any other document that may apply within the contractual relationship between AssessFirst and its clients and contacts, including its General Terms and Conditions or its cookies policy.

4. GENERAL PRINCIPLES & COMMITMENT

AssessFirst does not process any data concerning its client or contacts that does not relate to personal data collected by or for its services, or processed in connection with its services, or if such processing does not meet the requirements of the general principles of the GDPR.

Any new processing, modification or deletion of any existing processing will be brought to the attention of clients and contacts through the modification of this policy.

5. TYPES OF DATA COLLECTED

<i>Non-technical data</i> <i>(depending on intended use)</i>	<ul style="list-style-type: none">• Identity and identification (surname, first name, date of birth, handle, client number)• Contact details (e-mail, postal address, telephone number) especially for sending newsletters and delivering publications• Personal / professional details when necessary• Banking data if necessary (for online subscriptions or online sales)
<i>Technical data</i> <i>(depending on intended use)</i>	<ul style="list-style-type: none">• Identification data (IP address)• Login data (logs, tokens in particular)• Acceptance data (clicks)• Location data

AssessFirst does not deal with sensitive data within the meaning of Article 9 of the GDPR, except those included in Article 9.2 (f), i.e. the data necessary "for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity".

6. DATA SOURCES

AssessFirst collects data from its clients and contacts through:

- Data provided by the client (paper forms, purchase orders, etc.)



- Business cards
- Electronic forms or paper forms filled out by clients
- Registration or subscription to our online services (website, social networks, etc.)
- Registration for events organized by AssessFirst
- Lists sent by the organizers of events or conferences in which we participate
- Exchanges on social networks.

Exceptionally, we may rent databases.

Collection may also be indirect via specialized companies or via AssessFirst's partners and suppliers. In this case, AssessFirst takes the greatest care to ensure the quality of the data it is provided with.

7. PURPOSES OF DATA PROCESSING

As appropriate, AssessFirst processes your data for the following purposes:

- Client Relationship Management (CRM)
- Prospect / Contact Relationship Management (PRM)
- Management of events organized by AssessFirst (conferences, breakfasts, webinars, etc.)
- Sending our newsletters or news feeds
- Management of user accounts
- Answers to questions put to us (by phone or online)
- Sending greetings and other congratulatory messages from AssessFirst
- Improvement of our services
- Fulfilling our administrative obligations
- CCTV for the purposes of security of property and persons
- Organization of quizzes
- Community management
- Compiling statistics.

8. LEGAL BASIS

The data processing purposes listed have the following legal basis:

Clients	Performance of pre-contractual or contractual obligations
Contacts	Legitimate interest and where required by law, consent

9. RECIPIENTS OF THE DATA

AssessFirst ensures that the data is accessible only to authorized internal or external recipients.



Internal Recipients	External recipients
<ul style="list-style-type: none"> - Authorized staff of the marketing department, services responsible for client relations and prospecting, administrative services, logistical and IT services and their managers - Authorized staff of the departments responsible for control (auditor, departments responsible for internal control procedures, etc.) 	<ul style="list-style-type: none"> - External recruitment firm - Service providers or support services (e.g. translation services, IT service provider, print services, etc.) - Judicial administration, judicial auxiliary staff, confreres, experts, agents, bailiffs, investigators, etc. - Ordinal instances - Administration - Authorized staff of subcontractors and external data processors

The recipients of clients' and contacts' personal data within AssessFirst are subject to a non-disclosure obligation.

AssessFirst decides which recipient will be able to access which data according to an authorization policy.

AssessFirst will not be held liable in any way for damages of any kind that may result from unlawful access to personal data.

All access relating to the processing of personal data of clients and prospects is subject to a traceability analysis.

Furthermore, personal data may be transferred to any authority legally entitled to have access to it. In this case, AssessFirst is not responsible for the conditions under which the personnel of these authorities have access to and use the data.

10. DURATION OF STORAGE

The duration the data is stored is defined by AssessFirst in view of its legal and contractual constraints and failing this, according to its business needs, and in particular according to the following principles:

Processing	Duration of storage
Client data	For the duration of contractual relations with AssessFirst , increased by 3 years for the purposes of presentations and prospecting, without prejudice to storage obligations or to limitation periods
Member and User data	For the duration necessary to perform the services provided by AssessFirst and 3 years after the last intervention regarding the specific activity of the company Cookies: 13 months



Processing	Duration of storage
Contact and Prospect data	3 years from the collection of the data by AssessFirst or from the last contact made by the prospect / contact
Technical data	1 year from collection
Banking Information	Deleted as soon as the transaction is completed, unless expressly agreed by the client If the transaction is in dispute: 13 months following the date of debit, in archived storage
Anti-money laundering initiative	5 years from collection

After the set storage periods, the data is either erased or preserved after being anonymized, especially for statistical purposes. It also may be preserved in cases of pre-litigation or litigation.

Clients and contacts are reminded that erasure and anonymization are irreversible operations and that AssessFirst is no longer able to restore such data afterwards.

11. RIGHT OF ACCESS (RIGHT TO COPIES)

Clients and contacts historically have a right to ask AssessFirst for confirmation that their data is being processed.

Clients and contacts also have a right of access, subject to compliance with the following rules:

- The request must come from the person themselves and must be accompanied by a copy of an up-to-date identity document
- The request must be made in writing to the following address: 20 Rue du Sentier, 75002 Paris, France or to the e-mail address dpo@AssessFirst.com.

Clients and contacts have the right to request a copy of personal data concerning them that is processed by AssessFirst. However, in the event of a request for an additional copy, AssessFirst may require payment of any pertaining costs by the client or contact.

If a client or contact submits their request for a copy of the data electronically, the requested information will be provided in a commonly used electronic form, unless requested otherwise.

Clients and contacts are informed that this right of access does not concern confidential information or data or of which the law does not authorize the transfer.

This right of access must not be exercised in an abusive manner, that is to say carried out regularly for the sole purpose of disrupting AssessFirst.

12. MODIFICATION - UPDATES AND CORRECTIONS

AssessFirst will update personal data:



- Automatically, for online changes to fields that technically or legally can be updated
- Upon written request of the person themselves, who must prove their identity.

13. RIGHT TO ERASURE

Clients' and contacts' right to the erasure of their personal data will not be applicable in cases where the data is being processed to meet a legal obligation.

Outside of a situation such as this, clients and contacts may request the erasure of their data in the following cases only:

- If the personal data is no longer necessary for the purposes for which it was collected or otherwise processed
- If the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing
- If the data subject objects to processing that is necessary for the legitimate interests pursued by AssessFirst and that there is no compelling legitimate reason for the processing
- If the data subject objects to the processing of their personal data for purposes of prospecting, including profiling
- If the personal data has been subject to unlawful processing.

In accordance with privacy legislation, clients and contacts are informed that this is an individual right which can only be exercised by the data subject with regard to their own information: for reasons of security, the department or service in question will have to verify your identity in order to avoid any transfer of confidential information concerning you to any person other than you.

14. RIGHT TO RESTRICTION

Clients and contacts are informed that this right does not apply insofar as the processing operated by AssessFirst is lawful and all personal data collected is necessary for the execution of the commercial contract.

15. RIGHT TO PORTABILITY

AssessFirst enables the portability of data in the specific case of data provided by the clients or the contacts themselves, through the online services offered by AssessFirst and solely for purposes requiring the consent of the individuals. In this case, the data will be transmitted in a structured, commonly used and machine-readable format.

16. AUTOMATED INDIVIDUAL DECISION-MAKING

AssessFirst does not use automated individual decision-making processes.

As part of an algorithm in operation on its site, AssessFirst offers a decision support tool to best target the most relevant applications.



However, any decision to hire or any in-house promotion is the sole responsibility of the client.

The tools proposed on AssessFirst's website are only help tools intended for clients and may only be considered as such.

17. POST-MORTEM DATA PRIVACY

Clients and contacts are informed that they have the right to provide guidelines regarding the storage, deletion and transmission of their personal data post mortem. Specific post-mortem directives can be sent and such rights can be exercised by e-mail at the address: dpo@assessfirst.com or by the postal service to the following address AssessFirst, 20 Rue du Sentier, 75002 Paris, France accompanied by a copy of a signed identity document.

18. OPTIONAL OR COMPULSORY RESPONSES

Clients and contacts are informed, on each form that collects personal data, of the compulsory or optional nature of the responses by way of an asterisk.

In cases where responses are compulsory, AssessFirst explains to clients and contacts the consequences of not responding.

19. RIGHT OF USE

AssessFirst is granted by clients and contacts the right to use and process their personal data for the purposes set out above.

However, enhanced data that is the result of processing and analysis work done by AssessFirst, otherwise known as "enriched data", remains the exclusive property of AssessFirst (usage analysis, statistics, etc.).

20. EXTERNAL DATA PROCESSOR

AssessFirst informs its clients and contacts that it may involve an external data processor of its choice in the processing of personal data.

In this case, AssessFirst will ensure the compliance of the external data processor with its obligations under the GDPR.

AssessFirst undertakes to sign a written contract with all its external data processors and imposes on them the same data privacy obligations as it is subject to itself. In addition, AssessFirst reserves the right to audit its external data processors to ensure their compliance with the provisions of the GDPR.

21. SECURITY

It is AssessFirst's responsibility to define and implement the physical or logical technical security measures it considers appropriate to protect against the accidental or illegal destruction, loss, alteration or unauthorized disclosure of data.

These measures primarily include:

- Authorization management for data access
- Internal backup strategies
- Identification procedures
- Conducting security audits and penetration testing
- The adoption of an information system security policy



- The adoption of continuity / business recovery plans
- A security protocol or security solutions.

To this end, AssessFirst may be assisted by any third party of its choice to conduct vulnerability audits or intrusion tests as often as it deems necessary.

In any event, AssessFirst undertakes, should it change the means it employs to ensure the security and confidentiality of personal data, to replace them by means of superior performance. No regression of the level of security is permitted no matter what development is undertaken.

In the case of subcontracting all or part of the processing of personal data, AssessFirst undertakes to contractually impose security guarantees on its external data processors using technical measures to protect such data and the appropriate human resources.

22. DATA BREACH

In the event of breach of personal data, AssessFirst undertakes to notify the French National Commission for Data Protection and Liberties (CNIL) under the conditions set out by the GDPR.

If the breach poses a high risk to clients and contacts and the data was not protected, AssessFirst will:

- Notify the relevant clients and contacts
- Provide the relevant clients and contacts with the necessary information and recommendations.

23. DATA PROTECTION OFFICER

AssessFirst has designated a data protection officer.

Their contact details are as follows:

Name: Eric BARBRY – Partner Lawyer – DPO AssessFirst

E-mail address: dpo@assessfirst.com

Tel.: +33 1 72 77 31 52

24. PROCESSING REGISTER

AssessFirst is not required to implement a processing register.

25. RIGHT TO LODGE A COMPLAINT WITH THE CNIL

Clients and contacts whose personal data is processed by AssessFirst are informed of their right to lodge a complaint with a supervisory authority, namely the National Commission for Data Protection and Liberties (CNIL) in France, if they consider that the processing of their personal data is not in conformity with the European Data Protection Regulation, at the following address:

CNIL – Service des plaintes (*complaints service*)

3 Place Fontenoy, TSA 80715, 75334 PARIS CEDEX 07, France

Tel.: +33(0)1 5373 2222



26. POLICY UPDATES

This policy may be modified or adapted at any time in the event of legal developments, changes in jurisprudence, decisions or recommendations made by the French National Commission for Data Protection and Liberties (CNIL) or common practices.

Any new version of this policy will be brought to the attention of clients and contacts by any means chosen by AssessFirst, including by electronic means (e.g. sent by email or posted online).

27. FOR FURTHER INFORMATION

For further information, please contact our data protection officer at the following email address: dpo@assessfirst.com.

For more general information on data privacy, please consult the website of the French National Commission for Data Protection and Liberties (CNIL) www.cnil.fr/en.

