

PERSONAL DATA PROTECTION POLICY

GROUP POLICY
UPDATED ON 04/24/2025

Internal validation table

Date	Drafting	Validation/Approval
01/21/2021	BU Compliance	Anatole de la Brosse
09/25/2023	BU Compliance	Estelle Idzik (DPO)
04/24/2025	BU Compliance	Estelle Idzik (DPO)

Versions history

Version	Date	Editor	Modifications
V1	11/17/2020	BU Compliance	Creation
V2	04/01/2021	BU Compliance	Updates
V3	09/25/2023	BU Compliance	Updates
V4	04/24/2025	BU Compliance	Updates & formatting

Communication

Distribution terms

Publication on Sia's website (GDPR section)

Reference documents

Document name

Internal policy on the protection of personal data

Processing register

Procedure for assessing the risks of a treatment

Procedure for managing people's rights

Preamble

Sia undertakes to respect the standards required in terms of confidentiality and data protection in all countries where the Group carries out its activities.

Privacy and data protection legislation applies in several countries where Sia is established and provides obligations on how Personal Data (i.e. any information relating to an identified or identifiable natural person) may be collected, used and disclosed. In addition, this legislation grants individuals certain rights regarding their Personal Data.

This Policy complies with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, relating to the protection of individuals with regard to the processing of personal data and the free movement of such data and repealing Directive 95/46/EC (the “**General Data Protection Regulation**” or the “GDPR”).

This Policy does not replace the applicable national laws and regulations regarding privacy and data protection in the countries where Sia operates. Local legislation must be adhered to at all times and takes precedence over this Policy if it establishes stricter rules regarding privacy and data protection.

Summary

Scope of application.....	4
How are personal data collected?	4
What personal data is collected?	5
How are personal data processed?	5
Who are the potential recipients of personal data?	6
Who is responsible for personal data in case of a link to a third-party site?.....	6
How long are personal data retained?.....	6
How personal data are protected?	7
What are the rights of data subjects?	7
How to exercise these rights?.....	8
How to make a claim?	8
How are cookies managed?	8
Updates	8

Scope of application

This Policy establishes a framework for the processing activities of Personal Data, including the collection, use and disclosure thereof by or on behalf of entities of the Sia Group.

This Policy also concerns transfers of Personal Data within Sia globally, including from group entities located in the EEA to other group entities located outside the EEA, to ensure that this data is adequately protected during its transfer.

Accordingly, the purpose of this Policy is to provide global rules that must be applied by all Sia employees worldwide when processing and/or transferring the following Personal Data for purposes indicated below:

- / Personal Data related to human resources,
- / Personal Data of commercial contacts of Sia, in particular customers, prospects and suppliers (information on the identity, information on contracts, information on billing, information provided as part of satisfaction surveys),
- / Personal Data processed as a subcontractor in the context of the execution of a service provision contract.

How are personal data collected?

European data protection rules require that Personal Data be collected for specific, explicit and legitimate purposes, i.e. the reasons for which the Personal Data will be used.

To this end, Sia ensures that the purpose for which Personal Data is collected is:

- / Limited,
- / Appropriate for its activities,
- / Communicated in clear terms to the persons concerned,
- / Authorized by legislation.

For example, Sia collects information:

- / In the event of subscribing to newsletters, alerts, or contests,
- / In the case of registering for conferences or events,
- / When requesting the download of a study or other intellectual production on one of the Group's websites,
- / In the case of applying for a job offer provided by Sia,
- / During navigation on the Group's websites, including using the mobile version.

What personal data is collected?

As an example, the data collected by Sia, as the data controller, includes:

- / Information relating to identification: surname, first name, title,
- / Contact: address, telephone number, e-mail,
- / Professional information: company, position,
- / Information submitted with applications,
- / Information collected indirectly: IP addresses, https protocol elements, site navigation footprint, cookies.

How are personal data processed?

Before any collection and processing of Personal Data, Sia must ensure that one of the following conditions is met:

- / Sia has obtained the consent of the person concerned for the collection and processing of its Personal Data, or
- / the processing of the data is necessary for the conclusion of a contract with the data subject or the performance of this contract with this person, or
- / Sia has an interest legitimate to process Personal Data, provided that this does not cause unreasonable harm to the interests or rights of the data subject.

Sia is required to process personal data, notably for:

- / Respond to requests for information,
- / Publish comments,
- / Manage forms registration requests for conferences or events,
- / Evaluate applications and recruit,
- / Distribute newsletters, articles, information and alerts,
- / Improve the quality of its offers and services,
- / Disseminate and promote commercial offers in B2B.

Taking into account the purpose and context of the processing as well as the persons concerned, Sia ensures that only Personal Data is collected which is necessary and appropriate in relation to the purpose for which it is processed and to an extent proportionate to the objective pursued.

Processing personal data during assignments:

The Sia Group is also likely to process personal data within the framework of services carried out as a subcontractor, on behalf of its clients, in accordance with contractual commitments.

In this case, personal data are processed exclusively within the framework defined by the mission.

Sia implements organizational and technical security measures to restrict access to data and ensure the confidentiality and security of information processed within the specific framework inherent to our services.

Who are the potential recipients of personal data?

The personal data collected is intended for the services of the Sia Group.

In certain cases, they may also be transmitted to third parties, such as certain service providers, for example as part of the management of applications.

Sia ensures that it has (including from its partners and service providers) sufficient guarantees in terms of the protection of personal data for each data transfer.

In the event that Sia wishes to transfer Personal Data to a third party, i.e. to a person who does not belong to the Sia Group, located in a country outside the European Economic Area (EEA):

- / Sia must ensure that these countries have been recognized by the European Commission as ensuring an adequate level of protection of Personal Data,
- / If the country in which is located the third party is not recognized by the European Commission as ensuring an adequate level of protection, Sia will take the necessary measures, in accordance with European data protection legislation, in order to ensure that the Data to be Personal Data are adequately protected when transferred to that country by signing Personal Data transfer contracts based on the standard contractual clauses adopted by the European Commission.

Who is responsible for personal data in case of a link to a third-party site?

If, while navigating on a Sia website, a link to a third-party site is provided, the rules and policies applicable to that site will apply. Under no circumstances can Sia be held responsible for the potential processing of personal data by a third-party site.

How long are personal data retained?

Sia only processes data that is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. This involves ensuring that the retention period of personal data is limited to the strict minimum.

This retention period is variable and depends on the nature of the data, the purpose of the processing and the obligations legal and regulations to which it may be subject.

How personal data are protected?

Sia ensures that the processing of personal data benefits from the best level of security. Sia guarantees the implementation of “appropriate technical and organizational measures”, taken according to the nature of the data, the purposes of the processing and the associated risks.

In the event of an incident leading to a breach of personal data that poses a risk to the rights and freedoms of the individuals concerned, Sia will notify the competent supervisory authority and, if necessary, given the risks, inform the individuals concerned as soon as possible.

What are the rights of data subjects?

In accordance with the applicable legislation on confidentiality and data protection, persons whose Personal Data are processed by an entity of the Sia Group must be able to ask it:

- / If it holds Personal Data Personnel concerning them,
- / To access the Personal Data concerning them which are the subject of processing by Sia and information on the purposes for which they are subject to processing and on the persons to whom the Personal Data is disclosed,
- / To rectify or erase (in accordance with applicable legislation and regulations) the Personal Data concerning them which is the subject of processing by Sia,
- / To obtain restriction of processing (in accordance with applicable laws and regulations),
- / To receive the Personal Data concerning them which they have provided to Sia, in a structured, commonly used and machine-readable format,
- / To object, for legitimate reasons, to the processing of their Personal Data by Sia.

Before sending direct marketing communications, Sia will ensure that data subjects have been informed of their right to object to the use of their Personal Data for direct marketing purposes, including profiling to the extent that it is linked to such direct marketing, and effective means to opt out of receiving direct marketing communications and being subject to profiling where it is linked to such direct prospecting were made available to them.

Additionally, when an individual objects to receiving direct marketing communications, Sia will record this decision to ensure that no further direct marketing communications will be sent to that individual.

How to exercise these rights?

Any data subject may exercise their rights:

- / by post, to the address: Sia, Attn: DPO, 21 rue de Berri, 75008 Paris, France, or
- / by email: sia-partners-conformite-rgpd@sia-partners.com

Sia has one month for and to respond.

In the event of a complex request or a large number of requests, this deadline may be extended to three months.

How to make a claim?

If, despite all the attention that Sia pays to the processing of your data and the exercise of your rights, you are not satisfied with the response provided, you can send a complaint to the CNIL (National Commission for Information Technology and Liberties) online on the www.cnil.fr website; or by mail addressed to the CNIL - 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07.

How are cookies managed?

When you browse the Sia internet sites, information may be stored in or retrieved from your browser, generally inform of cookies.

Generally speaking, a cookie is a small text file sent to your internet browser which serves as a connection witness.

This information may relate to your browsing preferences or your device and primarily used to ensure that the site functions properly. Cookies can also allow you to benefit from a personalized browsing experience.

To find out more about and the management of on Sia sites, go to the “Cookie management” page of our website.

Updates

This Policy may be modified at any time, in particular to take into account applicable legislation regarding confidentiality and data protection.

SIA ✓