

# Personal Data Protection Charter of the INVIVO Group

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## PREAMBLE

In the course of its activities, the INVIVO GROUP has made respect for privacy a priority and is increasingly vigilant about using personal data responsibly, in line with the principles and rules laid down by Regulation (EU) 2016/679 on the protection of personal data (hereinafter "the GDPR") and by French Law No. 78-17 of 6 January 1978 on information technology and civil liberties.

The processing of personal data carried out by the INVIVO GROUP is intended to comply with European and French data protection regulations. It is part of a commitment to transparency, security and control of their data for the persons concerned by the processing described below.

This Charter aims to provide you with details concerning the processing of personal data carried out by the INVIVO GROUP through the various services it offers. It also explains how we use and protect personal data, as well as your rights regarding your personal data.

Thank you for your careful reading of this document.

## 1. SCOPE AND LIMITS OF THIS NOTICE

The INVIVO GROUP offers a variety of activities and services to many stakeholders. We therefore want to provide you with this Charter, which presents the general terms and conditions applied to the main data processing operations carried out by the entities of the INVIVO GROUP, divided by categories of data subjects.

We would like to draw your attention to the fact that this Charter is intended to provide general information about how the INVIVO GROUP processes data ; it is not exhaustive and, in order to ensure a high level of accuracy, it is linked to other information resources that may be freely accessible or not, depending on your status, such as :

- ▶ Our "[www.invivo-group.com](http://www.invivo-group.com) Website Data Protection Policy" and our cookie management tool, available directly on this website, which provide you with comprehensive information about the collection and processing of your data when you browse our website [www.invivo-group.com](http://www.invivo-group.com).
- ▶ The personal data protection policies and cookie management banners available on each of the corporate websites of our subsidiaries;
- ▶ Any other detailed information notices that may be provided to you in another way when you subscribe to a service offered by an entity of the INVIVO GROUP, in particular within a contract between us, the creation of an account on our applications or the submission of contact requests for example;
- ▶ All information policies disseminated internally with regard to our employees and visitors.

## 2. FOUNDING PRINCIPLES

In general, the INVIVO GROUP undertakes to ensure that personal data is :

- ▶ Processed lawfully, fairly and transparently in relation to the data subjects ;
- ▶ Collected for specific, explicit and legitimate purposes ;
- ▶ Adequate, relevant and limited to what is necessary in relation to the purposes for which it was collected in application of the principle of data minimization ;
- ▶ Accurate and kept up-to-date – in the event that any data concerning you is inaccurate, you are invited to inform us at the [rgpd@invivo-group.com](mailto:rgpd@invivo-group.com) address so that corrections can be made ;
- ▶ Kept in a form that allows you to be identified, for a period that does not exceed that strictly necessary in relation to the purposes for which your data was initially collected, this period may be extended by any legal limitation periods to which we are subject in the course of our activities ;
- ▶ Processed in such a way as to ensure the appropriate security of your personal data against destruction, loss, alteration or unauthorized access.

## 3. CATEGORIES OF DATA SUBJECTS

Below you will find details on the modalities that govern the processing of your data depending on your situation :

- ▶ Purposes (why do we collect your data ?) ;
- ▶ The categories of personal data collected ;
- ▶ The legal basis (what legally entitles us to carry out this processing ?) ;
- ▶ The retention period (for how long we keep your data ?).

### a. Visitors to our institutional website

When you browse our corporate [www.invivo-group.com](http://www.invivo-group.com) website, we may collect your personal data in different ways, including:

- Deposit of cookies or "trackers" : for further details and to manage your preferences at any time, our consent management platform is always available by clicking on the dedicated logo at the bottom of your screen ;
- Registration or contact forms, newsletters subscriptions, job applications : please visit our dedicated information page by clicking on the "Data Protection" link at the bottom of our

Website, then selecting the “Data Protection Policy”.

## b. Visitors to our premises

When you visit us at our premises, we need to process some of your personal data for the following reasons :

Purpose of the processing	Categories of Personal Data	Legal basis	Retention period
Ensuring the security of property, people and confidential information within our premises	Images	Our legitimate interest in ensuring the security of property, people and confidential information on our premises	1 month, then deletion unless an event requires retention until the end of the procedure
Control access to the premises of our holding headquarters	Identity data Society Employee visited Date, time and reason for visit	Our legitimate interest in ensuring the security of property, people and confidential information on our premises	For employees: until they leave Visitors: 1 month
Control access to the InVivo Group's Wi-Fi networks	IP address, logs	Our legitimate interest in preserving the security of our information system when you access the InVivo Group's Wi-Fi networks	1 year

This personal data is only processed by our staff who are duly authorized to access this information, in particular :

- ▶ Public reception staff, who are the first point of contact for our visitors ;
- ▶ The network teams of our IT Services Department and in particular our employees authorized to manage access to the authentication portal of our Wi-Fi networks;
- ▶ Staff authorized to access video protection recordings solely in the course of their duties, in the event of an incident or dispute – the administration of such access is restricted and strictly regulated ;
- ▶ Third parties authorized to access and maintain video protection systems ; any use of an external service provider in this context is subject to a contract setting out adequate security measures and appropriate safeguards, verified and validated by our IT Services Department.
- ▶ "Trusted third parties" authorized to access data : law enforcement agencies and legal authorities in the event of an incident or dispute.

## c. Third-party partners: suppliers, service providers, subcontractors

Given the diversity of the services it offers, the INVIVO GROUP works with many partners whose

services it requests : suppliers, service providers, subcontractors, etc. As such, data processing is necessary for (non-exhaustive list) :

- ▶ Manage the business relationship and negotiate contracts ;
- ▶ Enable the performance of contracted services and provisions ;
- ▶ Administer our service offerings and activities ;
- ▶ Administer, maintain and develop our digital tools ;
- ▶ Ensure the security of our information systems and manage associated risks ;
- ▶ Comply with our legal obligations ;
- ▶ Where necessary, defend our rights before the competent courts.

The methods for processing the personal data concerned are set out in the contracts concluded with these partners prior to the implementation of the services subscribed to, and the InVivo Group scrupulously ensures compliance with the principles laid down in the GDPR, including rigorous verification of security measures by our Information Systems Department, particularly if a third-party solution is used.

#### d. Prospects

Like any business, the INVIVO GROUP is committed to meeting its customers' needs and seeks to anticipate them in order to adapt and continuously improve its product and service offering. As such, you may be contacted through various channels for the following purposes :

<b>Purpose of the processing</b>	<b>Categories of Personal Data</b>	<b>Legal basis</b>	<b>Retention period</b>
To inform you through newsletters or commercial prospecting	Email address, and if applicable, phone number	Your Consent	Upon withdrawal of consent through the dedicated link provided in each communication
To invite you to events we organize (open days, seminars, webinars, etc.)	Contact details	Our legitimate interest in offering you themed events	3 years after last contact
To manage your requests for information received through our contact forms	Identity data, Contact details	Your Consent	3 years after last contact

To manage the third-party assessment process	Identity data, contact data, other data identified during the internal assessment process	Our legitimate interest in ensuring our <i>due diligence</i> resulting from the AFA's recommendations relating to the Sapin 2 law	10 years from the last evaluation or termination of the relationship with the client
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This personal data is processed by our authorized staff and partners, in particular :

- ▶ Our employees in the Communication and Marketing departments in relation to sending communications, newsletters and invitations to events ;
- ▶ Any partners involved in the organization of events;
- ▶ The Compliance Department and its Referents in charge of managing third-party assessments and risk management.

### e. Customers

The INVIVO GROUP offers a range of products and services to its customers across various sectors. In this context, personal data is also processed, in order to (non-exhaustive list) :

- ▶ Carry out the missions that bind us contractually ;
- ▶ Administer and maintain the IT media and tools required for us and used in the performance of our contracts;
- ▶ To ensure the administrative management inherent to our missions, including accounting, finance, invoicing, etc.;
- ▶ Optimize our business and marketing development : we may therefore send you marketing communications, solicit you to take part in satisfaction surveys, invite you to events related to your sectors of activity, etc.
- ▶ Compile statistics, either in aggregate form or, where applicable, on an individual basis with your consent ;
- ▶ Manage the third-party due diligence process in accordance with our legal obligations under the Sapin 2 law.

Please note that if we have previously collected information about you as a prospective client, this data may be used and supplemented in the continuity of building our customer relationship.

The methods of processing personal data operated by the INVIVO GROUP are set out in the contracts put in place with our clients prior to the provision of the services subscribed to. To this end, the INVIVO GROUP has a personal data processing agreement which it adapts to each situation, applying the principles, measures and appropriate safeguards set out in the GDPR.

When you are a direct party to the contract, details of the terms and conditions are set out in this agreement. If you are indirectly concerned by the subscribed service, for example as an end user of the digital solution, the information is provided to you :

- ▶ By our client, who acts as the Data Controller where we act on their instructions as a Data Processor ;
- ▶ By us, when we act as the Data Controller, through a dedicated information notice on the most relevant media, such as a specific link on the website of our Data Controller entity or on the mobile application for example.

## 4. AUTOMATED DECISION-MAKING

A fully automated decision is a decision made in relation to an individual through algorithms applied to their personal data, without any human intervention in the process. It may have significant legal consequences for the individuals concerned, such as the inability to access a service (refusal of credit, exclusion from a contract, etc.).

The INVIVO GROUP does not carry out any automated processing of personal data providing for such legal effects in its capacity as Data Controller. Nevertheless, please be assured that should such a decision-making process be implemented, you will be informed of the existence of such a decision, its underlying logic, and the consequences for your access to our services, and you will have the right to challenge the decision and obtain human intervention for a reassessment of your situation.

## 5. WHAT ARE YOUR RIGHTS ?

You are in control of your data and have many rights in its management. You can contact us for the exercise of your following rights :

<b>ACCESS</b>	You may ask us to confirm whether we are processing personal data about you and request a copy of such data.
<b>RECTIFICATION</b>	You may ask us to rectify or amend any personal data about you that is no longer up-to-date, inaccurate or incomplete. Please note, however, that with regard to the "Careers" section, you can directly rectify your profile and data directly by accessing your Candidate account.
<b>OBJECTION</b>	You can object to the collection and use of your data.
<b>WITHDRAWAL OF CONSENT</b>	If you have provided us with your consent, it is reversible and you may withdraw it at any time, thereby immediately ceasing the processing in question.
<b>ERASURE</b>	You may ask us to delete your personal data when you withdraw your consent, exercise your right to object or if the data is no longer relevant.
<b>RESTRICTION OF PROCESSING</b>	You may request a temporary restriction on processing where you contest the accuracy of the data or the lawfulness of the processing.
<b>PORTABILITY</b>	In certain cases, you may ask us to provide you with your personal data in a structured, machine-readable format, or you may ask another controller to provide you with your data.
<b>OBJECTION TO AUTOMATED DECISION-MAKING</b>	You have the right to object to any fully automated decision if necessary (see article 4 of this notice).

<b>DIGITAL DEATH</b>	Applicable to French citizens, you may, during your lifetime, set out guidelines regarding the retention, erasure and disclosure of your personal data following your death. These guidelines may be amended or revoked at any time. In the absence of such instructions, your data will be deleted within the statutory time limits. Your heirs will be able to exercise rights over your data and in particular request its deletion.
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If you wish to exercise any of your rights in accordance with data protection regulations, or in the unfortunate event that you become aware of any non-compliance or breach relating to the processing of your personal data, you may submit your request through the following channels :

- ▶ By post, to the following address:  
**"INVIVO GROUP, To the attention of the Data Protection Officer, 83 avenue de la Grande Armée, 75116 PARIS Cedex"** ;
- ▶ However, to ensure a faster processing of your request, we advise you to send us your request digitally to the dedicated address [rgpd@invivo-group.com](mailto:rgpd@invivo-group.com), specifying the name of the entity or website concerned by your request.

Furthermore, you may lodge a complaint with the supervisory authority of the Member State in which you have your main residence, your place of work, or where the non-compliance or breach of your personal data occurred. Within France, we invite you to consult the website of the Commission Nationale de l'Informatique et des Libertés ([www.cnil.fr](http://www.cnil.fr)) for further information on your rights to seek redress and the required procedure, or to send your request to the following address : **Commission nationale de l'informatique et des libertés (CNIL), 3 Place de Fontenoy - TSA 80715, 75334 PARIS CEDEX 07.**

From the date we receive your request to exercise your right, we have one month to respond ; we may extend this period by a further two months depending on the complexity of the request.

Please note that a request to exercise a right may only relate to your own personal data (except where a delegation has been granted in a directive issued under the right to digital death) ; it may also be rejected in certain specific cases (right not applicable by virtue of the legal basis for processing, compliance with a confidentiality obligation, manifestly abusive request, etc.) or require you to confirm that you are indeed the data subject (request for further information).

In any case, you will be informed as soon as possible to ensure smooth and fastest possible processing of your request.

## 6. DATA TRANSFERS OUTSIDE THE EUROPEAN ECONOMIC AREA

Wherever possible, we prioritize processing the personal data you entrust to us within the European Economic Area (EEA), working with partners that offer a very high standard of protection and confidentiality.

However, given the international dimension of the INVIVO GROUP, your data may be processed outside the EEA, particularly if we need to share your information with certain INVIVO GROUP entities established outside the EEA, or if we need to use service providers established outside the EEA, for specific missions.

In such cases, we ensure maximum protection of your data in accordance with the strictest provisions of the GDPR, in particular Article 46, by signing, on a case-by-case basis, contractual clauses based on the European Commission's model adopted and published on 4 June 2021, or any other mechanism

that complies with the GDPR, where the country in which the recipient is established is not considered to provide an adequate level of protection within the meaning of Article 45 of the GDPR.

## **7. UPDATE OF THIS NOTICE**

The INVIVO GROUP is committed to ensuring that its processing of personal always remains compliant, as part of our ongoing commitment to continuous improvement and transparency towards you. As such, we reserve the right, at any time, to amend this General Information Notice relating to the protection of your personal data.

We therefore encourage you to refer to this document regularly to ensure you are fully informed, and thank you for your trust in this matter, both now and in the future !