

Charter on personal data

Paris, May 24th of 2018

The purpose of this present Charter (hereinafter « **the Charter** ») is to inform the clients, suppliers and more globally any concerned person (hereinafter called « **Concerned Person** ») on the processing of personal data which can be made by LEOSPHERE (hereinafter « **LEOSPHERE** »).

With this Charter, LEOSPHERE commits to comply with the European Regulation 2016/679 (or GDPR).

For this purpose, the Charter can be modified at any time by LEOSPHERE, in particular to be compliant with any development and/or amendment in regulation, case law or technical.

ARTICLE 1 : IDENTITY AND CONTACT OF THE CONTROLLER

The Controller is the company LEOSPHERE, *Société par Action Simplifiée*, which registered office is located at 43, rue de Liege, 75008, Paris, France, registered in the *registre du commerce et des sociétés* of Paris under the number 452 972 649 represented by its President, Mr. Alexandre Sauvage.

For the purpose to respect his or her rights and for any complementary information, the Concerned Person can send a complaint to the e-mail address : rgdp@leosphere.com

ARTICLE 2 : COLLECTED DATA

As part of its activity, LEOSPHERE can process data or data set which could lead to someone's identification (hereinafter called "Personal Data").

The type of Personal Data processed by LEOSPHERE can fluctuate from an Concerned Person to another.

That Personal Data, in particular, includes:

- Last name and first name, e-mails, gender, the address and the name of the company for which the concerned person work for, the nationality or the residential country of the Concerned Person;
- Data LEOSPHERE obtained from business cards;
- Data LEOSPHERE obtained following a recommendation and more globally through the conduction of its business relationships.

These personal data are not restrictively listed and can vary according to the information the Concerned Person consented to give.

ARTICLE 3 : PURPOSES OF THE PROCESSEING

Personal Data collected by LEOSPHERE are possessed in order to reach business operations, in particular: inform on content updates (for products and services), send a newsletter, scientific studies and invitation to events, to make annual customer survey

Personal Data can also be stored to allow the identification of the Concerned Person in the case of technical, business or scientific exchanges.

ARTICLE 4 : LEGAL BASIS FOR THE PROCEEDING

Personal Data processing by LEOSPHERE can be made for several reasons, in particular:

- the processing is necessary for the execution of an on-going contract;
- the processing is necessary to comply with a legal obligation of LEOSPHERE;
- the processing is necessary legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data;
- the concerned person has given consent to the processing of his or her personal data for one or more specific purpose.

ARTICLE 5 : LEGITIMATE INTERESTS

The processing of Personal Data is considered as legal because necessary for the purpose of legitimate interest of LEOSPHERE and/or by a third party acting on behalf of LEOSPHERE and/or any administration, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

In Particular, the legitimates interests followed up by LEOSPHERE can be : commercial prospection, performance of a contract or the continuation of the relations, management project, management of the client service.

ARTICLE 6 : THE RECIPIENTS

The Recipients or categories of recipients of the personal data regroup, in particular:

- LEOSPHERE, for the purposes described in the article 3 of this present Charter;
- The public authorities and organisms;
In accordance with the current regulation, personal data can be transmitted to the competent authority on request and in particular public organisms, exclusively to meet legal obligations.
- Third Parties.
Data can be transmitted to third parties to ensure the company activity and the purpose described above.

ARTICLE 7 : TRANSFERT OF PERSONAL DATA TO A THIRD COUNTRY

LEOSPHERE can carry out a transfer of Personal Data to those locations:

Countries the European Commission considered, at the time of the transmission, ensuring an adequate level of protection for Personal data, at the date of the Charter's signature.

Countries the European Union did not considered ensuring an adequate level of protection for Personal data, at the date of signature of this present Charter. For those countries, LEOSPHERE can transfer Personal Data by using standard contractual clauses adopted by the European Commission. The Concerned person can find these standard contractual clauses adopted by the European Commission on the web site of the *Commission Nationale Informatique et Liberté*, ("CNIL").

ARTICLE 8 : PROCESSOR

LEOSPHERE can resort to a processor to have Personal Data possessed. For that purpose, LEOSPHERE commits to have a responsible approach when it contract with such processor, and, in particular, commits that the processor respect this present Charter. LEOSPHERE ensure that the processor offer necessary guaranties to respect the European regulation on general data protection.

ARTICLE 9 : STORAGE PERIOD

Personal Data will not be stored over the necessary duration of the purpose described above, according to the Law.

Personal data of the Concerned Person are erased when the storage period expired.

In the strict respect of applicable laws and regulations, Personal Data could be archived beyond the forecasted duration, for purposes in the scientific interest, or in the case of a prosecution in criminal law, for the only purpose to allow the provision of those Personal Data to the judicial authority.

Archiving involve that those Personal Data will be anonymized and not searchable online but will be extracted and stored on an autonomous and secured support, only accessible to identified person legitimately recipient of these information.

ARTICLE 10 : Concerned Person Rights

The Concerned Person has the right to request to LEOSPHERE the Personal Data, the access to and rectification or erasure of personal data or restriction of processing concerning the concerned person or to object to processing as well as the right to data portability;

For the purpose to respect his or her rights, the Concerned Person can send a complaint to the e-mail address: rgdp@leosphere.com.

ARTICLE 10.1 RIGHT OF ACCESS

The Concerned Person shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the information listed in the article 15 of the European Regulation 2016/679 (GRDP).

ARTICLE 10.2 RIGHT TO RECTIFICATE

The Concerned Person has the right to obtain from LEOSPHERE without undue delay the rectification or the complement of inaccurate personal data concerning him or her.

ARTICLE 10.3 RIGHT OF ERASURE

The Concerned Person has the right to obtain from LEOSPHERE erasure of personal data concerning him or her without undue delay. For this purpose, LEOSPHERE shall have the obligation to erase Personal Data without undue delay where one of the following grounds applies:

- The Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- The Person Concerned withdraws consent on which the processing is based and there is no other legal ground for the processing;
- The Person concerned objects to the processing and there are no overriding legitimate grounds for the processing, or the Person Concerned objects to the processing;
- The Personal Data have been unlawfully processed;

-The Personal Data have to be erased for compliance with a legal obligation.

ARTICLE 10.4 : RIGHT TO REESTRICTION OF PROCESSING

The Concerned Person has the right to obtain from LEOSPHERE the restriction of processing if :

- The accuracy of the personal data is contested by the data subject, for a period enabling LEOSPHERE to verify the accuracy of the personal data;
- The processing is unlawful and the Concerned Person opposes the erasure of the personal data and requests the restriction of their use instead;
- LEOSPHERE no longer needs the Personal Data for the purposes of the processing, but they are required by the Concerned Person for the establishment, exercise or defence of legal claims;
- The Concerned Person has objected to processing, pending the verification whether the legitimate grounds of the controller override those of the Concerned Person.

Where processing has been restricted under this article, such Personal Data shall, with the exception of storage, only be processed with the Concerned Person's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or of one of its Member State.

The Concerned Person who has obtained restriction of processing pursuant to this article shall be informed by the controller before the restriction of processing is lifted.

ARTICLE 10.5 : RIGHT TO DATA PORTABILITY

The Concerned Person have the right to receive the Personal Data concerning him or her, which he or she has provided to LEOSPHERE, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from LEOSPHERE to which the personal data have been provided, where the processing is based on consent

In exercising his or her right to data portability, the Concerned Person shall have the right to have the Personal Data transmitted directly from one controller to another, where technically feasible.

ARTICLE 10.6: RIGHT TO ENFORCE THE PERSONS RIGHTS

Upon request to LEOSPHERE, any Concerned Person shall have the right to receive a detailed process explaining how to enforce those rights. That detailed process is released at the same time as the Charter. Furthermore and for that

purpose, each Concerned Person can submit a request at rgdp@leosphere.com for any question linked to that process.

ARTICLE 11 : RIGHT TO OBJECT

The Concerned Person shall have the right to object, on grounds relating to his or her particular situation, at any time, to processing of Personal Data concerning him or her if the processing is based on the purposes of the legitimate interests pursued by LEOSPHERE or by a third party. LEOSPHERE will no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, the Concerned Person shall have the right to object at any time to processing of Personal Data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

ARTICLE 12 : RIGHT TO WITHDRAW HIS OR HER CONSENT

When the Concerned Person consented to the processing of its personal data, the Concerned Person has the right to withdraw consent at any time, without any justification and without affecting the lawfulness of processing based on consent before its withdrawal.

ARTICLE 13 : RIGHT TO LODGE A COMPLAINT

The Concerned Person has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes this Regulation.

The supervisory authority in France is the CNIL

The supervisory authority with which the complaint has been lodged shall inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy

ARTICLE 14 : INFORMATION ON POTENTIAL CONSEQUENCES OF THE ABSENCE OF DATA SUPPLY

Requirement of the supply of Personal Data can be regulatory (requirement from public authorities or contractual, for the purpose of the proper functioning of LEOSPHERE.

For this purpose, the Concerned Person could, in some cases, have to supply Personal Data.

The absence of supply of these data could conduct to an impossibility to follow the contract or contracts execution. This absence may even conduct LEOSPHERE to bring a legal action in justice against the Concerned Person, if LEOSPHERE suffered damage from this absence.