

# PRIVACY AND DATA PROTECTION POLICY

## Protection of personal data

Valtus Transition ("Valtus") is concerned about the protection of the privacy and data of its customers, prospects, suppliers, job applicants at Valtus, as well as its employees. Thus, Valtus adopts and respects confidentiality and a data processing policy that complies with the regulations in force.

As such, Valtus complies with the applicable European law on the protection of personal data, and, in particular, the European General Data Protection Regulation No. 2016/679 of 27 April 2016 (known as "GDPR"), as well as all the rules of French law adopted pursuant to this regulation.

The purpose of the Privacy and Data Protection Policy is to provide data subjects ("you" or "your") with comprehensive information on how Valtus, as data controller, collects and uses your personal data ("Personal Data") and on the means available to you to control this use and exercise your rights in relation thereto.

This policy applies to the websites of the Valtus Group (www.valtus.fr, www.valtusgroup.com, LinkedIn page "Valtus", LinkedIn page "Valtus Alliance", LinkedIn page "Valtus Group" and the LinkedIn group "Interim Management"), as well as the manager portal and any other medium for collecting personal data by Valtus.

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[Access the GDPR Regulation](#)

### ***What is personal data?***

"Personal data" is "any information relating to an identified or identifiable natural person" directly or indirectly, from a single data or from a cross-referencing data.

### ***What Personal Data does Valtus collect and process?***

Valtus considers the principles of data minimization. Consequently, relevant, adequate, and limited information is collected in relation to what is necessary to the purposes for which it is processed. In some collection media, they are indicated by a "\*" sign. Apart from these cases, you are free to provide or not all or part of your Personal Data.

As part of its commercial relationship with its customers and prospects, Valtus, as well as its suppliers, subcontractors and service providers, is required to collect Personal Data such as: title, surname, first name, IP address, position, professional contact details, location, size of the company to which it belongs, company name, telephone number, LinkedIn title, profile link and email address.

Regarding managers, once their account has been created in their personal space, in addition to the aforementioned information, are also requested:

1. Date of birth
2. Home mailing address
3. professional background, including dates, place and description of held positions, etc.
4. training and in particular obtained diplomas, titles or certificates of qualification, professional experience subject to validation, etc.
5. Type of driver's licence held by the applicant
1. Candidates' previous salary level and daily rates
2. Associative mandates, honours, and other distinctions
3. Administrative information necessary (social security number, bank data in particular) for the conclusion of a contract
4. any other information contained in the candidate's curriculum vitae, as transmitted by you.

We may also collect Personal Data such as:

- your login data to the manager portal if this is necessary to ensure the purpose of the processing of your Personal Data;

- data concerning satisfaction surveys or from your interactions on pages dedicated to Valtus on social networks;

Valtus collects data via cookies and other similar technologies. A section dedicated to cookies can be found in our websites.

### ***When do we collect this data?***

The communication of a certain amount of information about you is essential to be able to enter in contact to you. As such, it is your responsibility to send us only strictly professional and relevant information in the context of our activities.

Of course, you have the right to refuse to provide information to Valtus, but in this case you will not be able to benefit from some of requested services.

You provide your Personal Data to Valtus when:

1. You contact Valtus via one of the various channels available to you (including on social networks);
2. You browse our website or connect to the Manager portal or mobile application,

3. You sign up to receive our newsletter,
4. When creating an "interim manager" account
5. You participate in a survey, conference or other event organized by Valtus;
6. you fill out a form or sign a contract;
7. You send business cards, during physical exchanges, telephone, by videoconference or e-mail, by post, during professional meetings, partnerships, application interviews.
8. You submit your application to become an interim manager.

### ***From whom do we collect this data?***

Valtus collects most of your Personal Data directly from you but may obtain information about you when one of its customers designates you or via third parties.

This is particularly the case during events organized by Valtus, trade shows, or as part of our commercial prospecting.

### ***What are the purposes and on what basis do we use your personal data?***

In general, Valtus uses your personal data either:

- to comply with the legal and regulatory provisions to which Valtus is subject, for example, the obligation to record and keep evidence of the performance of its missions, among other data.
  - This obligation is indicative, not exhaustive and is subject to change.
- in the context of the execution of the contract or the taking of pre-contractual measures. In concrete terms, this means that you can be contacted, for example, in the following cases:
  - about services in which you have shown an interest;
  - when you have started a registration process as an interim manager and have not completed this process.
- for reasons that are in Valtus' legitimate interest, while balancing this legitimate interest with respect for your privacy. Personal data is thus processed for:
  - marketing, statistics;
  - promotion of services promoted by Valtus
  - Optimizing the performance of Valtus' services: using transactional data to better understand the use of its services with a view to improving them.

Valtus also analyses:

- the results of its marketing activities in order to measure the effectiveness of its campaigns in order to offer you, as a customer, more relevant solutions;
- the results of surveys carried out among its customers and managers, statistics, tests and comments left by customers through the various social networks (Twitter, Facebook, etc.) to which Valtus is linked.
- monitoring Valtus' activities, including measuring the number of calls and visits to the website, the type of questions frequently asked by customers, etc.
- the use of cookies to improve user comfort on the website.

- when Valtus has your consent.

In some cases, Valtus will only process your Personal Data if it has specifically obtained your consent to do so.

If processing requires your consent, Valtus will only process your personal data after obtaining your prior consent.

For example, sending the newsletter.

*Please note* : your consent is only required for commercial communications by electronic means when you are a prospect. In any case, Valtus reserves the right to contact you through any communication channel and in particular, electronically in the context of the execution of your contract or if required by law to do so.

Regarding interim managers, we collect Personal Data in order to:

- interact with you and reference you in the Valtus manager database;
- assess your skills, experience and professional potential, before, during and after the completion of potential assignments as a Valtus manager;
- introduce you to and put you in touch with Valtus' customers and/or prospects in order to obtain missions and/or in the context of carrying out said missions;
- monitor our relationship and thus improve your management experience and the experience of our customers;
- allow you to request, obtain or receive information from Valtus,
- allow you to subscribe to and receive thematic information (training, documentation, invitations, activity reports, etc.);
- organize and allow you to participate in specific events for our candidates;
- Proceed with the administrative management of our relations concerning in particular contracts, orders, invoices, etc. or for any other purpose necessary to comply with the regulations in force;
- update your data (update campaigns), as well as allow you to exercise your rights with Valtus (requests for the right of access, rectification, deletion, portability and opposition).

### ***How long is your data kept?***

Valtus keeps your Personal Data for the necessary time to fulfil the purposes pursued, subject to legal archiving possibilities, obligations to retain certain data, and/or anonymization. In particular, we apply the following retention periods for these few broad categories of Personal Data:

- Personal data of customers/suppliers: the data of customers and suppliers are kept for the duration of the commercial relationship. They will then be kept, among other things, for commercial prospecting purposes or to feed our supplier base, for a maximum of 5 years from the last exchange.
- Personal data of prospects and suppliers: as long as the user is active and, at the latest, 5 years after the last contact from the latter.

- Personal Data of applicants for positions at Valtus: this data will be definitively destroyed two years after the refusal of the application.
- Personal Data of managers: kept as long as your profile is active (for example when missions are in progress or when you confirm your interest in our services during our update campaigns). As soon as your profile has not been active for more than five years, your Personal Data is archived for five years to facilitate the search for a new mission in the event of a request from you (in which case your profile will again be considered active) before being definitively destroyed. Some of your personal data is kept for a certain period after the closure of your account. This period may be extended in certain cases, for example, in the event of a dispute.

Valtus ensures that it does not store your personal data beyond the time necessary for the processing for which it was collected.

### ***Who has access to my Personal Data?***

Your Personal Data is confidential and only Valtus employees for whom access to Personal Data is necessary for their activity may access Personal Data, without prejudice to its possible transmission to the bodies responsible for a control or inspection mission in accordance with the applicable regulations.

The rights of access to Personal Data are granted by Valtus in line with the employee's function and are updated in the event of an evolution or change of function. Valtus employees are bound by confidentiality obligations regarding your Personal Data.

### ***Manager Portal specificities***

*For technical support purposes, the Interim Manager authorizes Valtus to log in to his portal via administrator authorization.*

*Valtus reserves the right exceptionally to modify the personal codes of the manager of access to its portal without prior notice, in particular in the event of a risk to the security of Valtus' IT systems (e.g. in the event of absence of prolonged use or unauthorized access). The manager will be kept informed of any modification of his codes.*

Our partners and certifying companies may also be required to process Personal Data strictly necessary for the performance of the services we entrust to them (computer maintenance, electronic and postal distribution, verification of compliance with our certified procedures, etc.);

Valtus may be required to communicate the Personal Data of interim managers *throughout the duration of its relationship with Valtus* to its customers, prospects, partners and subsidiaries, *with whom it is or will be in a contractual relationship*, with the aim of proposing your application for the performance of a mission. Conversely, Personal Data of customers and prospects is also transmitted to interim managers.

Valtus also ensures that its subcontractors undertake to use the data securely and confidentially and use it in accordance with its instructions. The Personal Data communicated via our websites passes through the servers of a partner specialized in recruitment technologies, located in the Netherlands, with which Valtus has concluded a contract guaranteeing the right of data subjects to their Personal Data. They are then stored on servers dedicated to Valtus, located in France.

When Valtus works with processors outside the European Economic Area (EEA), adequate measures are taken to ensure that your personal data will be duly protected in the destination country. In this case, Valtus acts (e.g. through contractual measures), to ensure that the personal data is processed with the same level of security as required by European legislation.

In all cases of transfer of your Personal Data to third parties, Valtus ensures that the Personal Data transmitted continues to benefit from a level of protection equivalent to that put in place by Valtus and requests contractual commitments so that your Personal Data is processed exclusively for the purposes you have previously accepted, with the required privacy and security.

### ***What security measures are in place?***

Valtus takes appropriate technical and organisational measures to ensure that your personal data is adequately secured against accidental loss or disclosure to persons who do not have permission to do so.

Valtus ensures the security of your Personal Data by implementing enhanced data protection using physical and IT security means. Despite these reasonable measures to protect your Personal Data, no transmission or storage technology is foolproof. Thus, and in accordance with the applicable European regulations, in the event of a proven breach of Personal Data likely to generate a high risk for the rights and freedoms of the persons concerned, Valtus undertakes to communicate this breach to the competent supervisory authority and, when required by said regulations, to the persons concerned (individually or generally depending on the case). It is of course also your responsibility to exercise caution to prevent any unauthorized access to your Personal Data and your terminals (computer, smartphone, tablet, ...). In addition, our websites may provide links to third-party websites that may be of interest to you. Valtus has no control over the content of these third-party sites or over the practices of these third parties about the protection of personal data they may collect. Consequently, Valtus declines all responsibility for the processing by these third parties of your Personal Data, not subject to this policy. It is your responsibility to inquire about the personal data protection policies of these third parties.

### ***What are my rights over my Personal Data?***

Through this policy, Valtus strives to provide you with clear, simple and precise information on the conditions of processing of your Personal Data (right to information).

You also have the following rights:

#### Right of access, rectification and erasure of your Personal Data:

You have the right to access from Valtus all Personal Data concerning you, as well as confirmation as to whether your Personal Data is processed, the conditions of such processing and the source of the

personal data processed, if they have not been collected from you. You also have the right to obtain from Valtus, as soon as possible (and by default, within 30 days), the rectification of your Personal Data.

Valtus takes all necessary measures to ensure that your personal data is correct, up-to-date, and complete. Valtus therefore asks you to inform it of any changes (contact details, address, etc.).

Interim managers who have created an account can modify some of the Personal Data directly from the manager portal.

Finally, subject to the exceptions provided for by applicable law (e.g. retention necessary to comply with a legal obligation), you have the right to request Valtus to erase, as soon as possible, your Personal Data, in the following cases:

- your Personal Data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- you wish to withdraw your consent on which the processing of your Personal Data was based and there is no other basis justifying this processing;
- you consider and can establish that your Personal Data has been unlawfully processed;
- your Personal Data must be erased by virtue of a legal obligation.

Valtus may, however, retain your personal data when it is necessary for the establishment, exercise or defence of its legal rights or for Valtus to comply with its legal obligations. Valtus will thus be bound by the retention periods provided for by the various legislations.

Right to object to the processing of your Personal Data:

Where the processing of your Personal Data is necessary for the performance of a task carried out in the public interest or in the exercise of public authority vested in Valtus, or because of the legitimate interests of Valtus or a third party, you have the right to object to the processing of any Personal Data in relation to your particular situation.

If your Personal Data is processed for direct marketing purposes, you have the right, regardless of the legal basis for such processing, at any time and free of charge, to object to such processing, including profiling to the extent that it is related to such direct marketing, whether initial or subsequent processing.

However, your request will not be complied with if the legitimate interest of Valtus overrides yours or if the processing of your data is required for the establishment, exercise, or defence of its legal claims.

Right to restriction of processing of personal data concerning you.

This specific right of objection allows you to ask Valtus for a temporary blocking of your data in specific cases defined by law: Valtus will then no longer be able to process your data concerned for a defined period of time.

The applicable regulations provide that this right may be invoked in certain cases, in particular the following:

- when you dispute the accuracy of your Personal Data;
- when you consider and can establish that the processing of Personal Data is unlawful, but you oppose the erasure of the Personal Data and instead demand the restriction of processing;
- when Valtus no longer needs your Personal Data but you still need it for the establishment, exercise or defence of legal claims;
- Where you object to processing based on the legitimate interest of the controller, while it is verified whether the legitimate grounds pursued by the controller override those of the data subject.
- When a request for opposition is being examined by Valtus.

If you have made use of this right, Valtus may store your data, but may no longer process it further except with your consent, for the establishment, exercise, or defense of its rights (or those of another person), or in the cases provided for by law.

#### Right to the portability of your Personal Data

Where the processing is based on your consent or a contract, this right to portability allows you to receive the Personal Data you have provided to Valtus. The data concerned by portability is limited to the raw data that you have transmitted to us, excluding data resulting from the work of Valtus.

#### Right to withdraw consent to the processing of Personal Data

When Valtus processes your Personal Data based on your consent, you can withdraw it at any time or object to the processing of your data at any time by sending a request to Valtus (see below "How to exercise my rights?"). On the other hand, and in accordance with applicable law, the withdrawal of your consent is only valid for the future and can therefore not call into question the lawfulness of the processing carried out before this withdrawal or based on another basis such as, for example, the performance of a contract.

#### Right to lodge a complaint with a supervisory authority

If, despite Valtus' efforts, you believe that your rights are not respected, you have the right to lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL) in France.

#### Right to decide the fate of your Personal Data in the event of death

Finally, you have the right to organize the fate of your Personal Data post-mortem by the adoption of general or specific directives. Valtus undertakes to comply with these guidelines. In the absence of instructions, Valtus acknowledges the possibility for heirs to exercise certain rights, in particular the right of opposition and deletion to oppose the processing of their data or close the deceased's account.



### ***How can I exercise my rights?***

You can exercise your rights relating to the protection of Personal Data by sending your request, accompanied by a copy of any identity document to the concerned subsidiary company.

### ***Applicable law and competent courts***

This Policy is subject to French law. In the event of a dispute and if an amicable agreement cannot be reached, the competent courts will be those within the jurisdiction of the Paris Court of Appeal, notwithstanding multiple defendants, or third-party claims.

### ***Dissemination of the Personal Data Protection Policy***

This policy is available on our websites: [valtus.fr](http://valtus.fr) and [valtusgroup.com](http://valtusgroup.com).