



"Training to protect"

# PERSONAL DATA PROTECTION POLICY

Updated on 08/12/2025

English translation. In the event of divergence, the French original remains the reference version.





## Our philosophy and commitments

AS is committed to protecting your personal data and undertakes to ensure a high level of protection for your personal data in accordance with European Regulation 2016/679 and the French Data Protection Act no. 78-17.

Below you will find our personal data protection policy, explaining in particular what personal data we collect, how it is processed and on what basis, how long it is retained and what personal rights you have. We invite you to read it.

Our Data Protection Officer is available to answer all your questions. You can contact him at: [m.pichot@asclepios-securite.com](mailto:m.pichot@asclepios-securite.com)

You can find the applicable European Regulation at:

<https://eur-lex.europa.eu/legal-content/FR/TXT/?uri=CELEX%3A32016R0679> or contact/lodge a complaint with the supervisory authority (CNIL) via its website [www.CNIL.fr](http://www.CNIL.fr).

This version of the personal data policy may be modified by us where appropriate and you will be informed.

## Your data controller

AS is the controller of your personal data. Its contact details are: 1 Impasse du Plateau de Cazelles, 11390 Cuxac-Cabardes. It is referred to by its name or as 'we/us' in this policy.

## Your personal data and its collection by AS

Your personal data may be collected during:

- Your visit to our website;
- Our exchanges;
- Our prospecting actions;
- The formation or performance of our contracts.

We do not collect any data that is not necessary for the processing purpose stated at the time of collection, nor any data prohibited by law or regulation.

Collection of certain data may be mandatory or optional, and you are informed of mandatory information. Your personal data may be collected by third-party providers or partners, who undertake to comply with European and national regulations on personal data.

Our policy is not to transfer your data outside the European Union. If, exceptionally, we were to do so, such transfer could only be made to a country or organization covered by an adequacy decision (Art. 45 GDPR) or presenting appropriate safeguards (Art. 46 GDPR).

We do not make any automated decisions.

## We may potentially collect the following personal data:

- Civil status, identity, contact details, images;
- Personal data of an economic and financial nature;
- Connection data;
- Internet and telephony data;
- Professional life data.



## Processing of your personal data

We process your personal data by entering it into databases. It is stored, retained and, where applicable, rectified, deleted, archived, anonymized or pseudonymized, and transferred to trusted third parties.



We may process your personal data for the following purposes or for purposes specified to you at the time of collection:

- Providing information about our commercial and promotional offers (products and services);
- Communicating with you: we may use your personal data for commercial prospecting, in particular to send you information about our products/services, commercial and promotional offers, quotations and other pre-contractual documents, and our news by email, post or telephone.
- Performing your current contracts and customer follow-up: we use your personal data to ensure performance of current contracts in accordance with your requests. We may also send you any information about your order or current contracts, their performance, your invoices and contractual documents, advice, performance of our guarantees where applicable and our legal obligations. We also use your personal data to manage our customer relationship, your requests or complaints, any disputes and your customer history.
- Improving the use of our services and improving our offers: we process your personal data to enable optimal use of our services, improve our offers and products/services, follow your user journey, conduct satisfaction surveys, polls and anonymous statistics.
- Your payments: your bank details may be collected either directly by us or by a dedicated and selected provider, which guarantees the full confidentiality of your banking data. These details are retained only for the time necessary for the contractual relationship or within legal limits.
- Protection against fraudulent initiatives: personal data collected may be used to fight fraud, particularly relating to payments or direct debits. In this respect, our payment-security providers may receive this data.
- Ensuring compliance with the law and court decisions: your data may be used to respond to a request from an administrative or judicial authority, a law-enforcement representative or an officer of the court, or to comply with a court decision; to ensure compliance with our general terms and conditions of sale/service; to protect our rights and/or obtain compensation for damage we may suffer or limit its consequences; and to prevent any action contrary to applicable laws, particularly in fraud prevention.

## We may also process your personal data for the following purposes:

- Commercial relationship: sending marketing campaigns by email, post or telephone, including through a provider; geolocation of users / clients / suppliers.
- Internet: customer statistics and surveys. Certain data is processed for statistical purposes, in particular to assess and improve the performance of our programs or to measure audience on our website. Personal data is anonymized for this purpose.
- Cookie management: necessary cookies for optimized use of the site (for example: identification, basket); performance cookies (used to establish anonymous statistics and website traffic levels) and tracking/personalization cookies collecting information about your use of the site and enabling personalization of our offers; analytical cookies enabling us to understand and analyze your browsing on our site.

## Legal bases for processing your personal data

In accordance with regulations, our processing of your personal data is lawful if it is based on one of the following legal bases:

- Your consent to our processing of your data: you accept the processing of your personal data through express consent. You may withdraw this consent at any time from our DPO; or
- The existence of a contract between you and us: the processing is justified by the needs of contract performance; or
- Our legitimate interest in processing your personal data, provided that this proportionate interest respects your fundamental rights and privacy; or
- The law or applicable regulations where they require us to process and retain your personal data.

## Methods and retention periods for your personal data



We manage your personal data according to three phases:

- An active phase, during which data is retained for the time indicated below in an active database. Your personal data is then accessible only to persons with an operational need to access it in order to carry out authorized processing;
- An archiving phase, for an additional period after retention in the active database, where a legitimate reason justifies it. Your personal data is then archived with restricted access and for a limited period;
- A deletion or anonymization phase: at the end of the additional archiving period within the deadlines below, your personal data is deleted or anonymized so that it can no longer constitute personal data identifying you.

Your personal data is retained for the time necessary for the purposes of its processing, our customer relationship where applicable and performance of contracts, and within specifically defined regulatory limits. We may archive your personal data for the retention of accounting, tax or evidentiary supporting documents for the duration of applicable limitation periods. By way of example, the following retention periods apply to the processing operations below, subject to regulations imposing a different retention period:

Processing purpose	Legal basis	Retention of personal data in the active database	Additional archiving
Prospecting	Your consent	3 years if you have not actively responded to any solicitation. The period starts again in the event of active solicitation on your part.	X
Performance of our contractual obligations towards you / services	Contract	The time necessary for contract performance and 3 years from the end of the commercial relationship (last activity, such as end of contract performance, purchase, service, or connection to the site as a registered user).	5 years after the contractual relationship
Customer relationship	Contract	3 years from the end of the commercial relationship (last activity on your part with us).	5 years after the contractual relationship

## Withdrawal of your consent to the collection or processing of your personal data

Consent given for the collection of your personal data may be withdrawn by writing to our DPO by email or post at the addresses indicated in the header, mentioning your surname, first name, email and address, together with the precise nature and purpose of your withdrawal request.

You may also send us any comments about your personal data to AS, 1 Impasse du Plateau de Cazelles, 11390 Cuxac-Cabardes.

## Exercising your personal-data rights

You have:

- A right of access, which enables you to obtain confirmation as to whether data concerning you is being processed, and communication of a copy of all personal data held by the controller.
- A right to request portability of certain data: this enables you to recover your personal data in a structured, commonly used and machine-readable format.
- A right to object: this enables you no longer to be subject to commercial prospecting by us or our partners, or, for reasons relating to your particular situation, to stop processing of your data for research and development, fraud prevention and detection purposes.
- A right to rectification: this enables you to have information concerning you corrected when it is outdated or erroneous. It also enables you to have incomplete information concerning you completed.
- A right to erasure: this enables you to obtain deletion of your personal data, subject to legal retention periods. It may apply in particular where your data is no longer necessary for the processing.
- A right to restriction: this enables you to restrict processing of your data in the following cases: unlawful use of your data; if you contest its accuracy; or if the data is necessary for you to establish, exercise or defend your rights. The data will then no



longer be actively processed and cannot be modified for the duration of exercise of this right.

- A right to obtain human intervention: data controllers may use automated decision-making for subscribing to or managing your contract. In this case, you may ask the Data Protection Officer which criteria determined the decision.

You may exercise these rights by email: [m.pichot@asclepios-securite.com](mailto:m.pichot@asclepios-securite.com) or by letter to: 1 Impasse du Plateau de Cazelles, 11390 Cuxac-Cabardes, indicating your surname, first name, home address and email (and, where applicable, your client references) as well as the purpose of your request in clear and legible terms. AS undertakes to respond to your verified request within one month of receipt.

In the event of difficulty, you may contact our Data Protection Officer directly by email: [m.pichot@asclepios-securite.com](mailto:m.pichot@asclepios-securite.com) or lodge a complaint with the French Data Protection Authority (CNIL).

## Our processors and partners

AS may transmit your personal data to processors carrying out services involving processing of your data and in compliance with the purposes set out herein. These processors must give your personal data the same level of confidentiality as AS and have undertaken to fully comply with personal data regulations, in particular the GDPR.

We do not trade in your personal data. If you would like to know more and specifically know the identity of the providers or partners to whom your personal data has been transmitted, you may contact our DPO at: [m.pichot@asclepios-securite.com](mailto:m.pichot@asclepios-securite.com)

The providers or partners likely to access your personal data may include:

- Providers likely to manage outsourced services for performance of our services and contracts;
- Providers helping us improve our services, analyze data and optimize our offers, and carry out surveys and statistics;
- Statutory auditors, chartered accountants, consultants, lawyers, audit firms, IT and hosting providers, security providers;
- Investors and buyers.

We may also transmit your personal data to French authorities, administrations and courts, in particular in the context of legal action or formalities requiring such communication.

## Cookie policy

### What is a cookie?

A cookie is a file placed on your device (computer, tablet, for example) by AS when you use the website and depending on your browser. During its storage period, this file will identify your computer during your next visits to the site, enabling us to retain your visit and browsing data.

AS may use various personal-data collection systems, in particular through cookies on our website, for which your consent is requested. The following cookies may be concerned:

- Necessary cookies - for optimized use of the site (for example: identification, basket);
- Performance cookies - used to establish anonymous statistics and traffic levels on the site - and tracking and personalization cookies collecting information about your use of the site and enabling individualized offers;
- Analytical cookies - enabling us to understand and analyze your browsing on our site.

AS may also issue third-party cookies enabling sharing of content from our site with third parties or tools expressing your appreciation (e.g. 'Like' buttons from social networks). You may then be identified by the social network, which may track your browsing. It is your responsibility to review its privacy and cookie-management policy; our company is not responsible for those tools.

Cookies are subject to your acceptance on our website during your first visit. The validity period for consent to the placement of cookies and trackers is a maximum of 13 months from their first placement on your terminal following your expression of consent.



You can manage your acceptance or refusal of cookies directly from your browser settings. You can accept all cookies, be warned when a cookie is placed, or refuse all cookies. If you refuse all or part of the cookies, some Site functions may be compromised or some pages inaccessible.

## To disable cookies:

If you use Internet Explorer 8 and later:

- Go to Tools in the menu bar and click Internet Options;
- Click the Privacy tab at the top;
- Move the slider up to Block all cookies to block all cookies, or down to Accept all cookies to accept all cookies.

For more information, consult: <http://windows.microsoft.com/fr-fr/internet-explorer/delete-manage-cookies>

## If you use Firefox 30.0 and later:

- Click the menu button and select Options;
- Select the Privacy panel;
- In the History area, for the retention-rules option, select Use custom settings for history;
- Check Accept cookies to enable cookies, or uncheck it to disable them;
- If you have problems with cookies, make sure the Accept third-party cookies option is not set to Never;
- Choose how long cookies can be retained: Until they expire; Until Firefox closes; or Ask me every time;
- Click OK to close the Options window.

For more information, consult: <https://support.mozilla.org/fr/products/firefox/privacy-and-security/cookies>

## If you use Google Chrome:

- Go to the Tools menu;
- Click Settings;
- Click Advanced settings;
- Click Privacy / Content settings;
- Cookies should be selected. Then select Block third-party cookies and site data.

For more information, consult: <https://support.google.com/chrome/answer/95647?hl=fr>

## If you use Safari 5.0 and later:

- Choose Safari > Preferences and click Security;
- In the Accept cookies section, specify whether and when Safari should accept cookies from websites. To see an explanation of the options, click the help button. If you have set Safari to block cookies, you may need to accept cookies temporarily to open a page. Repeat the steps above by selecting Always. When you have finished with the page, disable cookies again and delete cookies from the page.

For more information, consult: [http://support.apple.com/kb/ht1677?viewlocale=fr\\_FR](http://support.apple.com/kb/ht1677?viewlocale=fr_FR)

If you use a different browser type or version, please consult your browser Help menu.

