



# Personal data protection policy

Version effective on 01/01/2026

Groupe Positive SAS, located at 3 Avenue Antoine Pinay, Parc d'activité des 4 vents in Hem (59510) - RCS Lille Métropole 919 289 108, acting as a data controller as defined by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 applicable since 25 May 2018 and by the amended Law No. 78-17 of 6 January 1978, relating to data processing, files and freedoms (hereinafter, together, the "Regulation"), attaches great importance to the protection of personal data.

This policy (hereinafter the "Policy") applies to all websites (hereinafter the "Websites") offered by Groupe Positive (hereinafter "We"). Through this Policy, We wish to inform the users of our WebSites (hereinafter "You") of the means used and the purposes pursued for the collection of any information that directly or indirectly identifies a natural person (hereinafter "Personal Data"), in accordance with the Regulation, when We act as data controller, i.e. when We determine the purposes and means of the processing.

Processing means any operation (or series of operations) relating to Personal Data, by any process and in particular the collection, recording, organization, storage, adaptation or modification, extraction, consultation, use, communication by transmission, diffusion or any other form of distribution, merging or interconnection, as well as blocking, erasure or destruction (hereinafter referred to as "Processing").

## I. What kind of personal data do we collect ?

You may be asked to provide Personal Data, directly or indirectly. The compulsory or optional nature of the Personal Data requested and the possible consequences of a lack of response are specified to you during the collection.

Thus, We collect Personal Data that You provide to Us, Personal Data that We obtain from third party sources, and Personal Data that We obtain through Your use of the Websites.

Thus, the following Personal Data and other data may be collected and processed:

- Your contact information (name, first name, job title, address, telephone number, e-mail address);
- Identifiers and connection data, including IP address, device details, or activity logs, navigation data;
- Your interactions with Us;
- Data collected as part of our partnership program.

Regarding data collected from other sources, We may also obtain your contact details and other personal information from companies which are part of the Group to which We belong and from other third parties, including companies with which We offer shared services and which warrant to Us that they have obtained your data lawfully; and/or from publicly available sources and/or from the data providers from whom We obtain data.

## II. What is the legal basis to collect your Personal Information?

We collect and process Your Personal Data under the following legal bases:

- Our legitimate interest to communicate with you or to secure the Websites;
- Your express consent to the Processing of your Personal Data. This consent can be easily withdrawn at any time;
- The necessity to respect a legal obligation;
- The execution of pre-contractual measures or the establishment of a contractual relationship.

### III. Why are your Personal Data collected?

We may process your Personal Data for the following purposes:

- Evaluation and improvement of the quality of our Websites, including the preparation of statistics;
- Managing your requests and other questions sent via the contact form;
- Management of technical prospecting operations (including technical operations such as normalization, enrichment and deduplication);
- The execution of solicitations;
- Sending of newsletters, information letters, satisfaction surveys and promotional offers by e-mail or sms, to keep You informed of the latest news from Groupe Positive and its subsidiaries, analyze behavior for statistical purposes, or to send follow-up messages;
- Management of applications for recruitment purposes;
- Organization of contests;
- Management of your rights regarding the rules on the protection of Personal Data;
- Management of potential litigations;
- Managing Websites security;
- Respect of legal obligations which we are subject to.

### IV. Who are the recipients of your Personal Data?

Your Personal Data are processed primarily by Us, but We may also share your Personal Data (i) with different appropriate departments of the companies within the Group to which We belong, as data controller or jointly responsible (in particular: CRM tool, prospecting or solicitation operations, recruitment, access control management, use of shared infrastructure, etc.), with the respective roles of each entity established through a specific agreement (ii) and/or with external service providers, duly authorized. The departments of our Group and our external subcontractors operate on our instructions and within the strict limits of their tasks. In this context, your Personal Data are neither sold nor rented to third parties.

We may be required to disclose your Personal Data to any authority, court, or third party when such disclosure is required by a court order, regulatory provision, or law, or when such disclosure is necessary for the defense and protection of our rights.

When service providers are located outside the EU, We have made sure that they have signed contracts on the protection of personal data and in particular the standard clauses of the European Commission to regulate the transfer of personal data.

In any case, We ensure that the persons authorized to process your Personal Data (staff, partners, subcontractors, etc.) are committed to respect the confidentiality of Personal Data or are subject to an appropriate legal obligation to confidentiality. Thus, We ensure in particular that our Group employees who may have access to your Personal Data as part of their tasks are made aware of the protection of Personal Data.

### V. How are your Personal Data secured?

We inform you that appropriate organizational and technical measures are taken to preserve the security, the integrity and the confidentiality of your Personal Data and in particular, to prevent that they are distorted, damaged or accessible to unauthorized third parties.

### VI. How long will your Personal Data be kept?

We keep your Personal Data for the time necessary to fulfill the purposes for which it was collected. We also keep your Personal Data for the period of time defined by the applicable law.

For example, if You are a candidate for a recruitment, if your application is rejected and if You do not request the destruction of your application, your Personal Data are kept for a maximum of two years after the last contact. Only your express consent allows a longer retention.

## VII. What are your rights regarding your Personal Data?

In accordance with Regulations, You have the following rights:

- Right of access to your Personal Data;
- Right to rectify your Personal Data if they are inaccurate ;
- Right to erase your Personal Data in certain cases;
- Right to a limitation of the Processing of Your Personal Data and the right to the portability of your Personal Data, within the limits established by the applicable regulations;
- Right to withdraw Your consent at any time when the Processing is based on it
- Right to refuse the processing of your Personal Data;
- Right to determine the guidelines regarding your Personal Data after your death. Without such instructions, your heirs may exercise their right to your Personal Data.

If, after contacting us, you believe that your rights to your personal data are not respected, you can submit a complaint to a data protection authority.

You will find more details on the procedure on the website of the authority of your place of residence, the place where the facts were observed.

For example :

France	<a href="#">Commission Nationale de l'Informatique et des Libertés - CNIL</a>
Belgium	<a href="#">Commission de la protection de la vie privée - APD</a>
Spain	<a href="#">Agencia de Protección de Datos - AEPD</a>
Portugal	<a href="#">Comissão Nacional de Protecção de Dados - CNPD</a>
Germany	<a href="#">Sächsische Datenschutz- und Transparenzbeauftragte</a> ou <a href="#">Der Landesbeauftragte für Datenschutz und Informationsfreiheit Baden-Württemberg</a>
Italy	<a href="#">Garante per la protezione dei dati personali</a>
Poland	<a href="#">Urząd Ochrony Danych Osobowych - UODO</a>

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Consult the list of control authorities on the site of the [European Data Protection Board](#) (EDPB)

## VIII. Cookies

Details of the cookies used are provided in our [cookie policy](#), which is available on our website.

## IX. How to contact us ?

To exercise your rights, or contact us, You can contact Us at the following e-mail address : [gdpr@positivegroup.com](mailto:gdpr@positivegroup.com), or at the following address :

SAS Groupe Positive  
Legal department  
3 Avenue Antoine Pinay,  
Parc d'activité des 4 vents  
59510 Hem  
France

## X. How can this Policy be amended?

We may change this Policy from time to time, in order to comply with legal, regulatory, case law, or technical developments.

We recommend that you check this policy regularly for any changes or updates made to.