



Eurazeo Infrastructure Partners

Policy related to the protection of personal data


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I. Introduction

Eurazeo infrastructure Partners (EIP) undertakes to comply with the provisions of the Global Data Protection Regulation (GDPR) that came into force on May 25, 2018. Its objective is to protect the fundamental rights and freedoms of natural persons, and in particular their right to the protection of personal data.

1.1 Definitions

Personal data: Any information relating to an identified or identifiable natural person (hereinafter referred to as the "data subject"). Is deemed to be an "identifiable natural person" a natural person who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier, or one or more specific elements specific to his physical, physiological, genetic, psychic, economic, cultural or social identity.

Processing: Any operation or set of operations whether or not carried out using automated procedures and applied to personal data or sets of data, such as collecting, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of provision, reconciliation or interconnection, limitation, erasure or destruction.

Data controller: The data controller at EIP is the RCCI.

1.2 Principles

The personal data are:

- a) processed in a lawful, fair and transparent manner with regard to the data subject;
- b) collected for specified, explicit and legitimate purposes, and not further processed in a manner incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date;
- e) kept in a form allowing the identification of the persons concerned for a period not exceeding the necessary period for the purposes for which they are processed;

II. Disclosure of information and communications

1. When personal data relating to a data subject is collected from this person, the data controller shall provide him/her, at the time the data in question is obtained, with all the following information:
 - a) the identity and contact details of the controller and, where applicable, of the controller's representative;
 - b) where applicable, the contact details of the data protection delegate;
 - c) the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
 - d) the recipients or categories of recipients of the personal data, if any;
 - e) where applicable, the fact that the controller intends to transfer personal data to a third country or an international organization.

2. In addition to the information referred to in paragraph 1, the controller shall provide the data subject, at the time the personal data is obtained, with the following additional information which is necessary to ensure fair and transparent processing:
 - a) the retention period of personal data or, where this is not possible, the criteria used to determine this period;
 - b) the existence of the right to request from the data controller access to personal data, the rectification or erasure thereof, or a limitation of the processing relating to the data subject, or the right to object to processing and the right to data portability;
 - c) the right to lodge a complaint with a supervisory authority;
 - d) information on whether the requirement to provide personal data is of a regulatory or contractual nature or whether it conditions the conclusion of a contract and whether the data subject is required to provide the personal data, as well as the possible consequences of not providing this data;
 - e) the existence of automated decision-making, including profiling, and, at least in such cases, useful information regarding the underlying logic, as well as the significance and intended consequences of this treatment for the data subject.

3. When he intends to carry out further processing of personal data for a purpose other than that for which the personal data was collected, the controller shall provide the data subject beforehand with information about this other purpose and any other relevant information referred to in paragraph 2.

III. Selection, monitoring and evaluation process for key service providers

1. The controller keeps a record of the processing activities carried out under their responsibility. This register includes all of the following information:
 - a) the name and contact details of the controller;
 - b) the purposes of the processing;
 - c) a description of the categories of data subjects and the categories of personal data;
 - d) where applicable, transfers of personal data to a third country or an international organization, including the identification of this third country or this international organization
 - e) to the extent possible, the deadlines for the erasure of the different categories of data;
 - f) f) as far as possible, a general description of the technical security and organizational measures; and
 - g) the categories of recipients to whom the personal data have been or will be communicated, including recipients in third countries or international organisations.

2. Each processor maintains a record of all categories of processing activities carried out on behalf of the controller, including:
 - a) the name and contact details of the processor(s) and of each controller on whose behalf the processor is acting, as well as, where applicable, the names and contact details of the controller's representative or of the subcontractor and those of the data protection delegate;
 - b) the categories of processing carried out on behalf of each controller;
 - c) where applicable, transfers of personal data to a third country or an international organization, including the identification of this third country or this international organization and, in the case of transfers, the documents attesting to the transfer;
 - d) the existence of appropriate safeguards;
 - e) as far as possible, a general description of the technical and organizational security measures referred to in Article 32(1) of GDPR.