

BINDING CORPORATE RULES (BCR-P)

Tessi acts as processor

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I. BACKGROUND

The protection of personal data is a major concern for the Tessi Group. As part of its activities, the Tessi Group undertakes to protect the personal data processed, whether during its collection, processing, storage, or transfer. The Tessi Group undertakes to comply with the laws and regulations applicable in this area.

The Tessi Group has therefore put in place a specific governance structure to ensure the protection of personal data at group level. This governance structure has been approved by senior management and is overseen by a Data Protection Officer (Group DPO). This governance structure seeks to build, maintain, and coordinate the personal data protection programme within the Tessi Group and is strategically aligned with risk reduction issues. It must be implemented by all Tessi Group entities referred to in this document.

Pursuant to Article 46(2)(b) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the "GDPR"), the Tessi Group has decided to adopt binding corporate rules setting out appropriate safeguards, harmonised at group level, to provide a framework for the transfers of personal data carried out by its entities referred to in this document.

Consequently, this document sets out the binding corporate rules of the Tessi Group where it acts as processor.

II. DEFINITIONS

In the context of these BCRs, the terms listed below, whether or not capitalised, shall have the meanings given to them in this Section:

BCRs

Means these Tessi Group Binding Corporate Rules.

Controller

Means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law. *For example: The relevant Tessi Group entity is the controller for the personal data of its employees, prospective customers or suppliers, etc. Where it carries out processing on behalf of its customers as part of a service provided under an agreement, the entity's customers are then the controllers.*

Data exporter

Means the controller or processor that transfers the personal data outside the EEA.

Data importer

Means the controller or processor located outside the EEA that agrees to receive personal data from the data exporter.

Data protection authority (or Supervisory Authority)

Means the independent public authority responsible for the protection of personal data in each EEA State. *For example: In France, this is the Commission Nationale de l'Informatique et des Libertés (CNIL) while, in Spain, this is the Agencia Española de Protección de Datos (AEPD).*

Data subject

Means an identifiable natural person is one 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 factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

EEA

Means the European Economic Area which includes European Union countries and also Iceland, Liechtenstein and Norway.

Lead Supervisory Authority

Means, for the purposes of these BCRs, the French data protection Supervisory Authority, namely, the *Commission Nationale de l'Informatique et des Libertés* ("CNIL").

Personal data

Means any information relating to an identified or identifiable natural person (see "data subject" below); an identifiable natural person is one 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 to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. *Some examples of personal data: (i) the surname and first name, the identity photo or a personal email address (which directly identify the natural person), and (ii) the social security number, security pass number, customer identifier, connection logs, or identification number (which do not directly identify the individual but make it possible to indirectly identify the natural person to which they relate).*

Processing of personal data

Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording,

organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. *Some examples of processing: collection, digitisation, storage, retrieval, adaptation or modification, consultation, use, disclosure by transmission, transfer, dissemination, erasure, archiving or destruction.*

Processor

Means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. *For example: In providing services to customers, the relevant Tessi Group entity processes personal data on behalf of its customers as processor, in particular concerning the processing of their own customers' data (cheques, invoices, etc.).*

Rights of data subjects

Means the rights of data subjects as described in Section VI of these BCRs.

Sensitive data

Means special categories of personal data, namely, (i) personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, (ii) genetic data, (iii) biometric data for the purpose of uniquely identifying a natural person, (iv) data concerning health, and (v) data concerning a natural person's sex life or sexual orientation.

Service agreement

Means the contract (or other legal document) under European Union law or the law of a Member State) entered into by a Tessi Group entity acting as processor and the controller, and binding the relevant Tessi Group entity with regard to the controller.

Tessi Group

Means all the Tessi Group entities defined below.

Tessi Group entity(ies)

Means Tessi SAS and the legal entities controlled by Tessi SAS and bound by these BCRs, as listed in Appendix 1 to these BCRs. For the purposes of this definition, "control" means the holding of more than 50% of the economic and voting rights.

III. SCOPE

1. Geographic scope

The list of Tessi Group entities bound by these BCRs is set out in Appendix 1.

As such, these BCRs apply to all processing operations involving the transfer of personal data carried out by Tessi Group entities established within the EEA, in their capacity as processor and data exporter, and by Tessi Group entities established outside the EEA, in their capacity as processor and data importer.

They also apply to transfers of personal data carried out by Tessi Group entities established outside the EEA, as data exporter, transferring personal data to Tessi Group entities also established outside the EEA as data importer insofar as the GDPR applies to such processing in accordance with the conditions provided for in Article 3.2 of the GDPR.

Exclusions: These BCRs do not apply when Tessi Group entities established outside the EEA transfer personal data relating to data subjects not located in the EEA, even if those Tessi Group entities act as processor, unless these personal data have been previously transferred from a Tessi Group entity under the GDPR.

For example: if a Tessi Group entity established in Chile transfers personal data concerning the processed data of a Chilean customer not subject to the GDPR to a Tessi Group entity established in Colombia, that transfer, and the related processing will not be governed by the GDPR and these BCRs will not apply to those transfers and the related processing.

2. Material scope

The material scope of these BCRs is presented below and more fully described in Appendix 2.

2.1 Types of personal data and categories of data subjects

These BCRs cover the following types of personal data:

- (i) identity data.
- (ii) data relating to professional life.
- (iii) connection data (logs and IP addresses).
- (iv) economic and financial information (income, taxes, banking information, ownership interests, financial position, etc.).
- (v) sensitive data.

These types of personal data concern the following categories of data subjects:

- (i) customers (employees and representatives).
- (ii) customers (including prospective customers, members, patients, suppliers, etc.) of customers.

⇒ Note: The BCRs apply to automated and manual processing.

2.2 Purposes and nature of the processing

These BCRs cover the following processing purposes:

1. Application development activities: study, design and creation of web applications and mobile applications.
2. Testing and acceptance of the applications.
3. IT service management: support and operation.
4. IT security management.
5. Internal audit and internal control: quality, safety/security, and compliance.
6. Management of promotional operations relating to refund offers, deferred bonuses and competitions.
7. Management of marketing operations.
8. Complaint handling.
9. Management of websites and mobile applications as part of customer services.
10. Management and processing of electronic and paper document flows: categorisation, typing, coding, enrichment of customer files, etc.
11. Publishing management.
12. Processing of means of payment (cheques, interbank payment orders or SEPA): video coding, adjustment, video control, fraud control, money laundering, etc.
13. Business line back office: account opening, file completeness checks, recovery, factoring, receipts, etc.
14. Customer relationship management: incoming calls, outgoing calls, SMS, emails, etc.
15. Electronic document management.
16. Archiving.
17. Management of intellectual services.
18. Operational maintenance and performance optimisation of the automation solutions used by the Tessi Group: improving the rate of automated document reading/recognition (ADR) and optical character recognition (OCR), using, among other things, modelling and "machine learning" methods.
19. Processing of invoices.
20. Remote identity verification management.
21. Management of the patients' digital journeys.

22. Processing of electronic data interchange (EDI) flows.
23. Asset management.
24. Technical support by connected screens.
25. Processing of electronic registered letters (ERLs).
26. Compliance control processing.
27. Management of IT flows: business, banking, publishing, reporting, insurance, accounting or regulatory reporting and EDI (Electronic Data Interchange).
28. Management of the contractual life cycle on behalf of customers (banking, insurance, etc.): membership, contractual amendments or updates, terminations, and claims handling.
29. Management of the benefits of refunds to policy-holders (including third-party payers): “Cash-Out” concept.
30. Establishment of customer profiles based on criteria provided by the customer (controller).

Lastly, these BCRs cover the following types of processing:

1. Collection and recording.
2. Access and disclosure.
3. Reading and consultation.
4. Use and exploitation.
5. Organisation and structuring.
6. Copying and extraction.
7. Modification and adaptation.
8. Erasure and destruction.
9. Hosting, storage, and archiving.
10. Transmission, dissemination, or any other form of provision.
11. Alignment or combination.

IV. BINDING NATURE OF THE BCRS

1. For Tessi Group employees

These BCRs are binding on all Tessi Group employees under the terms of their employment contracts and/or the terms of the internal policies adopted by Tessi Group entities, and the employees undertake to comply with them.

Any breach of the BCRs by an employee may result in sanctions, including dismissal.

2. For Tessi Group entities

Tessi, as a group, must ensure not only that its head office defines a data protection policy, but also that all relevant Tessi Group entities are bound by the same principles and obligations. Consequently, these BCRs are binding on all Tessi Group entities (as defined in Section II) as a result of them entering into an intra-group agreement relating to the BCRs. The list of Tessi Group entities bound by the BCRs is set out in Appendix 1 and may be updated.

3. For Tessi Group customers

The BCRs are binding towards the controller through a specific reference to this aspect in the Service agreement, which complies with Article 28 of the GDPR.

The BCRs are an integral part of the Service agreement, either by being annexed to the Service agreement itself or by being referenced with the possibility of electronic access. The controller shall have the right to enforce the BCR against any Tessi Group entity for breaches they caused, and moreover, against the Tessi Group entity established within the EEA that has transferred personal data on the basis of these BCRs to a Tessi Group entity established outside the EEA in case of a breach of the BCRs or of the Service agreement by a the Tessi Group entity established outside the EEA that has received personal data on the basis of these BCRs from a Tessi Group entity established in the EEA.

Each Tessi Group entity, including their employees, shall respect the instructions from the controller regarding the data processing and the security and confidentiality measures as provided in the Service agreement.

Thus, where the relevant Tessi Group entity acts as processor, it undertakes to process the personal data processed on behalf of the controller solely in accordance with the instructions of that controller as defined in the Service agreement, in particular with regard to the purposes and means of processing, as well as the operational and technical measures necessary to prevent unlawful access to the personal data.

This undertaking must be expressly stipulated in the Service agreement entered into by the relevant entity and the controller. In addition, the Service agreement must state all the information required under Article 28 of the GDPR.

V. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

1. Local laws and practices

Before transferring personal data to third countries, the Tessi Group entity exporting the personal data and the Tessi Group entity importing the personal data will have to conduct an assessment to ensure that they have no reason to believe that the laws and practices in the third country of destination applicable to the processing of personal data by the Tessi Group entity importing the personal data, including any requirements to disclose personal data or measures authorising access by public authorities, prevent the Tessi Group entity importing the personal data from fulfilling its obligations under these BCR. This is based on the understanding that laws and practices that respect the essence of the fundamental rights and freedoms provided for in the Charter of Fundamental Rights of the European Union and which do not exceed what is necessary and proportionate in a democratic society to safeguard one of the objectives listed in Article 23(1) of the GDPR, are not in contradiction with these BCRs. European Union standards, such as Articles 47 and 52 of the Charter of Fundamental Rights of the European Union, must be used as a reference, in particular to assess whether access by public authorities is limited to what is necessary and proportionate in a democratic society and whether data subjects are afforded effective redress.

In carrying out the assessment mentioned above, the Tessi Group entities have to take into account, in particular, the following elements:

- the specific circumstances of the transfer, including the length of the processing chain, the number of actors involved, and the transmission channels used; intended onward transfers; the type of recipient; the purpose of processing; the categories and format of the transferred personal data; the economic sector in which the transfer occurs; and the storage location of the data transferred.
- the laws and practices of the third country of destination – including those requiring the disclosure of data to public authorities or authorising access by such authorities – relevant in light of the specific circumstances of the transfer, and the applicable limitations and safeguards.
- any relevant contractual, technical, or organisational safeguards put in place to supplement the safeguards under these BCRs, including measures applied during transmission and to the processing of the personal data in the country of destination.

In carrying out the assessment mentioned above, the Tessi Group entity importing the personal data must provide the relevant information to the Tessi Group entity exporting the personal data and continue to cooperate with the Tessi Group entity exporting the personal data in ensuring compliance with these BCRs.

The Tessi Group entity exporting the personal data and the Tessi Group entity importing the personal data must document the assessment referred to above and make it available to the competent data protection authority on request.

The Tessi Group entity importing the personal data must notify the Tessi Group entity exporting the personal data promptly if it has reason to believe that it is or has become subject to laws or practices not in line with the requirements under the first paragraph of this Section, including following a change in the laws of the third country or a measure (such as a disclosure request) indicating an application of such laws in practice that is not in line with the requirements of that paragraph. The Tessi Group entity exporting the personal data shall forward the notification to the controller.

Following a notification pursuant to the above paragraph, or if the Tessi Group entity exporting the personal data otherwise has reason to believe that the Tessi Group entity importing the personal data can no longer fulfil its obligations under these BCRs, the Tessi Group entity exporting the personal data shall promptly identify appropriate measures (e.g. technical or organisational measures to ensure security and confidentiality) to be adopted by the Tessi Group entity exporting the personal data and/or the Tessi Group entity importing the personal data to address the situation, if appropriate in consultation with the controller. The Tessi Group entity exporting the personal data shall suspend the data transfer if it considers that no appropriate safeguards for such transfer can be ensured, or if instructed by the controller or the competent data protection authority to do so.

2. Impact of national laws on the BCRs

Each Tessi Group entity must comply with applicable national laws. Where there is no national law on the protection of personal data or where national laws provide for a level of protection lower than that provided for by these BCRs, the BCRs must nevertheless be complied with. If local legislation (for instance, EU legislation) requires a higher level of protection for personal data, it will take precedence over the BCRs. In any event, personal data shall be processed in accordance with the applicable law.

Where a Tessi Group entity has reasons to believe that the existing or future legislation applicable to it may prevent it from fulfilling the instructions received from the controller or its obligations under the BCRs or Service agreement, it will promptly notify this to:

- the controller, which is entitled to suspend the transfer of data and/or terminate the Service agreement, under the conditions provided for in the Service agreement.
- Tessi SAS.
- the Tessi Group entity within the EEA that exports the personal data or any other data privacy officer/body at the processor; and
- the Supervisory Authority competent for the controller and the Supervisory Authority competent for the processor.

Any legally binding request for disclosure of the personal data by a law enforcement authority or state security body shall be communicated to the controller unless otherwise prohibited (such as a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation).

In any case, the request for disclosure should be put on hold and the Supervisory Authority competent for the controller and the competent Supervisory Authority for the processor should be clearly informed about the request, including information about the data requested, the requesting body and the legal basis for disclosure (unless otherwise prohibited).

If in specific cases, the suspension and/or notification are prohibited, the Tessi Group entity that is the subject of the request will use its best effort to obtain the right to waive this prohibition in order to communicate as much information as it can as soon as possible and be able to demonstrate that it did so.

If, in the above cases, despite having used its best efforts, the requested Tessi Group entity is not in a position to notify the competent Supervisory Authorities, it will annually provide general information on the requests it received to the competent Supervisory Authorities (e.g., number of applications for disclosure, type of data requested, if possible, etc.).

In any case, transfers of personal data by a Tessi Group entity to any public authority cannot be massive, disproportionate, and indiscriminate in a manner that would go beyond what is necessary in a democratic society.

VI. RIGHTS OF DATA SUBJECTS

Where the Tessi Group entity acts as processor, the data subjects, as third-party beneficiaries, have the right to enforce the Sections of the BCRs listed below directly against that entity where the requirements at stake are specifically directed to processors in accordance with the GDPR:

- Section II (Definitions).
- Sections IV.1 and IV.2 (Binding nature of the BCRs).
- Section V (Transfer of personal data to third countries or international organisations).
- Section VI (Rights of data subjects).
- Section VII (Principles relating to the processing of personal data).
- Section VIII (Record of processing activities).
- Section IX (Sub-processing and transfer of personal data).
- Section X (Processing of sensitive data).
- Section XI (Cooperation).
- Section XII (Request and complaint handling).

The Tessi Group undertakes to inform the data subjects of their rights as third-party beneficiaries with regard to the processing of their personal data and of the means to exercise those rights.

The data subjects have also the right to enforce the BCRs against the processor (taking into account the Sections listed above) as third-party beneficiaries in case the data subject is not able to bring a claim against the data controller (because the data controller has factually disappeared or ceased to exist in law or has become insolvent, unless any successor entity has assumed the entire legal obligations of the data controller by contract or by operation of law), in which case the data subject can enforce the Sections of the BCRs listed below against such entity:

- Section II (Definitions).
- Sections IV.1 and IV.2 (Binding nature of the BCRs).
- Section V (Transfer of personal data to third countries or international organisations).
- Section VI (Rights of data subjects).
- Section VII (Principles relating to the processing of personal data).
- Section VIII (Record of processing activities).
- Section IX (Sub-processing and transfer of personal data).
- Section X (Processing of sensitive data).
- Section XI (Cooperation).

- Section XII (Request and complaint handling).
- Appendix 1 (List of Tessi Group entities bound by the BCR).

The data subjects' rights as mentioned above shall cover the judicial remedies for any breach of the third-party beneficiary rights guaranteed and the right to obtain redress and where appropriate receive compensation for any damage (material harm but also any distress).

In particular, data subjects shall be entitled to lodge a complaint:

- Before the competent Supervisory Authority: choice between the Supervisory Authority of the EU Member State of his/her habitual residence, place of work or place of alleged infringement (Article 77.1 of the GDPR); and
- Before the competent court of the EU Member State: choice for the data subject to act before the courts where the controller or processor has an establishment or where the data subject has his or her habitual residence pursuant to Article 79 of the GDPR.

Where the processor and the controller involved in the same processing are found responsible for any damage caused by such processing, the data subject shall be entitled to receive compensation for the entire damage directly from the processor (Article 82.4 of the GDPR).

The data subjects may submit their requests or complaints to Tessi Group entities under the conditions defined in Section XII.

VII. PRINCIPLES RELATING TO THE PROCESSING OF PERSONAL DATA

Each Tessi Group entity undertakes to ensure that the processing of personal data carried out in its capacity as processor is carried out in accordance with these BCRs, in compliance with the following requirements and the Service agreement:

1. Transparency, fairness, and lawfulness

The Tessi Group entities will have a general duty to help and assist the controller to comply with the law, for instance, to be transparent about sub-processor activities in order to allow the controller to correctly inform the data subjects.

In this respect, the Tessi Group entities will have a duty to make available to the controller all information necessary to demonstrate compliance with their obligations as provided

by Article 28 of the GDPR and to allow for and contribute to audits, including inspections conducted by the controller or another auditor mandated by the controller, in accordance with the terms and provisions of the Service agreement.

In addition, the Tessi Group entities must immediately inform the controller if, in their opinion, an instruction infringes the GDPR or other provisions of Union law or the law of the Member States relating to the protection of personal data.

The Tessi Group will make the essential undertaking made under these BCRs easily accessible, taking into account the Sections listed below, and by adopting a public version made available to the controller and to the data subjects via the website www.tessi.eu and, for employees, via the intranet (or any other internal communication channel).

2. Purpose limitation

Tessi Group entities must process the personal data only on behalf of the controller and in compliance with its documented instructions, including with regard to transfers of personal data to a third country, unless required to do so by Union or Member State law to which the processor is subject.

In such a case, the processor shall inform the controller of that legal requirement before processing takes place, unless that law prohibits such information on important grounds of public interest (Article 28(3) GDPR).

In other cases, if the Tessi Group entities cannot provide such compliance for whatever reasons, they agree to inform promptly the data controller of their inability to comply, in which case the controller is entitled to suspend the transfer of data and/or terminate the relevant Service agreement, under the terms and conditions provided for in the Service agreement.

On the termination of the provision of services related to the data processing, the relevant Tessi Group entities shall, at the choice of the controller, delete or return all the personal data transferred to the controller and delete the copies thereof, and certify to the controller that they have done so, unless legislation imposed upon them requires storage of the personal data transferred.

In this case, the Tessi Group entities will inform the controller and warrant that it will guarantee the confidentiality of the personal data transferred and will not actively process the personal data transferred anymore.

3. Data quality

The Tessi Group entities will have a general duty to help the controller to comply with the law in accordance with the terms and conditions provided for in the Service agreement, in particular:

- The Tessi Group entities will execute any necessary measures when asked by the Controller, in order to have the data updated, corrected or deleted.
The relevant Tessi Group entities will inform each Tessi Group entity to whom the data has been disclosed of any rectification or deletion of data.
- The Tessi Group entities will execute any necessary measures when asked by the Controller, in order to have the data deleted or anonymised from the moment the identification form is not necessary anymore.
- The Tessi Group entities will communicate to each Tessi Group entity to whom the data have been disclosed of any deletion or anonymisation of data.

4. Security

Principles:

Tessi Group entities have a duty to implement all appropriate technical and organisational measures to ensure a level of security appropriate to the risks presented by the processing, taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, in accordance with Article 32 of the GDPR.

Personal data must be protected against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or unauthorised access, particularly where the processing involves the transmission of personal data over a network.

The Tessi Group entities must implement technical and organisational measures which at least, meet the requirements of the data controller's applicable law and any existing particular measures specified in the Service agreement.

The Tessi Group entities will also have a duty to assist the controller in ensuring compliance with the obligations as set out in Articles 32 to 36 of the GDPR, taking into account the nature of processing and information available to the processor.

Operational application of the BCRs:

The Tessi Group entities must put in place appropriate protection measures at all stages of the personal data life cycle (collection, operation, use, storage, hosting, transmission, destruction, etc.). These measures must comply with the requirements set out in the Tessi Group's General Information System Security Policy (GISSP). This policy uses a risk-based approach, in accordance with the ISO 27001 standard on information security management systems (ISMS).

The level of protection and security defined below constitutes a minimum standard with which all Tessi Group entities must comply. The entities are advised to adopt additional security measures where appropriate.

Accordingly, in applying the "Privacy by Design & Privacy by Default" procedure, the risks associated with the data processing must be assessed to determine the security measures "by design" and "by default" applicable to the services provided to the controller. In addition to this system, any security measures requested by a customer must be systematically reviewed and may be implemented upon agreement between the parties.

4.1 Security governance

The Tessi Group entities undertake to establish and apply an information security governance system to ensure and verify the implementation and operational functioning of the security measures relating to the protection of personal data.

Reference document: *Tessi Group Policy on Information Systems Security*

4.2 Human Resources

All Tessi Group employees and third parties that process personal data must undertake to respect data confidentiality. Tessi Group employees must be trained on and/or made aware of personal data protection issues.

Reference documents: *Tessi Group staff recruitment procedure, Personal data protection awareness-raising and training procedure, and Tessi Group IT charter*

4.3 Physical security

Each Tessi Group entity must implement physical security measures and maintain an appropriate level of protection for its premises, in accordance with the physical security procedure.

Reference documents: Tessi Group procedures on physical security

4.4 Incident management

Each Tessi Group entity must implement a consistent and effective method for managing incidents relating to the security of personal data, including the disclosure of events, breaches and incidents affecting personal data.

Reference documents: Tessi Group procedure on managing security incidents and Security incident sheet

4.5 Identity management

4.5.1. Access controls

Each Tessi Group entity must put in place a process for managing access to the Tessi Group's information system, including an authorisation mechanism and security measures aimed at preventing unauthorised access to personal data.

4.5.2. Management of remote access and mobile devices

Each Tessi Group entity must apply appropriate security measures to all methods of remote access and mobile devices to ensure the confidentiality and integrity of the personal data processed.

Reference documents: Tessi Group procedure on logical access security and Tessi Group procedure on managing remote access to the IS

4.6 Operational security

Each Tessi Group entity must ensure that the means of processing personal data operates properly and securely.

Reference documents: Tessi Group procedure on server security and Tessi Group procedure on workstation security

4.7 Protection against malicious code

Each Tessi Group entity must ensure that personal data and the means of processing such data are protected against viruses and malicious code.

Reference documents: Tessi Group procedure on server security and Tessi Group procedure on workstation security

4.8 Vulnerability management

Each Tessi Group entity must deploy appropriate measures to reduce the risks associated with the exploitation of published technical vulnerabilities. Exposure to vulnerabilities must be assessed and appropriate action must be taken to address the associated risk.

Reference document: *Tessi Group patch management policy*

4.9 Development security

Each Tessi Group entity must ensure the confidentiality and integrity of the personal data processed as part of its IT development activities. It must also ensure that the principles set out in Article 6 (Data protection by design and data protection by default) below are complied with as part of the application development cycle.

Reference documents: *Tessi Group procedure on development security and Tessi Group procedure on “Privacy by Design and Privacy by Default”*

4.10 Security of communications

Each Tessi Group entity must safeguard the protection of personal data as this data passes through the networks, whether it is transferred within the Tessi Group or to an external entity.

Reference documents: *Tessi Group procedure on network control and management and Tessi Group procedure on the security of network flows*

4.11 Backing-up of personal data

Each Tessi Group entity must put in place a backup policy on backing up personal data with the appropriate level of security.

Reference documents: *Tessi Group backup policy*

4.12 Encryption

4.12.1. Database encryption

Each Tessi Group entity must ensure a level of protection appropriate to the classification of the relevant data by using encryption on the personal data.

4.12.2. Transfer encryption

All personal data or personal data flows passing between a Tessi Group entity and an external third party must be exchanged via protocols that comply with the Tessi Group guidelines and that are encrypted during transit.

Reference document: *Tessi Group encryption policy*

4.13 Maintenance and destruction of personal data

Each Tessi Group entity must supervise all maintenance operations in order to control access to personal data by third parties. For example, personal data must first be erased from equipment destined for scrapping.

Reference documents: *Tessi Group procedure on the end of life of IT equipment, and Standard report on the destruction and erasure of data*

4.14 Traceability management

Each Tessi Group entity must record all operations carried out on personal data and be able to produce proof of the actions carried out on that data (access, modification, deletion, transfer, etc.).

Reference document: *Tessi Group IT trace security procedure*

4.15 Auditing of security measures

Each Tessi Group entity must undergo security audits based on the Tessi Group's security audit framework.

Reference document: *Tessi Group IT trace security procedure*

5. Notification of personal data breaches

Principles:

A “personal data breach” means a breach of security leading to the accidental or unlawful destruction, loss, alteration or unauthorised disclosure of personal data transmitted, stored or otherwise processed, or to unauthorised access to such data.

The Tessi Group entities shall inform the controller without undue delay after becoming aware of any personal data breach.

In addition, sub-processors have a duty to inform the processor and the controller without undue delay after becoming aware of any personal data breach.

Operational application of the BCRs:

Depending on the circumstances, a personal data breach may concern the confidentiality, availability and/or integrity of the personal data.

Personal data breaches may be associated with the following types of IT security incidents:

- a. Destruction of personal data.
- b. Loss of personal data.
- c. Unwanted alteration/modification of personal data.
- d. Unauthorised disclosure of personal data.
- e. Unauthorised access to personal data.

EX-NVIO-7: The relevant Tessi Group entity, in its capacity as processor, must inform the controller as soon as possible after becoming aware of a personal data breach.

EX-NVIO-8: Any detected personal data breach must be reported to the Group DPO either via the Tessi Group “ORQC” tool or via the report form of the Tessi Group procedure for notifying personal data breaches.

EX-NVIO-9: Based on the information provided in the breach report form, the Group DPO must assess the facts of the breach, its characteristics and, above all, its possible impacts for the data subjects. Based on this analysis, the Group DPO must formalise an action plan to remedy the breach.

Reference documents: *Procedure for notifying personal data breaches.*

6. Privacy by design and privacy by default

Principles:

The Tessi Group entities that act as processors undertake to comply with the principles of personal data protection by design and data protection by default by putting in place appropriate technical and organisational measures to implement the principles relating to the protection of personal data and to facilitate compliance with the requirements provided for in the BCRs in practice. More specifically, this means in particular that:

- The design of the products, applications or processes must effectively incorporate the principles of personal data protection.

- By default, the products, applications or processes must ensure that only the data which are necessary for the purpose of processing are processed with regard to the amount of data collected, the extent of their processing, the period of their storage and the number of persons who have access to it and ensure that the personal data processed are limited to the minimum necessary for the processing (i.e., proportionality of the processing relative to the purposes).

Operational application of the BCRs:

EX-PBDD-3: As part of the services provided to the controller, the relevant Tessi Group entity acting as processor must protect the personal data entrusted to it by the controller and ensure that the processing carried out by the entity complies with the current regulations relating to the protection of personal data and with the contractual requirements imposed by the Service agreement entered into with the controller.

EX-PBDD-4: The project manager of the relevant Tessi Group entity must arrange a workshop dedicated to security and compliance before provision of the service begins, in the presence of the customer, in order to identify the measures essential to the service and determine the level of data protection to be implemented. The project manager must ensure that the actions validated jointly with the customer are implemented.

EX-PBDD-5: In general, where the Tessi Group entity acts as processor, it shall also assist the controller in implementing appropriate technical and organisational measures to comply with data protection principles and facilitate compliance with the requirements set up by the BCRs in practice, such as data protection by design and by default.

Reference document: *Tessi Group “Privacy by Design & Privacy by Default” procedure*

VIII. RECORD OF PROCESSING ACTIVITIES

Principles:

The Tessi Group entities undertake to do the following:

- Maintain a written record, including in electronic form, of all categories of processing activities carried out on behalf of each controller in line with the requirements as set out in the GDPR.
- Make the record of processing activities available to the Supervisory Authority on request.

Operational application of the BCRs:

EX-REG-6: The record of processing activities of the relevant Tessi Group entity in its capacity as processor must contain at least the following information:

- The name and contact details of the processor(s) and each controller on whose behalf the processor is acting, as well as, where applicable, the names and contact details of the representative of the controller or processor and those of the Data Protection Officer.
- The categories of processing carried out on behalf of each controller.
- Where applicable, transfers of personal data to a third country or international organisation, including the identity of that third country or international organisation and, in the case of the transfers referred to in the second subparagraph of Article 49(1) of the GDPR, the documentation of appropriate safeguards.
- Where possible, a general description of the technical and organisational security measures referred to in Article 32(1) of the GDPR.

Reference document: *Procedure for identifying the processing of personal data.*

IX. SUB-PROCESSING AND TRANSFER OF PERSONAL DATA

Personal data may be processed by Tessi Group entities only with the prior informed specific or general written authorization of the controller. The Service agreement will specify if a general prior authorization given at the beginning of the service would be sufficient or if a specific authorization will be required for each new sub-processor. If a general authorization is given, the relevant Tessi Group entity must inform the controller of any intended changes concerning the addition or replacement of a sub-processor in such a timely fashion that the controller has the possibility to object to the change or to terminate the Service agreement under the terms and conditions provided for in the Service agreement before the data are communicated to the new sub-processor.

The data may only be processed by entities not bound by these BCRs if they have the prior informed special or general written authorization of the controller. If a general authorization is given, the processor must inform the controller of any intended changes concerning the addition or replacement of sub-processors, in such a timely fashion that the controller has the possibility to object to the change or terminate the Service agreement under the terms and conditions provided for in the Service agreement before the data is disclosed to the new sub-processors.

Where a Tessi Group entity subcontracts its obligations under the Service agreement, with the authorization of the controller, it shall do so only by way of a contract or other

legal act under Union or Member State law with the Sub-processor which provides that adequate protection is provided as set out in Articles 28, 29, 32, 45, 46, 47 of the GDPR and which ensures that the same data protection obligations as set out in the Service agreement between the controller and the processor and in Sections IV, V, VI, VII, VIII and XI of these BCRs are imposed on the sub-processor, in particular providing sufficient guarantees to implement appropriate technical and organizational measures in such a manner that the processing will meet the requirements of the GDPR (Article 28(4) of the GDPR).

X. PROCESSING OF SENSITIVE DATA

Principles:

In principle, the processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited.

As an exception, the relevant Tessi Group entity, in the context of the processing it carries out as a processor, may process sensitive data in accordance with the Service agreement entered into with the relevant controller.

Operational application of the BCRs:

EX-SEN-3: Where a controller asks a Tessi Group entity to process sensitive data on behalf of that controller, the controller remains solely responsible for defining the security measures it deems appropriate to address the risks underlying the processing of such data.

EX-SEN-4: The relevant Tessi Group entity must comply with the instructions of the controller and apply the measures agreed by the parties.

EX-SEN-5: The relevant Tessi Group entity is not required to determine the legal basis for processing such sensitive data.

EX-SEN-6: In any event, the relevant Tessi Group entity must process sensitive data in accordance with applicable laws. Where the applicable law imposes specific hosting or processing conditions, the entity must strictly comply with them.

EX-SEN-7: The relevant Tessi Group entity is required to:

- Comply with any security requirements that are specifically and explicitly imposed by the controller in order to protect sensitive data.
- If the data protection impact assessment carried out by the controller confirms the need for encryption, the relevant Tessi Group entity must encrypt the data.

Reference document: *Tessi Group sensitive data procedure*

XI. COOPERATION

1. Obligation to cooperate with the Supervisory Authorities

The Tessi Group entities, as a processor or subprocessor, undertake to cooperate with the Supervisory Authorities competent for the relevant controller.

The Tessi Group entities must also comply with the decisions of the Supervisory Authorities competent for the relevant controller on any issue relating to the BCRs.

In addition, each Tessi Group entity undertakes to submit to any audit carried out by the Supervisory Authorities competent for the relevant controller.

2. Obligation to cooperate with the controller.

The Tessi Group entities must cooperate with the controller on whose behalf they are processing personal data as a processor or sub-processor and assist it to comply with data protection laws (such as its duty to respect the data subject rights or to handle their complaints, or to be in a position to reply to investigation or inquiry from Supervisory Authorities).

This shall be done in a reasonable time and to the extend reasonably possible.

XII. REQUEST AND COMPLAINT HANDLING

The data subjects may contact the Tessi Group entities by sending their request or complaint to the specific contact point created for this purpose by the relevant entity and announced by the controller to the data subjects.

Where a Tessi Group entity receives a request or complaint from a data subject concerning processing in which the entity acts as processor, the entity undertakes to comply with the related procedure of the Tessi Group. In particular, processors and sub-processors will communicate to the controller any complaints or requests from data

subjects, without undue delay, without answering them (unless they are authorised to do so), by providing to the controller any useful information.

The relevant entity is not required to answer such requests or complaints, unless otherwise agreed with the controller.

If the controller has disappeared factually, has ceased to exist in law or became insolvent, the Tessi Group entity undertakes to handle complaints from the data subjects in accordance with the related procedure of the Tessi Group. In such case, the relevant Tessi Group entity shall handle the complaint without undue delay and in any event within one month of receiving the request. Taking into account the complexity and number of the requests, that period may be extended by two further months at the utmost; in which case the relevant entity must inform the data subject within one month of receiving the request, specifying the reasons for the delay.

The entity shall also cooperate with and assist the controller in respecting the rights of data subjects or in dealing with their complaints, within a reasonable time and to the extent reasonably possible. The entity will execute any appropriate technical and organizational measures, insofar as this is possible, when asked by the controller, for the fulfilment of the controller's obligations to respond the requests for exercising the data subject's rights as set out of the GDPR including by communicating any useful information in order to help the controller to comply with the duty to respect the rights of the data subjects.

Furthermore, if the data subject considers that the processing of his/her personal data implemented by the Tessi Group constitutes a violation of his/her rights provided for in these BCRs, he/she has the right to lodge a complaint with the Supervisory Authority and/or to appeal to the courts, regardless of whether the data subject has previously applied the request/complaint handling procedure.

APPENDIX 1: LIST OF TESSI GROUP ENTITIES BOUND BY THE BCR

I. Entities established in the European Economic Area

France, Spain and Bulgaria

FRANCE

ADM COLLECTING, Simplified Joint-stock Company with sole shareholder, with a capital of €10,000, whose registered office is in ISSY-LES-MOULINEAUX (92130), 32 rue Henri Tariel, registered in the Trade and Companies Register of NANTERRE under number 789 618 584 00013, mail: dpo.tessi@tessi.fr

ADM PROCESSING, Simplified Joint-stock Company, with a capital of €100,000, whose registered office is in ISSY-LES-MOULINEAUX (92130), 32 rue Henri Tariel, registered in the Trade and Companies Register of NANTERRE under number 532 328 986 00023 mail: dpo.tessi@tessi.fr

ADM VALUE, Simplified Joint-stock Company, with a capital of €500,200, whose registered office is in ISSY-LES-MOULINEAUX (92130), 32 rue Henri Tariel, registered in the Trade and Companies Register of NANTERRE under number 418 657 763 00078, phone number: + 33 (0) 1 76 61 37 00 mail: dpo.tessi@tessi.fr

ADM VALUE ASSURANCES, Limited Liability Company (SARL), with a capital of €10,000, whose registered office is in ISSY-LES-MOULINEAUX (92130), 32 rue Henri Tariel, registered in the Trade and Companies Register of NANTERRE under number 521 671 149 00032, mail: dpo.tessi@tessi.fr

BIP-TESSI (SOCIETE BORDELAISE D'INFORMATIQUE PERIPHERIQUE), Simplified Joint-stock Company, with a capital of €7,622.45, whose registered office is in LE HAILLAN (33185), Immeuble Cassiopée, 1-3 avenue des Satellites, registered in the Trade and Companies Register of BORDEAUX under number 342 913 522 00054, phone number: +33 (0)5 57 57 25 33, mail: dpo.tessi@tessi.fr

C2I PRODUCTION, Simplified Joint-stock Company with sole shareholder, with a capital of €289,317.17, whose registered office is in RAMONVILLE SAINT AGNE (31520), 2 avenue de l'Europe, registered in the Trade and Companies Register of TOULOUSE under number 383 984 028 00118, phone number: +33 (0)5 62 57 19 80, mail: dpo.tessi@tessi.fr

CALLWEB, Simplified Joint-stock Company, with a capital of €128,600, whose registered office is in AMIENS (80000), 22D rue du Général Leclerc, registered in the Trade and Companies Register of AMIENS under number 517 813 960 00062, phone number +33 (0) 6 20 74 63 04, mail: dpo.tessi@tessi.fr

CERTIGNA, Simplified Joint-stock Company with sole shareholder, with a capital of €276,485, whose registered office is in VILLENEUVE D'ASCQ (59650), 20 allée de la Râperie, registered in the Trade and Companies Register of LILLE MÉTROPOLE under number 481 463 081 00036, phone number +33 (0)3 20 79 24 09, mail: dpo.tessi@tessi.fr

GDOC LASERCOM FRANCE, Simplified Joint-stock Company with sole shareholder, with a capital of €15,000, whose registered office is in BOULOGNE-BILLANCOURT (92100), 27-33 quai Alphonse Le Gallo - Bâtiment ILEO, registered in the Trade and Companies Register of NANTERRE under number 512 067 877 00047, phone number: +33 (0)1 55 18 00 81, mail: dpo.tessi@tessi.fr

INNOVATION&TRUST FRANCE, Simplified Joint-stock Company with sole shareholder, with a capital of €435,800, whose registered office is in BOULOGNE-BILLANCOURT (92100), 27-33 quai Alphonse Le Gallo, registered in the Trade and Companies Register of NANTERRE under number 352 164 537 00099, phone number: +33 (0)1 55 18 00 18, mail: dpo.tessi@tessi.fr

LOGIDOC SOLUTIONS, Simplified Joint-stock Company with sole shareholder, with a capital of €142,100, whose registered office is in LIMOGES (87000), 4 rue Atlantis, Parc d'Ester Technopole, Bâtiment OXO, registered in the trade and companies register of LIMOGES under number 482 420 247 00033, phone number: +33 (0)5 55 77 11 79, mail: dpo.tessi@tessi.fr

MUTUA GESTION, Simplified Joint-stock Company with sole shareholder, with a capital of €4 300 000 whose registered office is in MURET (31600), 187 avenue Jacques Douzans, Trade and Companies Register of TOULOUSE under number 788 998 078 00026, phone number: +33 (0)5 61 43 83 83, mail: dpo.tessi@tessi.fr

ORONE FRANCE, Simplified Joint-stock Company with sole shareholder, with a capital of €1 250 000, whose registered office is in LE PETIT-QUEVILLY (76140), 72 avenue de la République, registered in the Trade and Companies Register of ROUEN, under number 521 071 324 00045, phone number: + 33 (0) 2 32 94 94 74, mail: dpo.tessi@tessi.fr

OWLIANCE, Simplified Joint-stock Company with sole shareholder, with a capital of €846 976 whose registered office is in BOULOGNE-BILLANCOURT (92100), 27-33 quai Alphonse Le Gallo, registered in the Trade and Companies Register of NANTERRE under number, 341 592 582 00124, phone number: + 33 (0) 1 82 70 16 00, mail: dpo.tessi@tessi.fr

OWLIANCE SERVICES INFORMATIQUES, Simplified Joint-stock Company with sole shareholder, with a capital of €1 500 000 whose registered office is in TOULOUSE (31100), 12 rue Louis Courtois de Viçose, Trade and Companies Register of TOULOUSE under number 510 435 696 00040, phone number: +33 (0)5 61 43 83 83, mail: dpo.tessi@tessi.fr

PERFO SERVICE, Simplified Joint-stock Company with sole shareholder, with a capital of €15,244.90, whose registered office is in SAINT JEAN BONNEFONDS (42650) - Bâtiment 7 du Parc Métrotech, registered in the Trade and Companies Register of SAINT ETIENNE under number 704 501 360 00074, phone number: +33 (0)4 77 43 97 30, mail: dpo.tessi@tessi.fr

PROCHEQUE NORD, simplified Joint stock Company, with a capital of 36,924, whose registered office is in VILLENEUVE D'ASCQ (59650), 24-26 rue du Carrousel Parc de la Cimaise, registered in the Trade and Companies Register of LILLE METROPOLE, under number 434 040 119 00043, phone number: +33 (0)3 20 94 50 35, mail: dpo.tessi@tessi.fr

RIB INFORMATIQUE DROME, Simplified Joint-stock Company with sole shareholder, with a capital of €7,622.45, whose registered office is in LYON (69007), 45 rue Saint Jean de Dieu, registered in the Trade and Companies Register of LYON under number 405 000 951 00039, phone number: +33 (0)4 26 68 86 00, mail: dpo.tessi@tessi.fr

RIP-TESSI (SOCIETE RHODANIENNE D'INFORMATIQUE PERIPHERIQUE), Simplified Joint-stock Company, with a capital of €7,622.45, whose registered office is in LYON (69007), 45 rue Saint Jean de Dieu, registered in the Trade and Companies Register of LYON under number 342 851 235 00032, phone number: +33 (0)4 26 68 86 00, mail: dpo.tessi@tessi.fr

SATC (SOCIETE ALSACIENNE DE TRAITEMENTS DE CHEQUES), Simplified Joint-stock Company, with a capital of €7,622.45, whose registered office is in SHILTIGHEIM (67300), 1 allée d'Helsinki, registered in the Trade and Companies Register of STRASBOURG under number 394 003 081 00079, phone number: +33 (0)4 26 68 86 00, mail: dpo.tessi@tessi.fr

SEDI (SOCIÉTÉ D'ENRICHISSEMENT DE DONNÉES INFORMATIQUES), Simplified Joint-stock Company with sole shareholder, with a capital of €7,622.45, whose registered office is in BOULOGNE-BILLANCOURT (92100), 27-33 quai Alphonse Le Gallo, registered in the Trade and Companies Register of NANTERRE under number 342 568 565 00036, phone number: +33 (0)1 41 31 53 83, mail: dpo.tessi@tessi.fr

SIP-TESSI (SOCIETE D'INFORMATIQUE PERIPHERIQUE), Simplified Joint-stock Company, with a capital of €7,622.45, whose registered office is in COULOMMIERS (77120), 37 avenue du Général Leclerc, registered in the Trade and Companies Register of MEAUX under number 342 568 565 00036, phone number: +33 (0)1 64 20 73 60, mail: dpo.tessi@tessi.fr

SYNERCAM, Simplified Joint-stock Company with sole shareholder, with a capital of €457,347.05, whose registered office is in LESCAR (64230), rue Saint Exupéry ZAC Monhauba III, registered in the Trade and Companies Register of PAU under number 419 833 470 00026, phone number: +33 (0)5 59 40 13 90, mail: dpo.tessi@tessi.fr

T.D.C. TESSI, Simplified Joint-stock Company, with a capital of €7,622.45, whose registered office is in LYON (69007), 45 rue Saint Jean de Dieu, registered in the Trade and Companies Register of LYON under number 407 687 565 00033, phone number: +33 (0)4 26 68 86 00, mail: dpo.tessi@tessi.fr

TRAITEMENT DE DONNEES INFORMATIQUES (T.D.I.), Simplified Joint-stock Company with sole shareholder, with a capital of €8,000, whose registered office is in MAMOUDZOU, Place du Marché – Immeuble Mahaba Club MAYOTTE, registered in the Trade and Companies Register of MAMOUDZOU under number 024 074 924 00010, phone number: +33 (0)2 69 61 02 57, mail: dpo.tessi@tessi.fr

TELETRAITEMENT ET INFORMATIQUE DE GESTION DE LA REUNION – T.I.G.R.E, Simplified Joint-stock Company with sole shareholder, with a capital of €40,000, whose registered office is in SAINT DENIS (97490), La Réunion, 1 rue Emile Hugo, Zone Technor - ZAC du Parc Technologique, registered in the Trade and Companies Register of SAINT DENIS, under number 310 851 324 00072, phone number: +33 (0)2 62 90 14 50, mail: dpo.tessi@tessi.fr

TESSI, Simplified Joint-stock Company with sole shareholder, with a capital of €6 524 342 whose registered office is in GRENOBLE (38000), 14 rue des Arts et Métiers, registered in the Trade and Companies Register of GRENOBLE under number 071 501 571 00237, phone number: +33 (0)4 76 70 59 10, mail: dpo.tessi@tessi.fr

TESSI ACCES, Simplified Joint-stock Company with sole shareholder, with a capital of €100,000, whose registered office is in AVON (77210), 44 avenue de Valvins, registered in the Trade and Companies Register of MELUN under number 338 621 972 00060, phone number: +33 (0)1 60 74 59 60, mail: dpo.tessi@tessi.fr

TESSI CHEQUE ILE DE FRANCE, Simplified Joint-stock Company, with a capital of €10,000, whose registered office is in MONTREUIL (93100), 240 rue de Rosny, registered in the Trade and Companies Register of BOBIGNY under number 439 202 698 00031, phone number: +33 (0) 1 41 58 65 32, mail: dpo.tessi@tessi.fr

TESSI CONTACT CENTER, Simplified Joint-stock Company with sole shareholder, with a capital of €400,000, whose registered office is in ISSY-LES-MOULINEAUX (92130), 32 Rue Henri Tariel, registered in the Trade and Companies Register of BOBIGNY under number 415 409 325 00024, phone number: +33 (0)1 41 31 53 83, mail: dpo.tessi@tessi.fr

TESSI 2M, Simplified Joint-stock Company with sole shareholder, with a capital of €37 000, whose registered office is in MAIGNELAY MONTIGNY (60420), 5 rue de Coivrel - Lieudit la Chapelle, registered in the Trade and Companies Register of BEAUVAIS under number 444 675 359 00053, phone number: +33 (0)3 44 50 00 90, mail: dpo.tessi@tessi.fr

TESSI DIGITAL SERVICES, Simplified Joint-stock Company, with a capital of €7,622.45 whose registered office is in LYON (69007), 45 rue Saint Jean de Dieu, registered in the Trade and Companies Register of LYON under number 383 587 557 00042, phone number: +33 (0)4 26 68 86 00, mail: dpo.tessi@tessi.fr

TESSI DOCUMENTS SERVICES, Simplified Joint-stock Company with sole shareholder, with a capital of €1,000,000, whose registered office is in BOULOGNE-BILLANCOURT (92100), 27-33 quai Alphonse Le Gallo, registered in the Trade and Companies Register of NANTERRE under number 326 803 582 00062, phone number: +33 (0)1 41 31 53 83, mail: dpo.tessi@tessi.fr

TESSI DOCUMENTS SERVICES CENTRE DE RELATIONS CLIENTS, Simplified Joint-stock Company with sole shareholder, with a capital of €10,000, whose registered office is in LYON (69007), 13 rue Pierre Gilles de Gennes - Immeuble B, registered in the Trade and Companies Register of LYON under number 813 438 249 00043, phone number: +33 (0)4 72 02 52 53, mail: dpo.tessi@tessi.fr

TESSI EDITIQUE, Simplified Joint-stock Company with sole shareholder, with a capital of €355,600, whose registered office is in LONGJUMEAU (91160), 4 rue George Sand - ZI de la Vigne aux Loups, La Chapelle Saint Laurent, registered in the Trade and Companies Register of EVRY under number 722 057 593 00096, phone number: +33 (0)1 64 54 62 00, mail: dpo.tessi@tessi.fr

TESSI ENCAISSEMENTS Simplified Joint-stock Company with sole shareholder, with a capital of €500,000, whose registered office is in NANTERRE (92000), 39 rue des Hautes Pâtures, registered in the Trade and Companies Register of NANTERRE under number 449 587 500 00017, phone number: +33 (0)1 47 69 53 00, mail: dpo.tessi@tessi.fr

TESSI GESTION ASSURANCE, Simplified Joint-stock Company with sole shareholder, with a capital of €10,000, whose registered office is in BOULOGNE-BILLANCOURT (92100), 27-33 quai Alphonse Le Gallo, registered in the Trade and Companies Register of NANTERRE under number 822 481 115 00084, phone number: +33 (0)4 76 70 59 10, mail: dpo.tessi@tessi.fr

TESSI INFORMATIQUE, Simplified Joint-stock Company with sole shareholder, with a capital of €99,987.50, whose registered office is in SAINT JEAN BONNEFONDS (42650), Bâtiment 7 du Parc Métrotech, registered in the Trade and Companies Register of SAINT ETIENNE under number 331 618 520 00042, phone number: +33 (0)4 77 81 04 50, mail: dpo.tessi@tessi.fr

TESSI MD, Simplified Joint-stock Company with sole shareholder, with a capital of €100,000, whose registered office is in PANNES (45700), 490 rue des Frênes, registered in the Trade and Companies Register of ORLEANS under number 300 647 609 00191, phone number: +33 (0)2 38 87 60 20, mail: dpo.tessi@tessi.fr

TESSI OUEST, Simplified Joint-stock Company, with a capital of €107,629, whose registered office is in ANGERS (49000), 35 rue du Nid de Pie, registered in the Trade and Companies Register of ANGERS under number 340 258 284 00074, phone number: +33 (0)1 41 31 53 83, mail: dpo.tessi@tessi.fr

TESSI PRINT, Simplified Joint-stock Company with sole shareholder, with a capital of €37,000, whose registered office is in LONGJUMEAU (91160), 4 rue George Sand – ZI de la Vigne aux Loups – La Chapelle St Laurent, registered in the Trade and Companies Register of EVRY under number 504 425 075 00042, phone number: +33 (0)1 30 13 92 00, mail: dpo.tessi@tessi.fr

TESSI SERVICES, Simplified Joint-stock Company with sole shareholder, with a capital of €37,000, whose registered office is in GRENOBLE (38000), 14 rue des Arts et Métiers, registered in the Trade and Companies Register of GRENOBLE under number 504 308 461 00020, phone number: +33 (0)4 76 70 59 10, mail: dpo.tessi@tessi.fr

TESSI TECHNOLOGIES, Simplified Joint-stock Company with sole shareholder, with a capital of €300,000, whose registered office is in LE HAILLAN (33185), 1-3 avenue des Satellites - Immeuble Cassiopée, registered in the Trade and Companies Register of BORDEAUX under number 382 105 823 00092, phone number: +33 (0)5 57 22 20 61, mail: dpo.tessi@tessi.fr

TESSI-T.G.D., Simplified Joint-stock Company with sole shareholder, with a capital of €100,000 whose registered office is in NANTES (44300), 8 rue de la Rainière - Parc Club du Perray, registered in the Trade and Companies Register of NANTES under number 393 046 784 00137, phone number: +33 (0)2 28 23 67 07, mail: dpo.tessi@tessi.fr

TESSI TMS, Simplified Joint-stock Company with a capital of €1,097,632.92, whose registered office is in VOISINS LE BRETONNEUX (78960), 130-136 avenue Joseph Kessel, registered in the Trade and Companies Register of VERSAILLES under number 649 801 826 00094, phone number: +33 (0)1 30 13 92 00, mail: dpo.tessi@tessi.fr

SPAIN

ADM VALUE ASSURANCES BARCELONA SUCCURSAL, a Succursa under Spanish Law, branch of ADM VALUE ASSURANCES, whose registered office is in BARCELONA, Spain, (08006), Calle AVILA, Num 61, registered in the Trade Register of BARCELONA, under number W2502949G, mail: dpo.tessi@tessi.fr

ADM VALUE BARCELONA SA, a public limited company (SA) under Spanish Law, with a capital of €60 000, whose registered office is in BARCELONA, Spain, (08006), C Tuset, Num 5 - Planta 5, registered in the Trade Register of BARCELONA, under number A67002808, mail: dpo.tessi@tessi.fr

GDOC ESPAÑA, a Limited Company (SL) under Spanish Law, with a capital of €8 000, whose registered office is in MADRID, Spain, (28033), Calle Golfo de Salónica 27, planta 7, registered in the Trade Register of MADRID, Volume 27369, Page 91, Sheet M-493218, Tax ID number (NIF) No. B85869824, phone number : +34 913 83 62 60, mail: dpo.tessi@tessi.fr

INNOVATION & TRUST SPAIN, a limited company (SL) under Spanish law, with a capital of € 3 000, whose registered office is in Madrid, Spain (28033) Calle Golfo de Salónica, 27, Planta 7, registered in the Trade Register of Madrid, Volume 46014, Page 145, Sheet M-808535, phone number: +34 913 83 62 60, mail: dpo.tessi@tessi.fr

INSYNERGY CONSULTING ESPANA, a public limited company (SA) under Spanish Law, with a capital of €63,665, whose registered office is in MADRID, Spain, (28033), Calle Golfo de Salónica 27, planta 7, registered in the Trade Register of MADRID, Volume 16660, Page 53, Sheet M-284237, with Tax ID number (NIF) No. A-83/032375, phone number: +34 913 83 62 60, mail: dpo.tessi@tessi.fr

TODO EN CLOUD, Sociedad limitada Unipersonal (SLU), with a capital of €20,000, whose registered office is in MADRID, Spain, (28033), Golfo de Salónica 27, planta 7, registered in the Trade Register, Volume 29.097, page 29, sheet M-523877, NIF: B-86266533, phone number: +34 910801233, mail: dpo.tessi@tessi.fr

BULGARIA

OWLIANCE BULGARIE, One-person joint-stock company, with a capital of €50 000 whose registered office is in SOFIA (1309),141 Todor Aleksandrov Blvd – Vazrazhdane District - Floor

7 – SOFIA Municipality, Trade and Companies Register of SOFIA under number 131346599,
mail: dpo.tessi@tessi.fr

I. Entities established outside the European Economic Area

Madagascar, Mauritius, Morocco, Senegal, Switzerland, Tunisia, and United Kingdom

MADAGASCAR

ADM BLUE, a public limited company with board of directors (SA) under Malagasy Law, with a capital of MGA 30,000,000, whose registered office is in ANTANANARIVO (MADAGASCAR), Golden Business Center Bâtiment D, Morarano Alarobia, Analamanga 101 Antananarivo Renivohitra, registered in the Trade Register of Antananarivo under number 2018B01262, mail: dpo.tessi@tessi.fr

ADM VALUE ALAROBIA, a Non-resident Limited Liability Company (SARL) under Malagasy Law, with a capital of MGA 30,000,000, whose registered office is in ANTANANARIVO (MADAGASCAR), Golden Business Center Bâtiment D, Morarano Alarobia; Analamanga 101 Antananarivo Renivohitra, registered in the Trade Register of Antananarivo under number 2018B00202, mail: dpo.tessi@tessi.fr

ADM VALUE DIEGO, a Non-resident Limited Liability Company (SARL) under Malagasy Law, with a capital of MGA 30,000,000, whose registered office is in ANTANANARIVO (MADAGASCAR), Lot n° 2-5 Immeuble Assist Velo Rainimangalahy Ivandry – Analamanga 101 Antananarivo Renivohitra registered in the Trade Register of Antananarivo under number 2015B00878, mail: dpo.tessi@tessi.fr

MADA M VALUE, a Non-resident Limited Liability Company (SARL) under Malagasy Law, with a capital of MGA 30,000,000, whose registered office is in ANTANANARIVO (MADAGASCAR), Golden Business center Batiment "I" Morarano - 101 Antananarivo Alarobia, registered in the Trade Register of Antananarivo under number 2008B01052, mail: dpo.tessi@tessi.fr

MAURITIUS

BATCH IMAGE PROCESSING INDIAN OCEAN-BIPIO, Private Limited Liability Company under Mauritian Law, with a capital of €100,000, whose registered office is in EBENE (MAURITIUS), 8th floor, Cyber Tower II, Ebene Cybercity, registered in the Trade Register of Mauritius under number 48775, phone number: + (230) 467 9111, mail: dpo.tessi@tessi.fr

PROCESSURE COMPANY LIMITED, with a capital of MUR 1,000,000, whose registered office is in EBENE (Mauritius), Cybertower 2, registered in the Trade Register of Mauritius under number C086913, phone number: + (230) 467 9111, mail: dpo.tessi@tessi.fr

ADM VALUE ASSURANCES MAURITIUS BRANCH, Succursa under Mauritian Law, whose registered office is in EBENE (MAURITIUS), C/O Axis Fiduciary Lt, 2nd floor, The Axis, 26 Cybercity, registered in the Trade Register of Mauritius under number C22186640, mail: dpo.tessi@tessi.fr

MOROCCO

2T SERVICES MAROC, a Private Limited Liability Company under Moroccan Law, with a capital of MAD 100,000, whose registered office is in OUJDA (MOROCCO), Boulevard Mohamed VI, Rond-Point de l'Université, registered under ICE number 003214218000074 and in the Trade Register of OUJDA under number 40477, mail: dpo.tessi@tessi.fr

ADM CALL CENTER, a non-resident Limited Liability Company (SARL) under Moroccan Law, with a capital of MAD 1,400,000, whose registered office is in MEKNES (MOROCCO), 4 Rue Nehrou - N 26 Espace - Bureau 4ème étage JAWHARA VN, registered in the Trade Register of MEKNES under number 27263, mail: dpo.tessi@tessi.fr

ADM CALL ASSURANCES SUCCURAL, a succursal under Moroccan Law, with a capital of MAD 0, whose registered office is in RABAT (MOROCCO), Rue Le Caire et Gandhi Résidence El Menzah APP20, registered in the Trade Register of RABAT under number 80325, mail: dpo.tessi@tessi.fr

ADM VALUE ASSURANCES ORIENTAL, a succursal under Moroccan Law, with a capital of MAD 10,000, whose registered office is in OUJDA (MOROCCO), BD Mohamed VI Rond point de l'université, registered in the Trade Register of OUJDA under number 32771, mail: dpo.tessi@tessi.fr

ADM VALUE GESTION, a non-resident Limited Liability Company (SARL) under Moroccan Law, with a capital of MAD 100,000, whose registered office is in RABAT (MOROCCO), 4 avenue Michlifen Agdal, registered in the Trade Register of RABAT under number 59021, mail: dpo.tessi@tessi.fr

ADM VALUE RABAT, a non-resident Limited Liability Company (SARL) under Moroccan Law, with a capital of MAD 100,000, whose registered office is in RABAT (MOROCCO), Immeuble Angle Avenue Hassan II et rue SIAM, registered in the Trade Register of RABAT under number 126115, mail: dpo.tessi@tessi.fr

CRM ON LINE, a non-resident Limited Liability Company (SARL) under Moroccan Law, with a capital of MAD 100,000, whose registered office is in RABAT (MOROCCO), 4 avenue Michlifen Agdal, registered in the Trade Register of RABAT under number 73385, mail: dpo.tessi@tessi.fr

CRM VALUE, a non-resident Limited Liability Company (SARL) under Moroccan Law, with a capital of MAD 3,300,000, whose registered office is in RABAT (MOROCCO), 4 avenue Michlifen Agdal, registered in the Trade Register of RABAT under number 55461, mail: dpo.tessi@tessi.fr

ID SWISS CALL SARL, a non-resident Limited Liability Company (SARL) under Moroccan Law, with a capital of MAD 100,000, whose registered office is in RABAT (MOROCCO), angle des rues El Koufa et Sana'a Hassan, registered in the Trade Register of RABAT under number 63721, mail: dpo.tessi@tessi.fr

NETWORK ONLINE, a non-resident Limited Liability Company (SARL) under Moroccan Law, with a capital of MAD 1,800,000, whose registered office is in RABAT (MOROCCO), angle des rues Koufa et Sanaa - Hassan, registered in the Trade Register of RABAT under number 58099, mail: dpo.tessi@tessi.fr

ORIEN CALL, a non-resident Limited Liability Company (SARL) under Moroccan Law, with a capital of MAD 3,000,000, whose registered office is in OUJDA (MOROCCO), BD Mohamed VI Rond point de l'Université, registered in the Trade Register of OUJDA under number 18683, mail: dpo.tessi@tessi.fr

SENEGAL

ADM BLUE SENEGAL, a public Limited Company, with a capital of XOF 10,000,000, whose registered office is in DAKAR (SENEGAL), Point E – rue de Ziguinchor, registered in the Trade Register of DAKAR under number 2024B7107, mail: dpo.tessi@tessi.fr

ADM VALUE SENEGAL, a non-resident Limited Liability Company (SARL) under Senegalese Law, with a capital of XOF 130,000,000, whose registered office is in DAKAR (SENEGAL), Immeuble Yaye Fatou Dieng - Ex rue de Ziguinchor, registered in the Trade Register of DAKAR under number 2019B23586, mail: dpo.tessi@tessi.fr

SWITZERLAND

TESSI DOCUMENTS SOLUTIONS (Switzerland), GmbH under Swiss Law, with a capital of CHF 400,000, whose registered office is in URDOF (8902), - Switzerland, In der Luberzen 17w, having as identification number in the Handelsregister des Kantons Zürich, CHE-105.915.806, phone number: +41 22 308 68 10, mail: dpo.tessi@tessi.fr

GDOC LASERCOM, a Public Limited Company under Swiss law, with a capital of CHF 100,000, whose registered office is in PETIT-LANCY (1213) - Switzerland, 12 avenue des Morgines, registered in the Trade Register of Geneva under number CHE-113.330.973, phone number: +41 22 710 62 00, mail: dpo.tessi@tessi.fr

GDOC HOLDING, a Public Limited Company (SA) under Swiss law, with a capital of CHF 500,000, whose registered office is in PETIT-LANCY (1213) - Switzerland, 12 avenue des Morgines, registered in the Trade Register of Geneva under number CHE-437.210.137, phone number: +41 22 710 62 00, mail: dpo.tessi@tessi.fr

TUNISIA

OWLIANCE TUNISIE, Limited Liability Company under Tunisian Law, with a capital of 12 800 Dinars Tunisien, whose registered office is in ARIANA TUNIS (2083) – ZI De Chotrana II Lot AFI 114 Raoued, TUNISIE, Trade and Companies Register of TUNIS under number B03109322009, Matricule fiscal 946909 WAM 000, mail: dpo.tessi@tessi.fr

TUNIS DATA SERVICES, Non-resident Limited Liability Company, with a capital of 184000TND, whose registered office is in TUNIS (2035), rue 8612 - impasse n°2- zone

industrielle la Charguia I, registered in the Trade Register of TUNIS under number of B2468682008 RC TUNIS, phone number: (+216) 71 284 721, mail: dpo.tessi@tessi.fr

TESSI TECHNOLOGY TUNIS, Non-resident Limited Liability Company, with a capital of TND 20,000, whose registered office is in TUNIS (2035), rue 8612 - impasse n°2 - zone industrielle la Charguia I, registered in the Trade Register of TUNIS under number B01237232017, phone number: (+ 216) 31 309 413, mail: dpo.tessi@tessi.fr

UNITED KINGDOM

DOCUPLEX LTD, a Limited Company under English Law, with a capital of GBP 40 000, whose registered office is at 22 Wycombe End - Beaconsfield - Buckinghamshire - HP9 1NB, registered in the Trade Register of England and Wales under number 03491827, phone number: +44 (0)1494 292602, mail: dpo.tessi@tessi.fr

APPENDIX 2: DESCRIPTION OF THE MATERIAL PERIMETER OF THE TESSI GROUP

Purpose of processing	Categories of personal data transferred							Categories of data subjects	Third countries
	Identification data	Data relating to working life	Connection data	Personal life data	Economic and financial data	Sensitive data	Location data		
Application development activities: study, design and creation of web applications and mobile applications.	✓	✓	✓	✗	✓	✗	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Testing and acceptance of the applications.	✓	✓	✓	✓	✓	✗	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
IT service management: support and operation.	✓	✓	✓	✓	✓	✓	✓	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
IT security management. connection tracking. Registered geolocation data (for mobile equipment)	✓	✓	✓	✗	✗	✗	✓	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Internal audit and internal control: quality, safety/security, and compliance.	✓	✓	✓	✗	✓	✓	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Management of promotional operations relating to refund offers, deferred bonuses and competitions.	✓	✗	✓	✓	✓	✗	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Management of marketing operations.	✓	✓	✗	✓	✗	✗	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland

Complaint handling.	✓	✓	✓	✓	✓	✓ Health data	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Management of websites and mobile applications as part of customer services.	✓	✓	✓	✗	✓	✓ health data, sexual orientation (marital situation)	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Management and processing of electronic and paper document flows: categorisation, typing, coding, enrichment of customer files, etc.	✓	✓	✓	✓	✓	✓ Access to claim files judicial decisions (guardianship, etc.) complaint	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Publishing management.	✓	✓	✗	✓	✓ Health data	✗	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Processing of means of payment (cheques, interbank payment orders or SEPA): video coding, adjustment, video control, fraud control, money laundering, etc.	✓	✓	✓	✗	✓	✗	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Business line back office: account opening, file completeness checks, recovery, factoring, receipts, etc.	✓	✓	✓	✓	✓	✓ Sexual orientation, (marital situation), judicial decisions (guardianship, etc.), family record book Judgment and claims	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland

Customer relationship management: incoming calls, outgoing calls, SMS, emails, etc.	✓	✓	✓	✓	✓	✓ complaint, information and photos about an infraction, judicial decisions (guardianship etc.), sexual orientation (marital situation)	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Electronic document management.	✓	✓	✓	✓	✓	✓ health data sexual orientation, health data, results of medical operation, political opinion, trade-union membership, Extract from criminal record,	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Archiving.	✓	✓	✓	✓	✓	✓ health data, Sexual orientation, racial origin, complaint, information about condemnation	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Management of intellectual services.	✓	✓	✓	✗	✓	✗	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Operational maintenance and performance optimisation of the automation solutions used by the Tessi Group: improving the rate of automated document reading/recognition (ADR) and optical character recognition (OCR), using, among other things, modelling and "machine learning" methods.	✓	✗	✗	✗	✓	✓	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland

Processing of invoices.	✓	✓	✓	✗	✓	✓ Indirect health data	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Remote identity verification management.	✓	✗	✗	✗	✗	✓	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Management of the patients' digital journeys.	✓	✓	✓	✓	✓	✓ Health data (date, establishment, or service where the patient got an appointment) Workplace accident attestation, Specific identifiers for regional hospital groups and establishments	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Processing of electronic data interchange (EDI) flows.	✓	✓	✓	✓	✓	✓ Sensitive data, potentially (on invoices)	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Asset management.	✓	✓	✓	✓	✓	✗	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Technical support by connected screens.	✓	✓	✓	✓	✓	✓ Legal capacity, (guardianship, etc.), Sexual orientation, (marital situation), judicial decisions (guardianship, etc.), police complaint	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland

Processing of electronic registered letters (ERLs).	✓	✓	✓	✓	✓	✓	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Compliance control processing.	✓	✓	✗	✓	✓	✓	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Management of IT flows: business, banking, publishing, reporting, insurance, accounting or regulatory reporting and EDI (Electronic Data Interchange).	✓	✓	✗	✓	✓	✓ health data (type of treatment, date of treatment, Coefficient, Quantity, fees amount), Sexual orientation, (marital situation), judicial decisions (guardianship, etc.), Extract from criminal record, police complaint	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Management of the contractual life cycle on behalf of customers (banking, insurance, etc.): membership, contractual amendments or updates, terminations, and claims handling.	✓	✓	✗	✓	✓	✗	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
Management of the benefits of refunds to policy holders (including third-party payers): "Cash-Out" concept.	✓	✓	✓	✓	✓	✓ Health data, judicial decisions (guardianship, etc.), mandate, decisions, claims	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland

Establishment of customer profiles based on criteria provided by the customer (controller).	✓	✓	✓	✓	✓	✓	✗	Employees, intern, clients, business partners, suppliers, service providers and sub-processors	Tunisia, Mauritius, Madagascar, Morocco, Senegal, UK, and Switzerland
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