

# GPDR POLICY

## PREAMBLE

The protection and security of Personal Data (PD) are major challenges for SARPLAST. Activities carried out internally as well as externally (Staff, Customers, Suppliers, etc.) may lead to risks of unlawful access, unwanted modifications and/or the disappearance of personal data. To prevent and control risks in terms of Personal Data Protection (PDP), Management undertakes to implement all means necessary, and to promote the analysis of risks.

## OUR POLICY

- To manage PD problems and issues, on the same basis and at the same level of importance as the other areas of SARPLAST activity (Quality, HSE, etc.)
- To comply with all European and French laws and regulations in force
- To ensure that SARPLAST staff are involved in the PDP and its implementation, and that they respect the fundamental rights and freedoms of individuals
- To limit unlawful access, unwanted modifications, or the disappearance of personal data

## OUR OBJECTIVES:

- To prevent identified risks that could infringe fundamental rights and freedoms, and to limit the negative impact of our data processing activities
- To ensure better efficiency in our work organisation, and to capitalise on PDP know-how through a continuous improvement process
- With the involvement of our staff and management, and by the implementation of a PD Management System, to ensure that we comply with the requirements of the GDPR and the Data Protection Act.

## OUR COMMITMENTS

- 1) To carry out our personal data processing activities while respecting the fundamental rights and freedoms of our employees, our customers, suppliers, partners, etc. in accordance with the General Data Protection Regulation - known as GDPR (European Regulation - UE 2016/679 of 27 April 2016) and Law no 78-17 of 6 January 1978 relating to data processing, files and freedoms - known as the 'Data Protection Act' as amended by the Law of 20 June 2018
- 2) To limit the collection of personal data to the data strictly necessary for the objective pursued
- 3) To keep personal data for the time necessary for this purpose, and to ensure its deletion at the end of this period
- 4) To implement the necessary measures to ensure the security and confidentiality of personal data
- 5) To ensure the updating and accuracy of personal data (Article 5.1 (d) of the GDPR)
- 6) To communicate our commitments and obligations towards the staff, our customers, and more broadly, towards all the Relevant Interested Parties.

I reiterate my full confidence in Doriane BRIGNIER as Data Protection Officer. Her mission will be to develop, implement, manage, improve, and verify the PD Management System, and to report to me on its effective operation.

January 2021

Christian GUINDON (CEO)