

## Data Protection Policy

The law firm De Gaulle Fleurance & Associés is concerned about protecting the privacy and data of their contacts (users of their sites and Internet platforms, contacts established within the framework of professional meetings, dossiers, missions, partnerships, services, applications, etc.). Thus, De Gaulle Fleurance & Associés ensures that they adopt and comply with a data processing policy in accordance with current regulations.

It is on this basis that De Gaulle Fleurance & Associés respects the applicable European law on the protection of personal data, and, in particular, the [European General Regulation on the Protection of Personal Data n°2016/679 of April 27th, 2016 \(the «RGPD / GDPR»\)](#), as well as all the rules of national law adopted in application thereof, as a subsidiary matter, and which may apply according to the case.

The purpose of this Data Protection Policy (the «Policy») is to provide clear, simple and complete information to the persons concerned («you» or «your») on the way in which De Gaulle Fleurance & Associés, in its capacity as data controller, collects and uses personal data concerning you («the personal data») and on the means at your disposal to control this use and to exercise your rights.

### 1. AT WHAT OCCASION ARE YOUR PERSONAL DATA COLLECTED ?

De Gaulle Fleurance & Associés may collect your personal data in the context of professional meetings, dossiers, partnerships, applications, your visit to our offices, your visits to our sites and web pages and your use of our online services, in particular information.

Declarative personal data are those that you provide via forms, whether they are dematerialised on websites, in paper format or in response to questions asked you by lawyers or members of the company.

De Gaulle Fleurance & Associés takes into account the principles of data minimisation, [data protection from their conception onward and data protection by default](#). Consequently relevant, adequate and limited information necessary for the purposes for which it is processed is collected.

Mandatory declarative personal data are indicated by an «\*» sign on the collection medium. Apart from these cases, you are free to provide or not all or part of your personal data. However, such a decision could limit your access to certain services or products offered by De Gaulle Fleurance & Associés, or other functionalities offered by its websites and mobile applications.

### 2. SUR QUELLE BASE VOS DONNEES SONT-ELLES COLLECTEES ?

Your personal data are processed by De Gaulle Fleurance & Associés in the cases permitted by applicable regulations, and in particular under the following conditions:

- when you have given free, specific, informed and unequivocal consent to the processing of your personal data (e.g. subscription to thematic information, registration for an event, etc.)
- when this is necessary for the execution of a contract, or pre-contractual measures taken at your request (e.g. application, handling of a dossier, need for access to a dataroom, etc.);
- to comply with legal or regulatory obligations of De Gaulle Fleurance & Associés (e.g.: fight against fraud);
- when the legitimate interests of De Gaulle Fleurance & Associés may be such as to justify processing by the law firm (e.g. computer security measures).

Information in accordance with the applicable law is provided in each case.

It is specified here that for minors under 18 years of age, such consent must be given or authorised by the holder of parental responsibility. If the latter discovers that Personal Data of the minor concerned has been entrusted to De Gaulle Fleurance & Associés without their consent, they may ask De Gaulle Fleurance & Associés to delete such Personal Data by following the procedure described in point 7.2. of this Policy.

### **3. WHY ARE PERSONAL DATA COLLECTED ?**

Your personal data is collected for specific, explicit and legitimate purposes. Depending on the case, your personal data may be used for the purpose of:

- dialogue with you within the framework of dossiers, missions, partnerships, etc.
- participation in satisfaction surveys, analyses and statistics in order to improve our products and services as well as the knowledge of our customers and prospects;
- requesting, obtaining or receiving information on De Gaulle Fleurance & Associés or one of its entities or affiliates, or on the products and services offered by them or their partners;
- subscribing and receiving thematic information (legal training, documentation, invitations, activity reports, etc.);
- processing your application for a position;
- improving your customer experience.

De Gaulle Fleurance & Associés may also use your personal data for administrative purposes or for any other purpose imposed by current legislation.

### **4. WHO ARE THE RECIPIENTS OF YOUR PERSONAL DATA ?**

Your personal data being confidential, only persons duly authorised by De Gaulle Fleurance & Associés can access your personal data, apart from their possible transmission to the bodies in charge of a control or inspection in accordance with the applicable regulations.

All persons who have access to your personal data are bound by an obligation of confidentiality.

These persons include the staff (lawyers, paralegals, administrative staff) authorised within the company and its affiliates. Our service providers may also be required to process personal data strictly necessary for the performance of the services we entrust them with (mission, electronic and postal dissemination, logistics and catering, etc.). In the event of recourse to affiliates or service providers located outside the European Union, De Gaulle Fleurance & Associés undertakes to verify that appropriate measures have been put in place to ensure that your personal data benefit from an adequate level of protection (in particular through standard contractual clauses of the European Commission, the Internal Company Rules or the Data Protection Shield set up between the European Union and the United States).

### **5. HOW IS THE SECURITY OF YOUR PERSONAL DATA PRESERVED ?**

De Gaulle Fleurance & Associés takes care to protect and secure your personal data in order to ensure their confidentiality and prevent their being distorted, damaged, destroyed or disclosed to unauthorised third parties.

When disclosure of data to third parties is necessary and authorised, De Gaulle Fleurance & Associés ensures that these third parties guarantee the same level of data protection as that offered to them by De Gaulle Fleurance & Associés, and requires contractual guarantees so that the data are exclusively processed for the purposes you have previously accepted, and with the required confidentiality and security.

De Gaulle Fleurance & Associés implements technical and organisational measures to ensure that personal data are kept securely for the duration necessary for the exercise of the purposes pursued in accordance with applicable law.

Although De Gaulle Fleurance & Associés takes reasonable steps to protect your personal data, no transmission or storage technology is foolproof.

In accordance with applicable European regulations and in the event of a proven breach of Personal Data likely to create a high risk for the rights and freedoms of the persons concerned, De Gaulle Fleurance & Associés undertakes to communicate this breach to the competent supervisory authority and, where required by the said regulations, to the persons concerned (individually or generally as the case may be).

Notwithstanding the above, it is your responsibility to exercise caution to prevent unauthorized access to your personal data and terminals (computer, smartphone, tablet,...).

In addition, the Company's websites may provide links to third-party websites that may be of interest to you. De Gaulle Fleurance & Associés has no control over the content of these third party sites or over the personal data protection practices of these third parties. Consequently, De Gaulle Fleurance & Associés declines any responsibility concerning the processing of your Personal Data by these third parties, not subject to the present Policy. It is your responsibility to inform yourself about the personal data protection policies of these third parties.

## **6. HOW LONG ARE YOUR PERSONAL DATA KEPT ?**

De Gaulle Fleurance & Associés keeps your personal data for the time necessary to fulfil the purposes pursued, respecting the legal possibilities of archiving, obligations to keep certain data, and/or anonymisation.

In particular, we apply the following retention periods for these few broad categories of personal data:

- Personal data of customers/prospects/business partners: as long as the user is active and, at the latest, 3 years after the last contact with the user;
- Personal login data (datarooms): 1 year after last login
- Personal data of candidates (recruitment): time needed to process the application and, in case of a negative outcome, 3 years after the last contact (unless the candidate agrees to a longer period).

## **7. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA AND HOW TO EXERCISE THEM?**

### **7.1. Your Rights**

Respecting the limits provided by the regulations in force, you have the following rights with regards to your personal data:

- Right to information on the processing of your personal data

De Gaulle Fleurance & Associés strives to provide you with concise, transparent, understandable and easily accessible information on the conditions for processing your personal data, in clear and simple terms.

- Right of access, rectification and deletion (or «right to be forgotten») of your personal data

The right of access allows you to obtain from De Gaulle Fleurance & Associés confirmation that your personal data have or have not been processed as well as the conditions of such processing, and to receive an electronic copy (for any additional copy, De Gaulle Fleurance & Associés is entitled to demand payment of any reasonable fees based on the administrative costs incurred).

You also have the right to obtain from De Gaulle Fleurance & Associés, as soon as possible (and by default within 30 days), the rectification of your personal data.

Finally, subject to the exceptions provided by applicable law (e.g.: retention necessary to comply with a legal obligation), you have the right to ask De Gaulle Fleurance & Associés to delete, as soon as possible, your Personal Data, when one of the following grounds applies :

- Your personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- You wish to withdraw your consent on which the processing of your personal data was based and there is no other basis justifying such processing;
- You consider and can establish that your personal data has been unlawfully processed;
- Your personal data must be deleted in accordance with a legal obligation.

- Right to limit the processing of your personal data

The applicable regulations provide that this right may be invoked in certain cases, in particular the following:

- when you dispute the accuracy of your personal data;
- when you consider and can establish that the processing of personal data is unlawful but you oppose the deletion of personal data and demand instead that the processing be limited;
- when De Gaulle Fleurance & Associés no longer needs your personal data but they are still necessary for you to establish, exercise or defend your legal rights;
- When you object to the processing that would be based on the legitimate interest of the controller, during the verification whether the legitimate grounds pursued by the controller prevail over those of the person in question.

- Right to the portability of personal data

When the processing is based on your consent or a contract, this right to portability allows you to receive the personal data you have provided De Gaulle Fleurance & Associés with in a structured, commonly used format, and to transmit this personal data to another data controller without De Gaulle Fleurance & Associés hindering it.

When technically possible, you may request that this personal data be transmitted directly to another controller by De Gaulle Fleurance & Associés.

- Right to withdraw consent to the processing of personal data

When De Gaulle Fleurance & Associés processes your personal data on the basis of your consent, this latter may be withdrawn at any time using the means provided for this purpose (procedure indicated in point 7.2 of this Policy). On the other hand, and in accordance with applicable law, the withdrawal of your consent is only valid for the future and cannot therefore call into question the lawfulness of the processing carried out before this withdrawal.

- Right to lodge a complaint with a supervisory authority

If, despite De Gaulle Fleurance & Associés' efforts to preserve the confidentiality of your personal data, you feel that your rights are not respected, you have the right to lodge a complaint with a supervisory authority. A list of supervisory authorities is available on the [European Commission's website](#).

- Right to decide the fate of your personal data after your death

Finally, you have the right to organize the fate of your personal post-mortem data through the adoption of general or specific guidelines. De Gaulle Fleurance & Associés is committed to respecting these guidelines. In the absence of directives, De Gaulle Fleurance & Associés recognises the possibility for heirs to exercise certain rights, in particular the right of access, if it is necessary for the settlement of the deceased's estate; the right to object to the closure of the deceased's user accounts ; and the right to object to the processing of their data.

## 7.2. How to exercise your rights

For any question relating to this Policy and/or to exercise your rights as described above, you may contact De Gaulle Fleurance & Associés, electronically or by post, by sending a letter accompanied by a copy of any identity document to :

[dp@dgfla.com](mailto:dp@dgfla.com)

ou

Personal Data Management Service  
De Gaulle Fleurance & Associés  
9 rue Boissy d'Anglas  
75008 Paris  
France

De Gaulle Fleurance & Associés commits to reply as soon as possible, and at the latest within one month of receipt of your request.

If necessary, this deadline may be extended by two months, taking into account the complexity and number of requests addressed to De Gaulle Fleurance & Associés. In this case, you will be informed of the extension and the reasons for the postponement.

If your request is submitted in electronic form, the information will also be provided to you electronically whenever possible, unless you expressly request otherwise.

If De Gaulle Fleurance & Associés does not comply with your request, it will inform you of the reasons for its inaction and you have the possibility of lodging a complaint with a supervisory authority and/or filing a judicial appeal.

## 8. APPLICABLE LAW AND COMPETENT COURT

This Policy is subject to French law. In the event of a dispute and if an amicable agreement cannot be reached, the competent courts shall be those of the Paris Court of Appeal, notwithstanding the defendants' plurality or the introduction of third parties.

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