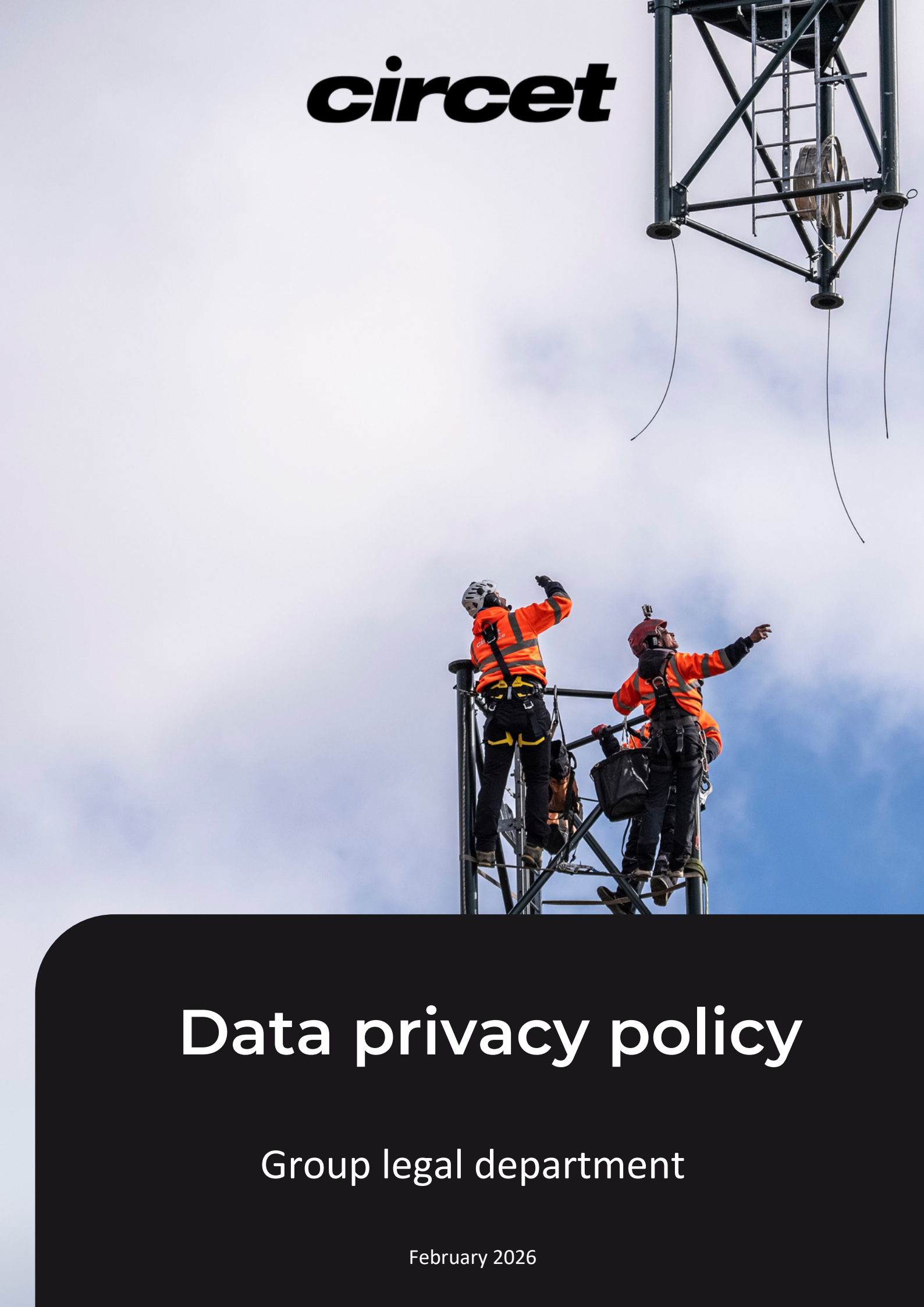




circet

Data privacy policy

Group legal department

February 2026

INTRODUCTION

Circet is required to process the Personal Data of various stakeholders including employees, job applicants, visitors, business partners, customers and final customers, suppliers and subcontractors.

Circet wishes to be a trusted partner for its various stakeholders and is strongly committed to the fundamental values of compliance. Safeguarding Personal Data is a fundamental priority for Circet, it is enshrined in our Environment, Social & Governance (ESG) strategy*, and we are committed to Processing all Personal Data in compliance with Data Protection Legislation.

The purpose of this Policy is to:

- ensure our employees and anyone working in any capacity on behalf of Circet understands the minimum standards and expectations concerning the Processing of Personal Data collected in the context of professional activities;
- explain who we collect Personal Data from, the types of Personal Data we collect, how we collect it and with whom it is shared;
- provide additional information about:
 - data transfers outside the European Economic Area;
 - Data Subjects' rights and the means available to exercise them.

All terms capitalized herein shall have the meanings ascribed to them in Appendix A

*ESG strategy on corporate website: <https://www.circet.com/esg/strategy>.



SCOPE, LIMITATIONS, REVIEW OF THIS POLICY

This Data Privacy Policy (the “Policy”) focuses on the main personal data principles that Circet implements and expects its employees to adhere to in their daily activities in order to ensure compliance with Data Protection Legislation. This policy does not deal with specific local regulations for each jurisdiction. Local regulations prevail where they are more stringent than the provisions of this Policy.

Franck Lavalloir, Deputy Managing Director (through Les 3 Ruches SAS) and Compliance Officer (“CO”) of the Circet group will monitor the adequacy and effectiveness of this policy, review it when necessary and examine its implementation by carrying out a regular assessment.

Any questions you may have about the day-to-day application of this Policy should be referred to the Data Protection Officer (the “DPO”), Privacy Officer and/or the Legal Department in your jurisdiction.

For the purpose of Processing Personal Data, as well as this Policy, additional documentation or information may apply as noted by way of example page 6.



DATA PROTECTION PRINCIPLES TO BE ADHERED TO

Circet may, as part of its activities, be required to act as a Data Controller and/or a Data Processor.

The Data Protection Legislation places an obligation on Circet, acting as a Data Controller and/or Data Processor, to observe a number of data protection principles.

Circet is strongly committed to compliance with Data Protection Legislation and the management of Circet relies on each employee to adopt fair and lawful behaviour in the conduct of all of Circet's data privacy related activities.

In summary the data protection principles require that Personal Data must be:

- **obtained and processed fairly and in a transparent way;**

Circet must be fair and transparent in how it communicates with individuals and how it intends to use their Personal Data.

- **kept only for one or more specified, explicit and lawful purpose(s);**

Processing of Personal Data should always be carried out for a clearly defined purpose which is stated upfront. Processing shall only be lawful if there is a legal ground to do so.

The appropriate legal basis will need to be determined by the Data Controller.

Examples of legal basis :



The Processing is necessary for the purposes of the legitimate interests (e.g. keeping certain contact details of our customers in a customer database)



An individual gives their consent to the Processing of the Personal Data (e.g. direct marketing)



The Processing is necessary for compliance with a legal obligation to which Circet is subject (e.g. fulfilment of certain social security registrations based on a social security number)



The Processing is necessary for the performance of a contract (e.g. execution of a contract)



For the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller



To protect the vital interests of the Data Subject

DATA PROTECTION PRINCIPLES TO BE ADHERED TO

The Data must be :

- **kept safe and secure;**

It is very important that Personal Data is adequately protected.

- **kept accurate, complete and up to date;**

Circet has to ensure that Personal Data is accurate, complete, kept up to date and, where necessary, corrected or supplemented.

- **adequate, relevant and not excessive;**

When collecting Personal Data from individuals, Circet must only collect the minimal amount of data required for a specific purpose.

- **retained for no longer than is necessary for the purpose(s).**

Personal Data will only be retained:

- for the period necessary to accomplish the purpose for which it is collected;
- for the duration of the statutory limitation period to bring a claim or legal action;
- longer if required or permitted by law (for example, under health and safety laws);
- if the Data Subject had given Circet consent to process its Personal Data, it can withdraw that consent and Circet cannot otherwise legally process its Personal Data.

SOME GENERAL DO'S AND DON'TS THAT Circet APPLIES FOR THE PROCESSING OF PERSONAL DATA:

- collect only as much Personal Data as is necessary;
- ensure Personal Data is accurately collated;
- store Personal Data securely and limit access;
- destroy Personal Data when it is no longer required.

- do not use Personal Data without lawful basis to do so;
- do not share Personal Data with any third party without having appropriate safeguards in place;
- do not leave any Personal Data unattended or unsecured.

CATEGORIES OF DATA SUBJECTS AND RELEVANT INFORMATION

Circet may, acting as Data Controller in accordance with the principles mentioned above, process the Personal Data of:

- **visitors** to our offices or website: the privacy policy for each jurisdiction is to be **found on the website** of each local entity);
- **job candidates**: the privacy policy in relation to job candidates for each jurisdiction is to **be found on the job vacancy website** of each local entity;
- **directors, officers, employees, authorised signatories, interns**: in addition to the employment contract and related onboarding documentation the above-mentioned persons **can consult the applicable notice** concerning the treatment of Personal Data;
- **clients, suppliers, subcontractors, partners and service providers and their employees**: relevant information **can be found in the data protection agreement** (DPA) of the supplier, service provider or other collaboration contract or the applicable notice concerning the treatment of Personal Data.

When Circet acts as Data Processor and unless otherwise agreed with the Data Controller, the relevant information is provided by the Data Controller.

For example, for end customers, relevant information may be found in the customer contract with the Data Controller or the applicable notice concerning the treatment of Personal Data.



TYPES OF PERSONAL DATA

As part of its activities, Circet processes many different categories of Personal Data, be it directly or indirectly through its information systems. By way of example, Circet's processing of Personal Data could include Personal Data relating to identification data, contact data, professional data, economic and financial information and login data.

PURPOSES OF PROCESSING

Circet may process Personal Data for the purposes of:

- ensuring **the security of property, people** and **confidential information**;
- **recruitment related activities**;
- **management and execution** of business relationships and services;
- an **acquisition** and/or **merger**;
- prevention, detection or combat of fraud or other **illegal or unauthorized activity**;
- **fulfillment of a legal obligation** or to comply with any reasonable request from competent authorities, such as courts, government agencies or bodies, including data protection authorities;
- **prevention of litigation** and **defence** of Circet in legal proceedings.



DATA RECIPIENTS

Circet will only process Personal Data:

- to the extent that it is required **for a specific purpose/specific purposes**,
- for the purpose(s) **specifically permitted by Data Protection Legislation**.

Personal Data will be shared internally only to those who have a legitimate need to access it for the purpose for which they have been collected.

Personal Data may be shared amongst entities within Circet. This is only on a strict 'need to know' basis and in accordance with Data Protection Legislation. In any case, anyone accessing Personal Data will always be bound by strict legal or contractual obligations to keep Personal Data secure and confidential.

In addition to entities within Circet, Personal Data may be sent to the following categories of recipients:

- **governmental, judicial and other competent authorities (e.g. police, tax authorities, social security authorities, data protection authorities, etc.), i) when such transfer is necessary under applicable laws or regulations; ii) to exercise, establish or defend Circet's legal rights; iii) to protect vital interests; iv) or based on a court order;**
- **the Data Subject.**

We may also engage the **services of third parties** as Data Processors, to assist us to perform our functions or obligations, for example, we may engage an external service provider to process payroll. Where this occurs, any Processing of Personal Data by the Data Processor will be in compliance with the requirements of the Data Protection Legislation. Any such Processing will be regulated by a contract between the relevant Circet company and the relevant Data Processor. That contract will govern the conditions under which any Personal Data may be processed, the security conditions attaching to the Processing of the data and will require the Data Processor to delete or return the data to the relevant Circet company upon completion or termination of the contract.



DATA RECIPIENTS

Circet may, from time to time, also be required to provide Personal Data to external professional advisors (such as lawyers, accountants, doctors etc.) and service providers (such as providers of payroll, pension scheme, insurance, medical benefits, human resources services, IT systems and support, and other third parties engaged to assist Circet in carrying out business activities) located wherever they operate. We will only share Personal Data with the professional advisers where necessary for the purposes of the Processing.

In the context of sensitive Personal Data, Circet will only share Personal Data with its professional advisers where necessary for the purposes of enabling Circet or an employee to carry out its obligations or exercise specific rights in the field of employment, insofar as it is authorised by Data Protection Legislation or where this Processing is necessary for the establishment, exercise or defence of legal claims.



STORAGE AND PROTECTION

Data Protection Legislation provides that **Personal Data shall** not be kept for longer than is necessary for the purposes for which it was obtained.

Circet operates so as to **minimize the threat of unauthorized access** to confidential information. Circet has implemented and maintains a comprehensive, written information security/Data Protection Legislation compliance program that contains administrative, technical, and procedural measures and physical safeguards designed to protect the security/privacy and confidentiality of confidential information, and to protect against any anticipated threats or hazards to the security/privacy and integrity of such information.

Circet only engages with Data Processors who operate in compliance with the requirements of Data Protection Legislation.

DATA TRANSFER OUTSIDE THE EUROPEAN ECONOMIC AREA

We **do not transfer** Personal Data to third parties outside the EEA (European Economic Area), except in the following cases and in compliance with the Data Protection Legislation:

- **explicitly consented** to the transfer;
- the transfer is necessary for **the performance of a contract between parties**;
- the transfer is necessary and in **the interest of the concerned person** for the conclusion or performance of a contract between parties and another natural person or legal entity;
- the transfer is necessary for **important reasons of public interest**;
- the transfer is necessary for the **establishment, exercise or substantiation of legal claims**;
- the transfer is necessary for **the protection of vital interests of the concerned person or those of other persons**, if the **Data Subject** is physically or legally **incapable of giving their consent**;
- when appropriate **safeguards** and **mitigating measures** are used to **ensure compliance with Data Protection Legislation**;
- or on the **basis of an adequacy decision** taken **by the European Commission**.

EXERCISING YOUR RIGHTS

All Data Subject requests will be answered by qualified personnel and in compliance with Data Protection Legislation. To exercise these rights, the **Data Subject** can **send a request by e-mail** to the respective privacy e-mail address mentioned on the website. Please note that Circet might ask the Data Subject to provide proof of identity. Circet will do this if it has reasonable doubts about the identity of the Data Subject.

- **The right to be informed:** as Data Controller, Circet has the obligation to inform the Data Subject which Personal Data Circet processes, for what purposes and on what legal basis, the recipients of their Personal Data, the identity and contact details of the Data Controller and DPO within Circet, the retention period, the right of access, erasure, improvement, limitation, objection and portability, the right to withdraw consent, explanation of Circet's legitimate interest if the Processing is based on this legal basis, the source of the data.
- **The right of access:** the Data Subject may at any time request to view the data that Circet keeps about them. The Data Subject may also request a copy to check whether the data is correct.



- **The right to rectification:** the Data Subject may have their Personal Data amended at any time if it contains errors.
- **The right to erasure** (also known as the right to be forgotten): a Data Subject has the right to have their data erased.
- **The right to restrict Processing:** in certain circumstances, the Data Subject may demand a restriction of data Processing. This is the case, for example, when the Data Subject contests the accuracy of their Personal Data, when the Processing is unlawful, when the Data Subject exercises their right to object. The applicability of the restriction depends on whether the legitimate interest of Circet outweighs those of the Data Subject.

EXERCISING YOUR RIGHTS

- **The right to data portability:** this right enables the Data Subject to obtain and transfer their Personal Data from one IT environment to another.
- **The right not to be subjects to a decision based solely on automated decision-taking:** these are decisions that, without human intervention, could significantly affect the Data Subject or have legal consequences.
- **The right to object:** where Circet process Data Subjects Personal Data on the basis of Circet's own interests, i.e. the Data Subject has not given its consent and Circet does not need it for the conclusion or performance of a contract, nor to comply with a legal obligation, the Data Subject has the right to object to the processing of its Personal Data.



- **The right to withdraw consent when the processing is made with prior consent:** if Circet asks for the Data Subjects consent to Process its Personal Data, the Data Subject has the right to withdraw this previously given consent. The lawfulness of the data processing carried out up to the withdrawal remains unaffected.
- **The right to file a complaint with the national authority:** if a Data Subject has a complaint about the Processing of its Personal Data by Circet, it can always contact Circet. If the Data Subject is not satisfied with the provided response, it always has the option of lodging a complaint with the supervisory authority.



CONTACT US

If you have any comments or queries on this Policy or Circet's implementation thereof or if you wish to exercise any of your data protection rights, you can contact the DPO of your jurisdiction. References to your DPO can be found on the website.



<https://www.circet.com/>

DEFINITIONS:

‘Circet’ means for the purpose of this policy any Circet company within the EU, the United Kingdom, Morocco and Switzerland.

‘Data Controllers’ means the people who, or organisations which, determine the purposes for which, and the manner in which, any Personal Data is processed. They are responsible for establishing practices and policies in line with the Data Protection Legislation.

‘Data Processors’ means any person or organisation that processes Personal Data on our behalf and on our instructions. Suppliers or subcontractors which handle Personal Data on Circet’s behalf could also act as Data Processors.

‘Data Protection Legislation’ means all applicable laws concerning data protection and privacy in electronic communications including :

- **regulation 2016/679 of the European Parliament and of the Council** on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the “General Data Protection Regulation” or “GDPR”)
- **the Data Protection Acts 1988 to 2018 and the European Communities** (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011 in Ireland
- **the Data Protection Act 2018 and the GDPR** (as retained by section 3(10) (as supplemented by section 205; (4)) of the UK Data Protection Act)
- **the Italian Decree n° 196** (June 30, 2003) “Privacy Code” as amended in particular by Legislative Decree n° 101 (August 10, 2018) on “Provisions for the adaptation of national legislation to the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council”
- **organic Law 3/2018, of 5 December 2018**, on the Protection of Personal Data and guarantee of digital rights and Royal Decree 389/2021, of 1 June 2021, approving the Statute of the Spanish Data Protection Agency of Spain
- **the Federal Data Protection Act**
- **the Telecommunications Digital Services Data Protection Act**

- **dahir n° 1-09-15 of 22 safar 1430** (February 18, 2009) promulgating law no. 09-08 on the protection of individuals with regard to the processing of personal data
- **the Federal Act on Data Protection of 25 September 2020**, (Data Protection Act, The Federal Assembly of the Swiss Confederation)
- **the Belgian Law of 30 July 2018** concerning the protection of treatment of personal data of natural persons
- **the Dutch General Data Protection Implementing Law of 16 May 2018**
- **the French Law No. 78-17 of 6 January 1978** as amended by decree of 29 May 2019 to comply with GDPR, as such legislation shall be supplemented, amended, revised or replaced from time to time and all guidance and codes of practice issued by a relevant supervisory authority, from time to time and which are applicable to Circet

‘Data Subject’ means a living person whose Personal Data is held by or accessible to Circet including customers, employees and applicants or employees of subcontractors.

‘Personal Data’ means information relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal Data can be factual (for example, a name, address or date of birth) or it can be an opinion about that person, their actions and behaviour. Sensitive Personal Data is Personal Data including but not limited to information as to health and race.

‘Process’, ‘Processed’ & ‘Processing’ means any activity that involves use of the data. It includes obtaining, collecting, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring Personal Data to third parties.

