

EVIOSYS INSTRUCTIONS FOR PERSONAL DATA REGISTER

In light of Article 30 of the GDPR, Eviosys must prepare and maintain records of its processing activities of personal data (so-called “Personal Data Register” or “Register”).

“Personal data” means any information relating to an identified or identifiable person (“data subject”); 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 (Article 4 of the GDPR). This includes name, date of birth, address, income, occupation, license tag, account or insurance number. Moreover, pseudonymized data, such as an IP-address, that makes the data subject indirectly identifiable are personal data.

Eviosys developed a user-friendly application to facilitate the completion of the Register which we will continue to use. This Register will contain pages, organized and completed according to the purpose of the processing and not by use of a specific application. You should preferably group several applications into the same entry if these applications are used for the same purpose. You have been identified as a person in charge within Eviosys of processing personal data. Therefore, we kindly ask you to complete part of this Register, notably for the applications and other processes for which you are responsible and through which personal data is collected and processed.

In order to have access to the Register, you must click on the following link:

[Data Register](#)

Once you are in the application, you must click on the tab “Register”.

The Register is composed of different sections according to the requirements of the GDPR:

- first, general information on the data controller (the Eviosys entity concerned) and the person having filled out the register page,
- second, processing information including the person in charge of personal data, and the purpose of the processing,
- third, the categories of data subjects (persons concerned by the personal data),
- four, the categories of personal data with the data retention periods,
- five, the recipients and whether there are any transfers of data outside the EU.

There is also a last section which concerns the technical and organizational security measures that Eviosys has implemented. You do not have access to this section which will be completed by IT. Finally, Legal will be indicating the legal grounds for processing the personal data.

If you are interrupted while you are completing the Register and/or miss any data, you can click on “Save as Draft” at the end of Register and complete it later (by clicking in the tab “My entries” in the top Header).

GENERAL INFORMATION

We ask that you indicate as a first step the country for which you are completing the register page and then select from the list of entities, the entity(ies) concerned, by double clicking in the drop down box.

Please note the possibility to select “All countries of the European division”, as well as ‘All entities of the European division.’

PROCESSING INFORMATION

In the processing information section, some of the information will already have been completed: the persons in charge of personal data at the European level. You should refer any questions or issues related to personal data to these persons.

For the alternative contacts, you should indicate the name of other employees also in charge of this processing, if any.

You will then be asked to select the main purpose of the data processing from the drop-down menu. If the one that applies is not listed, you should contact Alexandra Decombejean so that she can add this purpose. Whilst completing the register, you can save your entry by clicking “Save as Draft” at the end of the document.

You will also be asked to select the other purposes, where applicable, related to this general purpose. If the ones that apply are not listed or you wish to add comments, please contact Alexandra Decombejean so that she can add this purpose.

For example: if you select “management of payroll” as main purpose, you can also indicate in addition in “other purpose”, “management of working time”, “absences and time off”, which could also be taken into account for adjustments on overtime and/or paid vacation indemnity.

We recommend that you not select too many sub-purposes to avoid having an imprecise entry and fill out several register pages if needed.

CATEGORIES OF PERSONS CONCERNED

You will then need to indicate who is concerned by the personal data collection and processing.

This may be employees, customers, suppliers, service providers or candidates.

CATEGORIES OF PERSONAL DATA CONCERNED

You then need to specify what type of personal data Eviosys is collecting and processing. We have listed a description of the type of data included for each category. You can modify or complete this description, as necessary.

The list also includes sensitive data, designated as “Special categories of data” in the GDPR. This includes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data. The processing of such data is normally prohibited, except if duly justified.

You should indicate yes or no for each category and also complete the retention period. The retention periods applicable within Eviosys are listed in the drop-down menu. Select the one that applies accordingly. If you have any questions or would like to add a specific retention period, you should contact the persons in charge of personal data at the European level or your local contact.

DATA RECIPIENT CONCERNED:

You thereafter should select the data recipient, within or outside Eviosys which will receive the personal data. Within Eviosys, we have indicated in the drop-down menu different departments likely to receive the data.

With respect to transfers outside of Eviosys to external data recipients, we are aware that you may not have the information requested when external data recipients, including data processors, are used to collect and process personal information on behalf of Eviosys. You can check with Legal the list of existing service providers with whom Eviosys contracts and whether such providers are data controllers or processors.

For transfers to data processors or data controllers, we ask that you indicate the name of the company receiving the data ("Contractor"), its address, the contract date, contract end date where applicable, the purpose of the contract and also specify whether this company will be transferring data outside the EEA (European Economic Area, which includes the EU countries but also Liechtenstein, Norway and Iceland).

If data is transferred outside the EEA, Eviosys needs to ensure that protective means are in place in order to protect this data transfer. Laws outside the EU may not grant the same level of protection vis-à-vis privacy matters so that the GDPR requires protective means to be in place.

The different existing means include entering into Standard Contractual Clauses ("SCC") approved by the EU Commission.

Other protective means are transferring data to a country recognized as adequate by the EU Commission (this concerns Switzerland and the UK in particular).

If you do not have this information or have questions, you should contact the legal department.

There then is a section that will be completed by IT regarding existing security measures.

The final section will be filled out by Legal. It concerns the legal grounds for processing personal data. Under the GDPR, processing of data is not legal unless at least one of the following legal bases applies to the processing. The following are most likely to apply to the processing of data by Eviosys:

- **Contract:** the processing is necessary for performing a contract with the individual, or because specific steps need to be undertaken before the individual enters into a contract (for example: submission of employee data for the employment agreement, indication of the name of the person signing a contract with a customer);
- **Legal obligation:** the processing is necessary to comply with the law (for example: employee data for tax and social security purposes);
- **Legitimate interests:** the processing is necessary for Eviosys's legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests (for example, processing of certain employee connection data to provide a reliable and secure company IT network);
- **Consent:** the individual has given clear consent to process his/her personal data for a specific purpose. Eviosys would only rely on consent in rare cases.