



Dos & Don'ts

Data Privacy

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Applies to (Region): All

Applies to (Department): All

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Approvers: Gilles Galliou, Chief Executive Officer
Troy Randolph, Chief Financial Officer

Signatures of Approvers:

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Gilles Galliou
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DocuSigned by:
Troy Randolph
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Identification of Personal Data*



<i>DO</i>	<i>DON'T</i>
<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Determine whether data is Personal Data and if it belongs to the Special Categories of Personal Data <u>before</u> handling it. <input checked="" type="checkbox"/> Always consider whether you can use Anonymous Data (versus Personal Data) to accomplish your business purpose. <input checked="" type="checkbox"/> Record your Personal Data Processing as a "New DP request" on Envu's DP COCKPIT. 	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Don't forget that Personal Data can be present in any format (hard copy or digital format, and in writing, picture or audio). <input checked="" type="checkbox"/> Don't assume that data is not Personal Data just because it does not include a name. <input checked="" type="checkbox"/> Don't collect any Special Categories of Personal Data (i.e. Religion, Political opinions, Health Data) except if you have the express consent of concerned individuals.

*: information that directly or indirectly identifies a particular individual, such as a customer, employee, business partner, shareholder or supplier, or related to an identified or identifiable individual, including characteristics or preferences, behavior or communications.

Data Processing* Lifecycle



<i>DO</i>	<i>DON'T</i>
<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Remember to assess a new Processing Activity along the Data Processing Lifecycle (from the collection of data to their deletion). 	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Don't forget that Personal Data can also be collected by third parties on behalf of Envu. <input checked="" type="checkbox"/> Don't forget that making Personal Data available to third parties, including by granting access to Envu's IT systems, qualifies as a transfer. <input checked="" type="checkbox"/> Don't forget that even transfers of Personal Data within the Envu group can be subject to applicable Data Privacy laws.

*: any operation or set of operations that are performed on Personal Data.

Privacy Agreements*



<i>DO</i>	<i>DON'T</i>
<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Make sure that what you want to do with Personal Data is permitted by local statutes, rules or regulations, or that you obtain a valid consent. <input checked="" type="checkbox"/> Make sure to document consents you obtain 	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Don't place any conditions or requirements on consent – consent must be given freely. <input checked="" type="checkbox"/> Don't assume that you may use Personal Data for any purpose simply because you



<p>from Data Subjects or to check whether another legal basis is possible before processing personal data. In case of doubt, you must be able to provide proof that you have a valid legal basis.</p> <p><input checked="" type="checkbox"/> Check with Envu Global DP Business Partner to determine whether sharing Personal Data with a third party is permitted, and whether Envu must enter into a Privacy Agreement with the third party before transferring Personal Data for the first time.</p>	<p>may have access to it.</p> <p><input checked="" type="checkbox"/> Don't assume that you may Process Personal Data in a particular way because another company does it that way.</p> <p><input checked="" type="checkbox"/> Don't transfer Personal Data unless you are certain that you have any needed statutory permission or consent.</p> <p><input checked="" type="checkbox"/> Don't assume that you are allowed to transfer Personal Data to a third party just because Envu has a contract with that party – a legal basis and/or a Privacy Agreement may still be required.</p> <p><input checked="" type="checkbox"/> Don't assume that you may access and share Personal Data with anyone within Envu without first checking whether it's legally acceptable and if transfer to a different legal entity is permitted.</p>
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*: Legal document between an organization and a service provider that establishes the terms of how personal data will be used and should be protected.

Transparency and Fairness



<i>DO</i>	<i>DON'T</i>
<p><input checked="" type="checkbox"/> Make sure that you always provide a Privacy Statement to Data Subjects that informs them about the Processing of Personal Data in a concise, transparent, intelligible, and easily accessible form, using clear language.</p>	<p><input checked="" type="checkbox"/> Don't hide or disguise Processing Activities from affected Data Subjects.</p> <p><input checked="" type="checkbox"/> Don't provide information to Data Subjects that are irrelevant to the Processing of their Personal Data. It might confuse them.</p> <p><input checked="" type="checkbox"/> Don't confuse Privacy Statements with privacy policies. Privacy statements are mainly used externally to inform Data Subjects, whereas Privacy Policy is an internal document.</p> <p><input checked="" type="checkbox"/> Don't confuse Privacy Statements with obtaining Data Subjects' consent. Privacy Statements are only information / notification documents. Don't ask Data Subjects to confirm that they agree with or have read a Privacy Statement.</p>



Purpose Limitation



<i>DO</i>	<i>DON'T</i>
<input checked="" type="checkbox"/> Determine legitimate purposes for Processing Personal Data at the time you plan to collect it and try to be comprehensive and specific.	<input checked="" type="checkbox"/> Don't collect Personal Data unless you have a specific, definable business need for the data, and have a legal basis for the Processing Activity.

Data Minimization



<i>DO</i>	<i>DON'T</i>
<input checked="" type="checkbox"/> Make sure that the Personal Data you collect is absolutely necessary to fulfill the purpose for which you are authorized to collect the Personal Data.	<input checked="" type="checkbox"/> Don't collect more Personal Data than required just because you are concerned that you might want it at a later date or for a different purpose.
<input checked="" type="checkbox"/> Use Pseudonymized Data instead of direct identifiers when possible.	<input checked="" type="checkbox"/> Don't forget that Pseudonymized Data can still be Personal Data.
<input checked="" type="checkbox"/> Make sure the principle of "Privacy by Design" is integrated in each new project involving the processing of Personal Data.	

Data Retention & Deletion



<i>DO</i>	<i>DON'T</i>
<input checked="" type="checkbox"/> Determine the retention period (or at least the criteria for determining it) before starting a new Processing activity.	<input checked="" type="checkbox"/> Don't delete Personal Data until you confirm that applicable retention obligations do not require you to keep them.
<input checked="" type="checkbox"/> Consult with the Global DP Business Partner for retention and deletion requirements.	<input checked="" type="checkbox"/> Don't keep Personal Data beyond established retention periods unless required by law (e.g., legal hold).
<input checked="" type="checkbox"/> Delete or destroy Personal Data in accordance with local laws and Envu procedures.	
<input checked="" type="checkbox"/> Delete of Personal Data when it is no longer necessary for the purpose for which it was collected and Envu is not legally required to retain it.	
<input checked="" type="checkbox"/> Implement regular checks for the current status of retention / deletion obligations.	
<input checked="" type="checkbox"/> Include Personal Data from back up or	



archiving systems into your retention and deletion process.

Integrity and Confidentiality



<i>DO</i>	<i>DON'T</i>
<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Consider the security requirements you need to put in place to protect Personal Data – including appropriate technical and organizational data security measures – <i>before</i> collecting them. <input checked="" type="checkbox"/> Make sure to agree on appropriate technical and organizational measures with any third party that processes Personal Data on Envu's behalf. <input checked="" type="checkbox"/> Remember to regularly check the appropriateness of technical and organization measures. 	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Don't share Personal Data with a third party who is supposed to process Personal Data on Envu's behalf without first assessing that the technical and organizational measures taken by this third party to protect it.

Risks derived from the usage of Artificial Intelligence tools



<i>DO</i>	<i>DON'T</i>
<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Consult Envu IT Global Lead <u>and</u> Global DP Business Partner prior any use of new AI-based tools. 	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Don't use any AI based tools to share Individuals Personal Data except if you collected prior consent from them. <input checked="" type="checkbox"/> Never share Envu Business information with AI-based tools.

Data Subjects' Rights



<i>DO</i>	<i>DON'T</i>
<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Immediately contact Envu Global DP Business Partner when receiving a request from a Data Subject who would like to get access to all his Personal Data or would like to edit, delete or transfer his Personal Data. <input checked="" type="checkbox"/> Make sure that all Personal Data are accurate and correct any errors, even if an error seems minor or unimportant. 	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Don't dismiss or take lightly a request from a Data Subject, no matter how trivial the concern may seem to you. <input checked="" type="checkbox"/> Don't ignore a request for deletion because it is not possible due to retention obligations – If the deletion is not possible in the system, make sure the said Personal Data are archived in order not to continue using them.



Data Privacy Incident and Personal Data Breach



<i>DO</i>	<i>DON'T</i>
<input checked="" type="checkbox"/> In the event of a suspected Data Privacy Incident, involve Envu Global DP Business Partner promptly and not later than 72 hours , in order to facilitate meeting legally required notification periods.	<input checked="" type="checkbox"/> Don't try to handle a Data Privacy Incident on your own.

Interactions with Authorities



<i>DO</i>	<i>DON'T</i>
<input checked="" type="checkbox"/> Immediately notify Envu Global DP Business Partner, Region Legal Counsel or Local DP Ambassador when an authority reaches out to you.	<input checked="" type="checkbox"/> Don't try to answer or handle any request from an authority by yourself.

International Personal Data Transfers



<i>DO</i>	<i>DON'T</i>
<input checked="" type="checkbox"/> Before deciding to share personal data with a third party, immediately contact Envu Global DP Business Partner to check if the transfer project is legally possible and applicable requirements.	<input checked="" type="checkbox"/> Don't implement any data transfer to third party without preliminary check that you have a legal basis to implement it.

The complete version of the Envu Data Privacy policy # 5.02 is available in Envu Management Regulation Tool: [Management Regulation Tool - 5.02 Data Privacy - All Documents \(sharepoint.com\)](#)