



Appendix 3 – Data Subjects Requests Handling Procedure

This procedure shall be published on all Capgemini websites and adapted to include any relevant local legal requirement.

The aim of this document is to explain to individuals whose Personal Data are processed by Capgemini (“Data Subjects”) how to exercise their rights.

As we care about your privacy, we want you to be aware of how and why we may collect and further process your Personal Data, and in particular, what are your rights and how to exercise them.

Key data protection notions



“**Personal data**” does not only refer to information related to your private life but encompasses any and all information which enables to identify you either directly or indirectly.

“**Processing**” means any operation which is performed on Personal Data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, combination, restriction, erasure or destruction.

“**Controller**” means the natural or legal person which determines the purposes and means of the processing of Personal Data.

“**Processor**” means the natural or legal personal which processes Personal Data on behalf of the controller.

“**Purpose**” means the reason(s) why the controller needs to collect and further process the Personal Data.

Capgemini Service SAS and/or affiliates of Capgemini SE (together referred to as “**Capgemini**”) collect(s) and further process(es) your Personal Data as a Controller or as a Processor on behalf of a Controller. In any case, you can contact Capgemini – following the procedure described hereunder – to exercise your data protection rights.



What are your rights?

As a Data Subject, you can request to exercise the following rights in relation to the Personal Data concerning you that Capgemini collects and further processes:



Access your Personal Data	You can ask Capgemini confirmation as to whether or not Personal Data concerning you are being processed, and where that is the case, you can request access to your Personal Data.
Request the deletion of your Personal Data	In some cases, you can request that Capgemini delete your Personal Data.
Request the rectification of your Personal Data	You can ask Capgemini to rectify inaccurate Personal Data concerning you. This means that you can also request that Capgemini updates or completes your Personal Data.
Object to the processing of your Personal Data	In some cases, you are entitled to ask Capgemini not to process your personal data.
Request the restriction of the processing of your Personal Data	In some cases, you can ask Capgemini to limit the processing of your Personal Data for some purposes and subject to certain conditions.
Withdraw your consent to the processing of your Personal Data	You can withdraw your consent to the processing of your Personal Data even if you had initially granted such consent for Capgemini to process the Personal Data.
Right to data portability	In some cases, you can ask Capgemini to provide you with your Personal Data in a structured, commonly used and machine-readable format; and/or to transmit those data to another controller.
Submit a complaint	You can also submit a complaint if you consider that Capgemini is infringing applicable data protection regulation(s) or the BCR.



Please note that these rights may be limited in some situations under applicable law. For instance, if granting you access to your Personal Data would reveal Personal Data about another individual; or if you ask Capgemini to delete your Personal Data while it is required by law to keep it.

How to exercise your rights?

To exercise your rights, or if you have any questions or concerns related to our data protection policies, please contact us:

- By emailing us at the following address: d pocapgemini.global@capgemini.com
Please note that where relevant the Global Data Protection Office shall transmit your request to the local DPO;
- By writing to us at one of our offices which addresses you can find at the following link: <https://www.capgemini.com/fr-fr/nous-contacter/#undefined>
- By contacting by phone one the Capgemini office of your country.

In order to allow us to address your request, please provide us with the following information:



- **Your full name***
- Your status (employee, applicant, etc.)
- **Your email address or other preferred means of communication***
- Identity verification: you may be asked to provide suitable identification documentation
- Country / Region
- **The nature of your request***

* Without this information, Capgemini will not be able to address your request.

How will Capgemini handle your request?

Your request will be submitted to the competent Data Protection Officer depending on the Capgemini entity you will be addressing the request to. You will then receive an email acknowledging the receipt of your request. Capgemini shall strive to address your request without undue delay, and no later than 1 month after acknowledging receipt of your request. If your request is particularly complex, or if you sent several requests, the time for a response can be extended by a further 2 months. We would inform you of any such extension within a month after receiving your request.


If you choose to submit your request through electronic means, and unless you request otherwise, Capgemini shall provide you with the information in a commonly used electronic format.

Even though we strongly encourage you to follow this process to submit your request, please note that you can also file a complaint with a Supervisory Authority; and/or seek judicial remedy in court.



How will Capgemini address your request?

Once Capgemini has processed your request internally, you will be informed – through the preferred means of communication you indicated – and receive the information relevant to your request. Please find in the table below how Capgemini addresses Data Subjects’ most common requests:

 <p>Access your Personal Data</p>	<p>Capgemini shall first confirm to you whether or not it is processing your Personal Data; if that is the case, it will provide you with a copy of your Personal Data and all the relevant information on the processing.</p>
<p>Request the deletion of your Personal Data</p>	<p>If the request is justified, the Data Protection Office dealing with your request shall instruct the relevant function(s) to delete your Personal Data.</p>
<p>Request the rectification of your Personal Data</p>	<p>The Data Protection Officer dealing with your request shall instruct the relevant function(s) to rectify your Personal Data; and you shall receive confirmation that your Personal Data has been rectified or updated.</p>

Please note that upon receiving your request, the competent Data Protection Officer shall perform a first assessment to determine whether:

- Capgemini needs further information to handle your request:

or

- your request cannot be handled. In this case, we would explain the reasoning behind our conclusion.



Where Capgemini is acting as Processor

Where Capgemini is processing Personal Data on behalf of a data Controller, Capgemini strongly encourages you to submit your request directly to the Controller.

In any case, if Capgemini receives a request directly, it shall notify the data Controller without undue delay according to the terms and conditions agreed between Capgemini and the Controller.

Should Capgemini be instructed by the Controller to handle your request directly, Capgemini shall follow the above-mentioned procedure in close coordination with the data controller.