

GDPR Compliance Policy

Paris, 11th June 2018

Dear Partners,

On May 25th 2018, the new General Data Protection Regulation (GDPR) came into effect. Being in possession of a large number of personal data concerning our employees, our customers and our global Out of home database, we have strengthened our processes and have ensured company compliance with this new regulation.

First we appointed a Data Protection Officer (DPO), then mapped our personal data processing and finally put in place a complete internal documentation on personal data processing.

This GDPR documentation consists of the following 3 sections:

I. Personal data processing

- Register of processing operations (for data controllers) or register of processing activity categories (for data processors)
Personal data processing mapping consists of identifying and listing all the data processing within our company. This inventory, which is exhaustive, is then recorded in a register that our company, as a data controller, keeps regularly updated.
- Impact analysis for treatments that entail high risks to the privacy of individuals (PIA Privacy Impact Assessment).
This document provides a complete analysis of the treatment in question (if any) and identifies the most effective solutions to ensure the highest level of data protection and confidentiality.
In case of data breach, we are committed to informing the CNIL and the person (s) concerned within 72 hours maximum.
- Supervision of data transfers outside the European Union
For each treatment, we identify the detailed data flows to identify potential data transfers outside the European Union and therefore be able to ensure a sufficient and appropriate level of data protection.

II/ Information on people

- Information notices
We had previously been compliant with the Data Protection Act which required companies to inform data subjects of the nature and purpose of the data processing. Since May 25, 2018, we have ensured that these notices are even clearer, are properly communicated and easily understood by users.

- Data consent collection

When processing data relies on data subject consent, we keep a collection of the consents updated regularly.

- Process for the exercise of rights of data subjects

We have planned and communicated, when required, the procedures for exercising the rights of data subjects such as the right of access, right to request the rectification, right to data portability, etc.

III/Contract Clauses

We have completed our contracts with GDPR specific amendments guaranteeing the proper application of the new regulations by the parties of the contract:

- With subcontractors
- With clients

This global review of our processes and documentation also allows us, in accordance with the requirements of the GDPR to commit to:

- a) Ensure that any person authorized to process personal data has committed to respecting the confidentiality of the data;
- b) Not distributing personal data to third parties without the formal agreement of the data subject;
- c) Take all necessary security measures required by Article 32 of the GDPR;
- d) Implement the ISO 27001 standard in terms of computer security;
- e) Take into account the nature of each treatment and assist our clients in organizational measures and corresponding techniques and when possible, assist them in implementing their obligations that meet the requirements of the procedures for the exercise of the rights of persons in Chapter III of the GDPR;
- f) Assist our clients in being compliant with the obligations in Articles 32 to 36 of GDPR depending on the nature of the data processing and the information available;
- g) At the request of our customers, permanently delete or return data to them, except in cases of mandatory retention and cases required by legal or tax authorities;
- h) Provide access to our customers to any information necessary to demonstrate our compliance with the new General Data Protection Regulations (GDPR);
- i) Inform our customers of any breach of access to personal data within 72 hours max;
- j) To not keep personal data longer than the time needed for conservation, as defined in the contracts binding us to our customers;

Having implemented these regulatory obligations, I hereby declare that CHD Expert Group is fully in compliance with the GDPR.

For all legal intents and purposes,

If you have any questions, please contact our DPO:

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