

PERSONAL DATA POLICY

WHEREAS:

- 1.1. The Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of Personal Data apply since 2018, May 25th.
- 1.2. F. INITIATIVES is part of a major international group, it has still decided to comply with the regulation. In order to let any client strongly aware of their process, the present policy has been written.

NOW THEREFORE, in consideration of the mutual covenants and agreements contained herein, the following term such be understand as follows:

1. CLAUSE 1 - INTERPRETATION AND PRELIMINARY

The headings of the clauses in this Policy are for the purpose of convenience and reference only and shall not be used in the interpretation of nor modify nor amplify the terms of this Policy nor any clause thereof, unless a contrary intention clearly appears.

- 1.1. “**the/this Policy**” means this Policy and how **F. INITIATIVES** shall comply with the GDPR;
- 1.2. “**Data Processor**” means **F. INITIATIVES** in the course of its business.
- 1.3. “**Data Controller**” means **F.INITIATIVES’s** client, once a contract of provision of services has been signed. It is from the responsibility of the client to give specific instructions.
- 1.4. “**GDPR**” means the Regulation (EU) 2016/679 of the EU Parliament and of the Council of 27 April 2016, on the protection of individuals through Personal Data.
- 1.5. “**Personal Data**” means as per article 4 of the GPDR;
- 1.6. “**Personal Data Policy**” means the present policy.
- 1.7. “**Processing**” means as per article 4 (2) of the GDPR.
- 1.8. “**Sensitive Data**” means as per article 9 of the GDPR. **F. INITIATIVES** certifies that it does not process these kind of Personal Data.

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2. CLAUSE 2 – SCOPE OF THE PERSONAL DATA POLICY

Unless the Data Controller has gave other written instructions, the Personal Data Policy shall apply for all Personal Data which are process following the signature of a contract of provision of services with **F. INITIATIVES**.

3. CLAUSE 3 – NATURE OF THE PROCESSING

- 3.1. The Data Processor hereby undertakes that it shall respect the following principles:
- Personal Data shall be process only for specific purpose and legitimate interest
 - Personal Data shall not be kept longer than needed
 - Personal Data shall be kept in a safe and secure place.
 - Personal Data shall be provided only to the employee who truly need them in the course of their mission.
 - Personal Data shall not be send outside Great Britain without the prior written consent of the Data Controller.
 - Personal Data shall not be sub-lease without the prior written consent of the Data Controller. If such authorization was given, the processing shall comply with the Data Controller instructions.
- 3.2. The Data Controller hereby undertakes to make sure that each person has given its consent.

4. CLAUSE 4 – OBLIGATION OF THE DATA PROCESSOR

- 4.1. The Data Processor shall:
- Put in place appropriate security measures. The Data Processor shall make every effort to ensure that the security of the Personal Data complies with a level corresponding to the state of the art in the field.
 - Make its best effort to report data breach in the 48 hours after the discovery to the Data Controller, and if appropriate, to the data subject.
 - Propose adequate solution in order to fix the data breach as soon as discovered.

5. CLAUSE 5 – RETENTION AND DELETION

- 5.1. The Data Controller must communicate on this address: personaldata@f-initiatives.uk, which allow any data subject to use its rights under chapter 23 of the GDPR such as right of access, rectification, erasure, data portability etc.
- 5.2. The Data Processor must after verification of the ID of the data subject, alert the Data Controller in a timely manner and waits for written instructions.

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- 5.3. The Data Processor shall not delete any Personal Data if a statutory obligation requires to keep them on.

6. CLAUSE 6 - TERMINATION

- 6.1. The Data Protection Policy shall apply as long as the service agreement is applying. It may remain in force to the extent necessary, for provisions that shall survive such as storage limitation.
- 6.2. No third party has any right under the Personal Data Policy which can only be used by the parties.

7. CLAUSE 7 - GOVERNING LAW AND JURISDICTION

This Data Protection Policy is governed by and shall be construed in accordance with the law and jurisdiction as per the contract of provision of services that have been signed by the parties.

Date of issue

Mr Xavier CAZABON and Mr Frédéric BOUTE
Directors

