

# Lagardère Group Personal Data Protection Policy

## 1- CONTEXT

The Lagardère Group (the "Group"), present in over 40 countries, has diversified activities including publishing, airport retailing and media. Over the years, the products and services it provides in its various business sectors have become increasingly digital, and new technologies enable it to personalize and adapt them to the needs, lifestyles, preferences and habits of its users, customers, subscribers and visitors.

In this context, the protection of personal data is a subject that the Group places at the heart of its compliance commitments.

The purpose of this document is to describe the principles applied by the various Group entities in their Processing of Personal Data, in order to ensure that the latter complies with applicable regulations and respects the privacy of the data subjects.

As a preliminary point, it is important to emphasize that in the context of the Processing operations they carry out, both in their capacity as Controllers and Processors, Group companies undertake to comply with the regulatory provisions applicable to them in terms of personal data protection.

As the Group's entities operate in more than 40 countries, not all the regulations concerned can be cited, nor can their specific features be addressed here. For the sake of clarity, however, this document is based on the concepts and definitions described in Regulation 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (the "GDPR").

Thus, in this policy, terms beginning with a capital letter, whether singular or plural, have, unless otherwise expressly defined in the document, the meaning given to them by Article 4 of the General Data Protection Regulation (RGPD), recalled in the appendix.

## 2- ROLES AND RESPONSIBILITIES WITHIN THE GROUP

Within the Group, each entity, as soon as it determines the purposes and means of the Processing involved in its activities, is a **Controller**.

When two or more entities jointly determine the purposes and the means of Personal Data Processing concerning their activities, they are **co-controllers**.

Group entities may also use **Processors** to process Personal Data on their behalf. These Processors may be external to the Group, but an internal Group entity may also act as Processor for other Group entities.

The Group has set up a **network of Personal Data Correspondents** to cover all its activities. Their tasks are described in paragraph 8 of this policy.

### 3- PRINCIPLES APPLICABLE TO ALL PROCESSING OPERATIONS

In order to provide certain services and/or products, Group entities necessarily need to obtain communication of particular Personal Data.

In any event, when carrying out Processing operations, Group entities are committed to:

- Process Personal Data lawfully, fairly and transparently regarding the Data Subject.
- Collect only Personal Data that is adequate, relevant and limited to what is necessary for the purposes pursued, in compliance with the principle of proportionality.
- Maintain accurate Personal Data and, if necessary, keep it up to date by deleting and/or rectifying it.
- Keep Personal Data only for as long as is necessary for the purpose(s) for which it was collected.

In addition, Group entities only collect Personal Data for specific, explicit and legitimate purposes and undertake not to process it further in a way incompatible with the purposes initially pursued.

Lastly, Group entities endeavor to ensure that the Personal Data they collect is only communicated to those persons authorized to consult and process it in accordance with their mission, and within the limits strictly necessary for the purpose of the Processing.

### 4- CATEGORIES OF DATA COLLECTED

The nature of the Personal Data collected by Group entities varies according to the purposes pursued and the services and/or products provided. Such Personal Data may include:

- Identity data: surname, first name, gender, e-mail and postal address, date and place of birth, photograph, etc.
- Data relating to professional life: CV, qualifications, training, job title, employer, place of work, professional e-mail address, etc.
- Economic data: income, bank details, etc.
- Connection data: IP address, identifier, etc.
- Customer and purchase data (subscriptions, purchase data, customer behavior).
- Usage-related data: traceability of physical accesses, Internet usage, management of exchanges via collaborative tools, actions in applications within the information system, geolocation via means deployed by the company.

In cases where entities process so-called sensitive data within the meaning of Article 9 of the GDPR, processing is carried out in compliance with the applicable regulations.

## 5- LEGAL BASIS FOR PROCESSING

Group entities only collect Personal Data if they have a legal basis for doing so.

Depending on the Processing concerned, Personal Data are collected, processed and stored by Group entities based on:

- The consent of the Data subject (e.g. e-mail canvassing, deposit of cookies, etc.); and/or
- A contract to which the Data Subject is a party (e.g. for the performance of an employment contract for the Data Subject); and/or
- A legal obligation to which the entity is subject (e.g. to comply with its accounting obligations or to provide its external and internal employees with a whistleblowing system); and/or
- The pursuit by the entity of its legitimate interests, while respecting the rights of data subjects (for example, the installation of video surveillance cameras on the entity's premises to ensure the safety of goods and people, or the cybersurveillance of websites in order to prevent cyberattacks).

Group entities may use automated processing of personal data, known as "profiling". In most cases, Profiling is used for prospecting according to the appropriate legal basis.

## 6- CROSS-BORDER TRANSFERS

Group entities endeavor to process Personal Data in the countries in which they operate. However, in order to carry out their activity, they may call on service providers, partners or subsidiaries that may be in other jurisdictions.

In such a case, and if no decision of the competent authorities provides that the country or territory to which the transfer is envisaged ensures an adequate level of protection, any transfer of Personal Data outside national borders entails the implementation of appropriate safeguards in accordance with the applicable laws and regulations on the protection of Personal Data.

In addition, certain processing operations may be deployed in several countries and may therefore be subject to different regulations governing the protection of personal data. As a general rule, it is the responsibility of the Group entity acting as Controller to ensure that the processing deployed complies with these various regulations.

## 7- SAFETY MEASURES

The Group entity which is the Controller implements security measures adapted to the specific characteristics of the Processing and the risks involved, in order to ensure an appropriate level of security. In particular, it deploys technical and organizational measures to ensure the security and confidentiality of the Personal Data it processes in the course of its activities, in accordance with the applicable legal and regulatory provisions.

More broadly, the entity deploys the technical measures required by the Lagardère Group's Information Systems Security Policy, which is regularly updated by Group experts to reflect the state of the art in IT security.

The Controller also ensures that the service providers, partners and Processors to whom it communicates Personal Data present appropriate guarantees and apply suitable security measures to ensure the protection of the Personal Data communicated to them. Assessment of the robustness of the measures deployed by these various parties considers the expectations of the Information Systems Security Policy.

## 8- GOVERNANCE AND PREVENTION

The Lagardère Group has chosen to set up a network of Personal Data Correspondents whose mission is to provide day-to-day support to operational entities in their compliance with regulations on personal data. This network includes:

- The Lagardère Group's Data Protection Officer
- The Personal Data Protection Officers of the Lagardère Publishing and Lagardère Travel Retail divisions
- Personal Data Protection Officers or Personal Data Correspondents identified in each entity

Personal Data Correspondents act independently of the Controller, without instructions from the latter. They have the resources and professional skills required to carry out their duties.

These missions include advising Data Processors and Processors on their legal obligations, controlling the compliance of the processings with applicable regulations, and cooperating with the competent authorities. Details of their duties are set out in an internal document available on the Group's intranet. In carrying out their duties, the Personal Data Correspondents cooperate with all the parties concerned, in particular those in charge of information systems to provide appropriate operational, legal and technical support.

In addition to the controls carried out by the above-mentioned network, the Group Audit Department carries out regular compliance reviews of Group entities, as part of its multi-year assignment plan. A summary of the challenges and actions relating to personal data protection is regularly provided to the General Management of each of the Group's divisions, to Group General Management and to the Lagardère Group Audit Committee.

## 9- RECIPIENTS OF PERSONAL DATA

Depending on the type of processing concerned, the Group entity who is the Controller may be required to communicate the personal data collected. This is done in compliance with the principle of least privilege, and with the technical protection measures described in paragraph 7.

Personal data may be communicated to the following categories of third parties, on account of and for the purposes of their activities :

- The relevant department(s) of the entity and/or other Group entity(ies),
- Business partners,
- Service providers and Processors,
- External and internal auditors,
- Lawyers, court officers and ministerial officers,
- Administrative or judicial authorities.

## 10- CONTACT & SUPPORT

Anyone with questions about how their personal data is processed, or wishing to exercise their rights as provided for by the applicable regulations, may contact the following people:

- The specific contact designated by the entity responsible for Processing in its policy or made known to the data subjects in the context of Processing.
- By default, the Lagardère Group Data Protection Officer by e-mail at the following address: [delegueprotectiondonnees@lagardere.fr](mailto:delegueprotectiondonnees@lagardere.fr)

The analysis of the request and the sending of a response are conditional on the following elements:

- The request must be legitimate under the applicable regulations
- The Controller must have sufficient elements to ensure the legitimacy of the request. Thus, depending on the situation, proof of identity may be required from the person making the request.

In the absence of a satisfactory response, and depending on the jurisdiction and the situation, it is possible to refer the matter to the competent authority for the protection of personal data. For example, within the European Union, the list of authorities and their contact details can be found here: [https://www.edpb.europa.eu/about-edpb/about-edpb/members\\_fr](https://www.edpb.europa.eu/about-edpb/about-edpb/members_fr)

## APPENDIX: EXCERPTS FROM ARTICLE 4 OF THE RGPD

### "Article 4 - Definitions

For the purposes of this Regulation:

- 'personal data' means any information relating to an identified or identifiable natural 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;
- 'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;  
(...)
- 'profiling' means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;  
(...)
- 'controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- 'processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;  
(...)
- 'cross-border processing' means either:
  - o processing of personal data which takes place in the context of the activities of establishments in more than one Member State of a controller or processor in the Union where the controller or processor is established in more than one Member State; or
  - o (b) processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect data subjects in more than one Member State."