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Personal Data Protection Policy

1. Introduction

This personal data protection policy defines the framework within which **TEAMWILL** collects, uses, stores, and protects personal data.

This policy reflects **TEAMWILL's** strong commitment to privacy, personal data security, and the **fundamental rights** of data subjects. Data protection is fully in line with our **ethical values** and our approach to responsibility.

2. Governance of personal data protection

Aware of the ethical, legal, reputational, and commercial issues related to compliance with the General Data Protection Regulation (GDPR), **TEAMWILL's** general management has implemented a structured and sustainable governance system dedicated to the protection of personal data. This is based on a coherent set of internal policies, procedures, and charters.

TEAMWILL's general management reaffirms its commitment to complying with the applicable requirements for personal data protection in all its activities and to ensuring the continuous improvement of the associated systems, controls, and practices.

3. Principles of personal data protection

TEAMWILL is committed to complying with the fundamental principles of personal data protection, as set out in the GDPR. These principles guide all personal data processing carried out within the Group, regardless of the context (projects, business processes, tools, contractual relationships, etc.). These principles are:

1-Lawfulness, fairness, and transparency: data is collected and processed in a lawful, fair, and transparent manner with regard to the individuals concerned. Clear and accessible information is systematically provided;

2-Purpose limitation: data is collected only for specific, explicit, and legitimate purposes and is not further processed in a manner incompatible with those purposes;

3-Data minimization: only data that is strictly necessary for the purposes is collected and processed. Any excessive collection is prohibited.

4-Accuracy: data is kept up to date and measures are taken to ensure that inaccurate data is corrected or deleted as soon as possible;

5-Storage limitation: data is stored for no longer than is necessary to fulfill the purposes for which it is processed, in accordance with legal obligations and internal policies;

6-Integrity and confidentiality: appropriate technical and organizational measures are implemented to ensure data security, including protection against unauthorized or unlawful processing, loss, destruction, or accidental damage;

7-Accountability: **TEAMWILL** is able to demonstrate its compliance with all of these principles at any time through appropriate documentation, control processes, and dedicated governance.

4. Rights of the data subject

Individuals must be informed, in a clear, comprehensive, and accessible manner, about the nature of the processing, its purposes, its legal basis, the recipients of the data, the retention periods, and their rights.

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TEAMWILL guarantees the effective exercise of the rights recognized by the GDPR to individuals concerned by the processing of personal data, namely:

1-Right of access : everyone has the right to obtain confirmation that their data is being processed, to receive a copy of it, and to access information related to the processing.

2-Right to rectification : data subjects may request the rectification of inaccurate data or the completion of incomplete data concerning them.

3-Right to erasure ("right to be forgotten") : under certain conditions, a person may request the deletion of their data, in particular if it is no longer necessary for the purposes of the processing or if consent is withdrawn.

4-Right to restriction of processing : allows the use of data to be temporarily restricted, in particular in the event of a dispute over its accuracy or the lawfulness of the processing.

5-Right to portability : Offers the possibility to retrieve data in a structured format and transmit it to another data controller.

6-Right to object : individuals may object at any time, for reasons relating to their particular situation, to processing based on **TEAMWILL's** legitimate interest or for marketing purposes.

4.1.How to exercise your rights

Any request relating to the exercise of rights may be sent to the following address: **dpo@teamwillgroup.com**.

4.2.D Response times to requests to exercise rights

In accordance with Article 12 of the GDPR, **TEAMWILL** undertakes to respond within **one (1) month** of receiving the request. This period may be extended by two months in the event of complex or multiple requests, with prior notification to the data subject.

5. Consent of the data subject

When processing is based on consent, **TEAMWILL** ensures that consent is:

- free,
- specific,
- informed,
- and unambiguous.

The terms and conditions for obtaining and withdrawing consent are specified in the information notices applicable to the various types of processing (customers, prospects, visitors, partners, suppliers, etc.).

6. Handling of personal data breaches

In the event of a personal data breach, **TEAMWILL** implements the appropriate procedures to assess the risks, limit the impact, and notify the competent supervisory authority and, where applicable, the individuals concerned, in accordance with the GDPR.

7. Continuous improvement

TEAMWILL adopts a proactive approach to continuous improvement to ensure effective and sustainable protection of personal data. This approach is based on the regular implementation of controls, audits, and corrective and preventive actions.