

➤ **ACAPELA GROUP: qualification as subcontractor**

ACAPELA GROUP qualifies as a ‘subcontractor’ at the time when it processes personal data on behalf of a data controller.

It is typically the case when you use the services of ACAPELA GROUP as contractor and store personal data on an infrastructure managed by our company. Within the scope of its technical constraints, ACAPELA GROUP commits itself to not processing stored data unless instructed to do so by you.

➤ **ACAPELA GROUP commitments as subcontractor**

As a subcontractor, ACAPELA GROUP commits itself to respecting the following policies in relation to the protection of the personal data which it will need to process. Acapela is unconditionally committed to:

- processing personal data with the sole purpose of good implementation of services concluded with counter-parties. ACAPELA GROUP commits itself to never using information for other purposes (such as mail shots, direct or indirect contact with individuals, transfers of personal data, etc.).
- to not transferring data outside the UE or outside countries recognized by the European Commission as not having a sufficient level of protection. Acapela will not use a data center located in a geographically sensitive region unless specifically requested to do so by its client.
- Impose these restrictions on potential subcontractors
- To put into place heightened security standards in order to provide a high level of security for our services.
- Notify the ordering party as soon as possible in cases of data breaches.
- Assist the contractor to respect their own regulatory obligations by providing adequate documentation about our services.

These commitments make up part of General Conditions for Services. Under this heading, and with the exception of particular conditions, they are opposable by all clients of ACAPELA GROUP as subcontractor.

**Definitions:**

- Personal data: all information relating to an identified or identifiable private person. Is known to be an identifiable private person (or) a private person who could be identified, either directly or indirectly.
- Processing: all transactions or all groups of transactions regardless of whether or not carried out with the assistance of processes automated and applicable to personal data or groups of data (collection, registration, transmission, storage, protection, retrieval, consultancy, use, inter-linking, etc.).
- Data control: the private person or legal entity, public authority, service, or another organization which, on its own or in conjunction with others, determine(s) the processing purposes and methods.
- Subcontractor: the private individual or legal entity, public authority, service, or another organization which processes personal data on behalf of a data controller.