

Policy relating to the processing of personal data implemented in the context of Bpifrance's public affairs activity

1. WHO IS THIS POLICY FOR?

This policy (the "**Policy**") is intended for all persons whose data is processed by Bpifrance, its entities or persons acting directly or indirectly on its behalf, in the context of Bpifrance's activities in the field of public affairs (e.g. the development of biographies of public and/or political figures - elected officials, ministers, members of ministerial cabinets, etc.). representatives of public authorities in the broad sense, carrying out stakeholder mapping, developing and implementing engagement plans, etc.).

To this end, Bpifrance is required to process personal data in this context, and is concerned by the provisions applicable to the processing of personal data.

You are covered by this Policy if you ("**You**") are:

- A public and/or political figure - elected official, minister, member of ministerial cabinets, representative of public authorities, (hereinafter the "**Public Figure**");
- A media personality (essayist, author); journalist, editor-in-chief, reporter, photographer, etc.); (hereinafter the "**Media personality**");
- Any other person acting directly or indirectly on behalf of the public figure (e.g. advisor, chief of staff, etc.) or media personality (assistant, image advisor, communication, etc.) involved in the connection between Bpifrance and this person (hereinafter the "**Employee**");

When you provide personal data relating to other persons, it is your responsibility to duly inform these persons of the transmission of their data to Bpifrance and to make available to them the information contained in this Policy.

2. WHO IS RESPONSIBLE FOR THE PROCESSING CARRIED OUT?

Bpifrance, 27-31 avenue du Général Leclerc 94 710 Maisons Alfort, is deemed to act as a data controller (the "**Company**") when it processes your personal data for the purposes detailed below.

3. WHAT DATA DOES BPIFRANCE PROCESS, FOR WHAT PURPOSES AND FOR HOW LONG IS THIS DATA KEPT?

In accordance with the applicable regulations, in particular European Regulation 2016/679, known as the General Data Protection Regulation (GDPR) and the national provisions relating to information technology, files and freedoms (hereinafter the Applicable Regulation), Bpifrance, as data controller, collects and processes your personal data for the purposes listed below.



Bpifrance retains your personal data for the time necessary to implement the purposes set out and applies the retention periods below.



Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention period
On the basis of its legal obligation	1- To ensure the management of requests to exercise rights from data subjects	Identification data: title, surname, first name, postal address, email address, telephone numbers, copy of an identity document when the situation requires it, data necessary to respond to a request for a right of access	1 year from response
On the basis of Bpifrance's legitimate interest in developing and managing its relationships	1- Invite a public or media figure to an event organized by and/or for Bpifrance	Identification data : title, surname, first name Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company. Connection data related to the use of our websites dedicated to events : identification and authentication data for your connected spaces, including IP address, logs, browsing data.	3 years from last contact
	2- Identify the public or media personality in order to understand his or her positions, expectations, and the field of action and/or influence of the latter	Identification data : title, surname, first name Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, functions, mandates, positions, organisation to which they are attached, positions taken, centres of interest, areas of expertise, subjects covered or preferred, information relating to training, and professional and political career	1 year from receipt or consolidation of information
	3- Exchange and manage the business relationship between Bpifrance and the public or media personality	Identification data : title, surname, first name. Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company.	3 years from the last contact with the personality



Legal basis for processing	Purposes of the processing	Categories of Personal Data Processed	Retention period
		Data from correspondence and communications between you and us: interviews, phone calls, e-mails, instant messaging, social media communications or any other type of communication.	
On the basis of Bpifrance's legitimate interest in ensuring the defence of its rights, in particular in court	4- Manage any disputes	Identification data : title, surname, first name, signature (electronic or handwritten). Data relating to professional life : professional postal address, professional telephone number, professional e-mail address, position/position within the company. Any other data necessary for the management of the dispute	Until remedies have been exhausted

Please note that, in accordance with the principle of minimisation, Bpifrance only collects the personal data it needs for the above-mentioned purposes.



4. HOW IS YOUR PERSONAL DATA COLLECTED?

Your personal data is collected by Bpifrance directly from you or from a third party who has duly informed you of the transmission of your information to Bpifrance.

In some cases, Bpifrance also collects personal data about you indirectly:

- via the websites or publications of the entities (institutions, organizations, administrations) to which you are attached;
in newsletters or publications or via any other source of information available to the public (e.g. Lettre A, Lettre de l'Expansion, Context, Politico, the Daily Bulletin, etc.);
- in professional databases (e.g. lesbiographies.com, Public Actors, the Guide to Power, etc.);
- in public service directories (e.g. Who'sWho maintained by the European Commission); made available by authorities or official third parties (e.g. the Official Journal of the French Republic, the Trade and Companies Register, databases managed by supervisory authorities in the banking sector); or made available by private partners including the BONA FIDE firm.
- in the press, on any website (e.g. writing an opinion piece in the press revealing some of your personal data, personal data deliberately communicated by you to a journalist in the context of an interview intended to be published or on social networks, particularly professional networks, etc.);

In these cases, Bpifrance ensures that the indirect collection of your data is carried out in accordance with the requirements of the GDPR.

5. TO WHOM IS YOUR PERSONAL DATA DISCLOSED?

Your data is intended for Bpifrance and will also be communicated to the other entities of the Bpifrance group, as soon as this transmission is necessary to enable these entities to meet their legal or regulatory obligations or to ensure the deployment of the proposed system. This transmission of intra-group information does not in any way exempt the entities of the Bpifrance group from the legal, regulatory or contractual confidentiality obligations that apply to them with regard to third parties.

Bpifrance is committed to limiting the transfer of personal data outside the European Union. When such transfers are to be implemented, Bpifrance relies on the basis of:

- a decision issued by the European Commission, attesting to the level of adequacy of the regulations of the country to which your data is transferred;
- one of the derogations provided for by the GDPR (in particular when the transfers are implemented because they are necessary for the conclusion or performance of a contract concluded in your interest between Bpifrance and the legal person to which you are linked);

In other cases, Bpifrance ensures that the transfer is supervised in accordance with the GDPR and implements appropriate guarantees with regard to the protection of personal data, by means of legal, technical and organisational measures.

6. WHAT ARE YOUR RIGHTS?

In accordance with the Applicable Regulations, and subject to the conditions set out therein for the exercise of these rights, you benefit from:

- The right to access, rectify, delete, and portability of your personal data.
- The right to request the limitation of the processing that concerns you and to object to receiving commercial prospecting where applicable.



- The ability to provide Bpifrance with instructions relating to the fate of his or her personal data after your death.

To exercise your rights, you can contact the data protection officer of the Bpifrance group, using the contact details provided in Section 7 ("*How to contact Bpifrance?*") below.

You also have the right to lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL).

7. HOW TO CONTACT BPIFRANCE?

Please send all correspondence to the Data Protection Officer (DPO) of the Bpifrance group using the contact details below:

By email via donneespersonnelles@bpifrance.fr.
By post by writing to Bpifrance - DCCP - Data Protection Officer
Address: 27-31 avenue du Général Leclerc 94 710 Maisons Alfort

After receiving your request, it will be answered within a maximum period of one month, except for derogations provided for by the GDPR.

If there is reasonable doubt as to the identity of the person concerned by the request to exercise the right, you may be asked to provide additional information necessary to confirm your identity.

8. UPDATING THE POLICY

This Policy may be amended and updated periodically to reflect legislative or regulatory developments or to meet our information obligations under applicable regulations on the protection of personal data.

We invite you to refer to it regularly on the Bpifrance website. The Policy is available at the following address: [Data Protection | Bpifrance](https://www.bpifrance.fr/protection-des-donnees) or <https://www.bpifrance.fr/protection-des-donnees>

In addition, in the event of substantial changes, Bpifrance will make available on its website (add the website) an update to this Policy and specify the changes relating to the processing of your personal data.